Agricultural Development Services Australia Pty Ltd
[redacted]

Our Reference: [redacted]
Your Reference: PAN-415617

Date: 25 November 2024

[redacted]
Tamworth Regional Council
PO Box 555
TAMWORTH NSW 2340

Dear [redacted]

RESPONSE TO SUBMISSIONS – PAN-415617/CNR68403 – ANGORA FEEDLOT, 'ANNABRAE', RANNOCK BURN ROAD, SOMERTON

On behalf of Angora Feedlot [redacted] AgDSA submitted a development application to expand the Angora Feedlot from 1,000 head to a total of 9,500 head. Various submissions were made by people from neighbouring properties. The content of these submissions has been summarised into key topics and addressed. It is acknowledged that an individual response to each submission has not been made as there is a lot of overlap in the issues raised.

An amendment of the feedlot development has been made, with the capacity revised down to 4,000 head. This is primarily in response to the odour issues raised by submitters and the Environment Protection Authority (EPA).

The following issues were raised within the submissions and a brief response has been provided to each topic.

Lack of consultation

The description in the Environmental Impact Statement (EIS) of the consultation completed was based on information provided by the applicants. It is understood that the discussions occurred on a general basis about a feedlot expansion. This is reiterated by one of the submissions. It is understood that various discussions have occurred since the submissions were made, particularly in relation to existing activities associated with grazing and supplementary feeding activities on the property.

Size of the development

The proposed development has been revised down to 4,000 head. This is both in response to submissions relating to community expectations on feedlot capacity and comparison to other nearby feedlots as well as the revised odour assessment.

The property is also located within the Namoi Regional Jobs Precinct, which supports the growth of intensive livestock production.

While the feedlot is not formally staged, it's likely that it will be constructed progressively to ensure that cattle supply and markets can be maintained as the feedlot grows. It is unreasonable to apply a deadline for the full expansion as this does not change any impacts and contradicts the intent of the Namoi Regional Jobs Precinct, which intends to encourage the expansion of intensive agriculture in the area rather than arbitrarily restrict it.

Issues with existing operations

Various submissions raised concerns about current farming operations. These included fence maintenance, cattle escaping, and the management of dead cattle. There are comments about biosecurity, such as disease and feral pig prevalence. However, it is inferred by submissions that these issues are solely caused by the existing feedlot, which is unrealistic. It is understood that discussions have occurred on these topics and improvements to farm infrastructure will be undertaken to minimise the potential of these issues occurring in the future.

The feeding of cattle in larger paddocks across the property, including the pens identified for drought feeding, will be adjusted to ensure that the activities align with the planning definition of extensive agriculture. This means that all cattle outside the approved feedlot will primarily obtain feed from grazing pasture, with supplementation from a ration. The stocking rates will be reduced so that a 70 % ground cover can be achieved, except during drought conditions where a lack of rainfall prevents ground cover growth, even in pasture-only systems.

Proximity to neighbouring properties

The reduction in the proposed feedlot capacity has resulted in the shortening of the rows of pens. This provides a greater separation to the northern property boundary and rural buildings on the adjacent property.

Water

The 480 ML groundwater allocation substantially exceeds the requirements of the feedlot, even if share units are reduced to 50 % (240 ML). The revised feedlot would require approximately 70 ML of water. Groundwater will also be utilised to supplement the irrigation of effluent water and maximise plant growth. As feedlot effluent generation is associate with rainfall, extended periods of effluent generation will be associated with extended periods of alluvial groundwater recharge. This means that there is unlikely to be heavy restrictions in place for groundwater use when nutrient application to soils is greatest. High yielding cropping seasons normally follow seasons with extended effluent generation (rainfall).

Roads and traffic

A Traffic Impact Assessment (TIA) was completed for the original capacity. This has not been revised for the reduced capacity and the outcomes of this assessment will be retained. This ensures a more conservative assessment for the proposed 4,000 head feedlot. The Rannock Burn Road pavement will be widened to 6 m with a 1 m table drain on either side. The initial 50 m of Rannock Burn Road will be bitumen sealed. The intersection of Rannock Burn Road and Rushes Creek Road will also be

widened to provide for the swept path of the largest vehicle (B-double). Within Section 3.4.3 of the TIA, semi-trailers were incorrectly stated as being the largest vehicle size.

