

The Councillors
Gunnedah Shire Council

Dear Councilor.

Re Gunnedah Waste Facility

Application Number SSD-8530563

Good morning,

We write concerning the proposed Gunnedah Waste Facility, to be constructed on Lots 1 & 2 DP 1226992 16 Torrens Rd Gunnedah.

Residential Impact

The EIS submitted for this project, implies that the nearest residential lots are 1.15 km away from the proposed development. Ref Figure 1

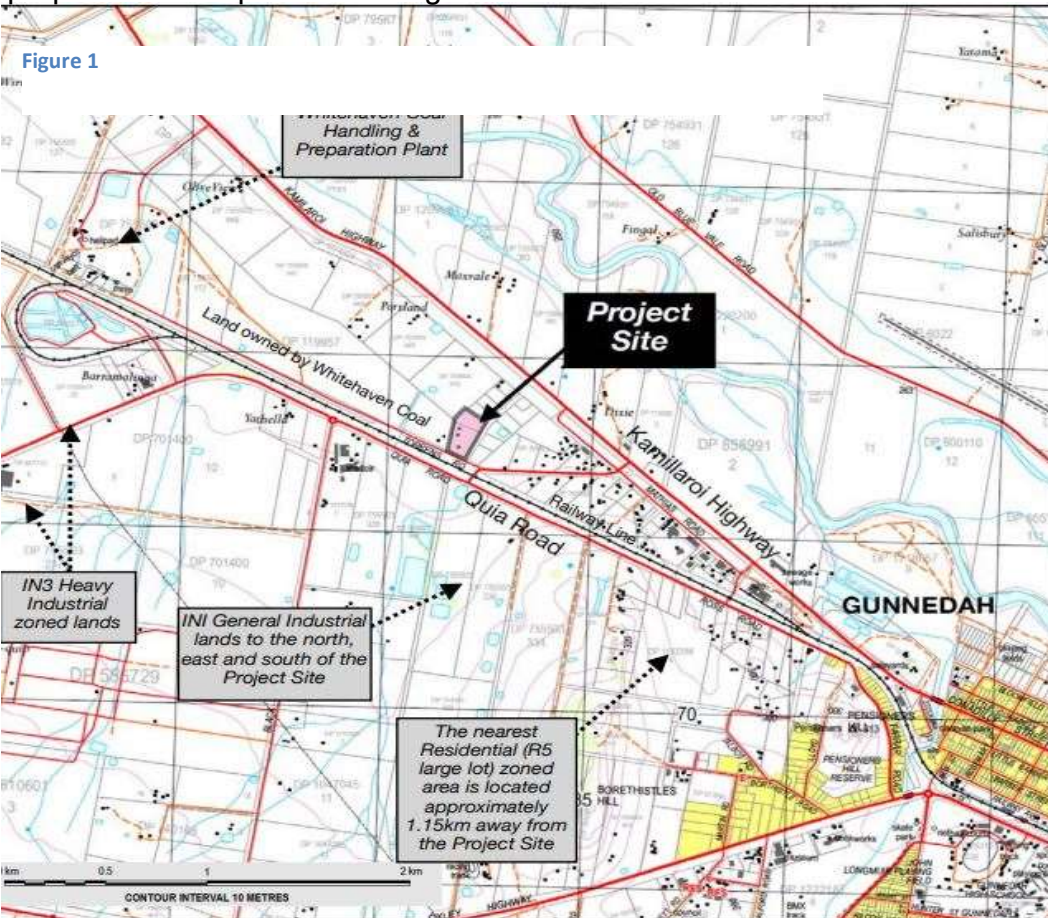
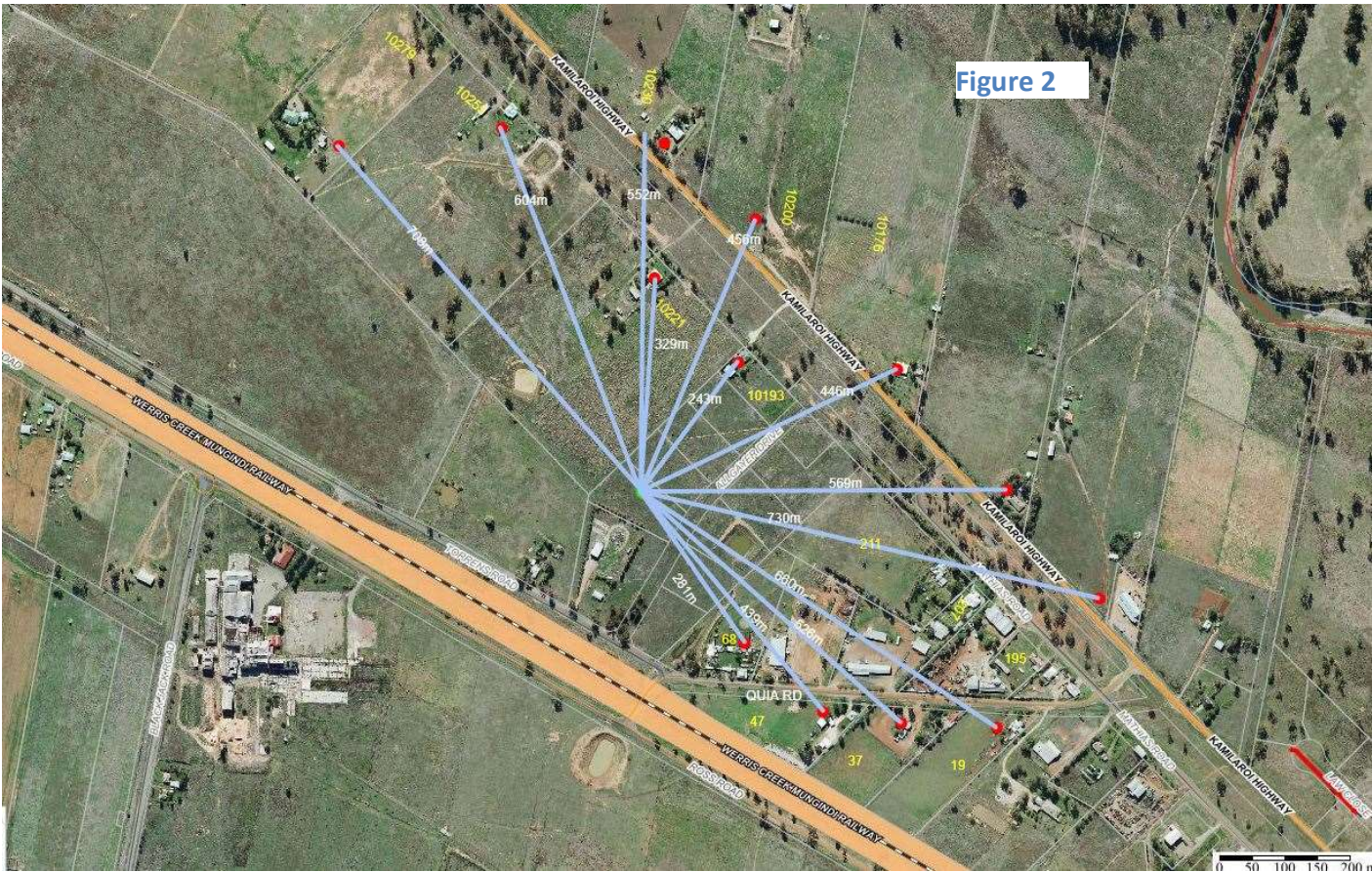


