

1 June 2015

Attention: Robert Byrne – Senior Planner and Chris Ritchie - Manager – Industry Assessments  
Planning Services  
Department of Planning & Environment  
GPO Box 39  
SYDNEY NSW 2001  
C/O [robert.byrne@planning.nsw.gov.au](mailto:robert.byrne@planning.nsw.gov.au) & [chris.ritchie@planning.nsw.gov.au](mailto:chris.ritchie@planning.nsw.gov.au), instead of  
[www.majorprojects.planning.nsw.gov.au/page/on-exhibition](http://www.majorprojects.planning.nsw.gov.au/page/on-exhibition) & [www.planning.nsw.gov.au/privacy](http://www.planning.nsw.gov.au/privacy)

**Submission Re: “State” and Local” “Significant” “Development Application for the Blayney Export Meats” “Small”er-Sized “Stock”, but Mass-Sized / Number of Killings, “Abattoirs”**

**Application No: SSD6594 Located At: 137 Newbridge Road, BLAYNEY NSW 2799**

Dear Robert Byrne, Chris Ritchie and To Whom It May Concern,

**Thank you for the extension in time to respond with my submission.  
I have much more information I would like to add, but time is of the essence...**

I also wish to submit further information (and in far more detail) when the opportunity arises (as you have stated I may) and with the PAC, in due course. Please note, I have been preoccupied with family concerns, and have still not received the information I requested from Blayney Council within a reasonable timeframe, to assist in support of my submission. Hopefully, it will be made available to me in the near future.

**I strongly object to the above-mentioned proposal.**

**I declare, to my knowledge, I have not made any reportable political donations in the previous two years.**

**As a neighbouring landowner, I strongly object to the above-mentioned proposal for the following reasons:**

**Metziya Pty Limited are proposing a:**

- 1. Direct Health Risk (to Residents and Visitors, Drinking /Domestic Water, Farm Stock & Township)**
- 2. Direct Negative Economic Impact (Reduction in Property Value, Increase in Insurance Costs, Loss in Local Businesses & Tourism)**
- 3. Direct Increase in Flood Risk to Residential Housing & Property including Stock, Roads & Township**
- 4. Direct Negative Social Impact (Offensive in Smell, Sound, Traffic, Dust, Sight & Practice) to surrounding Residential, Agricultural and Rural Protection Zones**
- 5. Risk of Further Unused Infrastructure Due to a Repeated Pattern of Overpromising & Under-delivering (in Employment & Unsustainable Business) based on Unsubstantiated & Unscientific Evidence**
- 6. A Repeated Pattern of Non-Compliance (Consistent refusal to meet DA conditions).**

**Has Metziya Pty Limited or the Department of Planning and Development actually stopped to think about the irrational, unreasonable and ludicrousness (lack of basic common sense in town or business planning) in proposing to build an Abattoir partly in flood plain zone, close to a river (whose run-off and high water-table is used for human consumption, stock drinking and domestic purposes), close and opposite and adjacent to residences and a wedding and garden function centre (within 500m), and within 850m (less than a kilometre) from the centre of a township, which will also cause the driving of numerous transport trucks past schools, open cafes and a retirement village!!!???**

**It appears all Metziya Pty Ltd has thought about is “potential income to Metziya P/L”. I hope it is more than “process and DA Fee payments, and environmental requirements” to the Department of Planning?**

**In further detail the Development Application for an Abattoir at 137 Newbridge Road, Blayney is a:**

- 1. Direct Health Risk (to Residents and Visitors, Drinking /Domestic Water Resources, Farm Stock & Township) of Q-fever and Ticks amongst other pests and diseases commonly found in feral goats** by the risk of high prevalence of stressed, birthing and/or aborting rangeland goats faecal and foetal, hair, and other bodily fluid-carrying and aerosol vectors  
Clearly, supported by other abattoir mistake examples, and given Council recent meeting feedback and the local Blayney newspaper submissions, this proposal directly threatens the health of:
  - Surrounding residents (including a retirement village),
  - businesses (Wedding & Garden Function Centre, IGA, Mower, and Adelaide Street stores and cafes in particular), and
  - the community (cricket oval players, retirement village, fishers, picnic park amenity users, shoppers) and
  - visitors (wedding / function / BBQs / picnic areas, walkers, tourism), exposed near the abattoir and by stock truck transport routes (high school and primary school children and pedestrians, etc.).

