Progressive Rural Solutions
PO Box 74
Deniliquin NSW 2710
0408 577 248
admin@prsltd.com.au

Sorell Councill
PO Box 125
SORELL TAS 7172
Delivered by email: sorell.council@sorell.tas.gov.au

Your reference: 5.2025.287.1

10th April 2026

To the Receiving Officer,

RE: Development Application 106 Bream Creek Road, Bream Creek
RFI Response Environmental Health – RFI 25-001 – 25-005 - Planning

Thankyou for your request for further information dated 13th November 2025 and the time to review this together late last year.

Reference is made to the above Development Application and Council's Request for Further Information (RFI) issued pursuant to Section 54 of the *Land Use Planning and Approvals Act 1993* (the Act). Following significant further work on all of the requested, items, we are now in a position to provide this information to your request.

In response, please find enclosed, under the cover of this letter, the Planning information addressing RFI Items 25-001 to 25-005. The response has been prepared in a format that directly aligns with the numbering and content of the RFI to facilitate an efficient and transparent assessment.

The additional information provided has been prepared to:

- Address the specific matters raised by Council,
- Further demonstrate compliance with the applicable planning controls, including the performance-based provisions of the relevant codes, and
- Confirm that the proposal will not result in unreasonable impacts on surrounding land uses or environmental values, having regard to its agricultural context and operational characteristics.

We submit, that the enclosed information satisfactorily addresses the matters on the responded to items 25-001 to 25-005 under Section 54 of the Act and provides sufficient detail to enable Council to proceed with the assessment of the application related to these points. If however Council require any further clarification, please do not hesitate to contact myself.

Yours sincerely,

Clare Fitzpatrick

Clare Fitzpatrick | Director
Progressive Rural Solutions

SORELL COUNCIL
Sorell Council
Development Application: 5.2025.287.1 - Response to Request For Information - 106 Bream Creek Road, Bream Breek - P2.pdf
Plans Reference: P1
Date Received: 13/04/2026

RFI 25-001. The proposal relies on land for the management of additional effluent and water directed from effluent ponds by irrigation. This treatment of organic waste is an attenuating activity, and is an intensification of the effluent management approved under DA2007/270. As such, any areas of land relied upon for effluent management including re-use must be considered as land to which the permit relates, and the certificates of title and folio plans for these parcels must be provided as an application requirement of the Planning Scheme.

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Response: Table of all searches completed with results of ownership and related use below.
Link to all searches provided in the email with this letter.

Property ID	Volume	Folio	PID	Address	Easement?	Easement Purpose	Restriction/ Use	Purpose	Fencing Provision	Owner
686707	138933	1	2179649	247 Burnt Hill Road Bream Creek	Yes	Benefiting - pipeline 2m wide	No	-	-	Stroud Pty Ltd
1413702	161908	1	3192124	460 Marion Bay Road Marion Bay	Stormwater	Stormwater & Drainage	Yes	Sewerage or drainage	Yes	Stroud Pty Ltd
	106070	1	3370744	Lot 1 Burnt Hill Road Brean Creek	No	-	Yes	Forestry - Newsprint Mills		Stroud Pty Ltd
686800	106067	2	3370752	124 Bream Creek Road Bream Creek	No	-	Yes	Private Timber Reserve		Stroud Pty Ltd
686554	106069	1	3370752	124 Bream Creek Road Bream Creek	No	-	Yes	Private Timber Reserve Forestry Right - Newsprint Mills	-	Stroud Pty Ltd
686708	35297	2	3370760	106 Bream Creek Road Bream Creek	No	-	No	-		Chubcak Pty Ltd
686557	35298	1	3370760	106 Bream Creek Road Bream Creek	No	-	No	-		Chubcak Pty Ltd
687437	156894	1	3370760	106 Bream Creek Road Bream Creek	Yes	Benefiting - pipeline, pumphouse, weir and storage	No	-	-	Chubcak Pty Ltd
686799	36107	1	3370779	198 Burnt Hill Road Bream Creek	Yes	Sewerage and drainage	No	-	-	Chubcak Pty Ltd
1136257	36176	1	3370779	198 Burnt Hill Road Bream Creek	No	-	No	-	-	Chubcak Pty Ltd
687439	53479	1	3370779	198 Burnt Hill Road Bream Creek	No	-	No	-	-	Chubcak Pty Ltd
686558	53479	3	3370779	198 Burnt Hill Road Bream Creek	No	-	No	-	-	Chubcak Pty Ltd
	65104	1	3370779	198 Burnt Hill Road Bream Creek	No	-	Yes	Forestry - Newsprint Mills	-	Chubcak Pty Ltd

Property ID	Volume	Folio	PID	Address	Easement?	Easement Purpose	Restriction/ Use	Purpose	Fencing Provision	Owner
686706	106067	1	3370779	198 Burnt Hill Road Bream Creek	No	-	No	-	-	Chubcak Pty Ltd
686704	106068	1	3370779	198 Burnt Hill Road Bream Creek	No	-	No	-		Chubcak Pty Ltd
686793	106412	3	3370779	198 Burnt Hill Road Bream Creek	Not provided no solids or effluent use on this title					
686593	107420	1	3370779	198 Burnt Hill Road Bream Creek	Yes	Sewerage and drainage	Yes	Forestry - Newsprint Mills		Chubcak Pty Ltd
	151068	1	3370779	198 Burnt Hill Road Bream Creek	Not provided – no solids or effluent use on this title					
687611	156892	1	3370779	198 Burnt Hill Road Bream Creek	Yes	Burdened - Wayleave Benifited - pipeline, pump, weir, dam and pump shed	No	-	-	Chubcak Pty Ltd
686680	156893	1	3370779	198 Burnt Hill Road Bream Creek	Yes	Burdened - Wayleave Benifited - pipeline, pump, weir, dam and pump shed	No	-	-	Chubcak Pty Ltd
686511	127848	1	5960959	12 Townsend Lane Copping Tas	No	-	Yes	Adhesion Order (Copping Township)		Stroud Pty Ltd
687444	127849	1	5960959	12 Townsend Lane Copping Tas	Yes	Drainage	Yes	Adhesion Order (Copping Township)	-	Stroud Pty Ltd
687442	241387	1	5960959	12 Townsend Lane Copping Tas	No	-	No	-	-	Stroud Pty Ltd
	36341	4	7873947	51 Bream Creek Rd Bream Creek	Not provided – no solids or effluent use on this title					
125032	37042	1	7873947	51 Bream Creek Rd Bream Creek	No	-	No	-	Yes	J.M. Bignell Pty Limited
686559	37042	2	7873947	51 Bream Creek Rd Bream Creek	No	-	No	-	Yes	J.M. Bignell Pty Limited

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Property ID	Volume	Folio	PID	Address	Easement?	Easement Purpose	Restriction/ Use	Purpose	Fencing Provision	Owner
687434	37042	3	7873947	51 Bream Creek Rd Bream Creek	No	-	Yes	Forestry - Norske Skog	Yes	J.M. Bignell Pty Limited
686555	37042	4	7873947	51 Bream Creek Rd Bream Creek	No	-	No	-	Yes	J.M. Bignell Pty Limited
686125	46004	1	7873947	51 Bream Creek Rd Bream Creek	Yes	Burdened - pipeline and Dam	No	-	-	Stroud Pty Ltd
687438	53774	1	7873947	51 Bream Creek Rd Bream Creek	Yes	Burdened - Right to take water from waterhole	No	-	-	J.M. Bignell Pty Limited
686607	53774	2	7873947	51 Bream Creek Rd Bream Creek	No	-	No	-	-	J.M. Bignell Pty Limited
686496	53774	4	7873947	51 Bream Creek Rd Bream Creek	No	-	No	-	-	J.M. Bignell Pty Limited
687441	100903	1	7873947	51 Bream Creek Rd Bream Creek	No	-	No	-	-	J.M. Bignell Pty Limited
686604	155706	2	7873947	51 Bream Creek Rd Bream Creek	Yes	Sewerage and drainage	Yes	Water supply	-	J.M. Bignell Pty Limited
686497	235982	1	7873947	51 Bream Creek Rd Bream Creek	Not provided – no effluent or solids use on this title					
686498	238854	1	7873947	51 Bream Creek Rd Bream Creek	No	-	No	-	-	J.M. Bignell Pty Limited

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FI25-002. Please clarify by way of imagery or plans at a suitable scale to identify nearby dwellings, the areas which effluent will be irrigated across the site relative to property boundaries (please refer to the areas of land clarified under item 1 of this request).

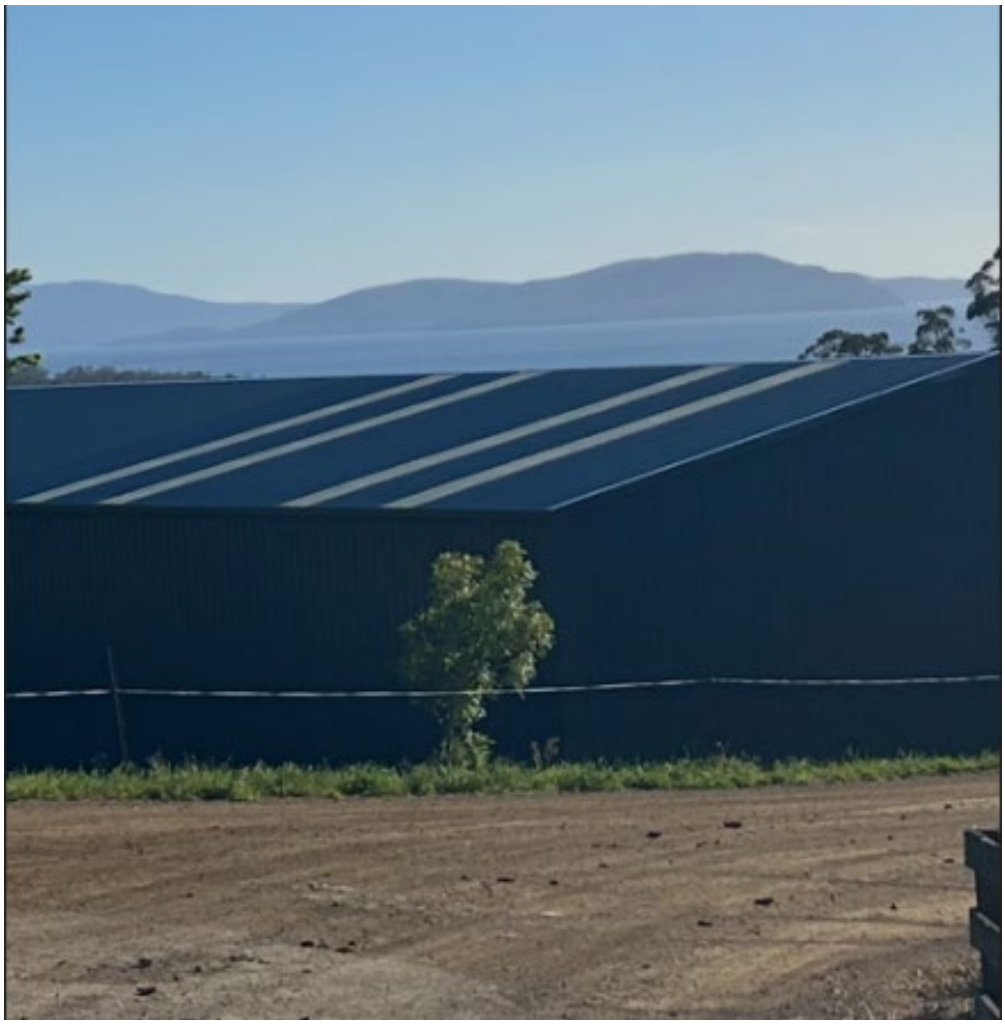
Response: Please see attached plans supplied which shows the total area of irrigation relating to machines that will use effluent, the areas proposed for effluent irrigation (consistent with the South East Soil and Water Effluent Management Plan), and the areas relating to a performance measure (hatched) proposed.

The total area proposed for effluent application remains at 139ha.

25-003. Please clarify by way of imagery or plans at a suitable scale to identify nearby dwellings, the areas which sludge will be applied across the site relative to property boundaries (please refer to the areas of land clarified under item 1 of this request).

Response: Please see attached plans supplied which shows the total area of farming areas owned, the areas proposed for solids/sludge application, and the areas relating to a performance measure (hatched) proposed. Please note, some minor changes have been undertaken relating to the application areas, which has reduced the total area proposed for use to 278ha.

RFI 25-004. Please provide further detail on the external finishes of the proposed loafing barn.



Response: The external finish of the barn is proposed in 'Deep Ocean' colour. Below is a photo of the adjoining shed showing the colour in context of the locality.

Please see attached photo of existing shed in same colour and renders of the shed.

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RFI 25-005. Please provide further information on the targeted control strategies for rodents, noting the prevalence of predatory birds including wedge tailed eagles in the area.

Response:

Context and Existing Conditions

The proposed development is located within an established agricultural setting where the presence of rodents and pest species is a known and routinely managed aspect of farm operations. As outlined in the Biosecurity section of the Environmental Impact Statement (EIS), the site currently operates under established farm management practices, including ongoing pest monitoring and control.

Rodent activity in agricultural environments is typically associated with the availability of feed, bedding materials and organic matter. These factors are well understood within the industry and are managed through standard operational and biosecurity practices.

Sources of Rodent Attraction

The primary potential attractants for rodents associated with the development include:

- feed storage and handling areas,
- bedding materials within housing systems, and
- manure and organic material associated with livestock operations.

These sources are not unique to the proposed development and are consistent with existing agricultural activities across the site and broader locality.

Operational Controls and Housekeeping

The management of rodent activity is fundamentally based on good housekeeping and operational controls, which form the first and most effective level of pest management.

Feed storage and handling areas will be managed to minimise spillage and accumulation of feed material, thereby reducing potential attractants. Bedding and manure will be routinely managed, removed or redistributed to prevent the build-up of organic material that may provide harbourage for pests.

