

I object to the proposed development modification. As is consistent with other proposals by Veolia, they do not provide sufficient adequacy of their submission to meet the expectations of the local community. While I would provide a more detailed response, the short exhibition period is prohibitive of detailed examination of the proposed modification. As such, the following items are dot point and the obvious issues with the proposal.

### **Transport Assessment:**

- Veolia have been made fully aware in other development proposals (the incinerator) there are at least four school buses that traverse the same routes proposed to be used by trucks and vehicles along Braidwood road. The traffic impact assessment clearly only takes into account a single bus and completely fails to account for other buses.
- High school students are often at the intersection of Braidwood Road and Tarago Road in the early and later hours of school days. These students frequently cross the roads during this time period. The traffic impact assessment fails to take into account the safety of the high school students.
- The traffic impact assessment fails to take into account primary school student drop-off and pick-up that occurs on Braidwood Road – where trucks will be passing.
- The traffic impact assessment fails to take into account the pre-school drop-off and pick-up times that also occur on Braidwood Road.
- The transport assessment lacks any cumulative assessment of traffic as a result of other proposed SSDs in the area. Each modification and proposed development is being done in isolation, and as such there is a continual “incremental” impact on the roads and community.
- While this proposal only increases the traffic a small amount for a short time (six months of development), there are other proposals that result in similar affects – as such the climbing lane/overtaking lane between Crisps Creek and the Woodlawn turnoff becomes a critical need for the local community. This proposal should only go ahead after a climbing lane has been completed.

### **Biodiversity**

- Like always, Veolia appear to have skipped over obvious vulnerable species. The biodiversity assessment makes no assessment of bats or bat habitat. Considering there is a roosting cave and bats will forage in the area, the proposed development must provide an updated study of bats in the proposed development footprint (based on prior evidence, there are multiple species present year round in the development area).

### **Groundwater**

- The proposed development highlights the risks associated with the shallow groundwater in the development footprint. This is a significant concern given Veolia have a demonstrated history of contamination of groundwater:
  - In **2015** Veolia are known to have contaminated the groundwater, and not informed the local community for years; and
  - In **2023** Veolia knowingly pumped leachate into the outer area of ED1, which is known at the time to leak into the surrounding groundwater. This was also a clear breach of their EPL conditions.
- (Veolia clearly demonstrate they are unable to protect groundwater).
- Veolia’s proposed modification must contain extensive groundwater monitoring requirements given prior history of contamination and the high risks associated with the shallow groundwater. We recommend the following are included:
  - Detailed monthly sampling from multiple groundwells;
  - Additional funding to be provided to the EPA to fund at least 0.5FTE to monitor Veolia’s compliance;

- Detailed emergency action response plans (released to the public) on how they will respond to contamination;
- Detailed information on how local farmers and community members will be compensated for future breaches of their conditions or failure to protect the environment.

## **Odour**

- Veolia's Odour impact assessment must be some sort of joke???
- Veolia continually hide behind the claim of no odour impact to the local receives that exceeds 6OU. However Tarago residents regularly report the stench from existing operations. Veolia continually breach their license conditions.
- This proposal clearly indicates there is an increase in odour and it should not impact the local receivers. However they make no mention of the town, or the ongoing impact on the town. They have completely ignored Goulburn Mulwaree Council's requirement to demonstrate no increase in odour emissions in the town.
- Veolia's odour assessment for the proposed modification needs a major overhaul and must take into account the additional detailed data now been collected as a result of odour complaints under the Woodlawn Bioreactor license.
- Veolia must dispense with the "there will be no real impact" concept and clearly take responsibility for the impact they have on the local community. 9 pages of odour assessment by Veolia is clearly thumbing the nose at the EPA, Department of Planning and the local community.

## **General**

- While Veolia clearly demonstrate there is a need for this proposal, Veolia have over the years performed simulations and modelling that has been demonstrated to be incorrect. Historically there was going to be no odour... there always has been. Historically they would be able to maintain the leachate onsite. Then they proposed they would truck it offsite. Now they need another storage dam and a reverse osmosis plant to deal with the leachate. Veolia have a demonstrated history of providing simulations that are incorrect. Veolia's proposed modification needs to include a Plan-B: If this does not work, what is their longer term proposal. This community has the right to know if Veolia are going to continually be proposing yet more modifications or SSDs now rather than death by a thousand SSDs.