Our home's (sterile-tested) bore water, and open well, and rainwater tank collection points, residence and stock, appear to be located less than 500m from the proposed abattoir. Such infrastructure threatens our health, our animal's health / infection, and contamination.

Is the Department of Planning and / or Metziya Pty Ltd prepared to meet litigation costs for approving an abattoir to be built so close to other residences and township when it causes the illness or death of a person or animal exposed to such risks, as has occurred in SA?

- 2. Direct Economic Impact (Reduction in Property Value, Loss in Local Businesses & Tourism)**

All property surrounding the abattoir will be forced to drop significantly in real estate value, due to the detrimental smell, site, dust, noise, traffic, flooding insurance, business and amenity impacts, etc.).

Would you want your property investment / retirement funds slashed? I did not move to a home surrounded by tranquil, peaceful quiet acres (where the loudest sound was once the

gentle breeze in the trees) for fresh air, grassy hill landscapes (just as I am sure you would not want your current home – wherever YOU live) to be spoilt, by the construction of an abattoir next door!!!???

Such a close unattractive, and smelly venture would also directly impact on the surrounding business including “Athol” - the wedding and garden function and centre (and heritage registered site) directly opposite the proposed site. Would you want to say your vows as truckloads of steaming skins stream away, and bleating goats head towards the knackery, in full view of where you stood to promise your partner’s eternal commitment? I cannot think of anything less appropriate, or romantic. Nor would overlooking such a view, or hearing such sounds assist one in relaxing as a visitor wishing to meditate or enjoy the tranquillity and beauty of an established garden, and otherwise scenic hillside surrounds.

In turn, I understand “Athol” employs local residents, and brings additional business to Blayney’s hotels and motels with their wedding and function party attendees need for accommodation.

What will this enterprise attract to Blayney, and what will it repel? New Blayney signs indicate it is a Historic Heritage town, not an industrial complex from every approach. An industrial area is already allocated in a western region situated well away from the township (where Blayney’s previous abattoir stands – as a derelict disused eyesore). Why build another one? Tourism significantly picked up in Blayney township, only after the previous rank-smelling abattoir was closed (where Q-fever infected staff who still suffer from its affects today). Who wants to stop to see or buy or eat anything in a stinky town? I believe a second attempt at constructing an abattoir so close to town will further detrimentally impact on our rural community’s struggle in current economic times. Why make the same mistake again? An export abattoir would not even supply product to our local town.

### **3. Direct Flood Risk to Residential Housing & Property incl. Stock, Roads & Township (stormwater, waste water, soils and water)**

The continuous creation of impervious roof, tar, and hard stand areas has led to a decrease in hill/land absorption of rain and an increase in water height of storm water run-off (volume and velocity) from the Metziya / Sealink sites into a collection dam which, in-turn, overflows into the water easement which runs through our property (near our open well / threatening possible contamination issues and within a few metres of our bore pump) approximately 30m from our house. The water drainage has built up so much over the years of increasing Sealink infrastructure, that stormwater has been seen moving so fast it pulls on the boundary fencing, and brims canal banks, threatening to overflow and flood our house. It limits our stock and vehicles from access to all our property. Photos available. Page 15 of volume 1 indicates a further 19,128sq metres of an approved DA warehouse (more impervious roofing) is yet to be constructed as it is!

In addition, this “canal” SLR refer to as “natural” catchments and drainage, drains out onto the road and across our drive’s gateway, which has also limited road traffic (both lanes), and access into and out of our property. Lower land on the site side of the river, and in another section from the river itself, also floods out onto the Newbridge Road, covering both lanes.

