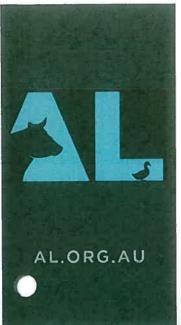
Council Email To: Cc: Objection Submission - Development Application No 25/20-21 lodged by Jardana Subject: Pty Ltd Attention: General Manager, Glen Innes Severn Council is grateful to Glen Innes Severn Council for the opportunity to lodge a submission in response to the Jardana Pty Ltd Development Application (DA), for a proposed intensive cattle feedlot at Stonehenge, in the Glen Innes Severn Local Government Area (LGA). Our submission in response to the DA and the corresponding Statement of Environmental Effects is attached for council's review and consideration. Our submission includes Animal Liberation's disclosures in line with Section 147(4) of the Environmental Planning and Assessment Act 1979, and, Amendments to Local Government and Planning Legislation regarding public inspection under the provisions of the Government Information (Public Access) Act 2009 (GIPA Request) and any political donations and/or of gifts made in the 2 years preceding the DA. ALNSW DA25:20-21.pd Regards

Thursday, 26 November 2020 2:55 PM

From:

Sent:

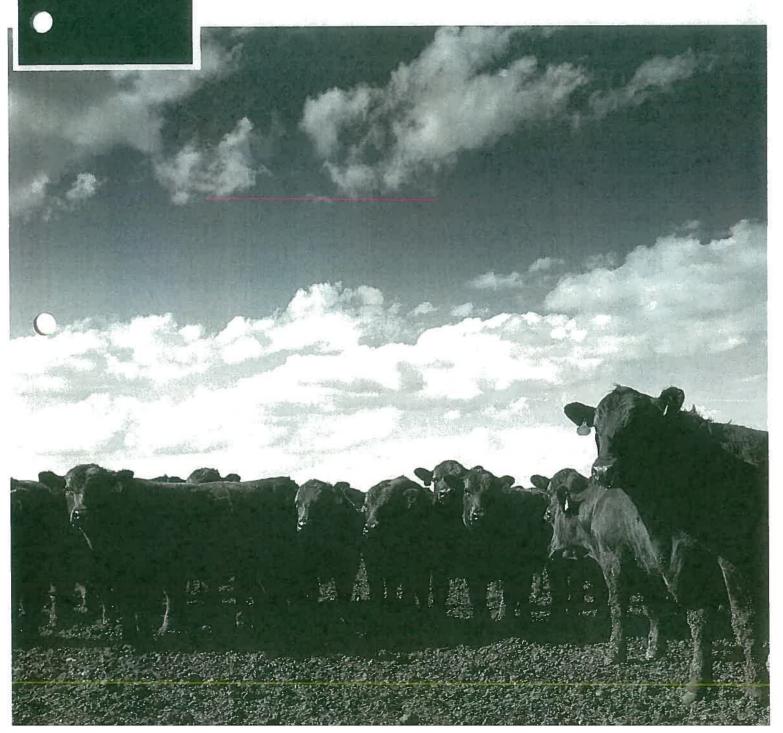


GLEN INNES SEVERN COUNCIL

DA 25/20-21 JARDANA PTY. LTD.

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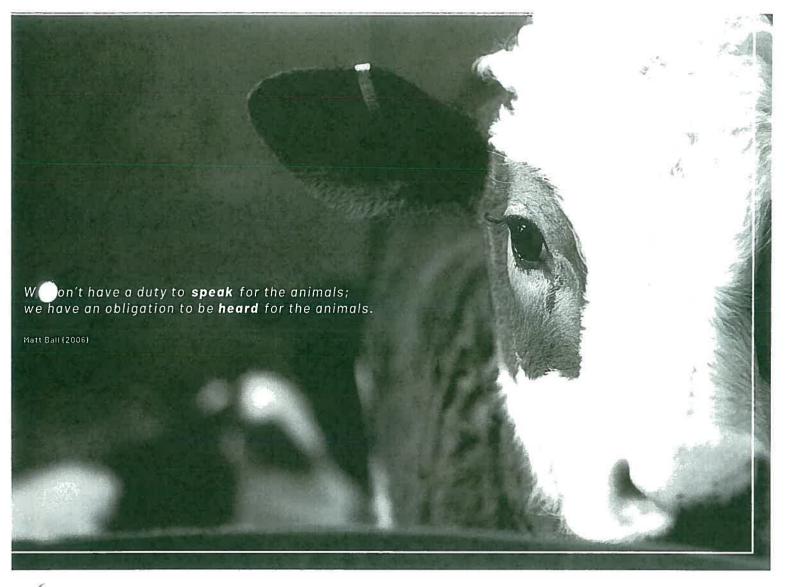
SUBMISSION



WE ACKNOWLEDGE THE TRADITIONAL & TRUE OWNERS OF COUNTRY THROUGHOUT AUSTRALIA AND RECOGNISE THEIR CONTINUING CONNECTION TO LAND, WATERS AND CULTURE.