FIGURE 0.1: The Project Site is located in a designated industrial area on the western fringe of the township of Gunnedah

Source: NSW Spatial Services Emerald Hill 8936-3S 1:25,000 topographic map)



As can be seen from the map below, (ref Figure 2) there are 13 residential properties, surrounding the proposed development, all with the potential to be adversely affected.



Flooding

The EIS also contends that the site is not prone to flooding Ref Fig 3

■ The Project Site and Existing Use

Figure 3

MacKellar Excavations Pty Ltd (MEX), Gunnedah Quarry Products (GQP) and MacKellar Equipment Hire Pty Ltd (the MacKellar Group) are privately owned earthmoving, plant hire, quarrying and waste companies operating in the Greater Sydney Region, North West New South Wales and Queensland, and is headquartered at No. 16 Torrens Drive, Gunnedah. Current infrastructure at this location consists of a main office, manager's residence along with associated storage sheds, car and truck parking area and hardstand, as well as workshop. A waste facility will complement the above businesses, in particular having regard for the fact that MEX already owns and operates processing equipment at their quarry at Marys Mount, including screens, as well as other mobile plant and equipment, capable of being used in the proposed waste facility.

The Project Site has a combined area of 2.77ha. Refer **Figure 0.2**. All of the Project Site is zoned IN1 General Industrial. Access to the Project Site is directly from Torrens Road, with side access to an industrial subdivision road, Allgayer Drive. Torrens Road then connects with Quia Road and thence to Kamilaroi Highway. All roads are bitumen sealed and already carry industrial traffic. Refer Photographs 0.1 and 0.2.

