



Gunnedah Waste Facility -- Application Number SSD-8530563

I write in **strong objection** to the Gunnedah Waste Facility and the EIS on exhibition.

Having read the EIS in the very brief time offered to the community for analysis and response, I raise the following points for the proponent to respond to, in relation to this development:

- 1) The project is not limited to the site alone or the industrial estate, the project extends by its nature of the projects intent - to the roads, residents and township of Gunnedah.

The described facility will process upto 250,000 tons per annum, which means upto 500,000 tons per annum of material to be transported by local roads. Analysis of transport movements within the 50km per hour road traffic residential zone and school areas along Bloomfield St, Gunnedah which is also the heavy vehicle bypass and Kamilaroi highway – these residents have not been considered sufficiently in the EIS. The EIS notes in some detail the Quia Road, Torrens Road and the intersections to the north of Gunnedah being the Kamilaroi Highway, but equal attention is missing for movement of these trucks via the town of Gunnedah.

- 2) What component of waste will be transferred by the nearby rail line? With the proximity to the rail line this project has scant regard for the potential use of rail options to remove road transportation risks locally or statewide. If much of the anticipated supply source is city locations, better use should be made of rail infrastructure.
- 3) On numbered page 25 of the EIS there is incomplete data that fails to reference an appendix.
“refer Appendix ?? For details.”
- 4) On numbered page 11 of the EIS the section indicates a suggested breakdown of the intended waste processing. Limitations should be placed so more toxic waste in nature can not be accelerated in its business activity to significantly change the makeup of the described composition.

Limits should be put on eg potential Asbestos, Salt waste or Lithium processing, to avoid an unanticipated higher-risk facility *approved by deceit and in stealth*.

- 5) Where is the landfill disposal intention for the anticipated indicated make up of the proposed business. If Gunnedah LGA or nearby sites in other LGA’s or existing mining voids in the region is anticipated for the final destination this should be clearly outlined in this proposal.

- 6) On numbered page 182 the document notes:

"The consultation process is ongoing."

"This EIS for the proposed waste facility will be placed on public exhibition. The proponent, Mackellar Equipment Hire Pty Ltd, will respond to any submissions made during this public exhibition process regarding the proposal. This may also highlight the need to consult with any individuals or groups with a particular interest in the proposal."

This has not occurred in a public space, it has only occurred in an online domain that limits much of our community's opportunity for research, analysis and response with rural residents evidence to have a lesser take up of internet options.

- 7) Noted in Appendix D:

"15. RECOMMENDATION"

"In summary, StreetWise recommend that the proposed Waste Facility, and the associated minor increase in traffic generation, including haulage of waste material, as being a suitable proposal. The relatively low number of proposed daily heavy vehicle trips, staff commuting, and delivery vehicles will not have a significant impact on the efficiency or safety of the local road network."

The term "relatively low" is *relative*, many residents would assert Gunnedah roads are significantly busy at different times of day and any significant addition to heavy truck movements or additions to weights of transport vehicles on publicly funded roads will only add to taxpayer requirement for maintenance and additional expense for repairs.

What analysis has occurred to calculate this addition cost to the LGA and state?

- 8) Appendix C map on page 1 is not a current map and many years - perhaps upto a decade, out of date. Is this a deliberate manipulation of the process to illustrate the project in a different light.
- 9) I note the below errors within Appendix C. Please advise what other errors there are in the Appendix C that the community should be aware of.

Appendix C page 1 references dates for a Rev I, is the date referenced really 2002?

Appendix C page 19 references dates for a Rev G, is the date referenced really 2002?

Appendix C page 20 references dates for a Rev G, is the date referenced really 2002?

Appendix C page 21 references dates for a Rev A, is the date referenced really 2002?

Appendix C page 22 references dates for a Rev A, is the date referenced really 2002?

Appendix C page 23 references dates for a Rev A, is the date referenced really 2002?

10) Appendix C, (Doc Page 16) notes “coal ash”.

With the significant amount of Coal ash stockpiled at power plants in the Lake Macquarie region, limits must be set in regards to sensitive materials - in transport, transfer and final deposit destination. Gunnedah should not become the states toxic waste dump, within our sensitive agricultural precinct. This region should not become a toxic landfill site by stealth.

11) Appendix C, (Doc Page 19)

“To set upon some absolute minimum or maximum tonnage would be most premature.”

Limits must be set. Indications of only say 1000 tons of Asbestos per annum has been indicated - the Planning Department and approval process shouldn't allow *indicative only* amounts - allowing the proponent scaling up more profitable waste products against the intended expectations shown in the EIS, and against the community's view / expectation for this project.

12) Appendix H page 7 & 8 of the Stringybark Ecological report uses significantly out of date aerial imagery that does not indicate or disclose the significant development that has occurred on site and immediate neighboring sites. **Is this misrepresentation of the location intentional?**

13) Appendix H page 5 & 6 of the DPIE letter from Chris Ritchie uses significantly out of date aerial imagery that does not indicate or disclose the significant development that has occurred on site and immediate neighboring sites. **Is this misrepresentation of the location intentional?**

14) Appendix H page 4 & 5 of the DPIE letter from Sarah Carr uses significantly out of date aerial imagery that does not indicate or disclose the significant development that has occurred on site and immediate neighboring sites. **Is this misrepresentation of the location intentional?**

15) Appendix I notes “Hours of operation 7.00 am and 6.00 pm Monday to Saturday. The facility to be closed Sundays and public Holidays” This is incorrect in comparison to the EIS. The proponent is not being completely accurate in his community consultation.

16) Why wasn't a Community Consultative Committee established for this significant SSD?

17) This project should not have been scaled back in its community consultation due to the Covid pandemic. Gunnedah Council should have fully exhibited this project and was remiss in declining to do so. The process that has been followed for this project does not meet community expectations, and has conveniently for the proponent – been submitted at time of year – and is a deliberate manipulation of the process. The State should review its timelines for release of SSD projects for exhibition and have blanket windows of exclusion of periods when most families and people have extra care responsibility's with children and family over the major holiday period.

I have made no reportable political donations in the previous two years

Kind Regards