Whilst the feedlot will generate additional vehicles, a large volume of heavy vehicles are generated by the extensive farming operations, both on 'Annabrae' (the subject site) and neighbouring properties. Many of the submissions raise concerns about the safety of passing heavy vehicles and dust generation from existing traffic. However, one submission identifies that 24,000 bales of hay and 1,000 tonnes of grain are produced by the neighbouring property, which is also accessed via Rannock Burn Road.

The proposed upgrades will resolve many of the issues that are associated with the existing use of Rannock Burn Road for farming activities and the existing feedlot. The expanded feedlot will also provide a close and consistent market for the sale of these commodities, reducing the need for them to be transported along Rannock Burn Road, saving both the neighbour and the applicants in transport costs. The feedlot expansion, and associated upgrades to the road, are expected to resolve some of the issues relating to the existing use of Rannock Burn Road.

Dust generation is common on unsealed rural roads and the trucks generated by existing farming activities (on and off-site) will result in a substantial amount of dust. There are no dwellings adjacent to, or near Rannock Burn Road, so the sensitivity of these properties to dust from a rural road is low. Further, one of the submissions notes that existing heavy vehicles are travelling at low speed and that dust is associated with light vehicles moving at the legal speed limit.

Although there are several submissions raising concerns about traffic on Rannock Burn Road, there are only two properties, including Annabrae, that utilise Rannock Burn Road for access. Further, only 'Annabrae' has a dwelling on the property.

Odour

A revised odour assessment has been completed in response to the EPA request for information. More detailed information provided by submitters and the EPA informed the odour assessment. The revised assessment also considered the Carrols Gap farmhouse which was accidently missed in the initial assessment. However, this missed receptor and other dwellings not specifically identified in the original assessment are not the most limiting receptors.

The revised assessment identifies the 'valley drainage' assumption for all receptors, even those uphill from the nearest part of the feedlot complex (existing effluent pond). This considers both katabatic and anabatic odour conditions. Cumulative impacts from the poultry farm have been considered in the assessment. However, the applicant has no control over the management or compliance of the poultry farm.

Soils

An effluent and nutrient mass balance was included in Appendix G of the EIS and is based on a site-specific model including 50 years of rainfall data. This aligns with the requirements of the EPA. It is understood that the soils assessment and effluent modelling has been assessed by the specialist EPA soils assessment team and the Department of Primary Industries (DPI) land use team. No further request for information relating to soils or effluent management has been issued by the EPA or the DPI.

The nutrient balance assumed the implementation of lucerne as the crop, which aligns with the crops implemented in neighbouring properties (as per a neighbour's submission). High yielding crops such as corn silage and/or irrigated pasture may also be implemented in rotation and are expected to result in similar nutrient removal. The nutrient mass balance resulted in a nutrient deficiency as the application of effluent would not provide adequate Nitrogen or Phosphorus for optimum plant growth. As the feedlot has been reduced in size, the proposed irrigation area will be more than adequate to achieve nutrient removal. In fact, it is anticipated that urea applications will be required in addition to effluent application. This is common in normal cropping systems, even where feedlot effluent is irrigated. All application of mineral fertilisers will be based on agronomic advice following annual soil sampling and analysis. The two centre pivots are now identified as 'primary' and 'secondary', with the installation and use of the primary pivot to be prioritised. This means less supplementary mineral fertiliser will be required.

As proposed in the EIS and Environmental Management Plan, and as expected to be conditioned in the Environment Protection Licence (EPL), annual soil monitoring will be undertaken to ensure the application of manure or effluent is not adversely impacting soils and/or underlying groundwater. Any accumulation of Phosphorus will only occur over a long time, and adverse trends will be recognised as a part of annual monitoring before it becomes an environmental issue.

Please contact AgDSA if you have any further questions.

Yours sincerely,

Agricultural Development Services Australia Pty Ltd (AgDSA)

ATCH: Amended Site Plans
Amended Environmental Management Plan