My disabled mother is elderly and does not need the anxiety of thinking an ambulance could not reach us if it rained for a few days (if she hasn't been made ill by Q-fever first)! Overhead power lines would prevent helicopter rescue close to the house.

Metziya's proposal to run the water to the river corner at the back of our property on a slow bend of the river, will likewise continue to threaten the flooding of our property and home – from behind (instead of just at the canal and gate at the front of) our house! Same issue, different entrance point / despite either run-off direction.

The road providing access to the retirement village homes has also been recorded as flooding. It is not fair to threaten these people with such risk, likewise, when they are trying to make the best of the rest of their lives. Photographs of past flooding will be provided to PAC.

Is Metziya P/L or the Dept of Planning going to supply boats and ferries, and/or build bridges for the surrounding residences and township as well?

**4. Direct Social Impact (Socially-Sensitive, Offensive in Air Quality & Odour /Smell, Waste Management, Sound & Vibration, Traffic & Transport, Dust, Visual Amenity / Sight & Practice, Land Use Safety, Flora and Fauna, Heritage, and overall Cumulative Impacts) to surrounding Agricultural and Rural Protection Zones**

From a glance, goat noise and smell estimates were based on one sample taken on one day date at one specific temperature in a sheep shed (completely different containment and weather range conditions to what the abattoir proposes). Such evidence is a basic statistical unscientific non-representative sample, and is not a close representation of what numbers and conditions are actually being proposed, or how emissions are increased with heat of summers, or still inversion layers of winters.

What about extreme temperatures and humidity and air flow within the abattoir as well as externally?

Blayney is renowned for intense cold still harsh frost-stricken winters (and inversion layers), particularly along the river flats.

Summers receive warm winds from the East of the site (as well as in winters) which would blow the concentrated non-filtered chimney of effluent and waste emission smells straight towards my house and the township! Basing wind dynamics and aerosol and dust fall out on wind dynamics modelled on a different topography and microclimate (Orange Airport) ~20kms away, and different in altitude and area, is also unscientifically founded. If records are available from 1996, why was only 2010's used (instead of the overall average?)? Temperatures have been recorded well below 0°C (e.g. -5°C to -14.0°C) on Blayney's Belubula River flats, versus the airport's minimum extreme of 0.5°C. Therefore, less than accurate temperatures / data would have been used in the wind and weather statistical models estimated.

In addition, aerosols are much lighter and act differently to dust particles.

It seems absurd the smell limits that neighbours are expected to put up with is based on the numbers of noses in the house, not on the ability or sensitivity of those noses in smelling goat urine, foetus, faecal and other waste products within a given distance or as the clouds and hazes of abattoir-chimney-concentrated fumes and truck dust billow and hang, or float

over and through our homes and throughout the township. Thank God the Wedding Function centre was included for a limited number of extra nosed guests!

Have you ever smelt a single buck goat on a goat farm? Try concentrating that smell 500-800 fold in a double B open truckload!?! It can be smelt easily within a kilometre and further if there is a breeze blowing!

Then there is the passing of skins in open trucks, and the rendering waste disposal area which has not yet been defined or assured yet. How can an application be approved without providing definite detail. And the cost of taking all rendering off site seems so inefficient it makes one question why someone would go to so much ongoing cost, trouble and impractical expense? Even though these waste trucks are described as being “fully enclosed” a smell is still emitted e.g. as one can smell garbage from behind an enclosed garbage truck. Have you ever driven behind one?

It seems all these SLR theoretically “qualified specialists” need to get a bit more realistic and practical, logical and far more scientifically-sound in the way they are making their estimates which threaten the future reduced quality of living in our own homes, Blayney township, businesses, and amenities!

The goats are proposed to be transported for hours without food, water, and in a mixed mayhem where females (does) can be easily separated from their young (kids), and would be constant calling (bleatings made by both) for them to hear and try and find each other. I can assure you a truck load of goats is going to be emitting more than the occasional quiet nervous bleat. When the trucks stop they will be even more frightened by the staff moving them out with electric prodders, and the smell of fear of death that awaits them.

