

Miles Hedge

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19 May 2015

Attention: Manager Industry Assessments
Planning Services
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Sir

**BLAYNEY EXPORT SMALLSTOCK ABATTOIR
SSD 6594**

Declarations:

- I object to the proposed development, for the reasons outlined below
- I declare a reportable political donation. I gave the sum of \$1,000 to the National Party of Australia on 17 March 2014. This donation has been reported to the Electoral Funding Authority.

Reasons for objection to the proposed development:

1. (lack of genuine) community consultation

A letter dated 14 August 2014 was sent by the Dept. of Planning (signed by Daniel Keary, Director Industry, Key Sites & Social Projects-ref 14/11918-1) to the applicant. The third paragraph of that letter stated:

"I wish to emphasise the importance of effective and genuine community consultation and the need for proposals to proactively respond to community 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”

According to item 5.5 (p58) the applicants state that a community meeting was held on 18 September 2014 and the following issues were discussed:

- Additional traffic
- Traffic noise
- Capacity of intersections
- Location of new access to site
- Consideration of recreational users of Newbridge Road
- Rail v. Road Transport
- Odour
- Noise
- Hours of operation
- Q Fever
- Potential impact on water resources
- Water usage
- Potential lighting impacts
- Waste management procedures

Any investigation (I repeat “any”) by the Department of Planning into the meeting held on 18 September 2014 will show that the above claim to have satisfactorily covered all the above issues is fallacious. The meeting was advertised (once only in the classifieds section) in the Blayney Chronicle on 11 September 2014 (copy enclosed) and only a few residents attended (which can be deduced to be the objective of the organisers). The Mayor attended and will tell you that nearly all questions asked were answered by statements such as “we are not in a position to comment at this time”, “those issues are under investigation” etc. The applicants have been requested by many residents to hold a follow up meeting but have singularly rejected these requests (as their advisor Mr Hornery knows full well). Below is an email I received from Rebecca Ryan, General Manager of Blayney Shire Council dated 22 April 2015 which only reinforces my contention that the applicants are not interested in any real & meaningful community consultation (relevant paragraph highlighted).

“Miles

Thank you for your request that Council convene a public meeting in regards to the proposed Smallstock Abattoir in Blayney, the EIS of which is currently on Public Exhibition.

Council has offered to facilitate such a meeting to Metzyia Pty Limited, however to date both Mr Hornery and Mr Tanos have declined the offer

stating 'all questions and concerns from the last public meeting have been addressed in the EIS and these are available at Council as required'. Please note that there is a link to the EIS on NSW Planning and Environment website from Council's website, as well as a couple of hard copies which are available at the Council office front counter and Blayney Library.

NSW Planning and Environment as Consent Authority for this development, has invited Council to comment on the proposal including providing advice on the recommended Conditions of Consent. Council will be seeking to negotiate a Voluntary Planning Agreement (VPA), the basis of which needs to have a nexus with any positive or negative impacts of the proposed development.

In order to meet this timeframe for submitting comments to NSW Planning and Environment, by Monday 25 May 2015, Council will be convening an Extraordinary Council Meeting on Monday 18 May commencing at 6pm to formally consider this matter.

Council will conduct a Public Information session on Thursday 14 May at the Blayney Shire Community Centre commencing at 6pm. Please note that the objective of this community consultation is for Council to present the Draft recommended Conditions of Consent and proposed structure of a VPA, which will be included in the Extraordinary Meeting Business Paper. Council staff do not have the scientific, engineering or Abattoir operations knowledge to address any questions relating specifically to the proposed development and our information source will be the EIS.

It is neither a meeting in support or in opposition to the proposal, rather an opportunity to engage and inform the community about Council's submission to the NSW Government for consideration. Council will be encouraging anyone with comments to make their own submission directly to NSW Planning and Environment.

I will ensure adequate notification time and promotion is given to allow the Blayney Shire community and businesses an opportunity to attend and whilst I will be inviting Metzys Pty Limited to attend this meeting, I cannot guarantee their participation.

Regards

Rebecca

Rebecca Ryan
General Manager
Blayney Shire Council"

In other words, the applicant expects the community to be satisfied with getting hold of an 800 page document, of which Council holds only one copy on public display, and to come to a sensible conclusion as to the merits or otherwise of this proposed development without any further involvement of the applicant. Their whole approach has been to treat any issues raised by the community with disdain. That should be of real concern to the Department of Planning.

If any of the above, and particularly the paragraph quoted above in Mr Keary's letter of 14 August 2014, is to have any meaning at all then the application should fail on those grounds alone.

