

Blayney Shire Council



30 July 2014

Mr Robert Byrne
Senior Planner
NSW Planning & Environment
GPO BOX 39
SYDNEY NSW 2001

Via email: robert.byrne@planning.nsw.gov.au

Dear Mr Byrne

**Re: Request for DGRs for Blayney Export Meats Smallstock Abattoirs
137 Newbridge Road, Blayney.**

Council refers to your correspondence dated 16 July 2014 requesting Councils input into the Secretary's Environmental Assessment Requirements (EARs) for the abovementioned proposal.

Council would like to thank the department for the opportunity to provide input into EARs and state that it is supportive of the proposed development. Council would like to provide the following comments for consideration;

- Please note there is no RU1 zone land that adjoins the proposed development site as discussed in the Project Briefing Paper (BP). There is RU2 zoned land that adjoins the site.
- Please note there is currently a Development Application currently lodged with council for a new dwelling on Lot 2 DP 6158. Although some distance away it may need to be acknowledged in the assessment of the proposed development.
- It is hoped that a complaints management system may be put in place to deal with matters such as traffic, noise, odour etc for the life of the project.
- The BP provides for a single transport route along Newbridge Road (local road) to the Mid Western Highway (Adelaide St) (State Road).

The following schedule identifies the road type, construction level and present traffic loads. These details indicate the local road shall be severely impacted by traffic loads proposed by this development, and

the Blayney Shire community severely disadvantaged by the increased road deterioration should the project proceed as proposed in the BP.

Road Name	Classification Surface Type	Width (m)	Condition
Newbridge Road	Local Sealed	10	1.4 km length to existing entrance Under strength pavement with poorly developed shoulders located over the floodplain. Poor vertical and horizontal alignment between Ch.0.8 & 1.2km. School bus route

Council has concerns with the route, based upon:-

- The establishment and development of the project will generate an increase in volume of heavy vehicles on Council local roads. In particular during the development phase the necessary movement of significant volumes of gravel and other construction materials, from undefined sources, will have a devastating impact, unless provision is made for adequate strengthening and ongoing maintenance of the affected road and bridges.
- The intersection of Burns St (Newbridge Road) with the Mid Western Highway is the commencement of the route servicing the project. Further increases in traffic movements at this location are of concern, and should be referred to Roads and Maritime Services for consideration of possible traffic control devices and calming measures at this location.
- Newbridge Road – from the Mid Western Highway to the site entry is generally of suitable width, and is approved for B-Double operations to the existing Sealink facility. It does however include a section with poor alignment (vertical/horizontal) around the hill that the heritage listed item “Athol” is located on. Council has received previous correspondence in relation to concerns by the community about the alignment. An opportunity exists to improve this by land acquisition (Lot 3 DP 6158) and road realignment offering a straight alignment with well-defined table drains, located to the north of the existing road, and an increased distance away from “Athol”
- Council considers the road pavement to be under strength, and at high risk due to the location traversing the floodplain. Upgrade/new construction works would require substantial pavement material upgrades to provide for a suitable strength

pavement, and sealing to develop it into a suitable route that has the capacity to cater for the proposed increased traffic movements.

- The route includes two concrete bridges, constructed in approximately 1976 and 2014. The older bridge currently exhibits no signs of deterioration from existing traffic flows, however the proponent would need to have this bridge certified for heavy vehicle loading. The most recent bridge is constructed to SM1600 standard in accordance with the current Australian Standard.

It is imperative that the intersections be assessed against the predicted traffic growth and RMS guidelines to identify any intersection upgrades (to RMS standards) that may be required to be undertaken by the proponent.

Council requests this advice as it remains concerned that the traffic generated by the project through the intersection will present an increased risk to the motoring community.

Council requests that the proponent undertake consultation with Transport for NSW and local bus operators to identify existing and proposed (school) bus traffic to ensure that the traffic associated with the development does not conflict with existing users.

The BP indicates that the application intends to deliver livestock 24 hours a day. Further detail regarding the need and impact of delivery times are expected to be addressed in the Traffic Impact Assessment. In particular the following is required to be addressed; need to deliver between the hours of 9pm and 6am, weekends and public holidays.

It would be expected that all internal roads and circulation areas would be sealed to prevent potential sediment movement and dust movement on the premise.

- Surface Water Management – the BP identifies the establishment of a *“system designed to provide long term structural controls and management to mitigate the impact of flows”*. Council notes that the current solution directs surface water to an existing dam that under sized for the scale of development, directing stormwater across private land (proponent and other) before spilling over Newbridge Road, presenting a road safety and road maintenance problem.

Council requests that construction of new works and modification of existing systems should be undertaken to redirect flows and “over” flows to the Belubula River and away from Newbridge Road.

A Flood Study is currently being coordinated by Council for the Belubala River adjoining the proposed development site. The proposed development should consider this study, in particular the citing of any buildings and associated infrastructure. Additionally it should also be considered if the proposed development will have any adverse impact on the flood study. Further information regarding the flood study can be obtained from Councils Director of Infrastructure.

