

Department Planning NSW

ATT: Katelyn Symington

RE: Gunnedah Waste Facility (SSD-8530563)

We (Paul and Deeanne Rankin) are the owners and residents at "Portland", 10255 Kamilaroi H'way, Gunnedah NSW and we write concerning the proposed development of Gunnedah Waste Facility to be constructed on Lots 1 and 2/16 Torrens Road, Gunnedah NSW

Our property is near the proposed development, approx 500 meters distance – our boundary fence is closer.

We object to the proposed waste treatment facility on the following grounds.

1. **Water Inundation:** whilst the EIS states this site is not prone to flooding, there is a major issue with heavy rain down pours/storm events - water is known to wash from the proposed site onto the neighboring property, making it way across that property and into our back paddock, finding its way to the Stock Route, under the Kamilaroi Highway, through neighbouring properties and the natural water course and to the Naomi River System. This area is prone to inundation during heavy rain fall as water comes from the old abattoir site located above the railway line, down across the Costalot Subdivision. Water in such volume that it breaches the Kamilaroi Hwy. Whilst a water channel was put in during the development of the Costalot Industrial site (to the east of the site) this has only caused water to move quicker and in larger volumes into neighbouring properties. Hence, we have very real concerns for the environment with the potential for toxic waste and contaminates to escape the site. If the open storage bays are wet during normal weather patterns leaching from contaminated soil is a very significant risk. Not every drop of water that falls onto a particular site can be contained within that site. We are aware that this is one of the concerns raised by NSW Water is the potential to affect ground and riparian flows.

Who will be responsible for monitoring what leaves the site and how will this be done?

2. **Dust:** we are located to north-west of the proposed facility. This is down wind of the prevailing wind pattern as stated in the EIS. On page 147 of the EIS are dust disposition maps which show that we will be subjected to any dust coming from the site. We have rainwater tanks on our property that could be contaminated by dust from the proposed facility. Similarly we have goats and other livestock that water from open stock water troughs, ground water laying in paddocks and a ground dam; these would also be contaminated by any dust coming from the facility. Our boundary is less than 400 meters from the site.

Noted on the EIS is that there are 14 external open storage bays for the reception of bulk materials. Given that some of this material will contain toxic substances and the fact that we already encounter dust from the MacKellar site, this represents a substantial health risk and impacts on our predominantly outdoors lifestyle. If this development is approved – will there be any dust monitoring by an independent body during both construction and operating phase?

3. **Noise:** We object to any extra noise emanating from that site as it will interfere with the enjoyment and amenity of our property. This includes both the construction and operating phase. We object to the hours of the proposed construction phase as 11 hours per day (7am – 6pm) 6 days per week. We believe this is excessive and will impact negatively on us and the way we and our neighbours live in our home and small acreage.

Proposed operating hours on Saturdays is also excessive and will certainly interrupt our precious weekend relaxation/leisure time.

The EIS particularly makes mention of the use of a crusher at the facility, which they admit will exceed noise tolerance levels. Given the close proximity of many hobby farms where families reside – this is unacceptable and can cause long lasting hearing issues and emotional distress. In the EIS it is stated that the crusher will only be used once or twice a month but the facility proposes to process up to 250,000 tonnes per annum. Does the proponent seriously believe this or is he deliberately understating this important point?

Vibration from crushing and loading equipment has the potential to cause damage to our property and other properties/homes as we are down gradient from the site.

Extra traffic noise from trucks, (up to 80 movements per day -both 32 tonne tippers with trailer and 52 tonne B Double trucks) going into and out of the facility, idling whilst waiting to enter and exit the facility will greatly add to the noise level and adversely affect our lifestyle. Who will be responsible for monitoring noise levels?

4. **Contaminated waste:** We object to having contaminated waste including asbestos/lithium batteries being processed/stored near to our property. This has the potential to adversely affect our property and our health. The majority of winds experienced by us come from that direction, should toxic fumes or dust emanate from that site we will be immediately and severely affected. In heavy down pours water sheds off the proposed site and makes it way down toward the river often flowing through our neighbours paddock, into our paddock (we have dam and animals in this paddock), then onto the adjoining stock route and along the main road and down to the Naomi River. Having this proposed site situated above the Naomi River where runoff can quickly enter the river system is of great concern.

There are approx 14 open receiving bays that are open to the elements which is very concerning as liquid run off and air pollution are very concerning.

Bringing contaminated waste many 100's of kilometers from the site it was generated also poses a wider community concern. Bringing it across the state border and from metropolitan areas means this rural community is subjected to unnecessary environmental risks that it would otherwise not be subjected to.

5. **The scale of the facility:** Proposed up to 250,000 tonnes of potentially contaminated waste to be processed at the facility. It is noted that some of this will be brought across the state border from Queensland. The EIS states Queensland has a waste levy, is the Developer bringing it to the Gunnedah region purely because it is a financially cheaper option or is it because removing the waste from his 'backyard' (Director lives on the Gold Coast).
- Should the Gunnedah region be the depository for metropolitan and another states toxic waste? Who will be responsible for ensuring that the facility only receives appropriate material? If the proponent is the one transporting the waste over such large distances, there is little or no

incentive for him to reject any material once it arrives in Gunnedah. We have very little faith that this will be carried out to the exacting standards as it should be.