WE ACKNOWLEDGE THAT THIS DOCUMENT WAS WRITTEN ON LAND STOLEN FROM AND NEVER CEDED BY THE GADIGAL PEOPLE.

WE PAY OUR RESPECTS TO THEIR ELDERS PAST, PRESENT AND EMERGING.



DOCUMENT DETAILS

Animal Liberation 2020. DA 25/20-21. A submission by in response to the Development Application No. 25/20-21 by Jardana Pty. Ltd. with the Glen Innes Severn Council for a 1,000 head, intensive cattle feedfol. Prepared by

ABOUT ANIMAL LIBERATION

Animal Liberation has worked to permanently improve the lives of all animals for over four decades. We are proud to be Australia's longest serving animal rights organisation. During this time we have accumulated considerable experience and knowledge relating to issues of animal welfare and animal protection in this country. We have witnessed the growing popular sentiment towards the welfare of animals, combined with a diminishing level of public confidence in current attempts, legislative or otherwise, to protect animals from egregious, undue, or unnecessary harm. Our mission is to permanently improve the lives of all animals through education, action, and outreach.

INTELLECTUAL PROPERTY RIGHTS

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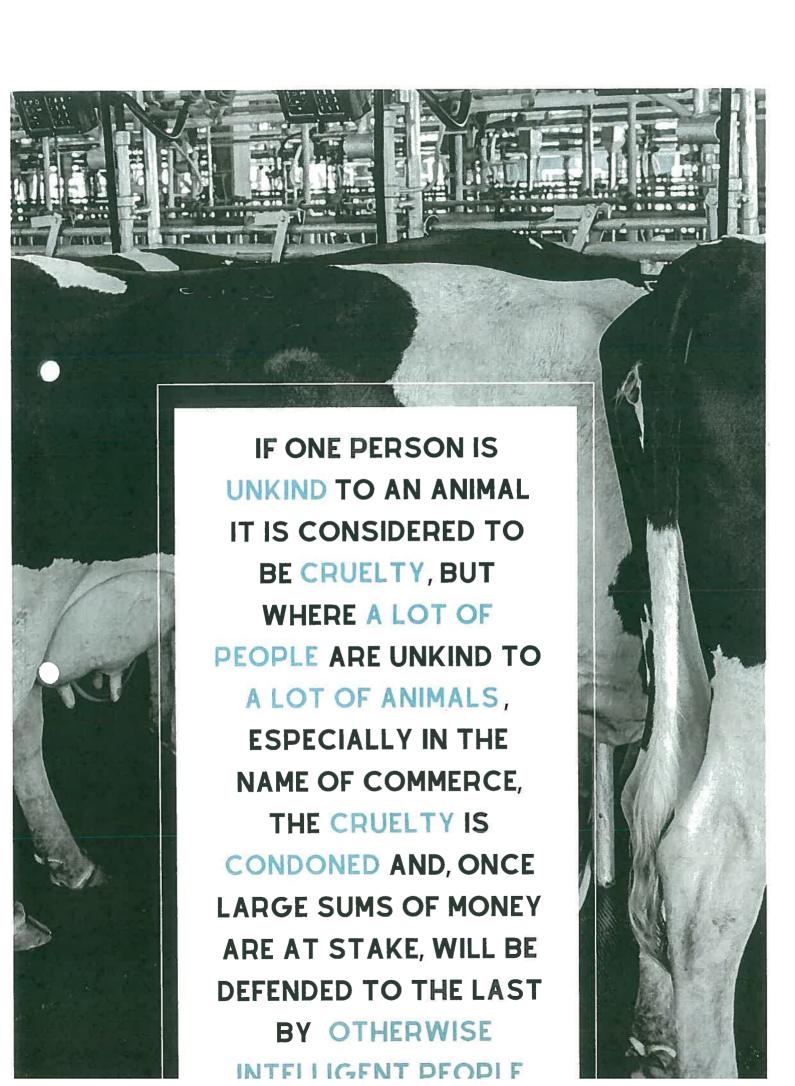


