



Branch: Cumberland Branch

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Date: 21/08/20

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To Whom It May Concern,

I write to you behalf of the members of the Cumberland Branch, and in support of our member Joanne Spiteri, who is among a number of primary producers who will be affected by the proposed Luddenham Resource Recovery Facility (SSD-10446).

The application for a Resource Recovery Centre in this location is inappropriate, and problematic in the extreme, and needs far more consideration and consultation with the surrounding community than has occurred. The Spiteri's have a number of concerns with specific details of the development application which the branch submits needs considerably more consideration by the proponent and council than that which has been made evident.

### **Zoning**

The zoning of this parcel of land is imminently about to change, making the proposed development inadmissible, and for this reason, must be refused. Even under current zoning, the proponents of this project are relying on this project being permissible under the current State Environmental Planning Policy.

Encroachment of non-agricultural land uses into agricultural areas, often long-standing and productive, is impacting our ability to grow food in areas long-associated with agricultural activity. NSW Farmers has long called for the Right to Farm to be legislated in a Regional Planning Act, ensuring that agriculture's place in our economy and our community is forever protected against inappropriate development. The Act should aim to reduce land use conflict and preserve our most productive agricultural land for farming purposes.

### **Biophysical strategic agricultural land (BSAL)**

As per the recently gazetted Strategic Regional Land Use Policy mapping, BSAL has been located in close proximity to the proposed site. BSAL is a rarity in the Sydney Basin and indeed, scarce across NSW. It is important to encourage the continued sustainable use of natural resources in these highly important areas, and as per the zoning classification, to minimise fragmentation and alienation of resource lands. It is also critical as food security becomes a significantly more pressing issue, and as consumers demand more low food-mileage product that existing use of important agricultural lands be maintained.

### **Water use and run-off**

The EIS regarding water and run off cannot provide the detail necessary for surrounding landholders to be confident that any runoff will not impact the quality of the water in their dams that receive this runoff. Stormwater will be dealt with onsite, but no mention of water quality that exits the site as runoff to surrounding lands, only to the nearby Oakey Creek.

### **Roads not fit for purpose**

The current road infrastructure surrounding the site is not going to be able to handle the huge numbers of trucks that will form an inevitable part of the estimated 6000,000 Tonnes of waste for recycling. The increased truck movements and the associated wear on these surrounding roads will have a detrimental impact on the ability of surrounding agricultural industries to get their products to market in a safe manner. The presence of the driveway in close proximity to other agricultural enterprises and Poultry sheds has potential to create significant productivity issues on these surrounding agricultural enterprises.

**Noise impact**

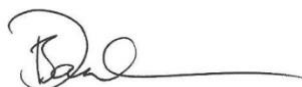
Our members are concerned that the proposed development will have considerable noise impact on nearby properties which have not been adequately addressed. The facility is proposed to be operational 24hrs a day and it will be impossible to predict the noise, dust and general liveability issues that will come from such a facility operating in close proximity to working poultry farms, and extensive livestock industries.

**Air Quality**

There is a significant potential for an air quality issue, with the EIS even indicating a medium level of risk. We believe that the proposed mitigation measures of street sweepers and wheel washers will prove impractical and potentially be abandoned mid- project, leading to perverse outcomes.

In support of our local farming members NSW Farmers feels that the proposed development does not adequately address the above serious concerns.

David Banham  
Regional Services Manager-NSW Farmers



On Behalf of Sal Russo  
Chair- Cumberland Branch,  
NSW Farmers