Goats are great escape artists. This is how they became feral. What is the contingency plan if one or more goats escapes onto the site when unloading?

What emergency plans are in place re: the spread of disease, or ticks, or chemical spills? Ray Hornery advised me personally that the open dam would be used for emergency back-up for containment of abattoir waste. Where is the effluent control measures in place to meet EPA requirements with such a plan?

Trucks reversing with alarm beeps, goats screaming, and then, there's the way they intend to kill them. Will the goats and sheep be humanely stunned before being hung alive and cut in the throat to bleed to death over minutes (versus seconds)?

It is interesting to note the volumes of application information fails to include photographic views from all boundaries nor did they include all immediate adjacent residences / points of view. I can assure you that my property and home will be particularly exposed to the already encroaching white stark bright reflective buildings (that will be so close they will stand out and above the outline of hills behind, in perspective. Then there is the noisy dusty trucks turn around and wash stand! 3m high artificial hill slopes are not going to hide the height or sound of hundreds of Double B / 2 level stock trucks, etc. On still nights, sound waves are carried even further!

In addition, the views that were taken by SLR photographers appear mostly skewed panoramic shots from very biased perspectives (e.g. taken from ground level to insinuate trees and slopes appear taller or more screening than they really are). I intend to provide

photos re: what “Protected Scenic / Agricultural Zoned” view my property would be exposed to.

And with buildings and parking comes the lighting, particularly with operations proposed to be extended further again! There goes seeing the milky-way against the interfering glare!

Given limited time, I am typing this as I think it...

Has all the land owners directly adjacent to the proposed site been contacted, consulted and their concerns considered? Or the cricket clubs that play on the local oval between IGA and the Belubula River, or IGA, etc?

I note Metziya Pty Ltd record that they have “consulted” with me on two occasions. I can assure you that conversations, mostly one-way; being advised of someone’s proposal and getting to ask them a few questions re such plans, is not the same as my being consulted and having all of our residential concern’s identified, or attempts to consider and address such obvious issues in a two way conversation. It also appears in the two volumes briefly scanned - where detriment in risk of disease or smell or dust or sight, etc, is found, conveniently it is biasedly assessed as being of low or little impact (from Metziya P/L’s point of view)!

Then there is the traffic – fuel emissions, engine and reverse warning noise, the noise of air brakes, dust, and congestion. I have several photos showing the hard turns trucks make now to get into Burns street to go to Sealink. Who is going to look after the wear and tear of the roads and bridges with the increase in traffic flow? Who is going to look out for the pedestrian walkers, or kids who skateboard, or play by the bridges and picnic ground areas along Newbridge Road between the site and the town?

## **5. Infrastructure Eyesore & Repeated Pattern of Overpromising & Under-delivering (in Employment & Unsustainable Business) based on Unsubstantiated Evidence**

In their previous State Significant DA, Metziya promised 65 jobs would be made by the construction of a mine and federally-funded \$20M dollar railway spur link, by a previous “State Significant” Development.

However, Metziya failed to obtain the contract business required and has never appeared to use the spur link at all for transport (despite promises to “get trucks off the road” by utilising rail more). To my knowledge, Metziya’s employment also appeared to have changed by less than 5% of Metziya’s initial estimate, and no social-economic benefits are apparent either. What a waste of state and tax-payers money!

An abattoir-associated business group representative appears to have talked on ABC Radio of planned job losses in Orange (Electrolux) and Cadia Mine (Construction) as though such high paying and clean-room operating employees would want to rush to get basic award abattoir wages and far from cleanroom conditions. Mine-associated employees often move to other mine areas.

In addition, current local abattoirs do not need the small stock (sheep and lamb) competition as they indeed themselves are struggling to stay afloat. Recently, Dubbo abattoir had to shut down for two weeks due to lack of stock numbers. Metziya’s proposal threatens other abattoir small stock numbers and subsequent abattoir job losses.

Feral goats are not managed for breeding, so supply is even less consistent and dependent on seasonal conditions for numbers (reduces particularly during drought and predation), and in access to the source of goats (trucks are limited by black soils / bog easily in wet conditions). Effectively within a few months of erection, Metziya's infrastructure would become a second Blayney abattoir infrastructure eyesore!

In addition in Volume 1 page 3 of Metziya's documentation, they base their feral goat number estimates on a clearly depreciating number of goats in the wild over several years. Logically, if such depreciating patterns continued, estimates indicate there would be less than 1.5 years operating supply of goats (even when assuming maximum good season and stated small increase in numbers occurred, only if all remaining feral rangeland goats were processed by Metziya). In reality, there is some competition for such goats from other abattoirs located much closer to their western source, therefore Metziya's own "facts" do not show how Metziya could support such a business venture in goat and product supply. It is up to Metziya to throw \$38M to the wind, but they cannot feasibly promise permanent consistent improvement in Blayney's employment figures.

Metziya appear to state their case on "the need" for an abattoir is "to fill one of their empty freezers". It would be more appropriate (economic, cost-efficient and less health risky) to utilise existing abattoirs in Charleville and Nyngan and transport the meat to Metziya's warehouse, or build a new freezer warehouse close to these existing abattoirs. There was a reason Blayney Saleyards were placed over 10km away and out of the valley of the township of Blayney.

To my understanding, ironically, Metziya's site was once zoned as "Agricultural Zoned Land", and Metziya began the freezers & warehouses on the claim that he was storing "agricultural products". To break up and sell off substantial pieces of this agricultural land, it suited Metziya to then state / admit that he had built so much infrastructure he would like his site rezoned as "industrial zone". However, now Metziya are proposing to build an abattoir which I have been informed is an Agricultural Zone-specific and not appropriate as an industrial zoned operation.

So now Metziya have a freezer they wish to utilise more! Why should the local community of Blayney (and the general public of NSW - state tax payers) continue to empathise and pay for Metziya's poor business choice mistakes (to fix truck-worn roads, and unused rail infrastructure, ruining of local view and noise amenities) and waste further tax payers money into temporary / short-term-supported private enterprise investments with no returns?), particularly when Metziya P/L appear to have little consideration for surrounding residential, township or community concerns? The government got better returns from other car and valuable agricultural e.g. beetroot and tomatoe private industries that have had to move overseas. Why help a storage place when, with current economy, we have little national product to store?

Also, re: Fauna the reference does not include birdlife clearly seen within the site and adjacent lands including: Black swans, Rosellas, King Parrots and Golden eye finches (photos available). Likewise, many other fauna and flora species may have been missed.

## **6. Repeated Pattern of Non-Compliance (Consistent refusal to meet DA conditions)**

Perhaps you might empathise with why I have lost all faith in local or state planning government bodies' assistance and regulatory duty in ensuring any development

application and consent conditions are treated in a fair and reasonable manner in consideration of the whole community surrounding such a development, and in the lack of enforcement re: non-compliance.

Over the last decade, Metziya Pty Limited have consistently been found to be non-compliant in their development application and development approval conditions.

Why should this pattern of non-compliance (which disrespects, voids, and breaches all contractual agreements) be expected to change this time?

Some examples include:

- Metziya P/L fined by EPA for at least 5 tonne of soil that was washed into Belubula River (erosion not controlled during construction on site – apparently filmed going through the easement / canal at 61 Newbridge Road Blayney.)

- a DA condition committing to a 300m deep forest of evergreens be established in the scenic protected rural zone western boundary of the site has never eventuated or been maintained over the last decade (or within 3 years of the condition, as required). Blayney Council have not acted on this non-compliance.

- in one of the more recent DAs, Metziya had already completed the foundations of the development before the DA public exhibition closure date, or DA and the associated submissions were considered, for approval. Again further displays of Metziya's P/L lack of respect or compliance for rules and regulations. It made the process appear as a farce – a mockery to ask adjacent neighbours for comment when clearly the development had already gone ahead. Photos of works provide to Blayney Council.