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CONTACT & ENQUIRIES

Animal Liberation

301/49 York Street, SYDNE+ NSV/ 2000





26 November 2020

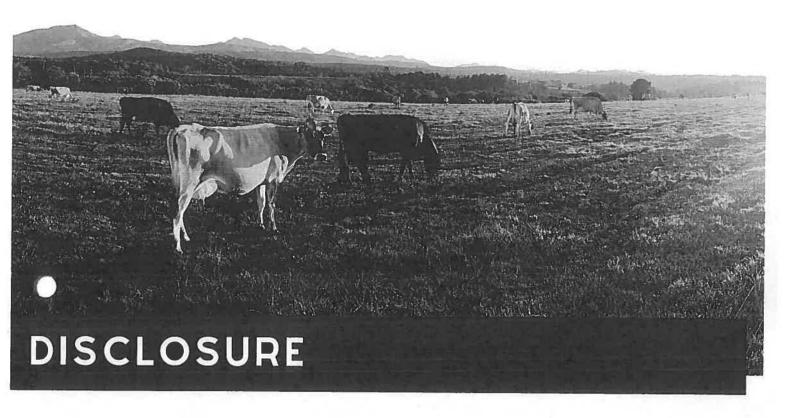
GLEN INNES SEVERN COUNCIL council@gisc.nsw.gov.au

We present this submission on behalf of Animal Liberation.

Animal Liberation is grateful to Glen Innes Severn Council for the opportunity to lodge a submission in response to the Jardana Pty Ltd Development Application (DA), for a proposed intensive cattle feedlot at Stonehenge, in the Glen Innes Severn Local Government Area (LGA).

We request that it be noted from the outset that the following submission is not intended to provide an exhaustive commentary or assessment in response to the issues contained within the scope of the DA, and/or, the corresponding Statement of Environmental Effects (SoEE). Rather, our submission is intended to provide a general examination and responses to select areas of key concern. As such, the absence of discussion, consideration or analyses of any particular aspect or component must not be read as or considered to be indicative of consent or acceptance.

For the purposes of this submission, Animal Liberation's focus covers aspects that we believe warrant critical attention and response. Particularly, the absence or the inadequacy of provisions for initiating and/or planning sustainability programs and policies; a distinct lack of concerted effort to transparently consider and support viable alternatives to unsustainable practices; and, finally, the lack of institutional resistance to sound science, emerging public opinion and the increasingly urgent need to proactively phase out environmentally harmful products and practices which also result in serious risks and impacts to humans and non-human animals. To this end, our primary focus is on the inherently unsustainable and harmful nature and consequences of intensive cattle feedlots.



In line with section 147(4) of the *Environmental Planning and Assessment Act 1979*, Animal Liberation confirms its understanding and acceptance that any submissions made in respect of the proposed development are available for public inspection under the provisions of the *Government Information (Public Access) Act 2009* (GIPA Request).

In line with Amendments to Local Government and Planning Legislation requiring the public disclosure of donations or gifts when lodging or commenting on development proposals, Animal Liberation discloses and confirms that it has not made any political donations and/or of gifts in the 2 years preceding the application.



SUBJECT: OBJECTION - DEVELOPMENT APPLICATION NO. 25/20-21, JARDANA P/L.

is grateful to Glen Innes Severn Council for the opportunity to lodge a submission in response to the Jardana Pty Ltd Development Application (DA), for a proposed intensive cattle feedlot at Stonehenge, in the Glen Innes evern Local Government Area (LGA).

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We appreciate council's assessing staff and decision makers have an onerous responsibility with this complex and technically challenging planning proposal, and that the assessment review must remain independent, objective and informed during the entire process. We acknowledge and further appreciate that this planning proposal includes risks and impacts which extend beyond the Glen Innes Severn LGA, and accordingly, carries an added and heavy burden of responsibility.

CHROCESTED FOR STORY STORY AND STORY

SUBJECT: OBJECTION - DEVELOPMENT APPLICATION NO. 25/20-21, JARDANA P/L.



proposed by the Applicant, to mitigate any potential risks, adverse impacts (including cumulative impacts). This is clearly outlined in the *Environmental Planning and Assessment Act 1979* which requires Council give due consideration to social impacts and public interest relating to any proposed development. All these considerations are accordingly a necessary and integral part of any comprehensive, objective and meaningful development assessment in line with the applicable planning instruments.

We have reviewed the SoEE, prepared by the Applicant's consultant, Agricultural Development Services Australia Pty Ltd (AgDSA), and the relevant planning framework and instruments at Council, State and Commonwealth Government levels. Animal Liberation is familiar with the history of this proposed development and the previous two applications lodged by the Applicant, including the resulting Land and Environment Court action instigated by the Protect Glen Innes Inc Association against the Applicant and Glen Innes Severn Council. We further note the ongoing strong local community opposition and numerous valid concerns raised by members of the local community.

Animal Liberation has no 'economic' or 'vested interest' pertinent to this planning proposal, however, we care deeply about Animals, our shared Environment, and People including our 'Humanity' which extends to our unique rural communities.

also support the democratic process of public exhibition and the right to have an opinion and voice that opinion, and we support and encourage a rigorous and robust Council assessment process. Our primary objections to the proposed intensive cattle feedlot are set out below.

Finally, it is Animal Liberation's strong recommendation that in consideration of the highly complex and technical nature of this DA and SoEE **Council has a duty and a responsibility to engage and establish an Independent Hearing and Assessment Panel (IHAP)** to ensure key and critical areas which require specialist technical oversight, are adequately assessed by qualified experts in their given fields of knowledge and experience.



ONE

Animal Liberation is strongly opposed to the DA lodged by Jardana Pty Ltd Development Application (DA), for a proposed intensive cattle feedlot at Stonehenge, in the Glen Innes Severn LGA. Our objection is based on the important and inter-connecting platform of Animals, our shared Environment and People, and can be summarised as follows.

TWO

The Applicant's completed and signed Development Application form includes potentially inaccurate and potentially misleading information under the heading of 'Statement of Environmental Effects Standard Form'; notably under questions, 1a and 1b, 2c, 4a and 4b, 5b, 5c, 5f, and 5g.

THREE

The Applicant has failed to identify, respond to and address all risks and impacts and cumulative risks and impacts, and has failed to adequately demonstrate how they would monitor, avoid, minimise, mitigate and manage these risks and impacts.

FOUR

The Applicant has relied on numerous assumptions and statements indicating they have various levels of "confidence" with many of their non-evidenced control measures, and where many other potential risks and impacts are missing entirely. Such omissions prevent decision makers from undertaking a comprehensive, objective and meaningful development assessment, in line with the applicable planning instruments and community expectations. Such omissions can impede sound and effective

EXECUTIVE SUMMARY CONT.

FIVE

The Applicant has **failed to undertake the necessary and expected level of consultation with key stakeholders** including the local Indigenous Ngoorabul people, immediate neighbours, sensitive receptors, and the broad community.

SIX

The Glen Innes Council's Local Environment Plan (LEP) has not been updated to accurately reflect the current situation. These failures by council include a failure to implement the urgently needed and important protection for the local drinking water catchment, and the noted zoning issues and anomalies of residential properties situated near the proposed feedlot which all lay within the RU1- Primary Production zone.

SEVEN

Site selection is critical and it is our view that the proposed cattle feedlot site is entirely unsuitable for any intensive animal agriculture including the proposed intensive cattle feedlot; notably taking into consideration the local topography, local weather patterns, sensitive receptors, and the serious risk of an immediate pollution event or ongoing contamination of local surface water, groundwater and soils.

EIGHT

The Applicant refers to offsite effluent management (removal to off-site locations) but has gone outside of the scope of the lodged DA which only applies to onsite effluent management and has failed to elaborate or indeed provide any information at all regarding requirements concerning removal of effluent to off-site locations. The information provided by the Applicant regarding the storage, containment and spreading of effluent is completely inadequate.

NINE

In general, the information provided by the Applicant regarding manure management and the corresponding sedimentation basin and effluent holding pond, stormwater management, land capacity and cattle mortalities is woefully inadequate for the purposes of a comprehensive and informed planning assessment. These omissions are glaring and ignore the related risks and impacts with odour, amenity, disease and biosecurity, as well as the difficulty in assessing whether or not the provisions for dead cattle are adequate.

TEN

There has been a marked shift in public expectations about how we treat non-human animals including those raised for human consumption and byproducts. The broad public are strongly opposed to intensive and industrial animal agriculture on animal welfare, environmental and

EXECUTIVE SUMMARY CONT.

ELEVEN If approved, the proposed development will result in numerous adverse impacts and will pose significant risks to the local environment, biodiversity and ecosystems. The 'precautionary principle' must be applied in environmental planning decision-making with the conservation of biological diversity and ecological integrity being a fundamental consideration. The 'precautionary principle' requires decision-making to give the environment the benefit of the doubt.

WELVE The proposed development is not aligned to ecologically sustainable development (ESD) and the conservation of biological diversity and ecological integrity processes which forms part of environmental law and inter generation equality. Council, as the consent authority is required to conserve and enhance the community's resources so that ecological processes on which life depends, are maintained, and that the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations.

