



OUT21/1321

Mr Jim Betts  
Secretary  
Department of Planning, Industry and Environment  
Locked Bag 5022  
PARRAMATTA NSW 2124

Dear Mr Betts

**Submission to Draft Glenfield Place Strategy**

Thank you for the opportunity to make comment on the draft Glenfield Place Strategy (draft strategy) and structure plan.

The NSW Department of Primary Industries (NSW DPI) Agriculture is committed to the protection and growth of agricultural industries, and the land and resources upon which these industries depend. In this instance the potential impacts of the draft strategy on Hurlstone Agricultural High School are of interest to DPI Agriculture.

We have reviewed the draft strategy and note the proposed redevelopment of part of Hurlstone Agricultural High School (Hurlstone) for residential and commercial uses.

It is understood that some of the proceeds from the development of the site for urban and residential purposes will be used to upgrade of the Hurlstone facilities and upgrade and expand other agricultural education facilities in the state.

The upgrade and expansion of agricultural facilities at Hurlstone and other institutions to provide modern farming facilities to educate the next generation of farmers and allow a focus on the STEM aspects of the agricultural sector is supported.

However, the draft structure plan for the Hurlstone redevelopment is not supported. The configuration of future residential and commercial land uses surrounding Hurlstone is likely to result in an increase in the potential for land use conflict between new residential development and the agricultural activities occurring at Hurlstone. Land use conflict between agricultural and residential land uses has a significant impact on agricultural production and its avoidance or mitigation through better land use planning is a focus of the work being undertaken by the Agriculture Commissioner.

Reduction in the size of Hurlstone and upgrading and expansion of the agricultural facilities are likely to result in more intensive agricultural activities which, when combined with the closer proximity of high and medium density housing could result in greater potential for land use conflict.

It is noted that the supporting studies on exhibition with the draft strategy do not include noise or odour assessments or a land use conflict risk assessment to determine the potential impact of agricultural activities at Hurlstone on the proposed surrounding residential land uses.

DPI Agriculture's [Buffer Zone Interim Guideline](#) suggests separation distances of 500m between dairies (including facilities holding less than 50 head) and sensitive land uses (residential), and 300m between residential and outdoor cropping activities. Even for low impact agricultural land uses such as stock grazing a minimum separation distance of 50m should be achieved.

The concept design does not appear to achieve these separation distances and no consideration has been given to alternative measures to mitigate any potential land use conflict. While it is acknowledged that Hurlstone is not a commercial agricultural operation it is still likely to generate similar impacts and separation distances to residential land uses should be maximised.

The agriculture based curriculum of Hurlstone is considered an important resource for the future of agriculture in NSW. DPI Agriculture is concerned that the encroachment of residential land uses on the land surrounding Hurlstone may result in land use conflict which causes Hurlstone to curtail its agricultural activities having a negative impact on the agricultural curriculum at Hurlstone.

DPI Agriculture strongly recommends that:

- noise and odour assessments and a land use conflict risk assessment be prepared to determine the potential impacts of agricultural activities at Hurlstone on the proposed residential land uses;
- changes to the structure plan are made to relocate the public recreation areas so they provide greater separation between Hurlstone and the proposed residential land uses;
- the development control provisions for the new residential and commercial land uses require proponents to achieve appropriate buffer distances or include measures to mitigate any potential impacts arising from Hurlstone's agricultural activities.

DPI Agriculture has also reviewed the information on the layout of the new "Farm Hub" for Hurlstone contained in the "Hurlstone Agricultural High School Information pack December 2020" on the School Infrastructure NSW website. DPI Agriculture's Livestock Systems Branch has identified several issues with the layout which may adversely impact on the operation of the hub, and management of biosecurity and land use conflict. These issues include:

- the close proximity of the piggery to Roy Watts Road which is the main access road for the school;
- the co-location of pigs and poultry and potential biosecurity issues arising from this arrangement; and
- the operational use of the facilities and the management of animal waste products to avoid contamination and biosecurity risks.

DPI Agriculture has an interest in the success of the agricultural curriculum at Hurlstone and would like to offer assistance to School Infrastructure NSW in the design of the new Farm Hub to ensure it provides the best opportunities for a successful ongoing agricultural curriculum.

Should you require clarification on any of the information contained in this response, please contact Paul Garnett, Agricultural Land Use Planning Officer, on 0429 864 501 or by email at [landuse.ag@dpi.nsw.gov.au](mailto:landuse.ag@dpi.nsw.gov.au)

Yours sincerely



**Kate Lorimer-Ward**  
**Deputy Director General Agriculture**