Operational areas, including the dairy complex, feed lanes, storage areas and access ways, will be maintained in a clean and orderly condition. Infrastructure will be maintained to minimise opportunities for shelter and nesting, and waste materials will be appropriately managed to avoid attracting vermin.

These measures are consistent with standard agricultural practice and represent the primary mechanism for minimising pest activity.

Targeted Pest Management Program

A targeted pest management program will be implemented across the site to complement operational controls. This program will include:

- routine monitoring of rodent activity through regular inspections,
- identification of activity in higher-risk areas such as feed storage, housing and waste management zones, and
- implementation of control measures, including baiting and trapping, where required.

Control measures will be applied in a targeted and responsive manner, based on observed activity levels, ensuring that pest management remains proportionate to site conditions.

Records of pest activity and control measures will be maintained as part of routine site management, enabling ongoing review and continuous improvement of pest management practices.

Protection of Non-Target Species

Particular consideration has been given to the presence of predatory bird species within the locality, including wedge-tailed eagles and other raptors. Rodent control measures will be implemented to minimise the risk of secondary poisoning to non-target species. Where baiting is required, it will be undertaken using controlled and targeted methods, including:

- use of enclosed bait stations where practicable,
- strategic placement to avoid access by non-target fauna, and
- avoidance of broad-scale or uncontrolled baiting practices.

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Carcass monitoring and removal will form part of the pest management program to reduce the potential for secondary poisoning of scavenging or predatory species. These measures are consistent with accepted biosecurity and pest management practices and ensure that environmental risks are appropriately managed.

Consistency with Agricultural Practice

The proposed approach to rodent management is consistent with standard agricultural practice across Tasmania and aligns with general biosecurity principles applied to intensive livestock operations. The measures outlined above reflect established and effective management practices that are already implemented on-site and will continue to be applied as part of the proposed development.

Conclusion

The proposed development does not introduce new or atypical sources of rodent attraction beyond those already present within the existing agricultural operation. Rodent activity will be effectively managed through a combination of good housekeeping, operational controls and a targeted pest management program, supported by monitoring and adaptive management practices. Specific measures are incorporated to minimise risks to non-target species, including predatory birds.

Accordingly, it is submitted that the risk of increased rodent activity associated with the proposed development is low and can be effectively managed without adverse environmental impact.

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Legend

- Property Owned
- Property Leased

Spray Irrigation Areas

- Pivots
- Effluent Application Area
- Performance Criteria Areas (Effluent)

Attenuation Distance Offset

- Sensitive Receptor 300m
- Property Boundary 20m
- Waterways Buffer 30m

Receptors

- Not Owned
- Owned
- Other
- Town

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PROGRESSIVE RURAL SOLUTIONS

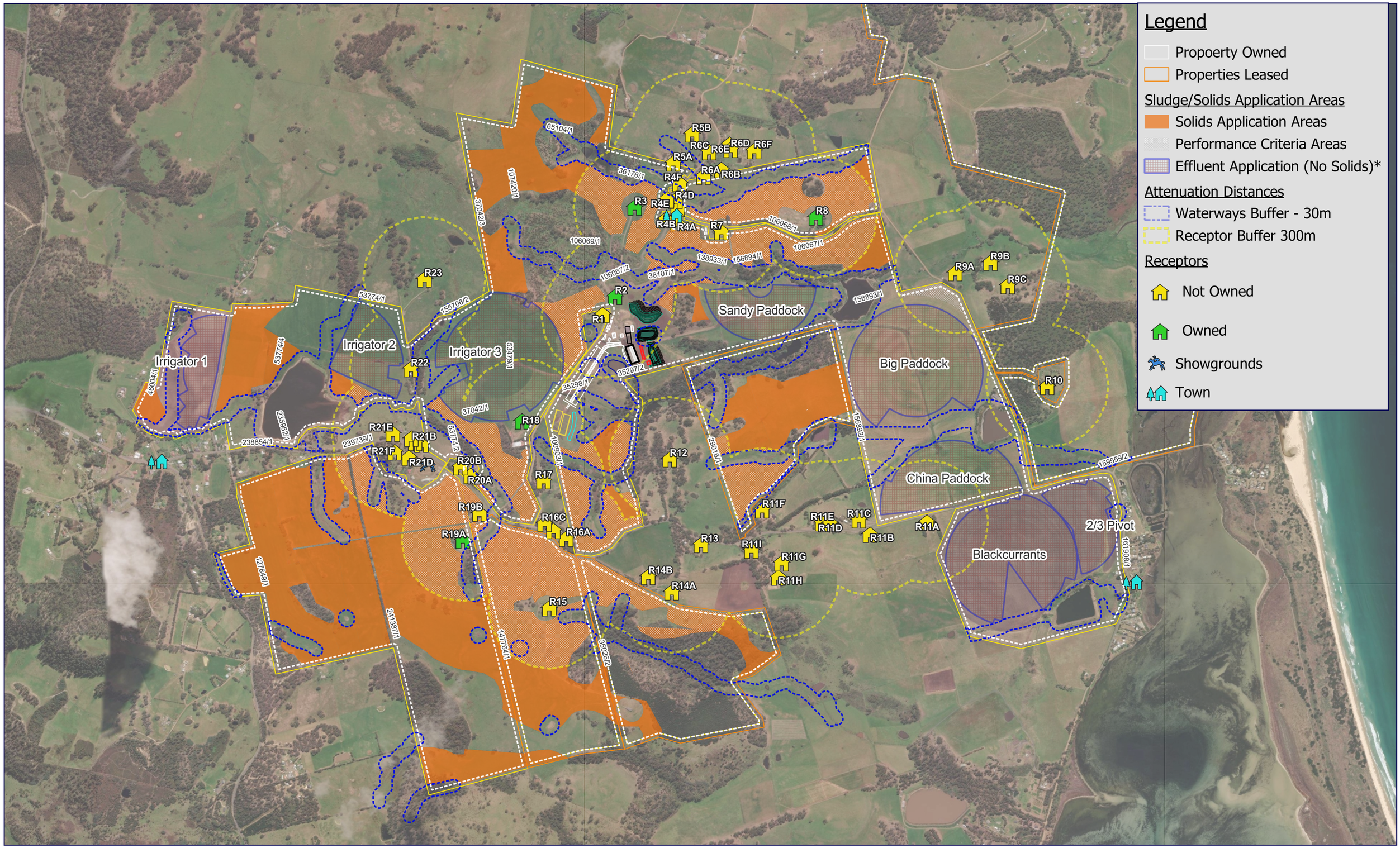
Prepared by:
Progressive Rural Solutions Pty Ltd
ABN: 58 63646 825
PO Box 74, DENILIQUIN, NSW 2710
Email: admin@prsltd.com.au
Phone: 0408577248

Project Details:

J373 - Stroud Dairies - Loose Housing Development

Date:	01/04/2026
Client:	Stroud Dairies
Property:	Bream Creek
Project:	Loose Housing
Plan type:	Site Plan
Plan Description:	Effluent Application Plan

0 0.5 1 km



Prepared by:
Progressive Rural Solutions Pty Ltd
ABN: 58 63646 825
PO Box 74, DENILIQUIN, NSW 2710
Email: admin@prsltd.com.au
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Project Details:

J373 - Stroud Dairies - Loose Housing Development

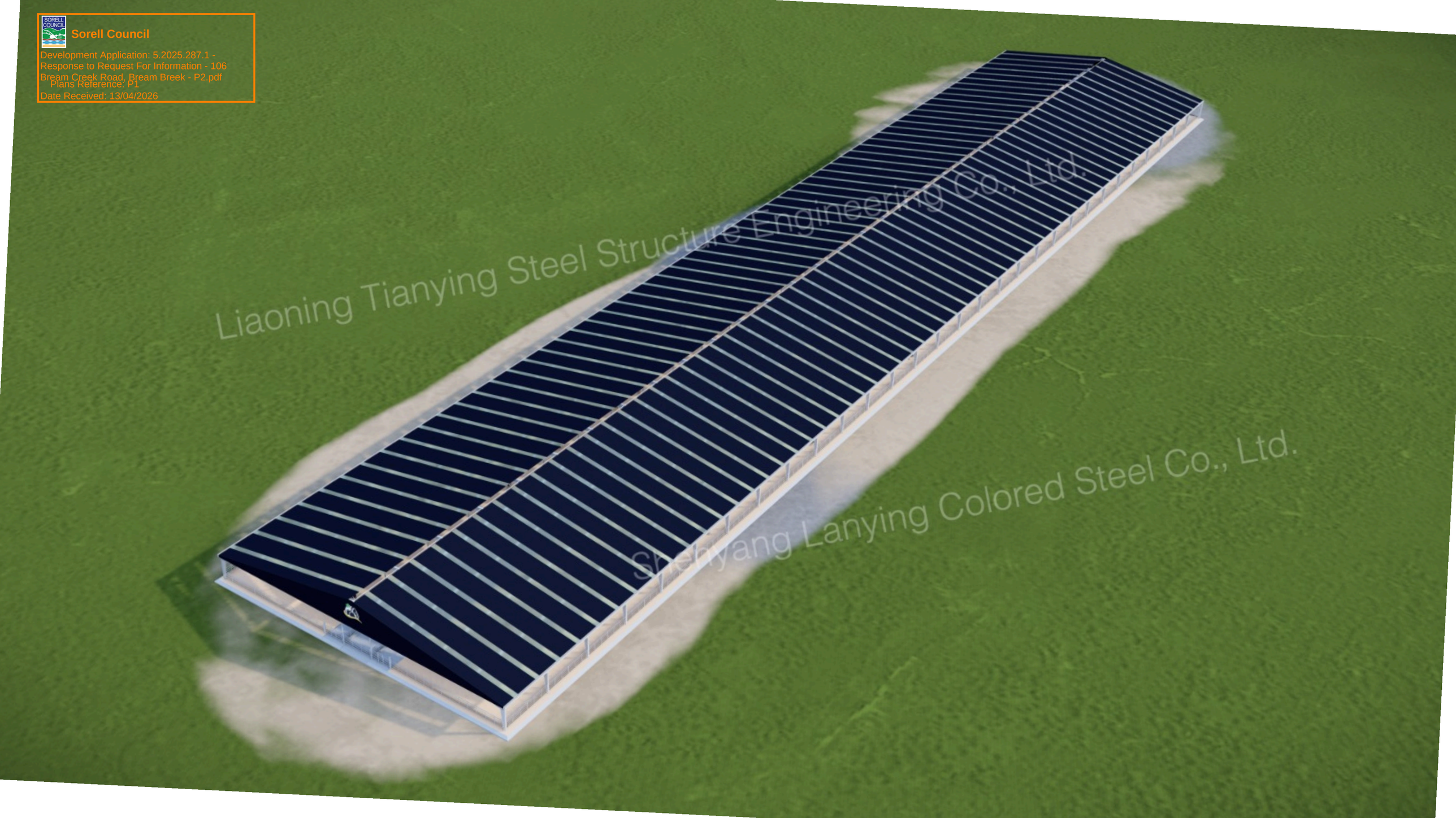
Date:	01/04/2026
Client:	Stroud Dairies
Property:	Bream Creek
Project:	Loose Housing
Plan type:	Site Plan
Plan Description:	Effluent Application Plan

0 0.5 1 km

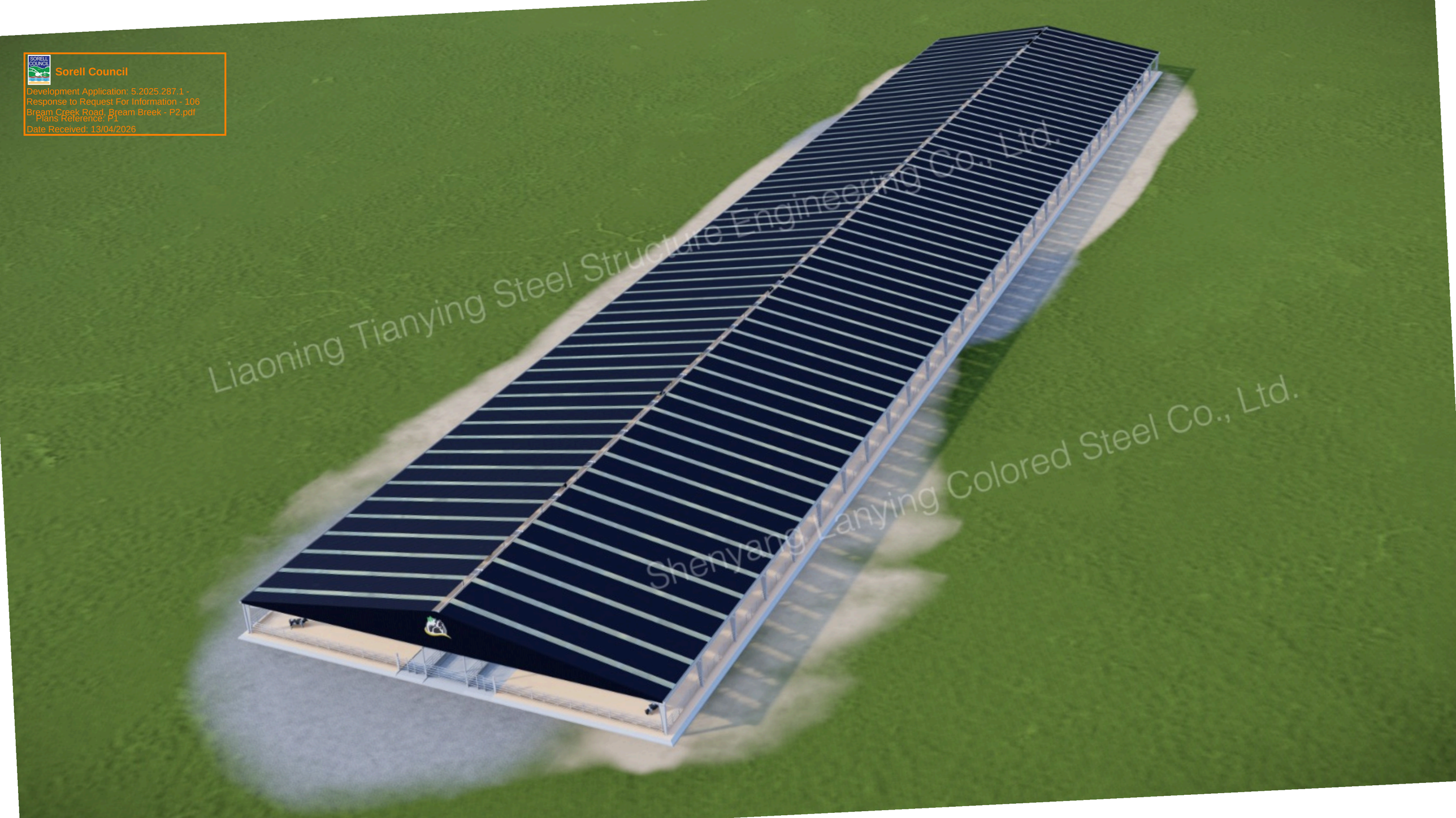
*Areas utilised for effluent application via irrigation are not to have soilds applied simultaneously without agronomic advice