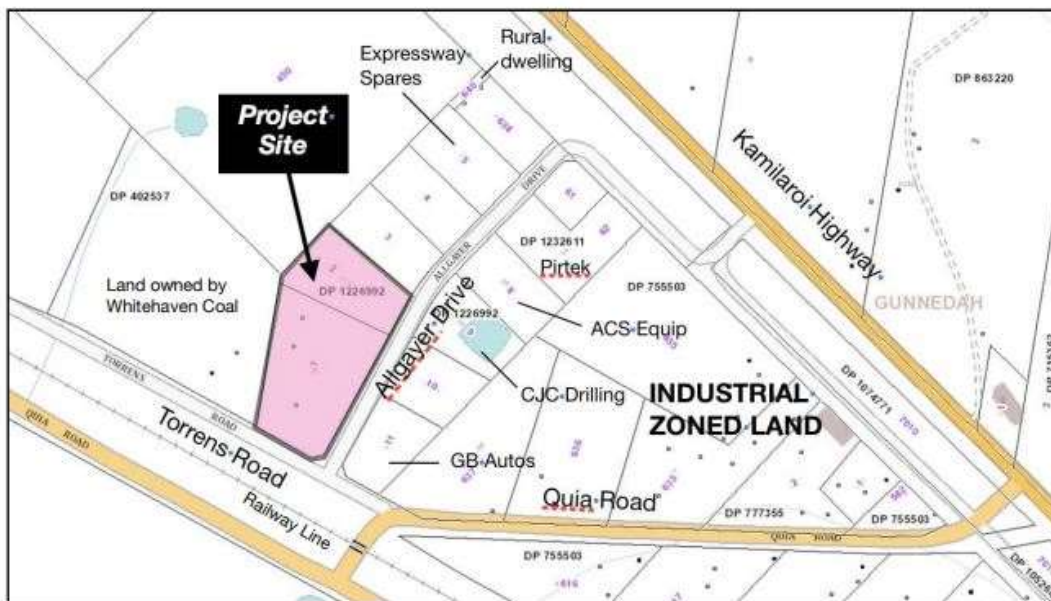


FIGURE 0.2: The Project Site and immediate surrounds

(Source: SIX Maps)

Other site features are summarised in the following:

- The site is flat and well suited to use for industrial purposes.
- The Project Site is not flood-prone land.
- The Project Site is not identified as bushfire prone land.
- The Project Site and surrounds is cleared and developed for industrial purposes.
- The Project Site forms part of an established industrial area at Allgayer Drive. The Allgayer Drive ('Costalot') industrial estate is fully serviced and has bitumen sealed road access and and kerb and guttering.
- There are no known archaeological sites likely to occur on the Project Site.

In fact the whole industrial sub division, of which the proposed development forms part, is subject to inundation.

2 Aerial view Costalot prior to Flood channel

Figure 4

Numeralla

13305256 450/755503

13305045 620/755503

13303302 51/1226992

1331089 61/1226911

13331045 62/1232611

13330324 2/1226992

13330316 1/1226992

13330405 10/1226992

13330413 11/1226992

13261004 455/755503

13261012 635/755503

13261214 636/755503

13264222 637/755503

537

When the Costalot subdivision was constructed, the developers (McKellar's) constructed a flood channel along the south eastern side of the sub division see figure 5.



Concerns were raised with Gunnedah Council, re the increased potential for flooding from storm water runoff from the old abattoir site on the opposite side of the railway line, and running through the Costalot subdivision.

Our concerns were largely ignored, being advised that engineer's reports had stated that the subdivision, including drainage, had been constructed to code.

On 30th March 2019, there was a torrential downpour in the area of the old abattoir site resulting in a serious flood which inundated portion of the Costalot subdivision, and seriously impacted properties opposite on the Kamilaroi Highway see fig 6 & 7

In addition, there is extensive run off from Lots 1 & 2 DP 1226992 during heavy rain events which impacts properties to the west of that site

