

OUT18/14109

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Dear Ms Maguire

**Amended advice: Rushes Creek Poultry Production Farm (SSD 7704)  
EIS Exhibition**

I refer to your email of 5 September 2018 to DoI in respect to the above matter. Please note the comments and recommendations below replace the previously issued response by the Department of Industry (DoI) for this project dated 11 October 2018. Comment has been sought from relevant branches of Lands & Water and Department of Primary Industries. Any further referrals to Department of Industry can be sent by email to [landuse.enquiries@dpi.nsw.gov.au](mailto:landuse.enquiries@dpi.nsw.gov.au).

The department provides the following comments and recommendations for consideration in assessment of the proposal.

**DoI Lands**

- DoI Crown Lands requires that all Crown roads affected by the proposal must be closed and purchased prior to development.

**DoI Water**

**Recommendations prior to project determination**

- Further investigation be completed of market availability to ensure adequate entitlement (General Security and/or High Security) can be acquired to address potential Available Water Determinations and that adequate volumes can be supplied by WaterNSW during a range of climatic scenarios. Where water entitlement is not available it is recommended the viability of alternative water supply options such as trucking be investigated in further detail.
- Confirm the construction water requirements and sources and whether a secure supply is available. Where additional entitlement is required an analysis is required of the ability to acquire this entitlement.

**Recommendations post project determination**

- A Construction Environmental Management Plan should be prepared in accordance with the guideline Managing Urban Stormwater: Soils and Construction (Landcom 2004).

- Surface water management at each site should be designed to ensure stability of the diversions and the water is conveyed at a stable discharge point into the downstream watercourse.
- Works on waterfront land (including stormwater works and construction of the pump station and pipeline) should be undertaken in accordance with the Guidelines for Controlled Activities on Waterfront Land (NRAR 2018).
- Detention dams should be lined to mitigate impacts to groundwater and designed to ensure they satisfy a relevant exclusion from consideration under Harvestable Rights as detailed in Schedule 1 of the Water Management (General) Regulation 2018.
- A Groundwater Monitoring Plan should be prepared to be able to monitor and respond to potential aquifer impacts due to the project. This will require a monitoring bore network to understand groundwater quality and level at the project site and the development of trigger levels linked to a contingency plan.

Yours sincerely



Alison Collaros  
A/Manager, Assessment Advice  
**Lands and Water - Strategy and Policy**  
16 October 2018

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**Water Resources**

- Based on a review of Available Water Determinations (AWD) for General Security access licences in the Upper Namoi Regulated River Water Source, 2015 and 2016 had AWD's ranging from 10, 40, 50 and 100%. The proposal by the proponent to rely on 437.2 units of entitlement to obtain the operational demand of 330ML is therefore insufficient to address all these situations. Due to the pump location just upstream of the backwaters of Lake Keepit, confirmation is required of the ability of WaterNSW to supply the proposed volume during a range of climatic scenarios.

<b>Table 1 – GS AWD's Upper Namoi Regulated Water Source</b>	
<b>AWD Order Date</b>	<b>Available Water Determination (volume per unit share)</b>
1 July 2018	1
7 July 2017	1
6 September 2016	0.4
1 July 2016	1
4 September 2015	0.1
1 July 2015	0.5

- Operational water demands have been identified at a maximum of 330ML per year, however the construction requirements, sources and the time period have not been included.
- The proposed use of the swales as the primary treatment mechanism for shed wash down water represents a risk to the groundwater source and the local stock and domestic water users. This is due to the vegetation being predicted to be limited to achieve less than 50% nutrient removal and the proposal to maximise infiltration in the swales which has the potential for downward movement of the nutrients. The clay layer in the geological logs of bores in the area is highly variable in thickness and hence potentially limited in its ability to prevent movement of nutrients into the groundwater. Groundwater monitoring and a contingency plan is therefore recommended to ensure this can be adequately addressed.
- The pump on the Namoi River is proposed approximately 30m from the bank. Impacts of this construction and the associated pipeline within waterfront land can be adequately addressed in a management plan in accordance with the CAA guidelines.
- The main operational water sources from the development include wash down water from within the poultry sheds, rainfall runoff from the shed roofs and rainfall runoff from the ground around the sheds. Approximately 12kl of water is to be used in the wash down process for each poultry shed at the end of each production cycle. This amounts to 648kl every 9.3 weeks or approximately 3.63ML/yr. Wash down water is predicted to have water

quality of TSS-2500mg/L, TN - 65mg/L and TP – 45mg/L. Each shed is proposed in the Harvestable Right zone, hence consideration needs to be given to the adequacy of dam design and use to address relevant exclusions and highlight if entitlement is necessary. The proposal to convey clean water past the facility is a key element and this will need to ensure the channels and entry points back into the natural channel are adequately stabilised.

**END ATTACHMENT A**