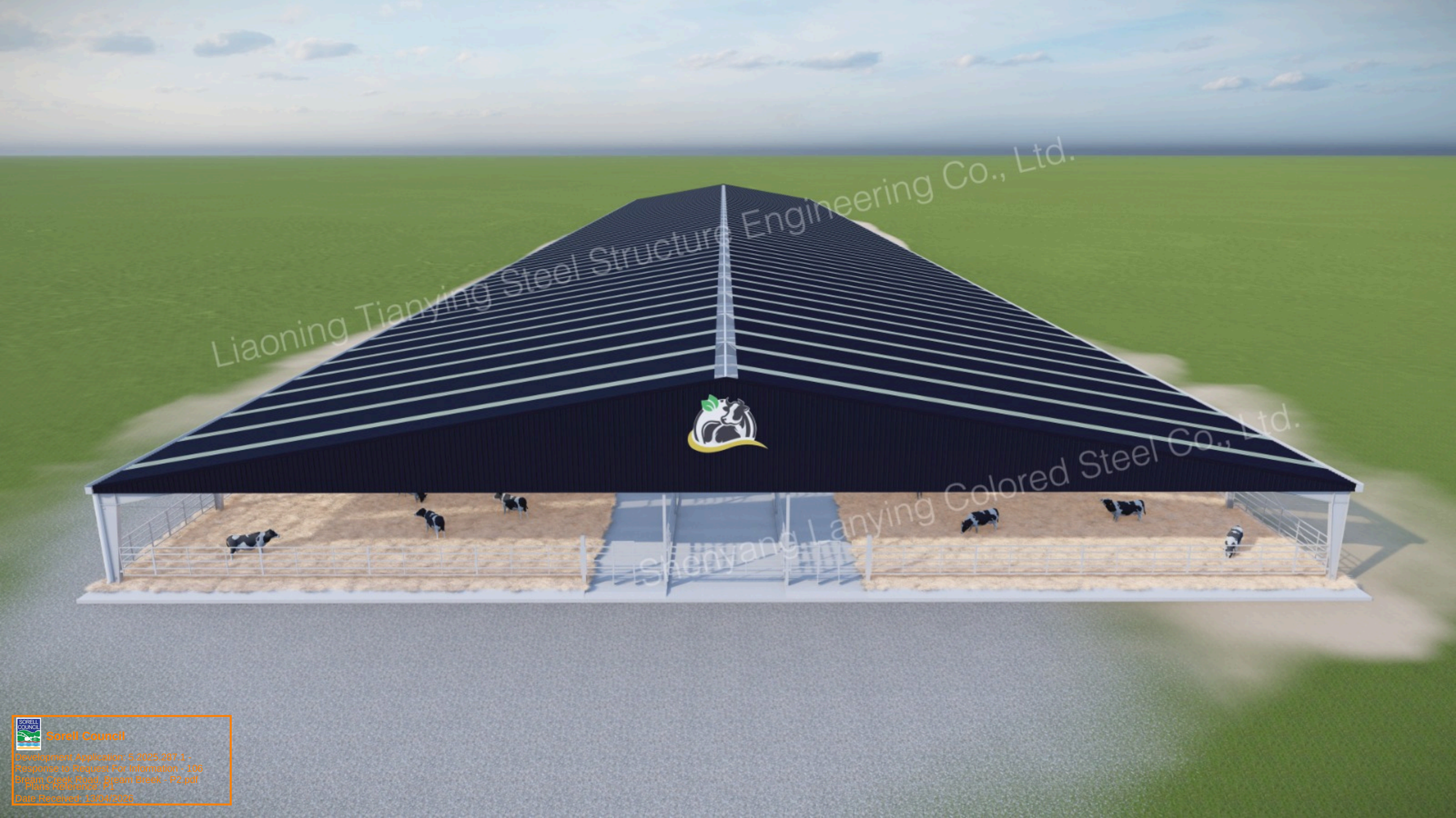
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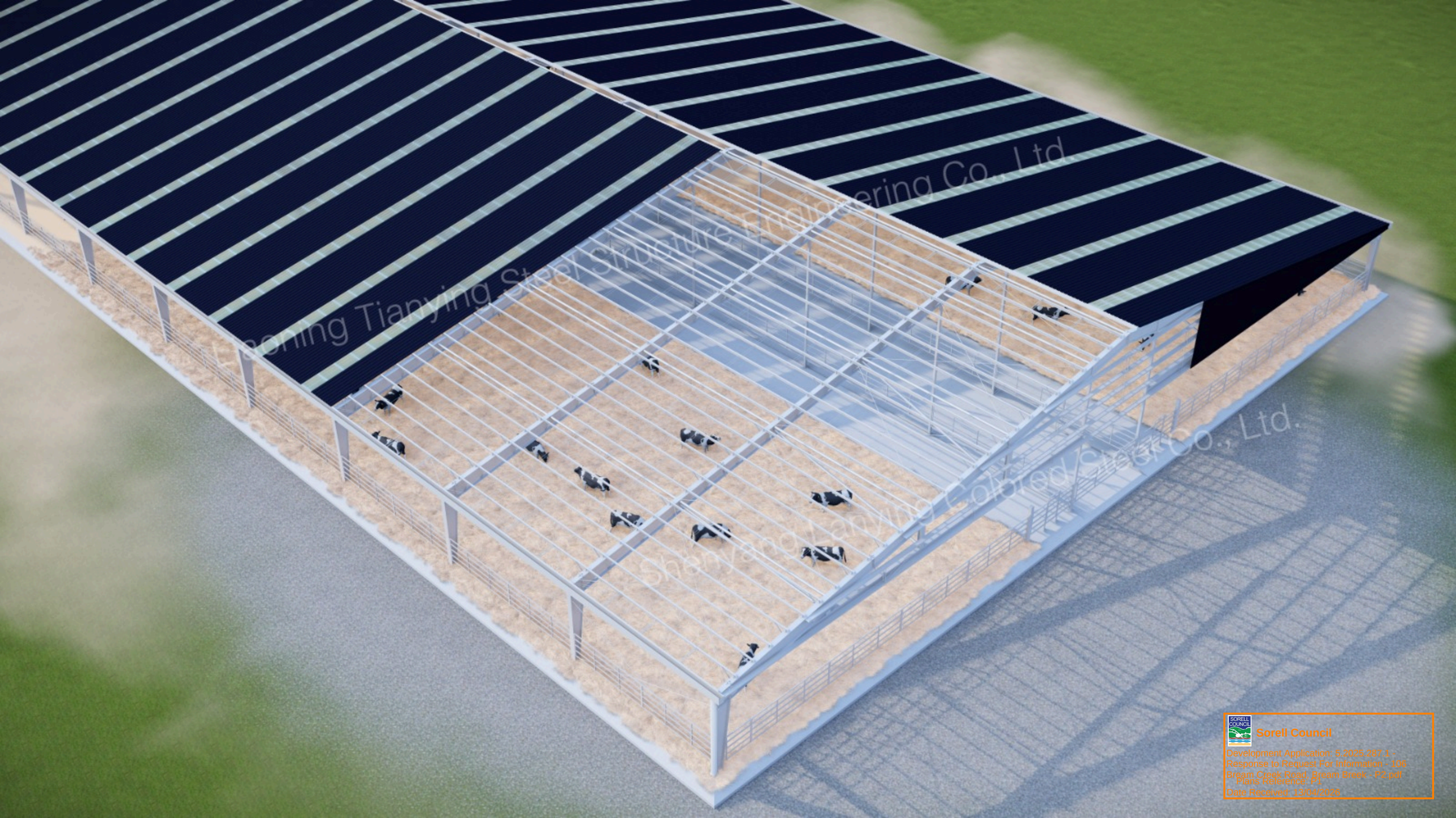


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Plans Reference: P2
Date Received: 13/04/2026

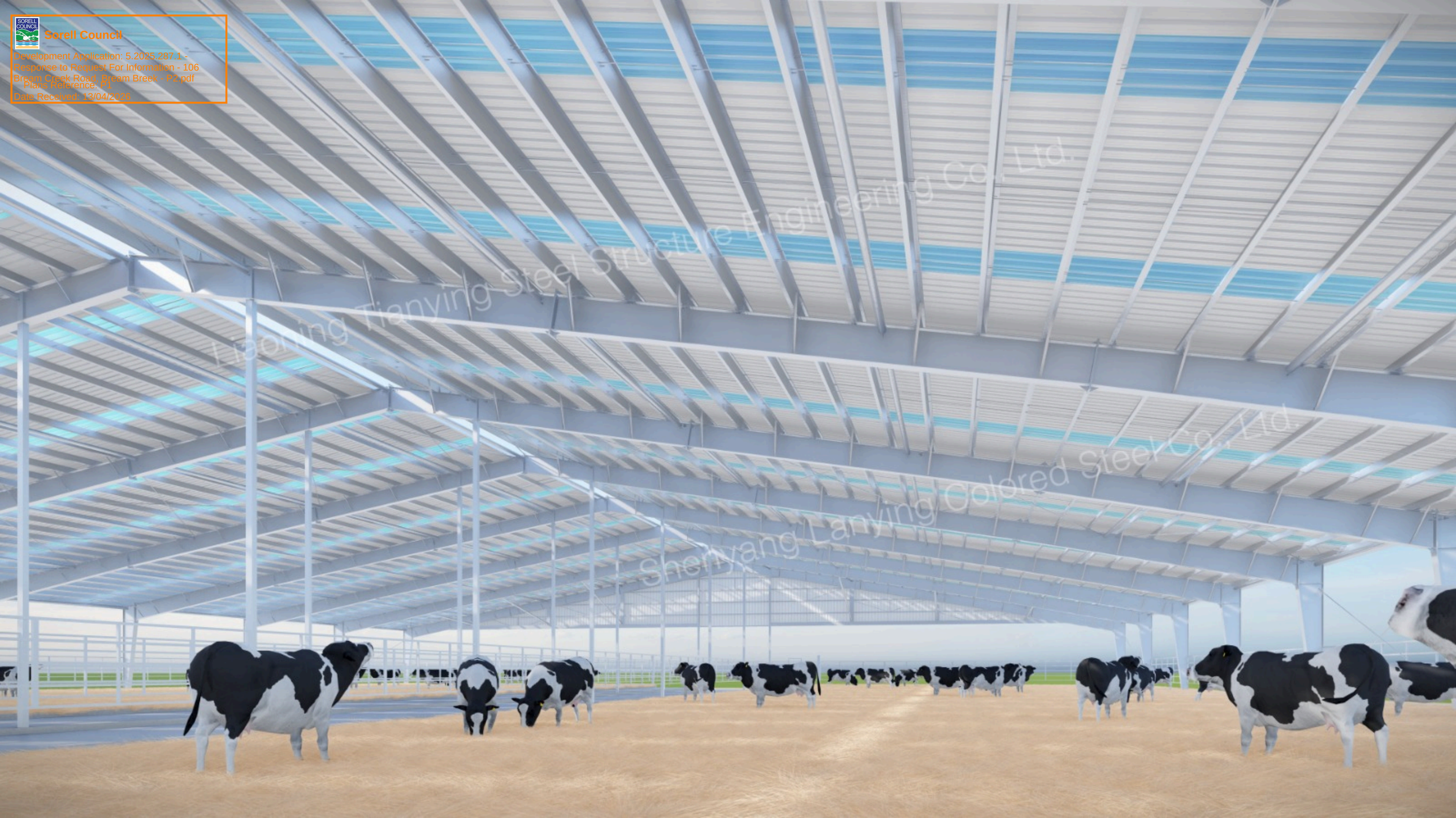


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Sorell Council
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Sorell Council
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Plans Reference: P2
Date Received: 13/04/2026



ASIC
Australian Securities & Investments Commission

ABN 86 768 265 615

14-22 Grey Street, Traralgon
PO Box 4000
Gippsland Mail Centre VIC 3841

Customer enquiries: 1300 300 630
Facsimile: (03) 5177 3999
ASIC Homepage: www.asic.gov.au

Receipt Number: 9000090910654976000

Payment Details:

Date:	16/10/2025
Amount:	$30.00
Payment type:	Credit Card
Type of card:	Visa

Description	Amount
CHUBCAK PTY. LTD. ACN 605 913 255	
Current company information	10.00
Subtotal	10.00
J.M. BIGNELL PTY. LTD. ACN 009 525 811	
Current company information	10.00
Subtotal	10.00
STROUD PTY. LIMITED ACN 009 537 884	
Current company information	10.00
Subtotal	10.00
Payment Total (AUD):	30.00

Not subject to GST- Treasurer's Determination 2000 (Exempt Taxes, Fees and Charges).

