

15th April 2021

General Manager
Warrumbungle Shire Council
PO Box 191 Coonabarabran NSW

Objection to Warrumbungle Shire Council (WSC) - DA 11/2021 - FEEDLOT

Objection to the Development Proposal for a Feed lot DA 11/2021 Warrumbungle Shire Council (WSC) proposed on the property 'Mount Mill' 1170 Coolah Creek Road Coolah Lot 2 DP 1107124 by the Minnamurra Pastoral Company on the basis of inappropriate site suitability, negative impact on resources, disposing of effluent, bio security, traffic movements, lack of contingency plans, odour assessment, water availability, animal welfare, pollution, lack of bush fire management plan, lack of a rigorous design plan to have considered detail environmental conditions and future reporting of operations, incidents, town water contamination and noise and odour monitoring.

We challenge this DA determination to have serious consideration for contingency planning, adequate mitigation and compensation to the individuals, environment and our community negatively impacted by this intensive development.

Our 24 years residency on the neighbouring farm, we are the residing community neighbours classified as the ' **receptors R1' referenced in the DA proposal and the recipient of ***fugitives from the feedlot and we intensely oppose to the increase cattle feed lot activity development application as above.

As as long standing, dedicated community citizens, and wholistic farm operators as full time neighbours who reside within a 1500 paces away from the proposed intensive feed lot and waste site; closer than 500 paces from the *kababatic drainage of the ***fugitive ammonia odour, dust and biological contaminates such as exposures E.coli and Q Fever into our air and drinking water.

Reason to oppose is due to multiply facets including information used in DA is underestimation of impacts- unsuitable location due to negative environmental impacts on river and Coolah township drinking water, increased heavy vehicle traffic on local road and tourist destination Coolah Tops National Park and **receptor negative impacts potential cost and losses to our amenity and income.

Climatic - ref 4.1of DA

The climatic and meteorological conditions data used in the development proposal is not appropriate or detailed enough to consider negative impact or contingency potential. This proposed feedlot fits within the State approved Liverpool Plains Wind farm SSD6696 which has evidenced high wind data collected for over ten years which validates the approval for wind farm energy project on these lands and

has not been adequately considered. This DA proposal uses data from Dunedoo a town post office, over 60 kilometres away not adequately considering the local wind conditions which will carry the odour and dust towards the R1 receptors a significant portion of the time. Wind prevalence is easterly with a significant percentage of time from the west which will directly carry fugitive odour and noise toward the residence for a significant portion (40%)[^] of time.

Land use Zoning ref 4.6.1.3 This type of operation of intensive farming is not deemed appropriate

Water - ref. 4.6.16 & 5.7 of DA

Ground Water vulnerability

The high risk of drainage as this feedlot site location and effluent waste ponds into the riparian zone of the river which is less than 300 paces on a downward slope into the creek that flows into perennial Coolaburragundy River which flows Talbragar into the Macquarie and then the the Murray Darling Basin and is directly on route to the Coolah Tops National Park, our community's and state attraction. The gradient quoted in the DA may be the gradient of on the pens not the site as as whole.

Amenity - Noise, odour, vibration ref 4.65 & 5.14 of DA

Although the distance appears acceptable buffer we are R1 receptors of the *katabatic flows from the feed lot increasing the potential to losses are amenity personal quality of life, loss of income from guest accommodation, tourist impacts, air and water quality are all negatively impacted. This contravenes statutory planning framework of the local government Warrumbungle Shire's Environmental Planning Plan 2013 "stating to provide for future tourist and visitor accommodation in a sustainable, manner that is comparable with and will not compromise the natural resource and heritage values of the surrounding area."

Warrumbungle Shire's Development control Planning Plan 2015 part 5

"To protect the amenity of the locality in which the development is situated."

" To ensure the development does not adversely impact upon the existing and future agricultural and rural industry potential of the land and adjoining."

Intensive Livestock Agriculture ref- 4.6.1.5 in the DA

The appropriate mitigation is not adequate to consider seasonal variation and receptors impact. Without an Environmental impact statement (EIS) the determining body would lack adequate information to make and informed decision; especially with the known intense climate changes.

A. Only refers to a desk top odour assessment this requires adequate monitoring and site specific assessment.

As fugitive odour, dust and noise and leeching contaminates are a significant issue with feedlots and do not adequately consider the neighbours who would be directly impacted by this without any mitigating or compensatory strategy, is deemed unsatisfactory and not best practice. Other than appearing to meet the required buffers for receptors, there are no management strategies outlined to reduce the negative impacts or to mitigate the receptors reduced amenity. The

MLA guidelines for Beef cattle feedlots (3rd edition 2012) these are considered only as a companion document to the National Beef Cattle Feedlot Environmental Code of Practice; of which best practice is the governing recommendation. The consideration the single rural homestead as receptor being a low 'S' Factor rating should not release the proponent operator from any responsibility to their neighbours loss of amenity and income. Therefore there guideline does not indicate that there will be no fugitive impacts. The Minnamurra Pastoral company's benefits from an increased intensive farming operation at the cost and loss of amenity for the neighbour receptor, environmental impacts and community drinking water contamination risk heightened.

Designated Development -ref 4.5 of DA only 1 animal difference between the requirement of Environmental Impact Statement does not constitute best practice. This DA does not offer any proposed audit to ensure the operations is conducted to standard or monitored. No mitigating strategies to overt contaminated leeching due to a change in weather conditions; data only based a 1 in 20 year high measure and 5 ml buffer for effluent irrigation. In the last two years we have had three intense weather events with conditions causing heavy rainfall with overflows from this local area onto the Coolah Creek Road with water, run off and soil. The WSC have evidenced through increased related remediation work.

Traffic - Ref:3.2.2 & 5.2 & 5.4 of DA

Coolah Creek Road increased traffic heavy vehicles

An increased wear and tear and no scheduled allowance for servicing maintenance costs of roads.

An increased in safety risk for residents and tourist alike - large heavy vehicles and no pull off areas - the likelihood risk is increased for a tourist towing vans/trailers coming up to large trucks.

FEED - An increase estimated only 18 semis for feed -estimated 100% own property supplies has not considered predictive to seasonal variation or feed hay verses grain and supplies from elsewhere of farm.

STOCK - estimated 60 outgoing stock B doubles (no incoming stock transfers mentioned or calculated into the proposed traffic.

Public Domain - Ref 5.3 of DA

This does not address the tourism access road to the Coolah Tops National Park loss of amenity, is exposed to all potential fugitives from a feedlot. This traffic increased risk on roads.

Heritage - Ref 5.5.1 of DA

Although not current documentation of Aboriginal heritage does not mean this does not exist.

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This site is within bush fire zone and has had incidents of hay combusting creating fire - therefore there predicted increased feed adds to the potential fuel load and risk.

Site Impact ref - 5.18 Social Impact

This is classified as rural remote and has the associated rural tourism and lifestyle which should not be discounted as not impact.

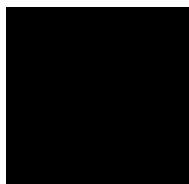
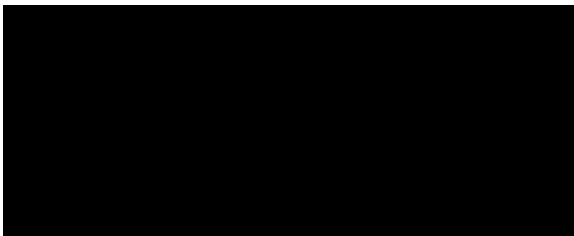
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Site options, as this DA is a corporation with ownership of many alternative properties; the location they have chosen is not their only alternative - they have site locations that are not close to rivers or residences.

Issue

- 1: loss of amenity fugitive contaminates, air quality, odour and noise
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References

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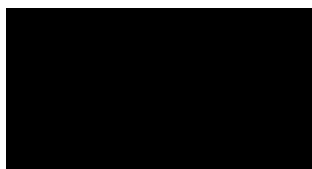
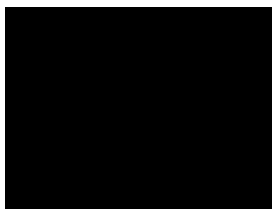
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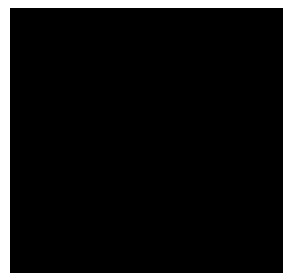
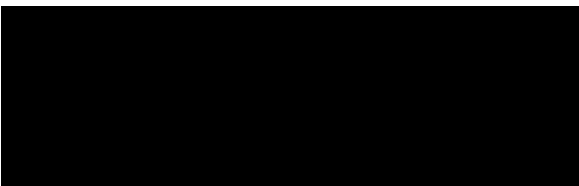
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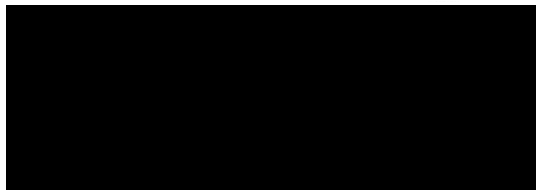
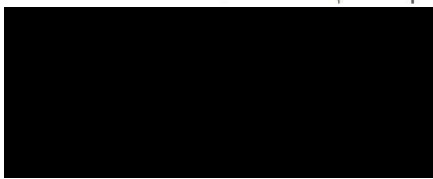
16th April

D/A 11/2021

This letter is to confirm that an email was sent to the General Manager on 16/4/21 at 8.0am.

Attached is a copy, also a map illustrating the waterway which was not included on the original D/A.

Yours faithfully



[REDACTED]

From: [REDACTED]
Sent: Friday, 16 April 2021 8:06 AM
To: 'info@warrumbungle.nsw.gov.au'
Subject: D/A 11/2021 - New 1000 Head Feedlot

Attention : The General Manager

Submission From : [REDACTED]

No reportable Political donations or gifts.

I wish to object to the development on the following grounds:

After reviewing the D/A, the Figure 4, 5.7.1.1 (Existing Environment) which illustrates mapped water ways, has neglected to include a major waterway within the development. It is located to the South West of the main infrastructure of the development. This waterway runs through the development area and flows directly into the Coolahburragundy River. The unmarked waterway also passes within close proximity (less than 100m) to the Effluent Utilization Area, crosses the site boundary and into the neighbouring property "Meringa".

No consultation has been made with the owner with regard to the impact of the effluent entering this waterway. Effluent Irrigation tail water is free to flow directly into the waterway, with the topography of this site promoting this effect. The slope of the Effluent Utilization Area and the structure of the drainage lines, which exist within this area and the development site clearly show that this will occur. Surface water runoff into this waterway shall have increased nutrients, pathogens and sediment, posing a major risk to the water quality and groundwater, via water pollution.

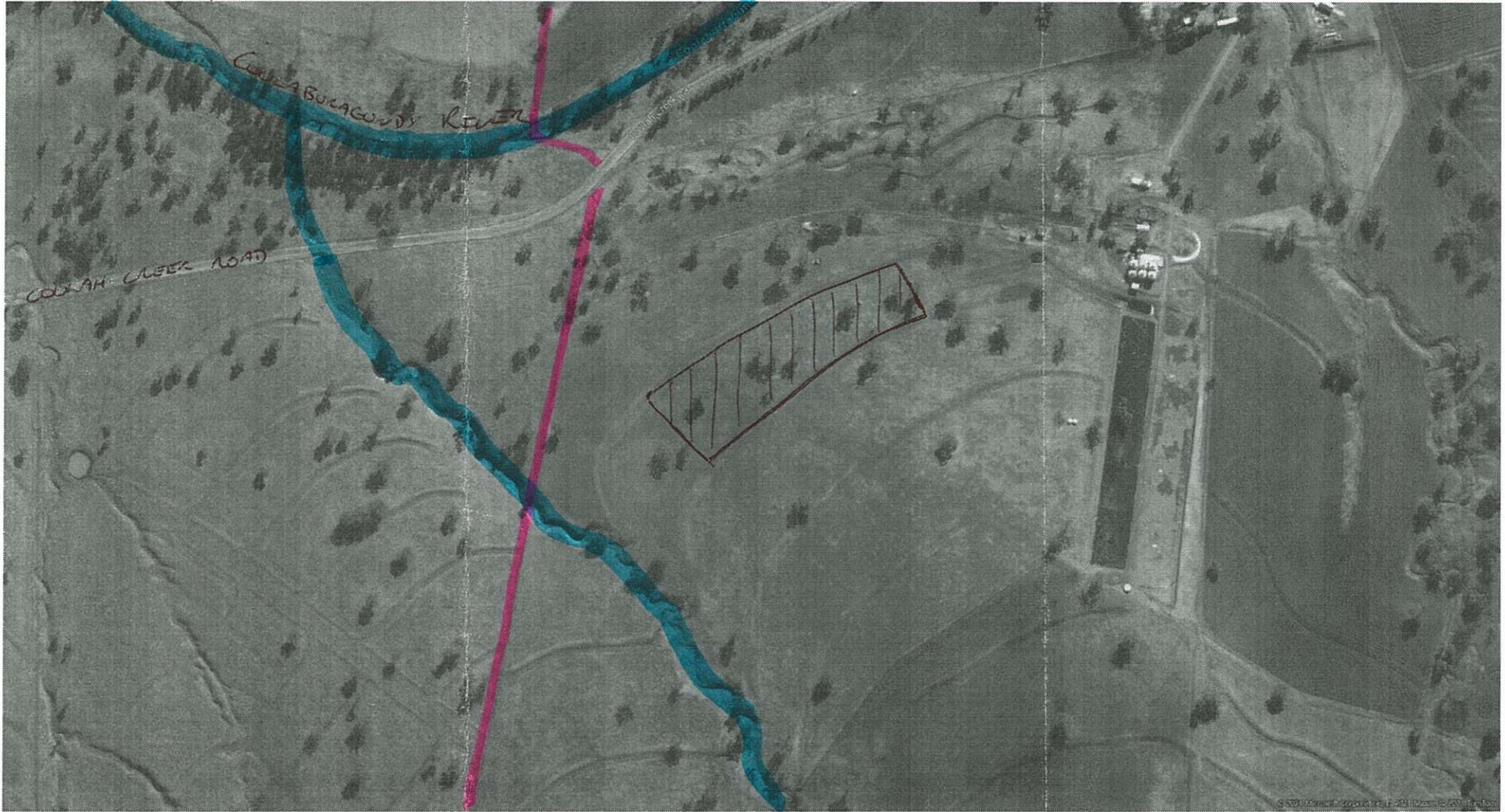
This shows a bio-security risk due to the proximity of the Agricultural business on neighbouring land. Effluent entering the watercourse poses a high risk to stock animals, flora and fauna. A risk almost certain to occur and the consequences shall be major, with serious and long term impacts.

As noted in the D/A this project is located in a "groundwater vulnerability" area. No buffer between the watercourse and the Effluent Utilization Area is shown in the Application, or even within the neighbouring boundary.


At no stage, have I been consulted by Minnamurra Pastoral Company, with regard to this proposed development. Minnamurra Pastoral Company have a duty of care to ensure that the environment is protected. I do not believe that the risks associated with the management of the effluent flowing into the water way will be appropriately managed, therefore there is a need to modify/redesign or consider other sites.

[REDACTED]

#Please note that a short letter confirming the above email will follow. A map will also be attached to illustrate the water way which has not been included on the D/A



 BOUNDARY FENCE
 WATERWAY

 Proposed Effluent Utilization Area



16th April 2021

General Manager
Warrumbungle Shire Council
P.O. Box 191
Coonabarabran NSW

DA Submission of concerns re WSC DA 11/2021 Feedlot

1. Truck movements/Traffic

The DA cites 18 semi-truck movements. This we believe is an under estimation of movements as it only cites grain movements. Not every year will the Mt Mill aggregation be able to supply the amount of hay/silage required for the feed lot, therefore there will be hay trucks movements from their other holdings Mia Mia and Ardgour to supplement. In drought years most of the hay will most likely to be sourced outside of the Mt Mill aggregation.

It is also more likely B-double trucks would be utilised than semi-trailers especially for grain and hay sourced outside of Minnamurra holdings as it is more cost effective. We believe the Oct-Dec time period would only be for the silo refill at Mt Mill aggregation, we believe there would be other movements throughout the year to replenish Mt Mill aggregations storage from Mia Mia and Ardgour on farm storages or further afield in prolonged droughts.

Internal movements of fodder across the Mt Mill aggregation may need to travel via Gundare Road, Cooks Road then Coolah Creek Road to feedlot at Mount mill in wet weather/season periods as road across Mt Mill to The Bowery (northern property in aggregation) is currently not all weather. This also can potentially increase the number of truck movements.

