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10 November 2025

Adam Williams
Senior Planner | Development Facilitation
Planning Facilitation | Planning
Department of Transport and Planning

adam.j.williams@transport.vic.gov.au

Dear Adam,

RE: SUMMARY OF PRE-APPLICATION ADVICE FOR THE PROPOSED POULTRY FARM (CAGE FREE EGG LAYER FARM) – WARWICK'S BLOCK FARM – 2952 MURRAY VALLEY HIGHWAY, TORRUMBARRY

Further to the lodgement of the pre-application package for the proposed Poultry Farm (Cage Free Egg Layer Farm) at 2952 Murray Valley Highway, Torrumbarry we provide the following responses to the matters raised by the agencies from their preliminary assessment of the proposed development.

MATTER RAISED	APPLICANTS RESPONSE
Transport for Vic – Traffic Impact Assessment	
In terms of the analysis of crash data along this section of the MVH: 1. The timeline is limited to the 5 years preceding the report (15 years is preferred):	Please see section 4.4.2 of the updated Traffic impact assessment which provides further review of crash data from the previous 15 years. The assessment of this data indicates that there is no pattern of intersection crashes.
2. The physical section of the MVH that has been assessed is shorter than would normally be expected for a Highway with a posted speed limit of 100km/h (in reality it should be between Patho School Road and Young Road in each direction from each intersection with the MVH).	Please see section 4.4.2 of the updated Traffic impact assessment which provides an assessment of the crashes between Patho School Road and Young Road.
3. The Report has been prepared by a consultancy that is not on the DTP list of pre-qualified practitioners who are able to undertake this assessment.	The Traffic impact assessment has been prepared by a Senior Traffic Engineer (RPEQ, CPEng & NER – approx. 10 year experience) and a Principal Traffic Engineer (RPEQ, RPEV, CPEng & NER – approx. 20 years experience) from Queensland as part of the development engineering team. Both engineers are accredited Senior Road Safety Auditors and have undertaken countless TIA, Safety assessments (RSA, Full and Rapid SSA, Risk registers, SiD, Fatal crash reporting), and mitigation identification and design.
4. Given the items above, the Traffic Report makes the conclusion that BAL and BAR turns are appropriate as they do not trigger channelisation having regard to the principles relating to turn warrants.	It is noted that the crash data indicates that there is no pattern of intersection crashes which warrants the intersections to be upgraded to a standard greater than that originally identified within the Traffic impact assessment.

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	The Traffic Impact Assessment has been updated in response to this feedback. Please refer to Section 10.
5. <u>Traffic Impact Assessment - Overall Comments</u> Overall, this leads us to submit that the Traffic Report understates identified road hazard and the crash pattern along this section of the MVH. Further adding the types of movements proposed will increase the risk profile for serious collision for this section of the MVH. The consequence of a Traffic Report that does not undertake a holistic assessment, is that the proposal gives rise to a serious escalation in the risk profile for collisions in future. Going forward, we would expect the applicant to submit a revised or new Traffic Report that addresses the matters above. To gain the support of HTfV for any future permit application, we suggest that the revised or new Traffic Report should investigate at a minimum: • CHR into Heppel Road. • BAL into Davis Road. • CHR/CHL into Roslynmead Rd. Regardless of turn warrant assessments, this is a matter that goes to basic road safety and hazard mitigation principles.	The Traffic impact assessment has been reviewed with regards to the standard of intersection required for Heppell Road, Davis Road and Roslynmend Road and it has been determined that the specified intersections exceed what is identified through the operational and safety assessments presented in this report. A review of crash data over the past 15 years does not reveal any patterns that would warrant full-length channelisation. In the absence of reactive safety concerns, turn treatment warrants have been used to determine the appropriate intersection upgrades. Based on these warrants, the recommended treatments—basic left-turn (BAL) and basic right-turn (BAR)—are considered to be fair and reasonable for all parties. Accordingly, it is maintained that these treatments represent an appropriate and proportionate response to the projected traffic demands. The Traffic Impact Assessment has been updated in response to this feedback. Please refer to Section 10.
Campaspe Shire Council – General – Environmental Health	
<u>Wastewater</u> Wastewater has only been calculated for showering, with no other fixtures appearing to be included. T Block and Pollocks have the same calculation formula, but a different value has been utilised for Warwick's Block. There does not appear to be any allowance in the wastewater calculations for fixtures in the packing sheds, machinery sheds, transfer shed or workshops. No allowance has been provided for the 1% AEP flood event for Warwick's Block. The current information does not mention setbacks to facilities, waterways, drainage lines, ponds etc. in accordance with the EPA Guidelines for Onsite Wastewater Management.	Please see Section 3.6 of the updated Preliminary engineering assessment report which includes an assessment of all the waste producing fixtures from all the proposed buildings. The correct formula has now been applied. It should be noted that the design of the wastewater treatment systems will be subject to detailed design, which will incorporate the requirements of the EPA Guidelines for Onsite Wastewater Management (GOWM), the EPA Guidelines for Effluent Dispersal and Recycling Systems (EDRS), and the Victorian Land Capability Assessment Framework (VLCAF), as applicable.