THIRTEEN The proposed development is not aligned to protecting and preserving native habitat where a fundamental consideration should require all planning and decision making to include an Environmental and Species Impact Statement. In addition to a local community drinking catchment, Beardy Waters is a Natural Habitat to the Rakali - Water Rat, Bell's Turtle and Murray Cod, which are all endangered species.

FOUR TEEN

The intensive cattle feedlot development if approved, would result in a highly offensive, unpopular and very visible development, notably with sensitive receptors, and will seriously risk and impact immediate neighbours and their ability to enjoy rural living and peaceful amenity including valid concerns about health and general well-being and issues concerning water, air, noise, visual, odour, dust, vibration, disease and biosecurity.

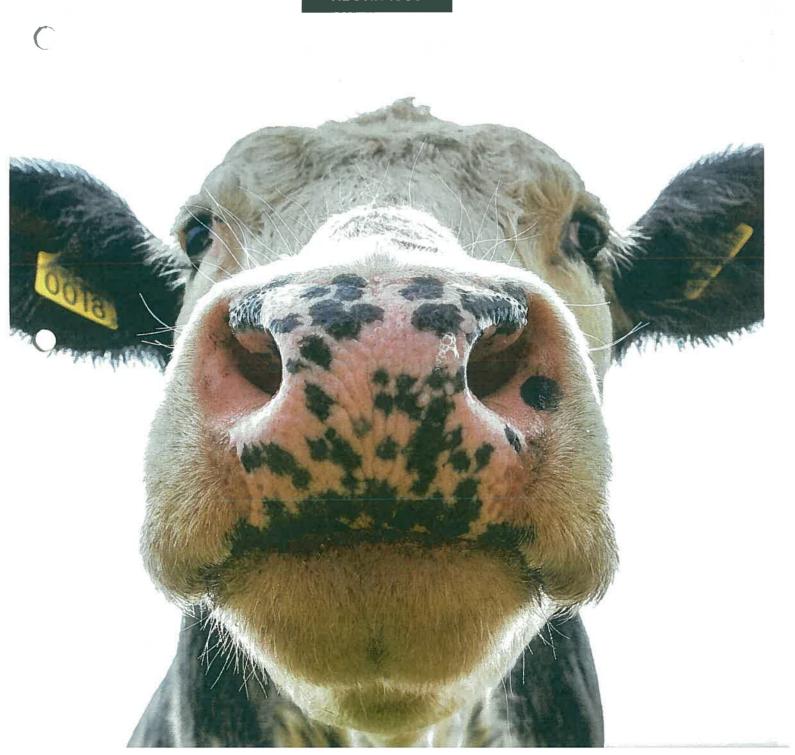
FIFTEEN

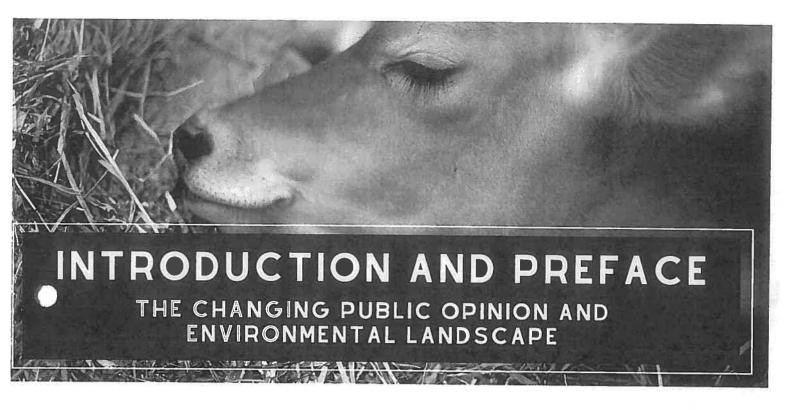
The development will also likely result in negative social and economic impacts to immediate neighbours and the broader community including the depreciation of land value and residential property values. Apart from facilitating a private business, the proposed development offers no benefits to the local community. The Applicant has failed to demonstrate how the proposed development is in the public interest.

WHAT HAPPENS TO THEM

MATTERS TO THEM

REGAN 1983





Based on an abundance of credible scientific evidence relating to climate change including current and emerging climate and general weather patterns, we are concerned that much of the available and current SoEE information and data, including numerous 'assumptions', has not fully considered climate change and the 'un-predictability' of our environment.