The DA cites approximately 60 livestock truck movements per year, approx. one per week exiting the feedlot. We believe this is also an under estimation of truck movements. In a perfect world stock arriving and leaving feedlot would be the one truck movement but highly unlikely to happen in the real world. Did not notice incoming livestock truck movements listed in DA. The Mt Mill aggregation will not supply all stock going into feedlot, livestock will have to either come from the corporations' other holdings (Mia Mia and Ardgour) or sourced elsewhere.

2. Noise

We believe the homestead at Hidden Valley (R1) will be the most affected from increase in noise from the feedlot activity. The feedlot will generate an increase in mechanical noises - truck movements, augers, motors, a mass increase in daily farm vehicle movements and often in feedlots very early in the morning. This increase in noise may have an impact on the Hidden Valley landowners and their relatively new farm stay business.

3. Odour

Hidden Valley and Mount Oeba are the two adjoining properties most likely to be impacted by any unpleasant odours that may result from the feedlot. Potentially Gynawah, Willania, Mt Norris, Yattendon, Gundare. This may reduce their enjoyment of their own homes and environs and potentially the Hidden Valley farm stay. The DA only indicates 3 receptors and greater than NSW guidelines but this does not reduce impact if the feedlot odour descends, especially as Coolah Valley does regularly have strong winds.

We realise the odour management requirements are greater today but when the feedlot last operated in the 1970-80's the children on the school bus held their breath passing the feedlot zone and majority of properties adjoining occasional had the feedlot odour depending on wind direction and speed.

4. Effluent & irrigation

The DA is minimal in information and the plans hard to see due to A4 size on public display. The .6ML terrace and .3ML sedimentation basin ponds then the 2.4ML sediment basin seem to be the bare minimum to be required. The DA states a pond storage capacity 90th percentile spill and once every 10 years – any potential spill is a disaster so near to a river that has many other users below this point.

It is alarming that the rainfall cited in proposal is 1 in 20 year as the design foundation for the feedlot for the effluent capture, storage and management. The Coolah Valley along Coolah Creek road to the intersection with Vinegrove road has had one major rainfall deluge event in 2007 (June) and in 2019 and two in 2020 which resulted in a huge amount of runoff of water, soil, vegetation and muck from the mountain slopes along the valley. Water gushed out of the gully between the Mt Mill homestead and cottage. This gully is on the eastern side of the feedlot. We have no doubt if the feedlot had been fully operational at this time there would have been a major environmental issue as this water ends in the Coolaburragundy River. There have been smaller deluge events also.

The areas rainfall is no longer the regular approx. 50mm per month with a slight dominance in summer, in this current century rainfall events have been fewer, heavier and shorter. Timor Dam inflow and rain data I believe supports this.

As we all know seasons can be wet, average or dry. In a wet season we have doubts around the .4Ha irrigation being able to handle the effluent effectively (2016 winter was extremely wet, council should look if Coolah sewer effluent irrigation was able to cope).

The feedlot is under the capacity that requires EPA monitoring, how will downstream users of the Coolaburragundy River be notified if there is spillage from effluent ponds?

5. Solid waste

The stock pile site information is minimal – Is site bunted to prevent waste running off in a rainfall deluge? Is there an issue with rainfall percolating through the solid waste pile and into the ground water below or run out into the gully nearby? More information is required to decide if this stock pile area for bio solids is suitable. We applaud the use of bio solids onto to soil for crops to utilise but care must be taken that solids not spread too close to waterways (cultivation is within metres of some).

6. Flora and Fauna

There is minimal impact, removal of 3 trees in cattle pen area stated in DA. No statement regarding trees in 2.8Ha irrigation area can only assume they are remaining. Feedlots have the habit of attracting masses of unwanted birds due to feed rations. There was no mention of any plan to deal with duck, cockatoos, galahs etc if they become an issue.

7. Soils Ref: 5.8

“existing ponds located onsite provide evidence that the soil landscape is well suited to support the network of ponds involved in the feedlot. Any additional excavations involved with the proposed development would be minor and focused around construction of the feedlot”

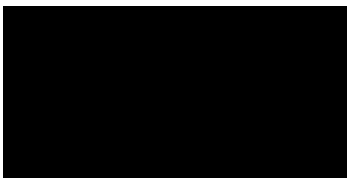
Clarity is needed here. Is this referring to the existing ponds on the slope west of the homestead, below the proposed feedlot, on the hillside adjacent to Coolah Creek Road and the River is on the other side of the road or are these ponds already constructed for this feedlot DA prior to approval? If it is the former, they were inadequate in rain events in the 1970's-80's. Can only assume it is the new ponds.