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ASIC
Australian Securities & Investments Commission

Current Company Extract

Name: CHUBCAK PTY. LTD.
ACN: 605 913 255

Date/Time: 16 October 2025 AEST 01:37:05 PM

This extract contains information derived from the Australian Securities and Investments Commission's (ASIC) database under section 1274A of the Corporations Act 2001.

Please advise ASIC of any error or omission which you may identify.

EXTRACT

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Date Received: 13/04/2026

Organisation Details		Document Number
Current Organisation Details		
Name:	CHUBCAK PTY. LTD.	029229907
ACN:	605 913 255	
Registered in:	Tasmania	
Registration date:	29/05/2015	
Next review date:	29/05/2026	
Name start date:	29/05/2015	
Status:	Registered	
Company type:	Australian Proprietary Company	
Class:	Limited By Shares	
Subclass:	Proprietary Company	

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Date Received: 13/04/2026

Address Details		Document Number
Current		
Registered address:	JOHN N WILLIAMS PTY LTD, 'Avalon', 436 Elizabeth Street, NORTH HOBART TAS 7000	3EMK55328
Start date:	03/11/2022	
Principal Place Of Business address:	'STROUD', 198 Burnt Hill Road, BREAM CREEK TAS 7175	029229907
Start date:	29/05/2015	

Contact Address	
Section 146A of the Corporations Act 2001 states 'A contact address is the address to which communications and notices are sent from ASIC to the company'.	
Current	
Address:	PO BOX 448, NORTH HOBART TAS 7002
Start date:	23/02/2016

Officeholders and Other Roles		Document Number
Director		
Name:	CHARLES MACMICHAEL BIGNELL	6EJJO0589
Address:	'Stroud', 198 Burnt Hill Road, BREAM CREEK TAS 7175	
Born:	19/09/1966, HOBART, TAS	
Appointment date:	29/05/2015	
Name:	RICHARD ARCHER BIGNELL	6EJJO0589
Address:	143 Bream Creek Road, BREAM CREEK TAS 7175	
Born:	18/11/1967, HOBART, TAS	
Appointment date:	29/05/2015	
Secretary		
Name:	RICHARD ARCHER BIGNELL	6EJJO0589
Address:	143 Bream Creek Road, BREAM CREEK TAS 7175	
Born:	18/11/1967, HOBART, TAS	
Appointment date:	29/05/2015	

Share Information

Share Structure

Class	Description	Number issued	Total amount paid	Total amount unpaid	Document number
ORD	ORDINARY SHARES	2	2.00	0.00	029229907

Members

Note: For each class of shares issued by a proprietary company, ASIC records the details of the top twenty members of the class (based on shareholdings). The details of any other members holding the same number of shares as the twentieth ranked member will also be recorded by ASIC on the database. Where available, historical records show that a member has ceased to be ranked amongst the top twenty members. This may, but does not necessarily mean, that they have ceased to be a member of the company.

Name: RICHARD ARCHER BIGNELL
Address: 143 Bream Creek Road, BREAM CREEK TAS 7175

Sorell Council
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Plans Reference: P1
Date Received: 13/04/2026

Class	Number held	Beneficially held	Paid	Document number
ORD	1	yes	FULLY	6EJJO0589

Name: CHARLES MACMICHAEL BIGNELL
Address: 'Stroud', 198 Burnt Hill Road, BREAM CREEK TAS 7175

Class	Number held	Beneficially held	Paid	Document number
ORD	1	yes	FULLY	6EJJO0589

Documents

Note: Where no Date Processed is shown, the document in question has not been processed. In these instances care should be taken in using information that may be updated by the document when it is processed. Where the Date Processed is shown but there is a zero under No Pages, the document has been processed but a copy is not yet available.

Date received	Form type	Date processed	Number of pages	Effective date	Document number
27/10/2022	484B Change To Company Details Change Of Registered Address	27/10/2022	2	11/10/2022	3EMK55328
23/05/2025	484 Change To Company Details 484A1 Change Officeholder Name Or Address 484A2 Change Member Name Or	23/05/2025	3	23/05/2025	6EJJO0589

	Address				

End of Extract of 3 Pages

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Plans Reference: P1
Date Received: 13/04/2026

ASIC
Australian Securities & Investments Commission

Current Company Extract

Name: STROUD PTY. LIMITED
ACN: 009 537 884

Date/Time: 16 October 2025 AEST 01:37:05 PM

This extract contains information derived from the Australian Securities and Investments Commission's (ASIC) database under section 1274A of the Corporations Act 2001.

Please advise ASIC of any error or omission which you may identify.

EXTRACT

Sorell Council
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Plans Reference: P1
Date Received: 13/04/2026

Organisation Details		Document Number
Current Organisation Details		
Name:	STROUD PTY. LIMITED	00953788B
ACN:	009 537 884	
Registered in:	Tasmania	
Registration date:	29/06/1982	
Next review date:	29/06/2026	
Name start date:	UNKNOWN	
Previous state number:	17781	
Status:	Registered	
Company type:	Australian Proprietary Company	
Class:	Limited By Shares	
Subclass:	Proprietary Company	

Sorell Council
Development Application: 5.2025.287.1 - Response to Request For Information - 106 Bream Creek Road, Bream Breek - P2.pdf
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Address Details		Document Number
Current		
Registered address:	JOHN N WILLIAMS PTY LTD, 'Avalon', 436 Elizabeth Street, NORTH HOBART TAS 7000	3EMK55326
Start date:	03/11/2022	
Principal Place Of Business address:	'Stroud', 198 Burnt Hill Road, BREAM CREEK TAS 7175	6EJJO0587
Start date:	23/05/2025	

Contact Address	
Section 146A of the Corporations Act 2001 states 'A contact address is the address to which communications and notices are sent from ASIC to the company'.	
Current	
Address:	PO BOX 448, NORTH HOBART TAS 7002
Start date:	29/10/2012

Officeholders and Other Roles		Document Number
Director		
Name:	CHARLES MACMICHAEL BIGNELL	6EJJO0587
Address:	'Stroud', 198 Burnt Hill Road, BREAM CREEK TAS 7175	
Born:	19/09/1960, HOBART, TAS	
Appointment date:	25/07/1991	
Name:	JOHN MACMICHAEL BIGNELL	6EJJO0587
Address:	184 Marion Bay Road, BREAM CREEK TAS 7175	
Born:	11/04/1937, HOBART, TAS	
Appointment date:	29/06/1982	
Name:	KAYE ELIZABETH BIGNELL	6EJJO0587
Address:	184 Marion Bay Road, BREAM CREEK TAS 7175	
Born:	26/02/1942, HOBART, TAS	
Appointment date:	29/06/1982	
Name:	RICHARD ARCHER BIGNELL	6EJJO0587

Address:	143 Bream Creek Road, BREAM CREEK TAS 7175	
Born:	18/12/1967, HOBART, TAS	
Appointment date:	25/07/1991	

Secretary

Name:	KAYE ELIZABETH BIGNELL	6EJJO0587
Address:	184 Marion Bay Road, BREAM CREEK TAS 7175	
Born:	26/02/1942, HOBART, TAS	
Appointment date:	29/06/1982	

Share Information

Share Structure

Class	Description	Number issued	Total amount paid	Total amount unpaid	Document number
ORD	ORDINARY SHARES	2	2.00	0.00	000978857

Members

Note: For each class of shares issued by a proprietary company, ASIC records the details of the top twenty members of the class (based on shareholdings). The details of any other members holding the same number of shares as the twentieth ranked member will also be recorded by ASIC on the database. Where available, historical records show that a member has ceased to be ranked amongst the top twenty members. This may, but does not necessarily mean, that they have ceased to be a member of the company.

Name: JOHN MACMICHAEL BIGNELL
Address: 184 Marion Bay Road, BREAM CREEK TAS 7175

Class	Number held	Beneficially held	Paid	Document number
ORD	1	yes	FULLY	6EJJO0587

Name: KAYE ELIZABETH BIGNELL
Address: 184 Marion Bay Road, BREAM CREEK TAS 7175

Class	Number held	Beneficially held	Paid	Document number
ORD	1	yes	FULLY	6EJJO0587

Documents

Note: Where no Date Processed is shown, the document in question has not been processed. In these instances care should be taken in using information that may be updated by the document when it is processed. Where the Date Processed is shown but there is a zero under No Pages, the document has been processed but a copy is not yet available.

Sorell Council
Development Application: 5.2025.287.1 - Response to Request For Information - 106 Bream Creek Road, Bream Breek - P2.pdf
Plans Reference: P1
Date Received: 13/04/2026

Date received	Form type	Date processed	Number of pages	Effective date	Document number
27/10/2022	484B Change To Company Details Change Of Registered Address	27/10/2022	2	11/10/2022	3EMK55326
23/05/2025	484 Change To Company Details 484C Change Of Principal Place Of Business (Address) 484A1 Change Officeholder Name Or Address 484A2 Change Member Name Or Address	23/05/2025	3	23/05/2025	6EJJO0587

Note: Where the expression 'Unknown' is shown, the precise date may be available from records taken over on 1 January 1991 and held by ASIC in paper or microfiche.

*****End of Extract of 3 Pages*****

Sorell Council
Development Application: 5.2025.287.1 - Response to Request For Information - 106 Bream Creek Road, Bream Breek - P2.pdf
Plans Reference: P1
Date Received: 13/04/2026

Progressive Rural Solutions
PO Box 74
Deniliquin NSW 2710
0408 577 248
admin@prsltd.com.au

Sorell Councill
PO Box 125
SORELL TAS 7172
Delivered by email: sorell.council@sorell.tas.gov.au

Your reference: 5.2025.287.1

20th April 2026

To the Receiving Officer,

RE: Development Application 106 Bream Creek Road, Bream Creek
RFI Response Environmental Health – RFI 25-011 – 25-015

Thankyou for your request for further information dated 13th November 2025 and the time to review this together late last year.

Reference is made to the above Development Application and Council's Request for Further Information (RFI) issued pursuant to Section 54 of the *Land Use Planning and Approvals Act 1993* (the Act). Following significant further work on all of the requested, items, we are now in a position to provide this information to your request.

In response, please find enclosed, under the cover of this letter, the Environmental Health information addressing RFI Items 25-011 to 25-015. The response has been prepared in a format that directly aligns with the numbering and content of the RFI to facilitate an efficient and transparent assessment.

The additional information provided has been prepared to:

- Address the specific matters raised by Council,
- Further demonstrate compliance with the applicable planning controls, including the performance-based provisions of the relevant codes, and
- Confirm that the proposal will not result in unreasonable impacts on surrounding land uses or environmental values, having regard to its agricultural context and operational characteristics.

We submit, that the enclosed information satisfactorily addresses the matters on the responded to items 25-011 to 25-015 under Section 54 of the Act and provides sufficient detail to enable Council to proceed with the assessment of the application related to these points. If however Council require any further clarification, please do not hesitate to contact myself.

Yours sincerely,

Clare Fitzpatrick

Clare Fitzpatrick | Director
Progressive Rural Solutions

Sorell Council
Development Application: 5.2025.287.1 - Response to Request For Information - 106 Bream Creek Road, Bream Creek - P3.pdf
Plans Reference: P3
Date Received: 20/04/2026

RFI-011. Demonstrate compliance with the attenuation code C9.5.1 P1 with respect to the residence opposite the dairy (115 Bream Creek Road). Compare the predicted emissions to the current emissions (noise, odour and dust) i.e. will the proposed development increase, decrease or will there be no change to the status quo.

Response: Please see attached plan and additional information below dated 10th April 2026

Context and Existing Interface

Residence R1 (115 Bream Creek Road) is located within an established agricultural setting and currently interfaces with the existing dairy operation. The dwelling and related use area is located approximately:

- 110 metres from the existing dairy,
- 170 metres from the existing effluent pond,
- 150 metres from the proposed housing shed, and
- 130 metres from the proposed effluent pond.

It is also relevant that the proposed effluent pond is located within the area of a previously approved pond associated with the existing operation (which has since been decommissioned). Accordingly, the residence is already subject to the amenity characteristics of an operating dairy and associated agricultural activities. There will be a marked reduction in the area currently used for cow traffic and loafing that creates a mud/ manure interface. Consequently, it is probable that odour amenity for Residence R1 will be improved by the proposed development.

Atténuation Code Framework (C9.5.1 P1)

The Attenuation Code is performance-based under C9.5.1 P1 and requires that development does not result in an unreasonable loss of amenity or unreasonable impacts on health and safety, having regard to:

- the operational characteristics of the activity,
- the scale and intensity of the use,
- the nature of emissions,
- existing emissions, and
- the measures implemented to avoid, mitigate or manage impacts.

This assessment therefore focuses on a comparison between the existing and proposed environment and whether the proposal results in any unreasonable change.

Odour Assessment

The residence is already located within the influence of odour associated with the existing dairy and effluent management system. The proposed development has been assessed through the Odour Management Plan and associated EIS documentation, which demonstrate that odour emissions will be managed through:

- improved effluent containment and storage systems,
- controlled manure management practices, and
- consolidation of livestock and operational activities within defined areas acting to remove a significant area currently subject to formation of a mud/manure interface.

While the proposed housing shed and effluent pond will remain within the broader receptor interface of R1, the proposal introduces improved control over odour-generating processes compared to the existing, more dispersed operational arrangement.

Accordingly, odour impacts at R1 are expected to remain comparable to existing conditions, with improved management reducing the potential for diffuse or unmanaged emissions.

Noise Assessment

- The dwelling currently experiences noise associated with routine dairy operations, including:
- livestock movement and handling,
- machinery operation, and
- general farm activities.

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The proposed development does not introduce a new or fundamentally different noise source. Rather, it consolidates and continues existing dairy activities within a defined operational area. While there may be a redistribution of activity within the site, the overall noise environment is expected to remain consistent with the existing rural setting, with no material change in the nature or intensity of noise emissions.

On this basis, noise impacts at R1 are expected to result in no material change to the existing situation.

Dust Assessment

Dust generation under existing conditions is associated with general agricultural activities, including livestock movement and vehicle access. The proposed development is expected to improve dust management by:

- concentrating livestock within controlled areas,
- reducing diffuse activity across the broader site, and
- enabling more consistent operational management practices.

Construction-phase dust will be temporary and managed through standard controls.

During operation, dust emissions are expected to be equal to or less than existing conditions, and consistent with normal agricultural practice.

Overall Assessment

The proposal does not introduce a new sensitive interface at R1 but rather modifies and consolidates an existing dairy operation within an established agricultural environment. The residence is already located within the attenuation relationship of the current dairy, and the proposed development introduces improved operational control over emissions through:

- consolidation of activities,
- improved effluent and manure management, and
- application of best practice environmental controls.

Conclusion

The assessment demonstrates that the proposed development will not result in an unreasonable loss of amenity or unreasonable impacts on health and safety at Residence R1.

Relative to the existing situation:

- odour impacts are expected to remain comparable,
- noise impacts are expected to result in no material change, and
- dust impacts are expected to be comparable or reduced.

Accordingly, it is submitted that the proposed development satisfies the requirements of Clause C9.5.1 P1 in relation to the dwelling at 115 Bream Creek Road.

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PROGRESSIVE RURAL SOLUTIONS

Project Details:

J373 - Stroud Dairies

Progressive Rural Solutions Pty Ltd
ABN: 58 63646 825 PO Box 74,
DENILIQUIN, NSW 2710
Email: admin@prsltd
Phone:0408577248

Date: 01/04/2026
Client: Stroud Dairies
Property: Bream Creek
Plan Type: Receptor Plan
Plan Description: Receptor 1 Distances

Sorell Council
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Date Received: 20/04/2026

RFI 25-012. How do the attenuation distances to neighbouring residential properties compare to similar enclosed housing systems in other states.
Response:

Interstate Comparison of Separation Distances
In considering how the proposed separation distances compare with similar systems in other Australian jurisdictions, it is relevant that contemporary assessment frameworks for dairy housing, feedpad and contained livestock systems are typically not based solely on fixed separation distances. In jurisdictions such as Victoria and New South Wales, separation distances are typically applied as an initial screening tool, but are not determinative of acceptability. These frameworks increasingly adopt a risk-based and performance-oriented approach, which places emphasis on:

- the nature and scale of the activity,
- site layout and operational characteristics,
- prevailing climatic and topographic conditions, and
- the implementation of management and mitigation measures.

In particular, separation distances are generally measured from the boundary of the core operational footprint of the facility and do not extend to broader effluent or nutrient reuse areas, which are managed through separate agronomic and environmental controls.

Nature of the Proposed System
The proposed development comprises an open-sided, naturally ventilated dairy housing system, consistent with standard Australian practice, rather than a fully enclosed intensive animal facility (poultry/piggery). As such, emissions are characteristic of typical dairy operations and are subject to natural dispersion, which differs from enclosed systems where emissions may be mechanically ventilated and concentrated.

Application to the Proposed Development
A review of attenuation distances for the proposed development has been undertaken and is documented in the re-submitted plans (see separate RFI response - Planning) and supporting assessments. Where default attenuation distances are achieved, the proposal aligns with the acceptable solution. Where distances are not strictly met, the proposal has been assessed under the performance-based pathway of Clause C9.5.1 P1.

The assessment of potential impacts, including odour, noise and dust, has been undertaken through the Environmental Impact Statement, Odour Management Plan and Effluent Management Plan. These assessments demonstrate that emissions are effectively managed through:

- consolidation of operational activities,
- improved effluent and manure management systems, and
- implementation of best practice operational controls.

Established Receptor Context
The site is located within an established agricultural landscape, where surrounding receptors already exist in the context of an operating dairy and associated farming activities. In many instances, separation distances between receptors and operational areas remain consistent with, or similar to, the existing situation, and the proposal does not introduce a new or incompatible interface.

Conclusion
Contemporary practice across Australian jurisdictions demonstrates that separation distances are appropriately considered within a broader, performance-based assessment framework rather than as fixed or absolute criteria. The proposed development has been assessed in accordance with this approach, having regard to site-specific conditions, existing receptor relationships and the implementation of mitigation measures.

Accordingly, it is submitted that the separation distances, together with the design and operational controls proposed, are consistent with accepted interstate practice and are sufficient to ensure that amenity impacts remain acceptable and do not result in an unreasonable loss of amenity.

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RFI 25-013. Provide details on how dairy effluent irrigation water will be managed to prevent run-off or spray drift onto neighbouring properties, roads and wetlands including saltmarsh.
Response:

The proposed development has been designed such that all effluent generated within the dairy complex is captured, contained and managed within a controlled system prior to land application. As described in the Environmental Impact Statement (EIS) and South East Soil and Water's (SESW) Effluent Management Plan (EfMP), runoff from operational areas including lanes, yards and feed areas is directed to engineered collection and storage infrastructure, ensuring that uncontrolled discharge does not occur.

Land application of effluent, sludge and manure is undertaken in accordance with the EfMP, which establishes a controlled and agronomically based reuse system across the broader property.

Runoff Prevention Measures
SESW confirm that runoff risks are managed through a combination of site selection, operational controls and environmental safeguards. These measures are detailed in Section 9.2 of the EfMP and are specifically intended to address the protection of neighbouring properties, roads and environmentally sensitive receptors, including wetlands, salt marshes and watercourses. The measures include soil moisture, rainfall and wind-based triggers which the business must adhere to.

These controls are currently implemented as part of the existing operation and are supported by the current effluent management plan endorsed by the Tasmanian Dairy Industry Authority (TDIA). Effluent runoff is prevented by applying effluent to soils with a moisture deficit, allowing the soil profile to absorb applied effluent.

Sludge and manure application area runoff is prevented by ensuring materials are applied to soils below field capacity, allowing for absorption of the liquid fraction. Runoff is further mitigated by avoiding application during periods where significant rainfall is forecast, thereby preventing runoff via overland flow.

A minimum 30 metre setback is maintained from watercourses. These areas function as vegetated filter strips, capturing organic material and facilitating nutrient adsorption prior to any potential movement toward drainage lines.

Spray drift management and irrigation system design
SESW advise that the risk of spray drift is low and is managed through both operational practices and irrigation system design. Effluent is applied using controlled irrigation methods designed to minimise aerosol generation and prevent off-target movement. Application is not undertaken under high wind conditions, and equipment is operated to ensure that spray patterns remain within designated application areas.

Effluent application is further controlled through the design and operation of the irrigation infrastructure. Centre pivot irrigators are configured to:

- apply effluent separately from freshwater irrigation whereby application of liquid in undiluted form is delivered at lower trajectory heights and closer to the ground surface , or
- apply effluent at diluted rates by combining effluent injection to irrigation systems, and

This reduces the potential for aerosol formation and spray drift.

The irrigation system also allows for targeted application across defined areas of the property, enabling irrigation applications as:

- controlled effluent is application areas,
- controlled dilution rates within the system,
- exclusions of application within setback areas, and
- maintenance of required separation distances to waterways, boundaries and sensitive receptors.

Supporting site characteristics and controls
Application areas have been selected to avoid direct connectivity to waterways and incorporate minimum setback distances as described above. Soil testing results (refer Appendix I of the EfMP) confirm the presence of clay fractions with elevated cation exchange capacity, providing a strong capacity for nutrient adsorption and limiting the mobility of phosphorus and other constituents (refer also Response to RFI 25-007 – Natural Resource Management).

These site characteristics, combined with operational controls and irrigation system design, provide multiple layers of protection against runoff and off-site movement.

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Conclusion

The EfMP, as clarified by SESW, together with the system design described in the EIS, demonstrates that the risks of runoff and spray drift have been appropriately identified and mitigated.

A combination of:

- soil moisture and climatic controls,
- vegetated setbacks and buffers,
- irrigation system design, and
- operational management practices

ensures that effluent is applied in a controlled manner and retained within the soil profile.

Accordingly, it is submitted that off-site impacts on neighbouring properties, roads and environmentally sensitive areas, including wetlands and saltmarsh, are unlikely to occur.

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PROGRESSIVE RURAL SOLUTIONS

Prepared by:
Progressive Rural Solutions Pty Ltd
ABN: 58 63646 825
PO Box 74, DENILIQUIN, NSW 2710
Email: admin@prsltd.com.au
Phone: 0408577248

Project Details:

J373 - Stroud Dairies - Loose Housing Development

Date:	01/04/2026
Client:	Stroud Dairies
Property:	Bream Creek
Project:	Loose Housing
Plan type:	Site Plan
Plan Description:	Effluent Application Plan

0 0.5 1 km

Sorell Council
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RFI 25-014. Provide a copy of the Environmental Impact Statement (EIS) peer review completed by Scott MacDonald of the Victoria Department of Agriculture, referred to in clause 4.6 of the EIS.

Response: Please note that the Peer review has been undertaken by Mr Scott McDonald through TDIA. The EIS noted that "*It is understood that this application will also be referred to Mr McDonald for a complete review and comment from TDIA*".

Attached is the emailed response from Scott McDonald.

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Outlook

FW: OFFICIAL: RE: Contained Housing Document

From Scott A McDonald (DEECA) <Scott.McDonald@agriculture.vic.gov.au>
Date Thu 2026-02-19 09:32
To Clare Fitzpatrick | Progressive Rural Solutions <clare@prsltd.com.au>

Clare FYI commentary to TDIA

Scott McDonald

Program Manager & Dairy Development Specialist | Dairy Services
Biosecurity and Agriculture Services | Agriculture Victoria | Department of Energy, Environment and Climate Action

Cnr Annesley St & Ogilvie Ave (PO Box 441) Echuca Victoria 3564
M: 0438 227779 | **E**: scott.mcdonald@agriculture.vic.gov.au

Sorell Council
Development Application: 5.2025.287.1 - Response to Request For Information - 106 Bream Creek Road, Bream Creek - P3.pdf
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Date Received: 20/04/2026

OFFICIAL

From: Scott A McDonald (DEECA)
Sent: Tuesday, 16 December 2025 11:14 AM
To: 'Dick, Nathan' <Nathan.Dick@nre.tas.gov.au>; Rachael A Campbell (DEECA) <Rachael.Campbell@agriculture.vic.gov.au>
Cc: Parker, Kate <Kate.Parker@nre.tas.gov.au>
Subject: RE: OFFICIAL: RE: Contained Housing Document

Nathan sorry for delay, that time of year
The Effluent Management Plan for Stroud Dairies developed by Christian Bannan is of the standards we would expect for these intensive dairy systems, with a lot more rigour, attention to detail and a stronger focus on site specific requirements.
A few observations:

- The additional guidelines and current resources used in preparation of the plan provides reassurance, that this development meets industry best practices and adopts key learnings from other states, who have successfully navigated these intensive developments through the planning scheme.
- The consideration and incorporation of the cheese production facility into the Effluent Plan, is logical and well researched accounting for the extra nutrient loading and application to land requirements.
- The utilisation of existing effluent components (ie Trafficable Solids Trap, effluent pond, screw press) and modifications to add additional infrastructure to support the collection, storage and application of effluent and manure has been carefully considered taking into account environmental variables.
- The assumption around facility water consumption, manure generation and nutrient uptake through agronomic use is consistent with similar intensive systems across the mainland, whilst considering location specific climate.
- The inclusion of extra effluent point sources such as feedpad, laneways, calf rearing facility into the plan compliments the effluent system design and management.
- The toolkit recommends potentially 8 months storage, however the designer has carefully weighted up extra earthworks and a larger storage pond across a larger footprint, with a strategic irrigation and application program, that counteracts any concerns. This is a legitimate use of the toolkit, with a focus on nutrient utilisation and fodder production to support the Loose housing facility.
- The Effluent Plan has considered the bedding material as an additional source of generated manure, which is an expectation of these intensive developments, along with an increased emphasis on potential odour. (Noting; Loose Housing Composted Bedding Pack Barns are typically not known as odour sources, due to the careful management and regular aeration of the bedding pack and extended spacing per cow).
- The additional supporting documentation (geotechnical investigations, nutrient budgets, proposed site plans, site layout plans, site construction plans) shows due diligence and considered planning.

With intensive dairy systems (as opposed to a typical grazing farm), there is an expectation that to navigate state planning Effluent Management Plans completed by a professional service provider, should be supported by an Environmental Impact Statement (EIS), which provides further context and more comprehensive environmental planning. Clare Fitzpatrick has forwarded these documents, which compliments and synchronises with the Effluent Management Plan.

The technical team used by the Bignell family (Christian Bannan, Clare Fitzpatrick, Neil Carmichael, Ian Lean) to support this development are well known throughout the industry and have a reputation for delivering quality documentation, expertise and experience.
It was reassuring they have engaged professionals to set the standards and expectations of these new emerging dairy systems. The documents presented for Stroud Dairies is consistent with intensive dairy systems, currently fully operational in Victoria having successfully navigated both state planning and regulatory requirements.

Happy to clarify any concerns or further discuss this proposal
regards

Scott McDonald

Program Manager & Dairy Development Specialist | Dairy Services
Biosecurity and Agriculture Services | Agriculture Victoria | Department of Energy, Environment and Climate Action

Cnr Annesley St & Ogilvie Ave (PO Box 441) Echuca Victoria 3564
M: 0438 227779 | **E**: scott.mcdonald@agriculture.vic.gov.au

---

From: Dick, Nathan <Nathan.Dick@nre.tas.gov.au>
Sent: Thursday, 27 November 2025 3:13 PM
To: Scott A McDonald (DEECA) <Scott.McDonald@agriculture.vic.gov.au>; Rachael A Campbell (DEECA) <Rachael.Campbell@agriculture.vic.gov.au>
Cc: Parker, Kate <Kate.Parker@nre.tas.gov.au>
Subject: RE: OFFICIAL: RE: Contained Housing Document

EXTERNAL SENDER: Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi Scott

Hope you had a great break.