- In operations, Sealink currently appear to be operating outside of the current DA conditions prescribed. With trucks seen entering and parked to enter and exit outside the gateway of Sealink (and operation hours agreed to) at all hours of the day and night.

- Mr George Tanos also applied for a DA to build a hayshed (nearly as big as one of his warehouses) within a metre of the boundary fence, a few metres within the vicinity of the residence of 61 Newbridge Road Blayney. Council met with concerned owners and the applicant. The applicant agreed to move the hayshed further away from the neighbour's residence to within a few metres of Belubula River, but expected to be able to drive his machinery through the neighbour's property and (stock) at leisure. Who treats other people with such rudeness and lack of consideration, and builds a hayshed to store dry hay next to a river on a flood plain? This DA was approved but the hayshed was never constructed.

- In addition, Mr George Tanos' cattle (steers, cows, and occasionally bulls) regularly break through the boundary fences of 61 Newbridge Road Blayney. In some cases, it has taken Mr Tanos over 6 months to organise retrieval of his grazing cattle and for his farm manger to fix the damaged fences. On one occasion Mr Tanos' cattle were there so long they ate the vegetation within 61 Newbridge Roads boundary fences windbreaks and in many areas regrowth did not occur and in some cases seedling trees were eaten and some established trees have died (further impacting the property owners own stock use of the trees as shelter shade and windbreaks).



- On yet another occasion, Mr George Tanos himself drove onto the property of 61 Newbridge Road without invitation or prior request, and advised the property owner that council were planning to place a public road through the property owner's homes' lounge room and carport (which appears to have been a false statement).
- Mr Tanos has requested in writing to local council that his DA fees be significantly reduced, while other businesses are expected to pay the full fee for such applications.
- Mr Tanos / Metziya P/L has also employed various staff who originally worked in Blayney Council including Mr Ray Hornery. Did potential conflicts of interest occur prior their change in employment? In addition, I note on page 1 of volume 1 that "the information reported herein is based on the interpretation of data collected which has been accepted in good faith as being accurate and valid". And that "SLR Consulting disclaims any responsibility to the client and others in respect of any matters outside the agreed scope of the work". However, SLR later states that when they prepared the EIS on behalf of Metziya that "Hornery and Associates Consulting Pty Limited (HAC) provided direction in terms of the project scope and technical input" (on under section 1.9 page 11 of volume 1). Therefore the scope may well be biasedly limited and may not encompass complete and relevant important information.

Unfortunately, from what information I have read so far in volume 1, I have found it appears that the material particulars do misrepresent and omit information in some details, in several sections (especially in its approximations (lack of exact measurements, and lack of waste management detail). SLR and its EIS are indeed, materially misleading and offer empty promises.

The Dept. of Planning and EPA may have more resources than local Blayney Council to deal with DA non-compliance, but what will be the politics or result of non-compliance for three levels of ownership/partnership relations be at State level? If there is a major environmental chemical spill, or change in rendering off site to on-site, or any other of the processes committed to as part of the DA agreement, who will ensure enforcement and notifications and fines and agreed compliance will actually occur, and who will be made responsible?

It is better to have no development approval (i.e. the development application in question - refused and rejected), than to be promised DA conditions that give false hope or reassurance, or lip service. Without genuine commitment by Metziya Pty/Ltd and the abattoir management group, such DA conditions are just pieces of paper that hold no real commitment, ensure no accountability, transparency or consequence re: regulatory compliance and enforcement. Blayney's community could sure do with more employment opportunities, but Metziya Pty Limited do not seem to deliver on what they promise, or offer much in sustainable employment, processing or product for export, given the limited supply of feral / rangeland goats in Australia, and a goat export abattoir already established in Melbourne.

I look forward to future contact with you and / or your department representatives and PAC, in hope you may get a clearer picture of what we, businesses and the community of Blayney do not want in disease risk, sound, smell, trucks or visual amenity, so close to our homes and town.

Regards, a very concerned local resident and neighbouring landowner.