2. Location

The proposed abattoir will be constructed on the eastern side of Blayney township within a one kilometre radius of the IGA supermarket & other businesses, the Inala retirement village, local churches, the Post Office and various residences. Contrary to the assessment in the EIS (which is just plain wrong) the prevailing wind in Blayney is an easterly. One does not have to be Einstein to appreciate the very sour smell that emanates from wild goats (they say 4,500/day or over 31,000/week) will have on the surrounding area. That is an unconscionable burden for the town to suffer. I would lay London to a brick that if approval is given any conditions to preserve amenity would be ignored, as the history of the development of this site since Metzyia Pty Ltd acquired it in 2001 attests. The subsequent smell from activities on the site would be felt widespread throughout Blayney. The increased traffic is going to affect everybody in Blayney and the roads are not set up to handle the expected volume of traffic. The proposed site is just in the wrong place for this type of development. I also find it difficult to understand why a business (Athol Gardens) which is located directly opposite this site will be effectively put out of business as a long established & successful wedding reception venue for no other reason than this particular location maximises profit at the expense of the adjoining residences, businesses and the township generally. Even worse, I am given to understand that planning guidelines already dictate that an abattoir should not be developed within 500 metres of an adjoining property and that Athol Gardens is only 350 metres away. If this in fact true then the development application fails on those grounds too.

The proponents will want to compare their proposal with that of Nestle Purina, (located 2 kilometres from the main street, not one kilometre as stated in the EIS). No doubt Purina gets a lot of unprocessed meat into their factory. The difference is that they do not have yards for live animals. Purina also does not inflict the town with 58 B Doubles a day with live animals. Wild goats are known for the high level of smell they put out. No matter what steps are taken to control the smell at the factory, nothing can stop the smell from passing trucks. The smell will far exceed anything from cattle or sheep.

3. Economic benefit to Blayney Shire

The applicants have not properly demonstrated the economic benefit to Blayney Shire from this development in the EIS. Whilst I accept that the current Sealink site may have excess freezer storage capacity, that is not a proper reason to determine that constructing the abattoir will benefit the wider Blayney community. I am given to understand that the total of wild goats' available on the whole Eastern seaboard is 22,000 per week. I accept that statement requires verification however if the true figure is even close to that number it is hard to understand where Metzuya will source over 31,000 each week, using the assumptions they set out in the EIS, without putting every other abattoir out of business. There is a perfectly good abattoir in Nyngan which already processes wild goats. If the goats were killed there and then transported to Blayney for freezing & export a lot of the difficulties surrounding this application would disappear. Metzuya (or more particularly Mr Tanos) should be requested to explain why this option has been rejected. I note that if there had been proper community consultation maybe this and other questions could have been answered long before we got to this stage.

4. Water

The EIS as lodged is deficient in assessing the water risks to Blayney Shire with respect to the proposed abattoir. Contrary to their expert's report, the area where the proposed abattoir will be sited is on a known flood plain. There have been two floods in the last decade which have almost reached the retirement village and closed Newbridge Road (refer photo on cover page of Jacobs Group Blayney Flood Study dated 15 January 2015 and in the detailed report). The whole area has vulnerable ground water which flows into the Belubula River and then onto Carcoar Dam, a popular recreational dam and potential source of potable water. The site is thus totally unsuitable for the proposed use.

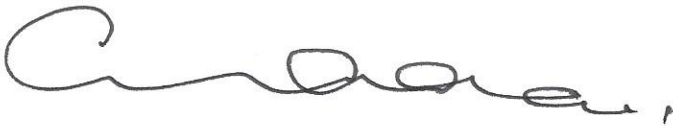
5. Other issues

There are a whole range of other issues which negatively impact on the proposed use of the site as a wild goat abattoir. Not least amongst these is the risk of Q Fever spreading into the local population, whether sourced directly from the abattoir or from passing trucks. Others with more knowledge than I have will no doubt be able to provide more information on this subject.

Blayney Council will be requesting as a condition of consent that Newbridge Road be reconstructed to allow for the high number of truck movements. I understand that a previous condition of consent was for the Glasson Bridge over the Belubula River to be strengthened. I note that Sealink (owned by Metzyia) did not financially contribute to the cost of this upgrade, which was paid for as to 70% by the ratepayers of Blayney Shire. How the Department of Planning will enforce any Conditions of Consent over this development, if approved, remains a mystery but one which must be solved as part of any consent process.

In summary, this is the wrong sort of development for a site so close to the town centre where it will not be possible to contain matters if an unfortunate accident occurs. Whilst Metzyia will say that no such accident can occur history is littered with people being wise after the event.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Miles Hedge', with a long, flowing underline.

Miles Hedge

Enc: