

Submission opposing the approval of Application SSD-6594 Blayney Export Meats Small Stock Abattoir.

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The following comments deal with the various appendices that support the claims made in the body of the EIS.

Appendix A – Secretary's Requirements

Whilst it can be a very subjective assessment I can find no evidence that the requirement for public consultation has been met, viz -

I wish to emphasise the importance of effective and genuine community consultation and the need for proposals to proactively respond to the community's concerns. Accordingly, a comprehensive, detailed and genuine community consultation and engagement process must be undertaken during preparation of the EIS. This process must ensure that the community is both informed of the proposal and is actively engaged in issues of concern to them. Sufficient information must be provided to the community so that it has a good understanding of what is being proposed and of the potential impacts.

One meeting was held, where significant concerns were raised. There has been no public feedback where these concerns were addressed.

Similarly, I have had no feedback to the concerns I raised in an email feedback to SLR as suggested at the one public meeting.

Appendix B - Sealink Previous Consents

Landscaping - what we can see today indicates that the implementation of the Landscaping requirements of the previous consents is clearly inadequate, and the threat of a \$1,500 security deposit requirement totally ineffective.

Appendix C - Project Risk Register

In general the risk ratings assigned are low. The specific items that stand out are:-

Ref 001 - Land Use Conflict - no mention is made of the potential conflict between a "wedding reception centre" and the proposal just over the road. The response in the EIS is also MUTE on this subject

Ref 002 - Air Quality - if odour emissions are inevitable there is a clear risk to neighbours that is not acknowledged

Ref 006 - Transport - possible damage to roads by heavy vehicles increased traffic is totally ignored. I fear the section of Newbridge Rd will end up like Browns Creek Rd with the damage caused to it by ANL trucks. Local experience indicates that stock transport vehicles do drain animal wastes onto the local roads. The increase in brown smelly stains on the roads since the opening of CTLX is a clear testament to this problem. The proposal does nothing to address this known problem.

Ref 011 - Heritage - acknowledges the existence of Athol but significantly underestimates the effect on the business

Socio-Economic - I am fearful of a return to the crime rates of the 90's in Blayney when the old abattoir was operating - the basic statistics indicate a significant drop in crime in town since the old abattoir closed.

Appendix D - Air Quality

I am concerned that this assessment does not take into account the very low height of the "inversion Layer effect often experienced in the Belubula valley, as evidenced by the low fog often seen at the Purina factory during certain weather conditions. This effect results in increased concentrations of odour particles, and hence the perceived odour.

The odour assessment also relies on "regular" removal of various wastes. Monthly would be "regular", but clearly inadequate. I believe that daily removal should be specified, in sealed transport to prevent fugitive emissions as the waste vehicles travel through the centre of town, when both empty and loaded.

The proposed use of a "turkey nest dam" in the SW corner (closest to Athol) for the temporary storage of waste water needs further controls. Contaminants present in this water may be acceptable for further dilution with the other sources of water supplying the Cadia Valley Operations water return pipeline, but after a couple of warm days in a stagnant pond are more than likely to become a significant source of odour. The evidence indicates that the CVO dewatering facility will come on line later rather than sooner, meaning the use of their return pipeline for disposal of waste water may not eventuate in the near future. There is no alternative put forward if the pipeline becomes unavailable for any reason.

Appendix E - Noise

In general the noise assessment and recommendations seem adequate. The main concern for the future will be trucks operating between 10pm and 7am, especially in the short section of Burns St, and when reversing on site. Reversing beepers are designed to be loud, and the noise will easily carry across the open ground between the stock unloading area and the nearest residential areas.

It is in this section that we see the first mention of animal feed deliveries. This is strange given the stated planned short holding time of the animals. It is a cause for concern for the generation of noise, given truck driver's propensity to "bang" the sides of the truck to get the last bit of feed to flow out of the truck. It is this "banging" activity that has been the greatest source of noise complaints for the Nestle Purina factory.

Appendix F - Traffic

As per comments above this section fails to deal with the increased maintenance that will be required on local roads as a result of the increased truck traffic. The example of the damage to the surface of Browns Creek Rd is there for all to see.

The other concern I have with the traffic assessment is that it fails to mention pedestrian traffic crossing Burns St that could be adversely affected by the increased number of vehicles using the road.

Appendix G - Visual

The assessment is realistic and acknowledges the small possible visual impact provided the landscaping plan is acted upon expeditiously and is suitably maintained, unlike the landscaping implemented for the SeaLink project.

Appendix H - Heritage

The assessment is clearly unrealistic, in the section where it states:-

Is the new development sympathetic to the heritage item? In what way (e.g. form, siting, proportions, design)?

Yes, the Project has been sympathetic.

The project is clearly **not sympathetic** with the Heritage listed Athol Homestead. It is even less sympathetic than the existing Sealink facility, being closer and thus must increase the downgrade of the heritage value of Athol. The landscaping plans required of the SeaLink facility have been poorly maintained and provide no screening whatsoever of the visual effect from the Newbridge Road.

Appendix L - Preliminary Hazard Assessment

I am concerned that this only deals with on-site issues and in no way addresses the hazards associated with increased truck traffic, especially in town where much of the increased traffic goes past the Primary School, Childcare Centre, and the Post Office, all of which are high pedestrian traffic areas, and short stay areas for parking cars.

Appendix M - Socio Economic Impacts

The assessment makes no mention of the probable negative effects on existing businesses in Blayney. The wedding reception business run from Athol will be severely affected, probably to the point of closure, with a consequent loss of employment for not only those directly employed, but also for others on the hospitality industry in town due to the reduction in visitors. Those of us who lived here during the time of the old Blayney Abattoir will remember the pleasant change that occurred in town when the old abattoir closed with a significant decrease in the local crime rate. The Police Station Sergeant publicly acknowledged he would have difficulty justifying his position after the old abattoir closed. Am I demonstrating a level of socio economic snobbery with this comment? Probably, but the crime rate figures do support this view, and people who live along Adelaide St no longer live in fear of the drunken anti-social behaviour that was a regular feature of Friday and Saturday nights.

Appendix N - Health Risks

The health risks from Q-fever are significantly understated, especially for one of the more vulnerable groups in our town, being the residents of the Anglican Retirement Village, which is among the closest residential areas to the proposed facility.

Feral goats, as opposed to farmed goats, are a known risk of Q-fever and have been identified as a source of Q-fever outbreaks on several occasions.