- Waste Management – The BP identifies all on-site staff amenities wastewater (domestic sewage) will be directed to Council's existing sewer network connection located on site. The BP also identifies all operational (development (abattoir) generated) wastewater will be directed to and treated by an onsite wastewater treatment system and then directed to Newcrest Mining's Cadia Valley Operations via existing pipeline.

Council requests that the proposed wastewater systems are designed as independent systems to eliminate any opportunity for cross connection and potential cross contamination that may jeopardise the existing domestic sewer treatment system.

Council will not accept any liquid trade waste generated by the development at its Sewer Treatment Plant.

Council is supportive of the waste water re-use initiative however details would be required for a back-up provision should Newcrest not be able to pump water to its mine site. It would be expected that a long term formal agreement should also be entered into between both parties.

Council would expect that all stock carrying vehicles should leave the site in a cleaned state so as to minimise any potential environmental pollution outside the property. A wash-down facility for these vehicles may need to be considered for the site.

Although a commercial decision Council would hope that the applicant looks further than just skin processing as the only local business to be utilised from the proposed development. Other local businesses such as Australian Native Landscape facility located in Browns Creek Road Blayney may be able to potentially process; manure, paunch and wastewater sludge which may create additional flow on benefits from the proposed development for the LGA.

- Air Quality – Odour assessment should have regard for seasonal climatic conditions, inversions etc. The BP states that most air quality issues relate to rendering. However significant odour issues can arise

especially in wet or hot weather relating to accumulation of manures and to urine soaked damp ground.

- The BP does not indicate the location and volumes of gravel materials that would be required to supply construction pads, road and access development/upgrades. As the location(s) of source material will dictate road damage from transportation it is important for the proponent to consult directly with Council to ensure that adequate provision is made to address road maintenance, upgrade and new construction requirements.

Council requests this advice as it remains concerned that the movement of volumes of construction materials in the Blayney Shire, shall destroy the rural road network.

Due to the volumes of materials that would be expected to be moved by road transport, the Blayney Shire community should not be disadvantaged by the destruction of its assets, as a result of this project.

- Social and Economic – Council would like to see a proactive approach to local employment between both the applicant and Council. In particular it is hoped the applicant and Councils Economic Development Officer can jointly prepare for the opening of the facility. Appropriate planning and sourcing of training providers would allow any person looking to gain employment to up-skill whilst the facility is still under construction and therefore both the employee and employer ready prior to the facility opening.
- Contributions – the BP provides limited advice on economic benefit derived from the project by the Blayney community. Chapter 3.15 notes economic benefit in the form of increased income to local suppliers and services, and increased employment.

Council acknowledges this will occur however it is expected this will be as a *“result of increased commercial activity”* associated with the development phase of the project.

The BP does not indicate, and Council would consider that the project will not generate a large amount of additional community infrastructure requirements, and the development may benefit the Blayney Shire community by the construction of additional housing, increased school numbers and other social membership areas.

Council considers that there will be a general need to assist in community development projects, and these should be based over the life of the project as opposed to a large up front contribution.

Council has not made any application for contributions for roads at this point in time, until a detailed roads assessment is undertaken, a solution is developed for either the proposed road realignment or structural pavement upgrades has been determined, and consultation occurred with Council. Council notes the current **Blayney Local Infrastructure Contributions Plan 2013**, as a mechanism to determine infrastructure contributions, alternatively the proponent may wish to consider the development of a Voluntary Planning Agreement with Council.

There are areas that would be of a community benefit that this project could support for the benefit of the overall and in the development of the project. These include:

○ Sponsorship of Community Environmental Program	\$10,000
○ Economic Development employee	\$10,000
○ Community Grants and Facilities funding	\$20,000
○ Community Education Grant Fund	\$20,000

TOTAL CONTRIBUTION (per annum) + CPI	\$60,000
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This contribution would be paid annually adjusted for CPI (Sydney) and will be payable for the life of the proposed project.

The funding of the Community Environmental Program would allow Council to attract Federal and State Government environmental program funding to undertake waterway rehabilitation works, in school environmental education projects, tree planting and other on ground environmental projects.

The funding of the Economic Development employee shall have benefits to Metziya in the establishment of, and assistance in attracting new support businesses to the Shire, to seek and attract staff, establish training for staff and flow on benefits to the community generally.

The Community Grants and Facilities funding would be administered by Council Financial Assistance committee to assess community projects put forward by local sporting associations, environmental groups, Council or other agencies. Examples of projects that may be funded could include tennis court upgrades, community amenities, and school environmental projects.

The Community Education Grant Fund will make contributions towards education, as assessed by a community committee for local people who undertake apprenticeships, cadetships, TAFE or University study and other personal or community development. Such a program can support the project, as Council recognises that many young people acquire skills and undertake training in electrical, animal welfare and meat processing related fields, before finding themselves full time employment within such industries.

Council would again like to reiterate that it is supportive of the proposed development and looks forward to assessing the Environmental Impact Statement when available and the opportunity to provide further input into the proposed development.

Should you require further information regarding this matter please contact Council's Planning & Environmental Services Department on (02) 6368 2104.

Yours sincerely

A handwritten signature in black ink, appearing to be 'MD' followed by a stylized flourish.

Mark Dicker
Director Planning & Environmental Services