Over recent times, Australia has experienced extreme, indeed catastrophic weather events, and incidents including severe drought, bushfires and flood. We can no longer assume that any historical data or mapping, and/or lack of mapping, can adequately predict the environmental future with any reliability or certainty. A comprehensive and thorough planning assessment must consider and apply fact and evidence, not assumptions and generalisations.

There is a noted lack of available or up to date mapping and studies pertaining to environmental, biodiversity and heritage considerations pertinent to the Glen Innes and surrounding areas. When large-scale proposals such as the proposed feedlot and the corresponding SoEE are directly related to critical environmental considerations, we can no longer assume anything. We must apply a new and rigorous assessment approach. We can no longer be confident that 'average' rainfall and climate patterns will continue to be the norm, and neither can we assume any parcel of land which has not previously been mapped as being in a flood zone, will not be subject to flooding, and particularly so when the surrounding region has experienced flooding. Nor can we assume that surface water and groundwater supplies are a never-ending supply of useable water.

1.2



Globally, across Australia and throughout NSW, we have reached a major cross roads because of the animal agricultural revolution, climate change, human-animal relations, and a massive growth in public awareness and public interest. There has been a major shift in the public's expectations. This has been magnified over recent decades during which time 'traditional' animal agriculture has given way to industrial scale intensive animal agriculture, which is by its very nature, based on a model of high volume and fast production and processing to maximise yields and profits for the agri-business producers, not the communities in which they are situated.

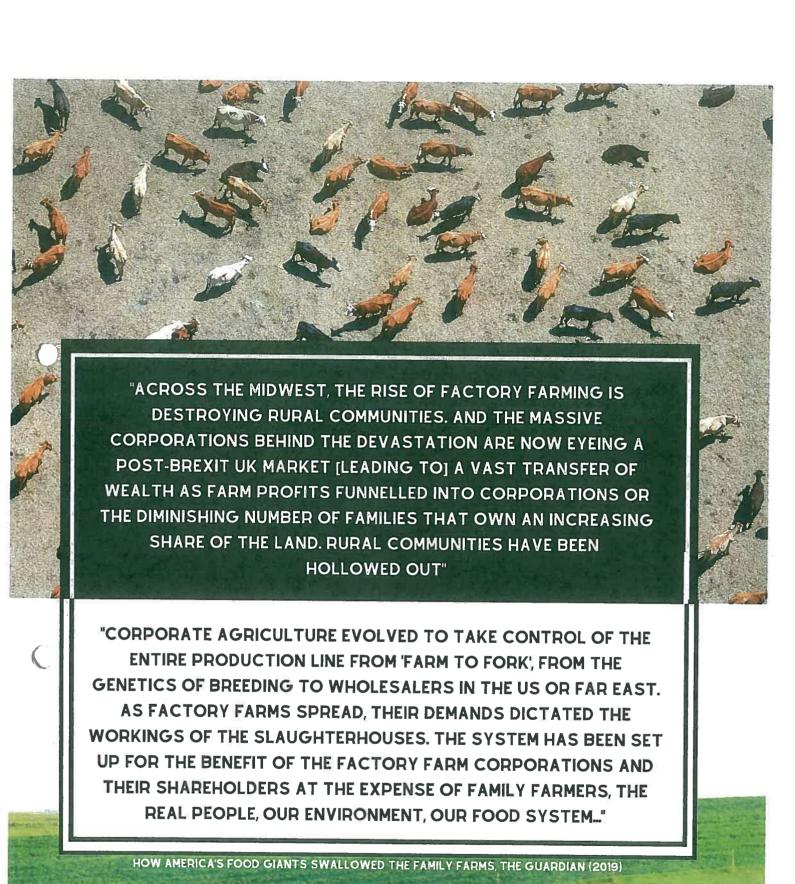
We are facing a climate change, environmental, human health and animal rights emergency, and increasingly, citizens from all walks of life and of all ages are deeply concerned, voicing these concerns and taking action. This was well evidenced by recent Australia wide, peaceful public gatherings of our young people and indeed many other people, calling for greater climate change action in Australia by our legislators and decision makers. Decision makers critically also includes all our local government councils who must consider current public perceptions and expectations.

Over the last several decades, animal agriculture in Australia has increasingly become industrialised and secretive. Large scale, intensive animal agriculture is becoming commonplace across our rural landscapes. This is changing and negatively impacting our 'country' landscapes permanently. We are increasingly sacrificing for economic gain, and losing all that is unique, beautiful, precious, and so intrinsically woven into the Australian fabric of who we are as a society. Over the past 50 years, agribusiness corporations have replaced family farms. This concentration means that individual profit driven corporations can be responsible for many thousands of animals at any one time, whilst also securing economic and market dominance. These large, often wealthy and powerful individual profit driven corporations benefit much at the expense of Animals, the Environment and People, including our rural communities.