Conclusion

We are not opposed to the feedlot but have concerns around noise, odour and effluent impacts and WSC should be seeking more information from proponent and seeking expert advice from appropriate agencies to ensure these impacts are minimised and risks to the environment mitigated. Any complaints received from affected neighbours, once feedlot is in full production, should be addressed and remedied.

1. Believe the proponent has supplied the bare minimum information in seeking approval.
2. Not being able to remove DA application from council office or take a copy makes it more difficult to seek professional advice around information in DA for any objector or others raising concerns.
3. WSC need to ensure effluent infrastructure at feedlot will handle large rain events which are becoming more frequent and damaging.
4. Many who lived along Coolah Creek Road have memories of unpleasant smells and effluent slurry running across road to the river in large deluge rain events. Even though this feedlot is using different sediment terrace, basin and pond along with irrigation locals do not want a repeat or those who are downstream users. This area as stated above has had 3 large deluge rain events in recent years.
5. WSC need to ensure design is suitable utilising other Govt agencies with specialist knowledge to ensure no environmental impacts may result (in particular effluent) as feedlot is under the capacity for ongoing monitoring and surveillance by Govt. authorities.
6. It is known locally that construction started prior to applying for a DA so this makes it harder for any objections or concerns raised for this DA proposal to be addressed in the design. This should not inhibit any govt requirement from being enforced if required.

Regards





Submission Re Proposal [DAII / 2021].

Cattle Feedlot 1170 Coolah Creek Rd. Coolah.

I, [REDACTED] wish to lodge an objection to the establishment of a feedlot at the above address on the following grounds:

1. Unpleasant level of smell. That such a project would generate an unacceptable level of smell to those residents in proximity to the feedlot. I stress the words, " would generate," as this is already a known quantity . A feedlot was operated at the address of this proposed site years ago by Henry Crouch & had an unacceptable level of odour,as this one almost certainly will.

2. Stress on council infrastructure. This proposal would cause increased stress on the Coolah Creek road system, which is only built to carry domestic & light farming traffic. An increase in traffic of itself brings problems of cost & safety as Coolah Creek Road would then change from a minor road to a more travelled commercialized roadway, carrying an increased number of B doubles & heavier vehicles.

3. Degradation of the environment. I believe that an earlier application for an irrigation system at the same address is at present before council. This is completely out of the question & is an example of big business & big money exploiting our environment for their own ends, namely to generate greater profits at the expense of our environment . Over my time here, I have seen the Coolah creek change from a permanent watercourse to a semi permanent stream , with large periods when it has stopped running altogether. This valley has a very fragile infrastructure & biodiversity, it would be nothing short of criminal to grant irrigation licenses under these conditions.

The natural infrastructure of our valley both land & water is geared to support a realistic level of usage while at the same time leaving it the ability to regenerate and not degenerate

4. Drop in real estate values. Were this proposal to be granted it would result in a drop of land & house prices to those wishing to sell ,who were close to the feedlot and or dependent on the river for domestic & stock water. At some future time we will have to sellout & we would then find ourselves at a serious disadvantage. This could lead to costly litigation at a council & personal level for all those concerned.

5. Noise & Dust pollution. In an activity of this kind .a certain level of noise & dust pollution will be present over & above what is reasonable to expect in a purely residential & farming district. Given the right conditions of wind this could become objectionable. This factor as well as all the foregoing objections would have a large impact on the quality of lifestyle we have always enjoyed & rightly expect.

In all of this objection I have never used the words "Development Proposal" as the word development intimates a certain element of benefit to the biodiversity of our valley and it's inhabitants, when in actual fact the hoped for benefit of this proposal is to bring increased profit & wealth to those submitting this proposal, those who are already rich ,to get richer .

In actual fact those living close to the influences of this proposed feedlot and the natural biodiversity of our valley would be the losers.

I live approximately [REDACTED] from the proposed feedlot & am dependent on the creek for both stock & domestic purposes & would not welcome any such proposal.

[REDACTED]

Submitted & accepted at the Warrumbungle Council office at Coolah . Wednesday 21st.April.