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Water Retention / Mosquito Breeding Significant works are proposed to ensure high-nutrient rainwater runoff is retained onsite. This includes ponds, settling ponds, and height-resetting ponds. If the ponds hold water (as they are designed to do) for too long, they will create significant mosquito breeding habitats. It will be important to understand how the ponds are to be managed and maintained to reduce creating a mosquito breeding environment.	To minimise the potential for water retention and mosquito breeding, drainage channels and basins will adopt best practice minimum gradients to minimise the opportunity for standing water. Warwick's Farm will also incorporate the use of pumps which will typically pump out water within 24 hours of a storm event.
Soil Understanding the soil characteristics across the sites will be important in the considering the potential impacts of erosion, particularly in relation to stormwater systems.	Discharge velocities from the proposed farm will be very minor and generally no greater than the existing scenario. There is currently no evidence of ongoing erosion in the vicinity of the development site and localised best practice management of outlet velocities should be sufficient to minimise erosion impacts.
Recommendation 1 A Land Capability Assessment (LCA) is required and must be consistent with the EPA Guidelines for Onsite Wastewater Management (GOWM), the EPA Guidelines for Effluent Dispersal and Recycling Systems (EDRS) and the Victorian Land Capability Assessment Framework (VLCAF). The LCA must: • Include all the waste producing fixtures from all the proposed buildings. • Propose how the wastewater from each location is collected and treated. • Propose suitable disposal locations in accordance with the documents above. • Include any staff accommodated onsite and the associated accommodation • Include the dwellings and any wastewater generated.	Please see Section 3.6 of the Preliminary engineering assessment report which has been updated to include a full land capability assessment which provides the following information: • Include all the waste producing fixtures from all the proposed buildings. • A description of the topographic features of the site. • A description of the soil profile and its properties with respect to sustaining disposal of wastewater. • A calculation of the area required for wastewater disposal based on a full water balance specific to the site. The development can be conditioned to ensure all onsite effluent disposal system are located, constructed and maintained in accordance with the relevant guidelines and standards.
Recommendation 2 There is a high predominance of Sodic Soils in the locations (usually dispersive clays), however there is no reference to erosion controls for stormwater management. Given how extensive the stormwater drainage and ponding proposed, this needs to be assessed. Sodic soils will also affect onsite wastewater disposal (and should be covered in the required LCA).	Discharge velocities from the proposed farm will be very minor and generally no greater than the existing scenario. There is currently no evidence of ongoing erosion in the vicinity of the development site and localised best practice management of outlet velocities should be sufficient to minimise erosion impacts.
Recommendation 3	To minimise the potential for water retention and mosquito breeding, drainage channels and basins will adopt best practice minimum gradients to minimise the