Figure 6



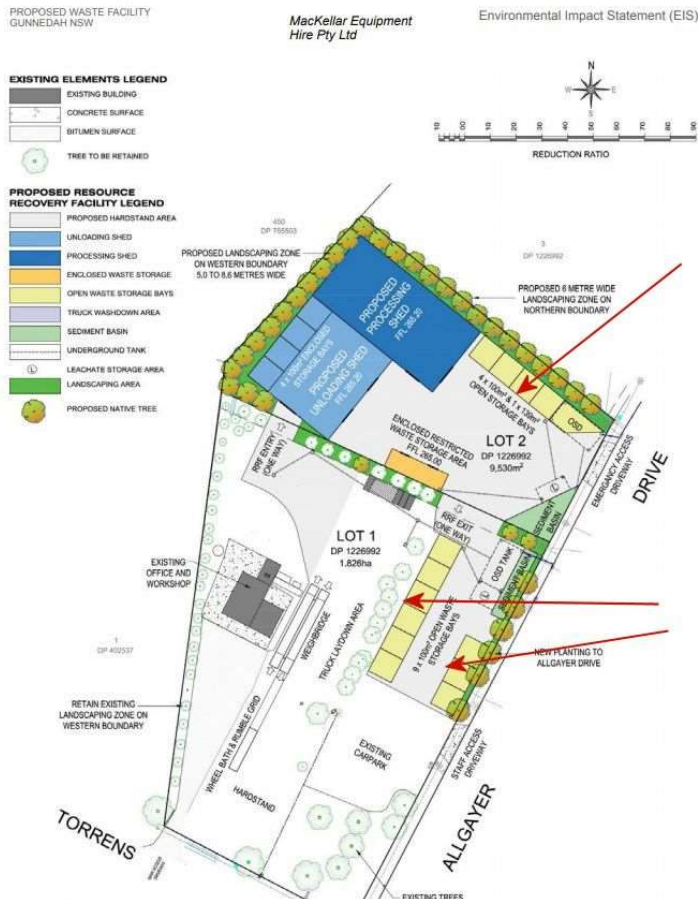
Figure7



Dust Nuisance

We note from the EIS that there are 14 external storage bays proposed for reception of bulk materials see figure 8

Figure 82



This represents a serious potential dust problem which will impact ours and neighboring properties, given that prevailing winds tend to be from the south/south west.

We already encounter dust from McKellar's site on windy days and during storm events.

Given that some of the materials proposed for processing, may contain toxic substances, this represents a substantial health risk

We are aware that Gunnedah High School, has an agricultural plot adjoining the proposed development site. This plot is attended on a regular basis by agriculture students and as such, these students will be exposed to any likely airborne particulates emanating from the waste processing site

Noise and vibration

The proposed development, including the use of crushing and loading equipment will subject neighboring properties to excess noise and vibration.

We accept that the site is zoned industrial however the existing sites in use, do not give any concerns in regard to noise and vibration.

Given previous experience with nearby construction of roads and the subdivision itself, excessive vibration from heavy equipment has caused structural damage to our houses.

Potential toxic waste contamination run off

We note from the EIS, that the proposed facility may involve some toxic waste processing.

Given the fact that storm water runoff from the Costalot sub division, discharges directly into a water course, which traverses properties opposite the proposed development, there is the potential, in event of a spill discharge, that toxic chemicals may impact our properties. Furthermore, the water course referred to eventually discharges to the Namoi River.

In addition, during heavy rainfall, runoff from the proposed site of the waste centre, impacts neighbouring properties.

We also note from the EIS, that there are concerns from NSW water, re the possible impact on ground water and riparian flows.

We also note concerns from NSW Fire Brigades, regarding the storage of lithium batteries on site and possible fire risk with toxic fumes emanating.

Ongoing Monitoring

The EIS is not specific about ongoing monitoring of the proposed waste treatment centre, by the relevant bodies, EPA and Council.

In other words how can we have confidence that any spills or breaches will be dealt with and affected properties notified?

We are aware that Council's Waste Management Centre is subject to very strict monitoring by the EPA on a regular basis.

On that note, it would be far more appropriate for the proposed development, to be located at Councils Waste Management facility, which is already well set up for reception and management of all classes of waste

Transport of Waste

The EIS submitted, is not clear about the origins of the waste for processing, however we understand from news reports, that some will come from Sydney

There is anecdotal evidence that waste will also be transported to the site from Brisbane and the Gold Coast, where the developers already own a large waste management service.

This is clearly unacceptable, as it is highly unlikely that there will be any scrutiny of waste crossing state borders into NSW.

The no. of daily truck movements to move the waste (approx. 250,000 tonnes PA) to Gunnedah will be immense, with the attendant increase in risk to road users

Objection to proposed development

On the basis of the facts presented, we are obliged to lodge an objection to the proposed development of the waste management centre as it has the potential to affect not only our health and wellbeing and amenity of our properties, but that of our neighbours and staff employed at businesses surrounding the facility.

We seek your intervention as the responsible minister to ensure that the proposed development on the site proposed, is not approved

Yours faithfully