In Australia, intensive and industrial scale animal agriculture is several decades behind similar ventures in the US and Europe however, the destructive path we are following, is similar. We need to learn from the mistakes made by others and heed the now evidenced and obvious lessons, impacts and consequences which are increasingly evident around the world, and particularly so in the US.

1.4

1.5





Communities and everyday people including farmers, are increasingly uniting, mobilising and opposing intensive agri-business – the intensive animal agriculture ventures which are also known as Factory Farms and Concentrated Animal Feeding Operations, or CAFOs. The Right to Harm documentary explores and questions 'whether the economic rights of the agribusiness corporations is more important and takes priority over the basic human rights of people'.

Glen Innes Severn Council will fully appreciate how important animal welfare is to the Australian public and how increasingly the public are far more informed on this topic. A 2018 public survey and report commissioned by the Commonwealth Government's Department of Agriculture and Water Resources, and published by Futureye, Australia's Shifting Mindset on Farm Animal Welfare, gleaned that the latest official figures on animal welfare issues are unequivocal. The report confirmed that 95% of respondents considered animal welfare to be an area of concern, with at least 91% wanting to see this improved through reforms, and many respondents flagged a lack of trust with regulators and perceived 'conflicts of interest'.

Animal Liberation agrees with the premise that "what makes the existence of domesticated farm animals particularly cruel is not just the way in which they die, but above all how they live". The scientific study of animals has played a dismal role in this unfolding tragedy. The scientific community has used its growing knowledge of animals mainly to manipulate their lives more efficiently in the service of human industry. Yet this same knowledge has demonstrated beyond reasonable doubt that farm animals are sentient beings, with intricate social relations and sophisticated psychological patterns. They may not be as intelligent as us, but they certainly know pain, fear and loneliness. They too can suffer, and they too can feel joy.

According to credible evidenced scientific research, farmed animals are sentient, emotionally complex, intelligent and have rich experiences of the world. They suffer from pain, feel emotions and build strong relationships. And yet on intensive factory farms, animals experience numerous and ongoing impacts on their welfare, including: confinement in unnatural and often unsanitary conditions in such large numbers that they struggle to find space to move or reach their food, water or shelter. Routine

1.10

1.9

1.7



The sentient capacities of non-human animals must be considered by decision makers when making ethical decisions about the treatment of animals. In 2012, an international group of eminent neuroscientists signed The Cambridge Declaration on Consciousness, which confirmed that many animals, including all mammals and birds, possess the "neurological substrates that generate consciousness. If we accept animal sentience, then practices like factory farming must be reconsidered – based on science and evidence and public expectations. Currently the law defines the acceptable treatment of animals according to their use rather than their capacity to suffer.

Many practices which would qualify as 'cruelty' under the law if performed on a dog are instead 'legal' if done to a cow raised for human consumption and byproducts. Each state and territory has animal cruelty legislation in place, however significant exemptions exist for the treatment of farmed animals. For example, in NSW it is an offence to fail to provide an animal with adequate exercise except if that animal is a farm animal such as a cow in a feedlot.

This is no longer considered acceptable by the mainstream public. As a compassionate and aware society, we must consider that as history has demonstrated over and over again, simply because something is legal, doesn't make it moral, ethical or right. Humanity dictates we all have a moral obligation to challenge injustice and societal wrongs and shape who we are as a society. Our leaders and decision makers, including local government councils, have a clear responsibility to listen, question and act in this regard. Science and technological advancement has deciphered the secrets of cows and how humans can subject animals to extreme living conditions. Vaccinations, medications, hormones, pesticides, housing systems, husbandry procedures and automatic feeders, now make it possible to cram thousands of cattle into intensive feedlots produce meat and by-products with unprecedented efficiency and profit.

The fate of animals in such industrial installations has become one of the most pressing ethical issues of our time, certainly in terms of the numbers involved. These days, most big animals live on industrial farms. The individual cows are commodities in a factory environment with a focus on profit, not animal welfare, well-being or sentience. Animal welfare as expected, indeed demanded by the community and public, includes animals being entitled to rights, welfare and protection under the

1.13



Feedlots involve cramped, fenced area where cattle are grain fed until they are ready for slaughter, unable to exercise and frequently found kneedeep in their own faeces. Often there's no shelter, as shade is not mandated by regulations. Living in these cramped, filthy conditions subjects the cattle to stress and sickness, with common conditions including footrot, botulism, respiratory disease and liver abscesses.