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Stormwater management must consider the quality of grading maintenance of the drains and ponds and the duration of retention of water, to avoid mosquitoes breeding. Any ponding lasting more than approximately six days may result in mosquito breeding.	opportunity for standing water. Warwick's Farm will also incorporate the use of pumps which will typically pump out water within 24 hours of a storm event.
<u>Recommendation 4</u> Regarding maintenance, given the high nutrient value of the runoff, vegetation growth in the drains and ponds will be high. Vegetation will increase the water retention time and provide habitat for mosquito breeding. Guidance is available in Drainage Considerations for Mosquito Control, Peter Whelan, Department of Health and Community Services, Sept. 1997. Pursuant to the Public Health & Wellbeing Regulations 2019 r15 Duty to control mosquito breeding grounds An owner or occupier of premises must take reasonable steps to— (a) control any mosquito breeding ground on the premises; and (b) abate any conditions on premises that are conducive to the establishment of a mosquito breeding ground	The birds will be free to move around but will always be contained within the proposed sheds. As such, all manure and litter can be collected and disposed without entering the environment around sheds. Given the controlled environment in which the proposed farm will operate, along with the approval and licensing conditions it will need to comply with, the proposed poultry farm will pose a minimal risk with respect to stormwater quality. To minimise the potential for water retention and mosquito breeding, drainage channels and basins will adopt best practice minimum gradients to minimise the opportunity for standing water. Warwick's Farm will also incorporate the use of pumps which will typically pump out water within 24 hours of a storm event.
Campaspe Shire Council – Traffic Impact Assessment	
Throughout the document, it is mentioned that there will be 'on-site' staff who have not been included within the vehicle count calculations. The on-site staff will be based in existing houses within the broader Torrumbarry Estate owned by the client. Based on this and although the increase will be minimal, the 'on-site' staff vehicle movements are to be included within the calculations as they will still be utilising the road networks as they are not on the specific Pollock, Warwick or T-Block sites.	Please see section 3.1.1 of the Traffic impact assessment which has been updated to remove reference to 'on-site' staff. For the purpose of this planning permit application, all staff have been assumed to be off-site. A carpooling rate of 10%-20% has been adopted for this assessment for multiple staff travelling to site together. As such, there is no increase in the number expected traffic movements as calculated in the original Traffic impact assessment.
Within the TIAR, Heppell Road is mentioned as a local gravel road, this is incorrect. The relevant section of Heppell Road is an earth road.	The Traffic Impact Assessment has been updated to note Heppell Road as an earth road. Please see Section 4.2.3 for further information.
• All site accesses are proposed onto Council managed roads, with no access onto DPT roads. It is assumed these access points will be used throughout the development of the site (construction works) as well as for ongoing maintenance access. Site accesses have been proposed to be sealed to mitigate pavement edge wear and transfer of gravel into the road lanes – this is considered a suitable proposal. Site specific detailed will	It is acknowledged the further details on the sealed site accesses will be required at the time of applying for WWRR permits (prior to construction). The accesses will be designed and constructed to Council and IDM standards and detailed TMP's are to be prepared for each location.

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be required for each location at the time of applying for WWRR permits (prior to construction). These accesses are to be designed and constructed to Council and IDM standard and detailed TMP's to be prepared for each location.	
Campaspe Shire Council – Stormwater Management Plan	
Generally, we have condition to retain water on site for smaller rural lot developments. For the proposed sites being industrial development within rural areas, are we allowing the discharge to limit to predevelopment rates. Detention based on catchment location and requirement.	Comment acknowledged. No changes to the Stormwater management plan have been made in response to this comment.
Proposed Drainage Strategy within Section 3.2.2, proposes stormwater collected within sumps will be discharged via pumps. These will also require approval from North Central CMA.	Comment acknowledged.
Campaspe Shire Council – Biodiversity Assessment	
It is recommended for another ecological survey be undertaken to ensure all species are surveyed given the timing of the current survey. It would be anticipated that threesome species may be dormant in winter that would not be picked up by the survey currently undertaken.	Additional ecological surveys will be undertaken during spring to ensure all species are surveyed. The updated ecological assessment will be provided upon completion.
Given the vulnerability of a number of flora and fauna species identified in the area, including plains grassland, the ecological assessment for this proposal will be important and should be submitted to the Department of Energy, Environment and Climate Action for review.	The Ecological assessment has been submitted to the Department of Energy, Environment and Climate Action as part of the pre-application process and will be submitted to the Department as part of the formal application process.
Campaspe Shire Council - General	
It would be recommended that Agricultural Victoria and the Environmental Protection Authority be engaged early to provide clear guidance around their requirements in relation to this proposal.	Agricultural Victoria and the Environmental Protection Authority have been engaged through the pre-lodgement/pre-application stages of the development application.
Goulburn Murray Water	
<u>General Comments</u> No GMW assets onsite. GMW's No. 1 Lagoon exists to the west of the site, and Heppels Lagoon exists to the	Comment acknowledged.