Attached is the EMP, I haven't included the rest of the EIS as there is a significant number of pages associated with this. If you need anything else reach out and we can send through.

Thanks again for your knowledge and expertise in this area as the TDIA continues to build its capability.

Kind regards,
Nathan

From: Scott A McDonald (DEECA) <Scott.McDonald@agriculture.vic.gov.au>
Sent: Tuesday, 25 November 2025 3:33 PM
To: Rachael A Campbell (DEECA) <Rachael.Campbell@agriculture.vic.gov.au>; Dick, Nathan <Nathan.Dick@nre.tas.gov.au>
Cc: Parker, Kate <Kate.Parker@nre.tas.gov.au>
Subject: RE: OFFICIAL: RE: Contained Housing Document

Thanks Nathan, yes, I am more than happy to review the documentation. I have had several conversations with Clare Fitzpatrick so was expecting it to arrive soon. We have visited the farm and familiar with site and area.
Please send through once you receive and my team and I will make time to review and advise.
cheers

Scott McDonald

Program Manager & Dairy Development Specialist | Dairy Services
Biosecurity and Agriculture Services | Agriculture Victoria | Department of Energy, Environment and Climate Action

Cnr Annesley St & Ogilvie Ave (PO Box 441) Echuca Victoria 3564
M: 0438 227779 | **E**: scott.mcdonald@agriculture.vic.gov.au

Sorell Council
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Date Received: 20/04/2026

OFFICIAL

From: Rachael A Campbell (DEECA) <rachael.campbell@agriculture.vic.gov.au>
Sent: Thursday, 13 November 2025 8:44 AM
To: Dick, Nathan <Nathan.Dick@nre.tas.gov.au>; Scott A McDonald (DEECA) <Scott.McDonald@agriculture.vic.gov.au>
Cc: Parker, Kate <Kate.Parker@nre.tas.gov.au>
Subject: OFFICIAL: RE: Contained Housing Document

Hi Nathan,

Good to hear from you.

As you will have seen from Scott's out of office email, he's taking some well deserved leave, returning 24th November.

It's best for him to respond directly to your request, so we'll let him know that your email is sitting there waiting for his response.

Cheers
Rachael Campbell
Dairy Industry Development Officer | Biosecurity and Agriculture Services
Agriculture Victoria | Department of Energy, Environment and Climate Action

402-406 Mair Street, Ballarat, Victoria 3350.
M: 0447 347 162 **E**: rachael.campbell@agriculture.vic.gov.au

Work Days: Monday, Tuesday, Wednesday & Thursday

We work flexibly at DEECA. I am sending this message now because it suits me. I don't expect you to read, respond or action outside your working hours.

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deeca.vic.gov.au

We acknowledge Victorian Traditional Owners and their Elders past and present as the original custodians of Victoria's land and waters and commit to genuinely partnering with them and Victoria's Aboriginal community to progress their aspirations.

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If you would prefer not to be contacted for evaluation or future events or do not consent to be on the Agriculture Services contact database, please reply to this email with a statement to that effect and we will ensure your wishes are adhered to.

Sorell Council
Development Application: 5.2025.287.1 - Response to Request For Information - 106 Bream Creek Road, Bream Creek - P3.pdf
Plans Reference: P3
Date Received: 20/04/2026

OFFICIAL

From: Dick, Nathan <Nathan.Dick@nre.tas.gov.au>
Sent: Wednesday, November 12, 2025 4:00 PM
To: Scott A McDonald (DEECA) <scott.mcdonald@agriculture.vic.gov.au>
Cc: Rachael A Campbell (DEECA) <rachael.campbell@agriculture.vic.gov.au>; Parker, Kate <Kate.Parker@nre.tas.gov.au>
Subject: Contained Housing Document

EXTERNAL SENDER: Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi Scott and Rachel

We have received the EIS for contained housing system at Bream Creek, Sorrel – it has been submitted to council for approval. This is the site I believe you visited when down in Tasmania.

We are awaiting the updated EMP for the dairy and the contained housing.

I know Carolyn has spoken with you regarding the potential for Ag Vic to review in conjunction with the TDIA.

Just want to confirm this offer is still open, pending no doubt your busy schedule?

Kind regards,

Nathan Dick
Senior Dairy Food Safety Officer | Tasmanian Dairy Industry Authority
M: 0457 102 835
www.tdia.tas.gov.au
Days of work – Tuesday, Wednesday, Thursday, Friday

TDIA Tasmanian Dairy Industry Authority *"Ensuring Dairy Food Safety"*

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RFI 25-015. On average how many litres of dairy effluent are predicted to be produced each day that will discharge into the effluent ponds?

Response:
South East Soil and Water (SESW) as Author of the Effluent Management Plan (EfMP) confirm that the total daily effluent generation from the dairy complex is approximately 117,818 litres per day, as detailed in Section 7 of the EfMP. This represents the volume of manure, urine and washdown water collected from concreted and controlled drainage areas and directed to the effluent management system.

Components of Pond Flow
For clarity, the primary contributors to pond inflow are summarised below.

Source	Approximate Volume	Description
Dairy effluent	117,818 L/day	Manure, urine and washdown water collected from yard, feed and dairy areas
Recycle effluent	160,000L/day	Recycled 'green water' from pond 2/3 used for housing and laneway floodwash system.
Rainfall (controlled areas)	Variable (climate dependent)	Rainfall captured from concreted and drained operational areas and directed to the pond system
Total inflow to pond system (net)	117,818 + rainfall contribution	Recycled water excluded from net generation

Recycled water and Internal recirculation
Recycled floodwash water, estimated at approximately 160,000 litres per day, is derived from the pond system and reused within the dairy operations. This volume does not represent an additional inflow to the pond system, but rather internal recirculation.

Rainfall contribution
The EfMP also acknowledges that rainfall contributes to inflows via controlled drainage areas associated with the dairy complex. These areas are designed to capture and direct runoff to the pond system, ensuring that uncontrolled discharge does not occur. The contribution from rainfall is variable and is accounted for in the overall storage and management capacity of the system.

Confirmation of adopted design
SESW advise that an earlier value of 119,961 litres per day referenced in Section 8.2.3 of the EfMP relates to a superseded draft calculation and does not reflect the final adopted design basis. The corrected value of 117,818 litres per day, as presented in Section 7 of the EfMP, represents the appropriate daily effluent generation rate.

Importantly, this discrepancy does not affect the adequacy of the proposed infrastructure. The effluent management system, including sump and storage capacity, has been designed using conservative assumptions and retains sufficient capacity to accommodate both operational inflows and rainfall contributions.

System function and capacity
The effluent system is designed to:

- capture all effluent generated from operational areas,
- contain and store inflows within the pond system, and
- manage reuse of effluent in accordance with the EfMP.

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The design ensures that inflows are appropriately managed within the available storage capacity and that no uncontrolled overflow occurs.

Conclusion
The average daily volume of dairy effluent directed to the pond system is approximately 117,818 litres per day, with additional variable contributions from rainfall. This volume has been appropriately quantified and incorporated into the design of the effluent management system, which has sufficient capacity to manage these inflows in a controlled manner.

In this regard, the proposed system does not constitute a wastewater treatment works involving the discharge

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Your reference: 5.2025.287.1

20th April 2026

To the Receiving Officer,

RE: Development Application 106 Bream Creek Road, Bream Creek
RFI Response Environmental Health – RFI 25-010 – Environmental Protection Agency (EPA)

Thankyou for your request for further information dated 13th November 2025 and the time to review this together late last year.

Reference is made to the above Development Application and Council's Request for Further Information (RFI) issued pursuant to Section 54 of the *Land Use Planning and Approvals Act 1993* (the Act). Following significant further work on all of the requested, items, we are now in a position to provide this information to your request.

In response, please find enclosed, under the cover of this letter, the Environmental Protection Agency (EPA) information addressing RFI Items 25-016 and 25-017. The response has been prepared in a format that directly aligns with the numbering and content of the RFI to facilitate an efficient and transparent assessment.

The additional information provided has been prepared to:

- Address the specific matters raised by Council,
- Further demonstrate compliance with the applicable planning controls, including the performance-based provisions of the relevant codes, and
- Confirm that the proposal will not result in unreasonable impacts on surrounding land uses or environmental values, having regard to its agricultural context and operational characteristics.

We submit, that the enclosed information satisfactorily addresses the matters on the responded to items 25-016 and 25-017 under Section 54 of the Act and provides sufficient detail to enable Council to proceed with the assessment of the application related to these points. If however Council require any further clarification, please do not hesitate to contact myself.

Yours sincerely,

Clare Fitzpatrick

Clare Fitzpatrick | Director
Progressive Rural Solutions

Sorell Council
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25-016 Schedule 2 of EMPCA defines 'Wastewater Treatment Works' as:
"Wastewater Treatment Works: the conduct of wastewater treatment works that involve the discharge of treated or untreated sewage, septic tank effluent or industrial or commercial wastewater to land or water, being works with a design capacity to treat an average dry-weather flow of 100 kilolitres or more per day of sewage or wastewater. "

Noting the figures given for daily water use for effluent in Table 2-8 of the lodged EIS (Summary of daily washdown and cleaning water use (Source SESW EfMP Table 8 & 9)), clarify whether the proposal involves a wastewater system (which may include ponds and/or more active treatment) that meets this definition.

Response:

Effluent volumes and system inputs
South East Soil and Water (SESW) as the Author of the Effluent Management Plan (EfMP) confirm that the total daily effluent generation is calculated at approximately 117,818 litres per day, as detailed in Section 7 of the EfMP. Recycled floodwash using pond effluent is proposed at approximately 160,000 litres per day. This recycled volume represents reuse of stored pond water and does not constitute an additional net inflow to the effluent system.

In addition to effluent generation, the pond system also receives inflows from rainfall and controlled drainage areas associated with the dairy complex. These inflows have been accounted for in the EfMP and are incorporated into the overall storage design capacity.

Tabe 1 - Daily Effluent and Inflow Volumes to Pond System

Source	Approximate Volume	Description
Dairy effluent	117,818 L/day	Manure, urine and washdown water collected from yard, feed and dairy areas
Recycled effluent	160,000 L/day	Recycled 'green water' from pond 2/3 used for housing and laneway floodwash system.
Rainfall (controlled areas)	Variable (climate dependent)	Rainfall captured from concreted and drained operational areas and directed to the pond system
Total inflow to pond system (net)	117,818 + rainfall contribution	Recycled water excluded from net generation

The volume referenced in Section 8.2.3 of the EfMP (119,961 litres per day) relates to a superseded draft calculation and does not reflect the final adopted design basis. SESW advise that this discrepancy does not affect the adequacy of the proposed infrastructure, with the system designed on conservative assumptions and incorporating an appropriate margin of safety.

Legislated definition and interpretation
Schedule 2 of EMPCA defines Level 2 activities to include wastewater treatment works involving the treatment or disposal of sewage, industrial or commercial wastewater above specified thresholds. In interpreting this provision, it is relevant to consider

- the nature of the wastewater,
- whether the activity constitutes "treatment" in the regulatory sense, and
- whether there is a discharge of treated or untreated wastewater to land or waters.

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Nature of the Effluent
The effluent generated by the proposed development is derived from agricultural activities, comprising manure, urine and washdown water associated with dairy operations. This material is generated as part of a primary production activity and is managed as an organic nutrient resource within an agricultural system. It is therefore distinct from industrial or commercial wastewater streams typically associated with processing, manufacturing or municipal systems.

Function of the Effluent Management System
The proposed effluent system is designed to capture, store and manage effluent for reuse within the agricultural production cycle, where nutrients are reclaimed and applied to land in accordance with agronomic requirements.

The purpose of the system is not to produce a treated effluent stream for discharge to waterways or for reuse as a classified water product (such as Class A–C recycled water). Rather, the system functions as part of an integrated nutrient management cycle, where effluent is retained within the farming system and beneficially reused.

While the system incorporates storage and natural biological processes within ponds, it is not designed or operated as a wastewater treatment plant for the purpose of producing a treated discharge stream, but instead operates as a containment and reuse system consistent with standard dairy effluent management practice.

Industry and Regulatory Context

It is also relevant to note that dairy effluent systems in Tasmania are subject to established industry frameworks, including guidance, assessment criteria and codes of practice administered through the dairy industry, including the Tasmanian Dairy Industry Authority (TDIA).

Dairy operations in Tasmania are further subject to a well-established regulatory and industry framework, including applicable legislation, codes of practice and licensing arrangements governing dairy operation and effluent management. These frameworks set out requirements for the design, operation and ongoing management of effluent systems to ensure environmental protection and sustainable nutrient reuse.

The Effluent Management Plan (EfMP) has been prepared in accordance with these frameworks and reflects current accepted practice for dairy effluent management in Tasmania. This further supports the characterisation of the proposed system as an agricultural effluent reuse system, rather than a wastewater treatment works for the purposes of Schedule 2 of EMPCA.

Discharge Consideration

A key characteristic of wastewater treatment works under Schedule 2 is the discharge of treated or untreated wastewater to land or waters. In this instance, effluent is not discharged to receiving waters, there is no release of treated effluent off-site, and land application occurs of treated effluent off-site, and land application occurs as part of a controlled and agronomically based nutrient reuse system in accordance with the EfMP.

This form of land application is consistent with standard agricultural practice and is distinct from disposal or discharge in the regulatory sense.

Conclusion

Having regard to the nature of the effluent, the function of the system, and the absence of discharge to land or waters in the context of wastewater disposal, it is submitted that the proposed development does not meet the definition of a wastewater treatment works as contemplated under Schedule 2 of EMPCA.

