



Director-Resource and Energy Assessments  
Department of Planning & Environment  
GPO Box 39  
SYDNEY NSW 2001

04 October 2018

Dear Sir/Madam,

**Re: Submission – Application Number SSD 7704**  
**Rushes Creek Poultry Production Farm – Rushes Creek Road, Rushes Creek**  
**(Lot 1 DP 4215, Part Lot 1 DP 1108119, Lot 1 DP 1132298, Lots 26, 85, 86, 101, 118, 165, 166 and**  
**171 DP 752169, Part Lot 143 DP 752189, Lot 1 DP 1132078, Lot 1 DP 1141148; and an unformed Council**  
**public road traversing through Lot 171 DP 752169)**

I refer to the abovementioned.

Council would like to make a submission in regard to the proposed development.

*Exhibition Details*

The exhibition should be updated to include details of the property address of each of the development allotments.

*Submitted Plans*

It is advised that the submitted plans for the Managers' Houses provided with the Environmental Impact Statement (EIS) do not contain the necessary documentation or plans for the consent authority to make a determination. The application does not appear to include, elevation, section or BASIX Certificates for the construction of these dwellings. These plans should be provided for consideration prior to the application being determined.

*Social and Economic Impacts*

The social and economic assessment of the development does not provide adequate detail.

- Section 8.12 & 8.13 of the EIS do not make consideration as to the social impacts of the prospective population increases in the surrounding region from construction staff and permanent employment for ongoing development operations. The assessment does not provide any detail in regards to the ability for the surrounding local centres to accommodate an increase in population, taking into consideration the current demand.
- The EIS does not provide adequate detail regarding the proposed workforce and any potential for training programs, within the local community. The availability of skilled workers has not been considered based on current availability of contractors within the surrounding communities. It is suggested that a skills and employment strategy be developed prior to the commencement of works.

*State Environmental Planning Policy No. 44 – Koala Protection (SEPP 44)*

The assessment provided within the EIS does not adequately address the provision of SEPP 44. Section 5.5.4 notes that the site is potential Koala Habitat and that the areas of woodland are outside of the disturbance area. SEPP 44 requires the assessment to be completed on the whole of the site and a detailed investigation of the potential presence of a Koala population within the entire site should be conducted. The Biodiversity Assessment Report, Appendix G, does not identify the full extent of the investigated area. Hence, the presence of Koala activity across the whole site cannot be determined.

*State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55)*

The assessment provided within the EIS does not adequately address the provision of SEPP 55. Section 5.5.3 notes that the site contains a historical sheep dip and that ProTen will engage a qualified and experienced consultant to undertake targeted soil investigation. Testing of the site should be conducted prior to the determination of this development to ensure that any remediation works are conducted prior to works commencing. SEPP 55 requires that the consent authority determine whether the land is contaminated, if the land is suitable in its contaminated state or if the land requires remediation. The consent authority cannot determine the requirements of SEPP 55 if the contamination investigation has not yet been conducted or ensure that remediation programs are adequate if they have not been proposed.

*Odour Assessment*

The Odour Assessment does not appear to be sufficient. No consideration appears to have been made to the odour emissions over Lake Keepit. The contours on figure 25-27 appear to exclude areas over the water surface. The odour emissions from the development has the potential to significantly impact on users of the Lake Keepit area for recreational purposes and affect businesses within the local community, that rely on the use of this area.

*Release of Particulate Matter*

It is noted that water quality assessment was submitted as part of the application. However, the assessment does not appear to have any consideration as to the implication of suspended particles on water quality through dissolvent. The current assessment only considers water quality contamination from surface water runoff. The assessment should be updated to include an investigation into the implication of presence of dissolvent from airborne particles not only surface water runoff, within the water catchment and settlement within the Lake Keepit water body. The presence of excessive amounts of particulates may have an implication on water quality, odour and aesthetic appearance of the water. This water body provides recreational value to the surrounding region and provides water supply to towns and localities downstream.

*Other Impacts*

In addition to the above specific matter, the impact of the proposed development should also address the following:

- Noise Impact – The noise implication of the operation of emergency generators.
- Visual Impact – Vegetation screens should be implemented and maintained prior to the commencement of works to ensure that vegetation reaches maturity prior to occupation of each Poultry Production Unit (PPU).
- Subdivision Plan – the development does not appear to include a plan of the resulting Boundary adjustment or subdivision of land to each farm.

If you have any questions regarding this matter, please contact Council's Town Planner, Wade Hudson on 6740 2100.

Yours faithfully



Wade Hudson  
TOWN PLANNER

Contact: 6740 2100  
Reference: 1259230  
wh.vg