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north. Waterway which terminates into the No. 1 Lagoon abuts site to the west. The proposed development area is over 100m from the waterways and GMW Channels.	
Comments from other GMW Departments The applicant refers to both the presence of High Reliability Water Share and Take and Use Licences with GMW. GMW's Water Delivery Services Manager – West would be required to provide input into the suitability of the proposal to be supplied by a GMW water supply.	Comment acknowledged.
Property Officer Comments • It is understood any dead birds from the site will be composted at the T-Block Facility, which is one of the other 2 sites incorporated with the proposal. • There are no GMW assets onsite which will be impacted by the proposal	Comment acknowledged.
Documents to be provided with the application to the Responsible Authority • Detailed site plan (scaled and dimensioned plans, including existing site plan, proposed site plan with setbacks from any water features on or near the site) • Site photos • Copy of title (less than 3 months old) • Copy of any restrictions registered on title (e.g. Section 173 Agreement) • Written summary of the proposal	The development application includes a number of development plans and specialist reports including development plans, site photos and a written summary of the proposal. A copy of the title for the subject lot has been included with the application material.
Report(s)/Assessment(s) required • Land Capability Assessment (LCA) with respect to domestic wastewater treatment and disposal that complies with the requirements of the current EPA Guideline for On-site Wastewater Management and includes: • A description of the topographic features of the site. • A description of the soil profile and its properties with respect to sustaining disposal of wastewater. • A calculation of the area required for wastewater disposal based on a full water balance specific to the site. • A scale drawn site plan of the subject land showing dimensions, any existing structures or notable features and the location of the proposed building and wastewater disposal envelopes.	The information requested has been included as of the Preliminary Engineering Assessment Report, Stormwater Management Plan and Egg Industry Design Philosophy Report. The birds will be free to move around but will always be contained within the proposed sheds. As such, all manure and litter can be collected and disposed without entering the environment around sheds. Given the controlled environment in which the proposed farm will operate, along with the approval and licensing conditions it will need to comply with, the proposed poultry farm will pose a minimal risk with respect to stormwater quality. It is therefore considered that the potential for water quality impacts from the farm on groundwater or surface water is low and a Nutrient Risk Assessment for Surface and Groundwater is not required.

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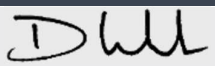
• The distance of the wastewater disposal field to any waterways, dams or bores showing that these meet the relevant setback requirements of the current EPA Guideline for On-site Wastewater Management • Recommendations regarding the most suitable wastewater treatment and disposal systems given the constraints of the land. • Stormwater Management Plan • A Nutrient Risk Assessment for Surface and Groundwater, completed as per the Nutrient Risk Assessment method provided in Appendix C of the Egg Industry Environmental Guidelines (EIEG, Edition II, produced by Australian Eggs and dated May 2018). In order to support the appropriateness of the shed location.	

If you have any questions in relation to this matter, or require further information, please contact Paul Hanly on (07) 3220 0288.

Yours sincerely,

Paul Hanly
Principal Planner
PSA Consulting (Australia) Pty Ltd

VERSION	DATE	DETAILS	AUTHOR	AUTHORISATION
V1	10 November 2025	FINAL	Paul Hanly	 David Ireland