Accordingly, the proposal is not considered to trigger classification as a Scheduled (Level 2) Activity.

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Date Received: 20/04/2026

25-017 In Tasmania, odour from regulated activities is measured using 'odour units', as at the boundary of the property on which an activity occurs, in accordance with the Environment Protection Policy (Air Quality) 2004 (Environment Protection Policy (Air Quality) 2004 | EPA Tasmania). Clarify how the odour assessment methodology/results provided in Appendix 9 to the EIS in the application correlate with the requirements of the Environment Protection Policy (Air Quality) 2004.

The odour assessment presented in Appendix 9 of the Environmental Impact Statement (EIS) has been undertaken using a separation distance (S-factor) methodology, which is a recognised risk-based approach for assessing odour from intensive livestock industries across Australia. This response clarifies how the adopted methodology aligns with the requirements of the *Environment Protection Policy (Air Quality) 2004 (EPP Air)*, which requires that odour emissions be considered at the boundary of the land on which the activity occurs and that those emissions do not give rise to environmental nuisance.

Legislative and Policy Framework

Under the *Environmental Management and Pollution Control Act 1994*, odour is regulated as an environmental nuisance, being an emission that unreasonably interferes with the enjoyment of the environment. The EPP Air establishes an outcome-based framework and does not prescribe a specific assessment methodology, require dispersion modelling, or mandate compliance with a numerical odour unit criterion. While odour units (OU) are used by the EPA in certain assessment contexts, particularly for dispersion modelling, they are not explicitly prescribed as a mandatory assessment method. In this context, the appropriateness of an assessment methodology is determined by its ability to demonstrate that odour emissions will not result in environmental nuisance at the property boundary or at surrounding sensitive receptors.

Additional Context – Scheduled Activities

The *Environmental Management and Pollution Control Act 1994* defines activities requiring detailed environmental assessment as Level 2 (Scheduled) Activities. These are typically subject to formal Environmental Impact Assessment processes and commonly involve detailed modelling, including the use of odour units. The proposed development does not fall within the definition of a Scheduled Activity and is therefore not subject to the EPA Level 2 assessment framework. The level of assessment undertaken is proportionate to the regulatory classification and risk profile of the activity. It is therefore submitted that the use of odour units is not a prescribed requirement in this context.

Adopted Odour Assessment Methodology

The EIS adopts a separation distance (S-factor) methodology derived from national research and guidance, including the National Guidelines for Beef Cattle Feedlots in Australia and is consistent with those from the Poultry and Pig Industry methods. This methodology has been widely applied across Australia for intensive animal industries, including dairies, feedlots, poultry and piggeries, and has been tested through planning and environmental assessment processes, including independent expert review and tribunal consideration. Although not codified within Tasmanian legislation, the methodology is well established in practice and is recognised as a conservative and fit-for-purpose tool for assessing odour risk in agricultural settings.

Alignment with National and Interstate Practice

In the absence of a prescribed methodology within Tasmanian legislation, it is standard practice to adopt recognised national and interstate approaches. The methodology applied in this assessment is consistent with those used in other Australian jurisdictions, including New South Wales, South Australia and Victoria, where separation distance methods are routinely used as a primary assessment tool for intensive livestock developments. In these jurisdictions, detailed dispersion modelling is generally reserved for circumstances where separation distances cannot be achieved or where there is a demonstrably higher risk of odour impact. In this instance, appropriate separation distances are achieved or are equal to existing distances, and the design and operation of the facility incorporate best practice controls, supporting the suitability of the adopted approach.

Relationship to Odour Units

While the S-factor methodology does not directly quantify odour in odour units, it is based on empirical relationships between odour emission, distance and observed nuisance outcomes. The methodology incorporates conservative assumptions regarding site conditions, climatic influences and operational scenarios. It is therefore submitted that compliance with the calculated separation distances provides a conservative and reliable proxy for ensuring that odour concentrations attenuate to levels that do not cause nuisance at the boundary or at sensitive receptors. This is particularly relevant in the context of multiple nearby receptors, where the adopted separation distances provide an appropriate and conservative level of protection.

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Consideration of Sensitive Receptors

The surrounding area contains a number of rural residential and agricultural dwellings that are considered sensitive receptors. The odour assessment has explicitly accounted for these receptors through identification of their locations relative to odour-generating sources and application of appropriate separation distances and attenuation factors. The methodology has been applied conservatively to ensure that odour emissions attenuate to acceptable levels prior to reaching any receptor or the property boundary. The presence of multiple receptors has therefore been directly addressed within the assessment and has informed the overall design and layout of the development.

Definition of Activity Boundary

For the purposes of odour assessment, it is necessary to distinguish between continuous potential odour-generating infrastructure and broader agricultural land use activities. The primary odour sources associated with the development comprise the dairy yard and holding areas, the loose housing system, and the effluent ponds and solids storage areas. These represent continuous or concentrated sources and form the basis of the odour assessment. By contrast, effluent irrigation and manure or sludge application occur intermittently, are dependent on climatic and soil conditions, and are consistent with standard agricultural practice. These activities are diffuse, short-duration in nature, and are not comparable to continuous emission sources.

Across Tasmania and other Australian jurisdictions, the land application of organic materials, including dairy effluent and poultry litter, is a routine component of agricultural operations. These activities are managed through operational controls such as setbacks to waterways and boundaries, soil moisture and rainfall triggers, and nutrient application rates aligned with agronomic requirements, rather than through separation distances. In this context, it is therefore submitted that it is not appropriate to define the entire land application area as the activity boundary for the purposes of attenuation assessment. The relevant boundary is that associated with the intensive operational components of the development. It is further submitted that extending attenuation requirements to these areas would be inconsistent with established agricultural planning practice and would impose requirements not typically applied to standard farming activities.

Operational Odour Controls

In addition to the separation distances adopted, the development incorporates best practice management measures to minimise odour generation at source. These include the controlled storage of effluent within purpose-designed pond systems, regular manure management and controlled stockpiling, and the application of effluent and nutrients in accordance with soil moisture, rainfall and agronomic conditions. These measures are consistent with the Effluent Management Plan and broader industry guidelines and provide an additional level of assurance that odour impacts will be effectively managed.

Consistency with EPP (Air Quality) 2004

The assessment demonstrates that appropriate separation distances are achieved between all primary odour sources and surrounding receptors, and that odour emissions are subject to both distance-based attenuation and best practice operational controls. On this basis, odour concentrations at the property boundary and at nearby sensitive receptors are expected to remain below levels that would cause environmental nuisance.

Accordingly, it is submitted that the proposed development is consistent with the requirements of the *Environment Protection Policy (Air Quality) 2004*.

Conclusion

The odour assessment methodology adopted in the EIS is appropriate for the scale and nature of the development, consistent with national and interstate practice, and aligned with the outcome-based framework of Tasmanian legislation. It is therefore submitted that the assessment provides a robust and conservative basis to conclude that odour impacts will be acceptable at both the property boundary and surrounding sensitive receptors.

Sorell Council
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Plans Reference: P3
Date Received: 20/04/2026

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Your reference: 5.2025.287.1

5th May 2026

To the Receiving Officer,

RE: Development Application 106 Bream Creek Road, Bream Creek
RFI Response Environmental Health – RFI 25-006 – 25-009 – Natural Resource Management

Thankyou for your request for further information dated 13th November 2025 and the time to review this together late last year.

Reference is made to the above Development Application and Council's Request for Further Information (RFI) issued pursuant to Section 54 of the *Land Use Planning and Approvals Act 1993* (the Act). Following significant further work on all of the requested, items, we are now in a position to provide this information to your request.

In response, please find enclosed, under the cover of this letter, the Natural Resource Management information addressing RFI Items 25-006 to 25-009. The response has been prepared in a format that directly aligns with the numbering and content of the RFI to facilitate an efficient and transparent assessment.

The additional information provided has been prepared to:

- Address the specific matters raised by Council,
- Further demonstrate compliance with the applicable planning controls, including the performance-based provisions of the relevant codes, and
- Confirm that the proposal will not result in unreasonable impacts on surrounding land uses or environmental values, having regard to its agricultural context and operational characteristics.

We submit, that the enclosed information satisfactorily addresses the matters on the responded to items 25-006 to 25-009 under Section 54 of the Act and provides sufficient detail to enable Council to proceed with the assessment of the application related to these points. If however Council require any further clarification, please do not hesitate to contact myself.

Yours sincerely,

Clare Fitzpatrick

Clare Fitzpatrick | Director
Progressive Rural Solutions

Sorell Council
Development Application: 5.2026.287.1 - Response to Request For Information - 106 Bream Creek Road, Bream Creek - P5.pdf
Plans Reference: P4
Date Received: 04/05/2026

25-006 - Please provide a Natural Values Assessment prepared by a suitably qualified person which has been prepared with specific regard for the infilling of the tributary to the freshwater dam, piping and redirecting of said tributary, and native tree removal to facilitate the proposed loafing barn and associated works as proposed, as well as direct and indirect impact during and post development in the area.

Response: Please find attached.

25-007. Appendix I1of Effluent Management Plan for Stroud Dairies Proposed Loose Housing Barn shows number of test sites with high phosphorous Environmental Risk Index (PERI), provide evidence of mitigation measures for leaching phosphorous on to the waterways.

Response:

The PERI is used to assess the potential risk of phosphorus loss from soils based on the relationship between:

- soil phosphorus levels (Colwell P), and
- phosphorus buffering capacity (PBI).

The index is calculated as the ratio of Colwell phosphorus to PBI, with:

- values greater than 2.0 indicating elevated risk, and
- values around 0.65 indicating increasing risk where application rates should be limited to match nutrient removal.

Identification of Higher Risk Area

The EfMP identifies that the majority of the site exhibits PERI values within acceptable ranges across both irrigated and dryland areas. A single area, identified as the Sand Pivot (refer Section 9.5.6 of the EfMP), exhibits a PERI value above the preferred threshold. SESW confirm that phosphorus application to this area will be restricted until soil levels return to an acceptable range, thereby directly addressing the identified risk.

Nutrient Management Controls

Across the broader site, phosphorus application is managed through nutrient budgeting principles, as detailed in Section 9.1 of the EfMP. This approach ensures that:

- phosphorus is applied at rates matched to crop uptake, and
- accumulation of phosphorus within the soil profile is avoided.

By aligning application rates with removal, the potential for phosphorus build-up and subsequent leaching is effectively controlled.

Spatial Controls and Buffering

A minimum 30 metre setback is maintained from all watercourses (refer Section 9.2 of the EfMP). These setback areas function as vegetated buffer zones that:

- capture organic material,
- reduce overland flow velocity, and
- facilitate adsorption of phosphorus within the soil profile.

This provides a physical barrier to off-site transport of nutrients.

Soil Characteristics and Phosphorus Retention

Soil testing results (refer Appendix I of the EfMP) confirm the presence of clay subsoils with elevated cation exchange capacity (CEC). These soils:

- have a strong capacity to adsorb phosphorus, and
- significantly reduce the mobility of phosphorus within the soil profile.

This inherent soil characteristic provides an additional level of protection against leaching.

Operational Controls

Effluent, sludge and manure application is subject to strict operational controls, as detailed in Section 9.2 of the EfMP. These include:

- application only when a soil moisture deficit exists, allowing infiltration,
- avoidance of application when soils are at field capacity, and
- avoidance of application when significant rainfall is forecast.

These controls prevent runoff and minimise the risk of phosphorus transport via overland flow.

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Ongoing Agronomic Management

All nutrient application areas will be managed with ongoing agronomic support, including input from FertCare-accredited advisors. This ensures that:

- application rates,
- timing, and
- spatial distribution

are regularly reviewed and adjusted in response to soil conditions and crop requirements.

Overall Risk Assessment

The EfMP demonstrates that phosphorus risks have been:

- identified through soil testing and PERI assessment,
- spatially managed through setbacks and land application controls, and
- operationally managed through nutrient budgeting and application timing.

The presence of clay subsoils with high adsorption capacity further reduces the potential for phosphorus leaching.

Conclusion

The assessment demonstrates that phosphorus risks associated with the proposed development have been appropriately identified and mitigated through a combination of soil, spatial and operational controls. Specific management measures are in place to address the identified higher-risk area, and broader nutrient management practices ensure that phosphorus application is aligned with agronomic requirements.

Accordingly, it is submitted that the EfMP provides a robust and effective framework for managing phosphorus, and that the risk of leaching to waterways and off-site impacts is low.

Sorell Council
Development Application: 5.2026.287.1 - Response to Request For Information - 106 Bream Creek Road, Bream Creek - P5.pdf
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Date Received: 04/05/2026

25-008. Please provide weed hygiene and management plan during construction and post construction to avoid weed dispersal brought in by feed or confirm that conditions regarding weed management will be accepted.

Response:

The proposed development is located within an established agricultural landscape where weed management forms part of routine farm operations. As outlined in the Biosecurity and Biodiversity sections of the Environmental Impact Statement (EIS), the site is currently managed for agricultural production and is subject to ongoing land, pasture and environmental management practices, including weed monitoring and control.

The potential for weed introduction and spread is primarily associated with construction activities, including the movement of machinery, equipment and materials onto the site, as well as ongoing operational activities following construction.

Construction Phase
During construction, weed hygiene will be managed through standard biosecurity practices, consistent with those outlined in the EIS Biosecurity section. Machinery and equipment brought onto the site will be visually inspected and, where required, cleaned down prior to entry to minimise the risk of introducing weed material. The movement of soil and organic material will be controlled to prevent the transfer of weeds within and beyond the construction footprint.

Disturbed areas will be stabilised and revegetated as soon as practicable following construction to minimise the opportunity for weed establishment and to protect surrounding environmental values.

Post-Construction / Operational Phase
Following construction, weed management will continue as part of normal farm operations, as described in the EIS Biosecurity and Biodiversity sections. This includes ongoing monitoring of pasture and disturbed areas, and targeted control of identified weed species as required.