It should be noted that Gunnedah Quarry Products (part of Mackellar Group of Companies) was convicted in Gunnedah Local Court on 2/6/2015 by the EPA for Fail to comply with an Investigative requirement.

Is a facility processing 250,000 tonnes of material suited to light industrial land? Currently this sites traffic is mostly trade utes, light vehicles and some truck movements – however this proposal intends to greatly increase truck with trailer activity. Would this development be better suited to located on Heavy Industrial Land away from town, homes, land deemed Rural/Residential, a School Agricultural Plot and other businesses and their employees?

6. **Proposed Site:** Mackellar's were the developers of the "Costalot" Industrial development at 16 Torrens Rd. We objected to that development and requested if it was approved by Gunnedah Council that the development be screened by a landscaping buffer (on the western side), as a visual screen and to reduce dust and noise from this development. This was subsequently a condition of the "Costalot" development. This landscaping buffer was never properly maintained and currently consists of a planting less than 10 trees (Lot 2), Lot 1 was screened as one of the owners then resided at the residence. Both Council and Mr B Mackellar were contacted by us and advised they had not met the development conditions and plans; unfortunately this issue was largely ignored and a very inadequate landscape remains. There has been enough time for a tree line to be planted and maintained however this have never eventuated. If the proponent cannot be bothered to comply with this simple condition of the initial development of this site, how can they be trusted to comply with the more onerous conditions of running a Waste Treatment Facility dealing with contaminated waste? We are also concerned should any further development of this site occur, it would many years for any vegetation to reach maturity and provide any visual screen or buffer.
7. **Water Inundation:** whilst the EIS states this site is not prone to flooding, there is an issue with heavy rain down pours and water is known to wash from the proposed site onto the neighboring property, making it way across that property and into our back paddock, eventually finding its way to the Stock Route and to the Naomi River. This area is prone to inundation during heavy rain fall as water comes from the old abattoir site located above the railway line, down across the Costalot Industrial site. Hence we have very real concerns for the environment with the potential for toxic waste and contaminates to escape the site.
We have not been approached and asked about how and where water flows/sits during rain/storm events, how it affects our properties. Whilst the EIS states flooding of the site is of no concern the amount and of runoff certainly is to us.
We are aware that this is one of the concerns raised by NSW Water is the potential to affect ground and riparian flows.
Who will be responsible for monitoring what leaves the site and how will this be done?
8. **Increase in Traffic:** will impact negatively on us, the home owners. This is a very busy road, it is a school bus route and it has multiple driveways within short distances both sides of the road which will increase risk of motor vehicle accidents. Greatly increased truck movements on a daily basis will add to noise, dust and a potential safety hazard.

It is obvious this Waste Management Facility is being developed mostly to manage waste from out of the local region and the State. We understand it will service Sydney and Brisbane areas. These areas are many hundreds of kilometers away and their waste should be managed closer to their locale/site of generation. We also hold fears that over time there may be an application to increase capacity/operating hours and this would further adversely affect us in many ways including our health and wellbeing; including emotionally, socially and financially, our animals, our native animals – kangaroos and koalas frequent this area. It is particularly concerning as we are in the Koala green zone. It will certainly negatively impact our lifestyle and what we and the surrounding neighborhood have worked many years to obtain.

It is of great concern that we have had no contact from this company given the proximity (boundary fences within under 400meters) of our property and given they have stated that they have contacted 'neighbours' and provided a Fact Sheet. We have not received this fact sheet either in person, email or via mail, we have not received any phone calls.

The EIS in 'paper form' hasn't been provided for neighbours or the community – there are some with no/very limited/troublesome internet access. When contacted the Gunnedah Council were unable to provide a paper copy.

There was no development model located in Gunnedah that could be viewed.

A copy of the EIS wasn't made available to the wider community other than online – and during conversations with friends and community members it appears this development is not generally known about. Why, when it is to be located within the town/local community and is suppose to be of State Significance. Will the wider community be given to opportunity to respond to the EIS? This has the potential to affect not only the local community but the whole environment, especially the system. Since reviewing the EIS it appears to us there are many more questions and concerns rather than answers!

There hasn't been any dialogue and we have not been afforded the courtesy or opportunity to ask and have our questions/concerns answered. This has been one of the most common points during discussion with our neighbouring properties. With that in mind we object to the development being approved, we have no confidence in this development becoming good and responsible neighbours, it will detract and not value add to our community.

We object to this development going ahead as it has the potential to adversely affect

1. Our community and the environment
2. Our health and wellbeing
3. Our lifestyle and amenity of our property
4. Our animals and native animals (Koala's frequent this area and we are in the koala green zone)
5. The environmental and financial value of our land and home
6. Our neighbours and the businesses located close to proposed site.

Regards

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