

SUBMISSION

We are the owners of the property known as "The Ashes" 52 Larcombe Lane Deniliquin NSW 2710 being Lot 31 in Deposited Plan 802306 where we reside with our children.

Our property is situate immediately to the north east of the proposed ethanol site diagonally opposite the site on the other side of the Barham Road. We believe that we would be one of the closest (if not the closest) residents to the proposed site.

We are Receptor 4 as stated in the EIS.

We do not object to the application. However, we have a number of concerns in relation to the development application.

Noise levels

At paragraph 17.5.1 of the EIS it is stated that at Receptor 4 (being our property) that noise levels are forecast to be within 5 dBA of the construction noise goal and are categorised as "noise affected" but not "highly noise affected" under the INCG.

It is stated at Clause 17.5.2 that operational noise at our property may be up to 2 dBA under what is described as "neutral" weather conditions but under what is described as "enhanced propagation" conditions will have a maximum exceedance of 7 dBA at our property.

Clause 17.5.2 goes on to state that further assessment of noise omissions should be undertaken during the Project's detailed design once inputs and assumptions have been refined. The design should incorporate mitigation measures to reduce noise levels during operations phases to comply with the noise criteria.

It is clear from Clause 17.5.2 that the level of noise in so far as it affects our property is likely to vary greatly depending on weather conditions.

With respect such an important matter as noise levels and appropriate mitigation measures should not be left to some later design stage but should be addressed directly now in the EIS before any planning approval is granted.

Surely the expert advisors to the applicant should be able at this stage from their experience with the development of similar ethanol plants in rural districts to be in a position to give more definitive conclusions as to the extent of noise levels which are likely to affect our property and what noise mitigation measures will be required.

What rights of objection, if any, do we have if it is found at these later design stages that noise levels will be higher than anticipated?

Above all the applicant and its expert advisors should be required from the earliest stage to be consulting with both our neighbours and ourselves in relation to potential noise levels and proposed mitigation measures.

Air quality and odours

At Clause 16.3.2 it is stated that as Receptor 4 (being our property) is outside the range of the step 1 screening criteria it has not been included in the assessment.

The question we ask as a result is whether or not that we will be affected at all by any odours or other adverse air quality impacts.

We would wish to know at this stage and not some time later down the line as to the likelihood of our property suffering from any odours or other adverse air quality impacts and if so the likely nature and extent of those odours and adverse air quality impacts.

If we are likely to be adversely affected then we would want to know what appropriate remediation measures will be taken by the applicant and that again these be spelt out at this stage and not at some later stage down the line.

We believe that this is another reason for the need for early consultation between the applicant and its experts and our neighbours and ourselves.

We also have difficulty when looking at the plan of the proposed site to ascertain the exact situation of some of the structures which may cause odours, particularly, the location of the aeration basin.

Wind direction

Obviously wind direction and its strength will be highly relevant to the questions of both noise levels, odours and other adverse air quality impacts.

The EIS at Clause 16.3 makes the statement that during summer winds from the south predominate. By autumn the southerly winds are less frequent compared with northerly and south westerly winds and that winds in winter are predominantly westerly or northerly.

We believe that the regulator should carefully examine these statements to see if they are correct.

In the many years we have lived in Deniliquin we believe that the predominant winds in summer are in an arc from east/north/east to the west with lengthy periods of hot northerly winds being temporarily mitigated by south westerly changes.

From our experience the predominant winds in winter are south east to south west bringing frequent cold fronts and the majority of Deniliquin's annual rainfall.

Fire and potential disaster mitigation

As far as we can understand from the EIS matters such as fire and waste leakages should be able to be contained within the site itself.

We believe, though, that the applicant should be required to provide further information as to those circumstances where such matters may not be able to be contained within the site itself and may directly impact on neighbouring properties including our own property.

We would like to have greater detail at this stage in relation to the applicant's proposals for fire and waste leakage mitigation.

We also believe that a relevant matter is that in the event of a major catastrophic event at the ethanol plant whether the emergency services in Deniliquin will be likely to be able to cope with such an event.

Increased traffic and school buses

It is clear from the EIS that there will be increased traffic on the Barham Road including many more heavy vehicles.

Our children use the school bus into and from Deniliquin which stops immediately near the proposed site.

Currently the school bus simply pulls over onto the side of the road to either pick up children or for them to alight.

With increased traffic from the ethanol plant, though, we have fears for their safety.

We believe that strong consideration should be given to making it a condition of the approval that the applicant at its own expense construct an appropriate lay-by where the school bus can stop in a position where it is totally off the Barham Road allowing children to enter the bus and alight in safety without the risk of being hit by heavy vehicles which may be on the Barham Road.