Livestock, fodder and bedding materials will continue to be sourced from known and reputable suppliers to minimise contamination risks, and operational practices will be managed to avoid unnecessary transfer of soil and organic material across the site.

On this basis, it is submitted that the risk of weed introduction and spread associated with both construction and ongoing operation of the development is low and can be effectively managed through established and practical control measures.

Sorell Council
Development Application: 5.2026.287.1 - Response to Request For Information - 106 Bream Creek Road, Bream Creek - P5.pdf
Plans Reference: P4
Date Received: 04/05/2026

25-009. Clarify proportion of days on yard for cows in loose housing barn is 25% as per the calculation figure in page 46 of Effluent Management Plan for Stroud Dairies Proposed Loose Housing Barn report.

Response:

As outlined in the Effluent Management Plan (EfMP) prepared by South East Soil and Water (SESW), cows are estimated to spend approximately 6 hours per day on concreted surfaces associated with milking operations and feed lanes within the dairy complex. This equates to approximately 25% of a 24-hour period. This time includes:

- milking activities within the dairy yard,
- movement through access lanes, and
- time spent at feed lanes and associated hardstand areas.

These areas are designed to capture and direct effluent to the effluent collection and storage system.

Relationship to Effluent System Design
The 25% assumption specifically represents the proportion of manure and urine deposited on hardstand surfaces that is captured within the liquid effluent system. This assumption directly informs:

- the calculation of daily effluent generation, and
- the sizing of effluent storage infrastructure, including ponds and associated systems,

as documented in the EfMP and reflected in the EIS.

Conservatism of the Assumption
The EfMP adopts a conservative approach by attributing the full 25% of time on hardstand to the effluent system. In practice, this is likely to overestimate the volume of effluent captured, as not all time on hardstand results in equivalent deposition or collection efficiency. This approach ensures that effluent infrastructure, including ponds and storage systems, is sized with an appropriate margin of safety.

Consistency with Industry Practice
The use of time-based assumptions to estimate effluent capture is consistent with established methodologies for dairy and intensive livestock operations. The adopted proportion reflects typical operational patterns for milking and feeding activities and is considered appropriate for the purposes of system design and environmental assessment.

Conclusion
The assumption that cows spend approximately 25% of the day on yarded or concreted surfaces is appropriate, clearly defined and directly linked to the design of the effluent management system.

The approach distinguishes between effluent captured within engineered infrastructure and manure managed within bedding systems and adopts a conservative basis for infrastructure sizing.

Accordingly, it is submitted that the 25% assumption provides a robust and suitable basis for estimating effluent generation and informing the design of the proposed system.

Sorell Council
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Sorell Council
Development Application: 5.2025.287.1 - Response to NRM RFI - 106 Bream Creek Road, Bream Creek P6.pdf
Plans Reference: P6
Date Received: 08/07/2026

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6th July 2026

To the Receiving Officer,

RE: Development Application 106 Bream Creek Road, Bream Creek
RFI Response Environmental Health – RFI 25-006 – 25-007 – Natural Resource Management Update

Thankyou for your response to this request for further information dated 13th May 2026. Reference is made to the response to our submission with included the following:

6. Please provide a Natural Values Assessment prepared by a suitably qualified person which has been prepared with specific regard for the infilling of the tributary to the freshwater dam, piping and redirecting of said tributary, and native tree removal to facilitate the proposed loafing barn and associated works as proposed, as well as direct and indirect impact during and post development in the area.
Not Satisfied

Due to highly modified nature of the site, the immediate vicinity of the proposed shed does not have clear delineation of the waterway. However, the property does have number of dams/ponds and vegetation along the waterways. Any high nutrient load leaching into the waterway can potentially impact the highly sensitive saltmarsh downstream. Please describe the extent of vegetation clearing and how potential phosphate and nitrate contamination to those waterbodies will be adequately managed.

7. Appendix I1of Effluent Management Plan for Stroud Dairies Proposed Loose Housing Barn shows number of test sites with high phosphorous Environmental Risk Index, provide evidence of mitigation measures for leaching phosphorous on to the waterways.
Not Satisfied Additional testing schedule of the waterbody at the southeasten end of the property boundary <is required>.

Response to Natural Values additional RFI on 25-006 & 25-007
There is no native vegetation clearing associated with the proposal with the exception of a single isolated native tree adjoining the proposed shed area which may be impacted by construction activities. Existing riparian vegetation adjoining the downstream drainage corridors is retained and continues to provide a vegetated buffer between agricultural land and receiving waters. The proposed development does not require clearing of native riparian vegetation associated with the downstream watercourses.

The proposed development footprint including the dairy infrastructure, has been specifically designed to minimise the potential for nutrient movement to surrounding waterways through the incorporation of a contained water management system that separates clean stormwater from nutrient-enriched runoff and directs all effluent water to storage for reuse. The proposed covered housing system also substantially reduces the interaction of rainfall with manure and traffic areas when compared with the existing open grazing and feedpad system, thereby reducing the opportunity for nutrient mobilisation and transport during rainfall events.

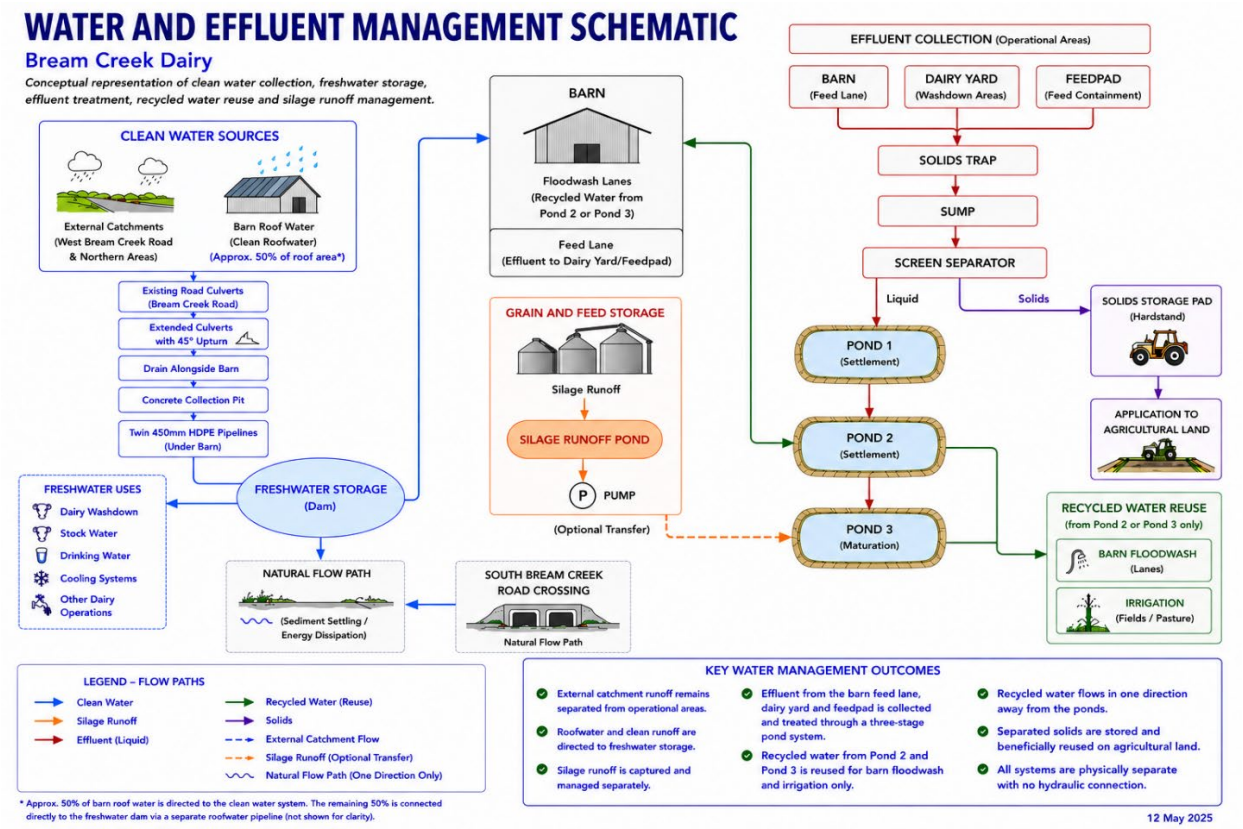
Following collection and storage, recycled effluent water will be applied to agricultural land in accordance with the Effluent Management Plan. Application rates have been determined through the nutrient balance presented within the Environmental Impact Statement and Effluent Management Plan and are based on crop nutrient demand.

Irrigation scheduling is matched to both soil moisture deficit and crop utilisation to prevent excessive nutrient application or runoff and deep drainage.

Additional safeguards incorporated into the management system include:

- maintenance of vegetated buffer areas adjacent to drainage lines and farm dams,
- no irrigation during unsuitable weather or saturated soil conditions,
- irrigation only at rates that avoid runoff and deep drainage,
- ongoing nutrient budgeting and review of application areas, and
- routine inspection and maintenance of drainage infrastructure and storages.

The following Water and Effluent Management Schematic further demonstrate that clean water, effluent and recycled water are managed as separate systems, ensuring that nutrient-enriched water generated by the development is collected, treated and beneficially reused rather than entering surrounding drainage lines or waterbodies.



To provide ongoing verification that these measures remain effective, a surface water monitoring program has also been incorporated into the proposal in response to RFI 25-007. Water quality sampling will be undertaken at the nominated downstream at the south-eastern property boundary at the end of spring and autumn, and when water is present, in accordance with the proposed attached Water Monitoring Plan. Monitoring will include parameters relevant to nutrient movement, including Total Nitrogen, Total Phosphorus and other indicators of water quality, allowing the effectiveness of the management measures to be demonstrated throughout operation.

Accordingly, the proposal incorporates multiple levels of protection, comprising containment of operational runoff, controlled nutrient reuse, retention of vegetated buffer areas and ongoing environmental monitoring. Collectively, these measures are intended to ensure that phosphate and nitrate movement to adjacent waterbodies, and ultimately the downstream saltmarsh environment, is avoided.

We submit that the enclosed information satisfactorily addresses the additional matters on the responded to items 25-006 and 25-007 under Section 54 of the Act and provides sufficient detail to enable Council to proceed with the assessment of the application related to these matters. If however Council requires any further clarification, please do not hesitate to contact myself.

Yours sincerely,

Clare Fitzpatrick | Director
Progressive Rural Solutions

Sorell Council
Development Application: 5.2025.287.1 - Response to NRM RFI - 106 Bream Creek Road, Bream Creek P6.pdf
Plans Reference: P6
Date Received: 08/07/2026

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Sorell Councill
PO Box 125
SORELL TAS 7172
Delivered by email: sorell.council@sorell.tas.gov.au

Your reference: 5.2025.287.1

16th July 2026

To the Receiving Officer,

RE: Development Application 106 Bream Creek Road, Bream Creek
RFI Response Environmental Health – RFI 25-007 – Natural Resource Management Update

Thankyou for your response to this request for further information dated 16th July 2026. Reference is made to the response to our submission with included the following:

7. Appendix I1of Effluent Management Plan for Stroud Dairies Proposed Loose Housing Barn shows number of test sites with high phosphorous Environmental Risk Index, provide evidence of mitigation measures for leaching phosphorous on to the waterways.
Not Satisfied Additional testing schedule of the waterbody at the southeastern end of the property boundary <is required>.

Not satisfied - Additional testing proposed need extended to at least two samples each site and two sites for the proposed seasons, satisfied with one already proposed site and another on the southeastern side of the property boundary, as below Red box highlighted in the screenshot below.

The revised monitoring program provides for surface water quality monitoring to be undertaken twice annually (at the end of Spring and the end of Autumn), subject to the presence of standing or flowing water within the nominated waterway. Where the waterway is dry at a scheduled monitoring event, this will be recorded and no sample will be collected for that monitoring period.

The monitoring plan has also been updated to identify two monitoring locations, comprising the originally proposed monitoring location and an additional monitoring location at the southeastern property boundary, consistent with Council's request.

The revised Surface Water Monitoring Plan is attached and supersedes the previously submitted plan.

We submit that the enclosed information satisfactorily addresses the additional matters on the responded to item 25-007 under Section 54 of the Act and provides sufficient detail to enable Council to proceed with the assessment of the application related to these matters. If however Council requires any further clarification, please do not hesitate to contact myself.

Yours sincerely,

Clare Fitzpatrick

Clare Fitzpatrick | Director
Progressive Rural Solutions

Sorell Council
Development Application: 5.2025.287.1 - Response to Request For Information - 106 Bream Creek Road, Bream Creek P7.pdf
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Legend

- Water Monitoring Point
- Property Owned
- Property Leased
- Pivots

Surface Water Monitoring Plan

Surface water quality monitoring shall be undertaken twice annually (end of Spring and end of Autumn), whenever standing or flowing water is present at the nominated monitoring locations.

Monitoring shall include analysis of:

- pH
- Electrical Conductivity (EC)
- Total Nitrogen (TN)
- Ammonia Nitrogen (NH_3-N)
- Total Phosphorus (TP)
- Filterable Reactive Phosphorus (FRP)
- Total Suspended Solids (TSS)

Where the waterbody is dry at either scheduled monitoring event, the absence of surface water shall be recorded and no sample collected for that monitoring period.

PROGRESSIVE RURAL SOLUTIONS

Prepared by:
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Phone: 0408577248

*Areas utilised for effluent application via irrigation are not to have soilds applied simultaneously without agronomic advice

Project Details:

J373 - Stroud Dairies - Loose Housing Development

Date:	16/07/2026
Client:	Stroud Dairies
Property:	Bream Creek
Project:	Loose Housing
Plan type:	Site Plan
Plan Description:	Water Monitoring Plan

0 0.5 1 km

Sorell Council
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