Intensive animal factory environments are cesspits of abnormal stress for animals, with excessive over crowded populations and stock densities and an accumulation of feces and urine, which is a fundamental part of the intensive livestock industry. These intensive environments have been the petri dishes or the cesspools where diseases such as swine flu, bird flu and others have occurred. Those diseases have occurred because they have been introduced by the industry itself.

Food production often has a significantly negative impact on our environment, and the production of meat, dairy and, to a lesser extent, eggs has a particularly disproportionate effect on our climate and natural resources. Livestock production has been found to significantly contribute to greenhouse gas emissions. The UN Food and Agriculture Organisation estimates that livestock production is responsible for 18% of greenhouse gas emissions, while other studies put the figure closer to 51%. Either way, livestock production contributes a bigger share of greenhouse gas emissions than the entire global transport sector.

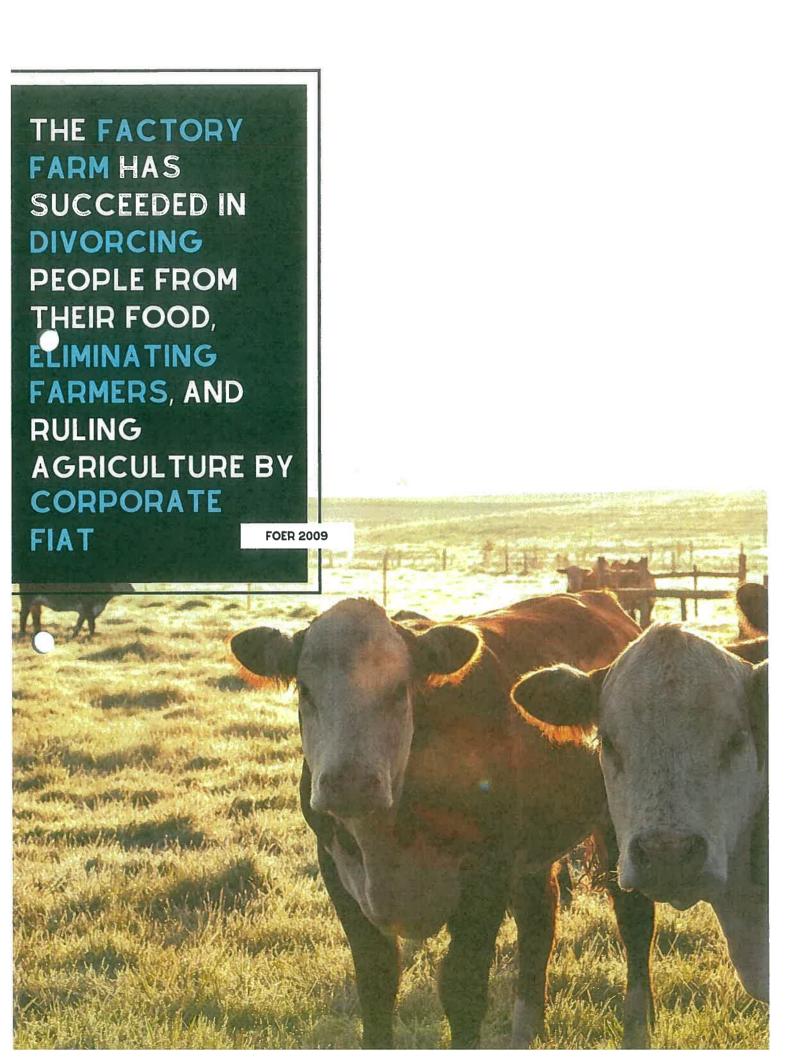
The most significant source of these greenhouse gas emissions is from animal digestion produced methane. In Australia, this creates about three million tonnes of methane annually. By 2022, this methane will have a greater effect on global warming than emissions from all of Australia's coal-fired power stations combined. Animal agriculture also has a devastating impact on our environment because of the huge consumption of water and resources. The average 'water footprint' per calorie of protein from meat is significant. To produce 1kg of meat protein, an average of 6kg of plant protein is required. Around 30% of the total land surface of the planet is now used for livestock production, with animal products now identified as a key driver of deforestation, with previously forested land often now occupied by pastures and feed crops for livestock.

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Globally the world has been crippled with the Covid-19 pandemic which many eminent scientists believe originated from "wet markets", and yet much of the intense focus has ignored the very breeding grounds for the diseases originating in global, industrial food systems. Much of the focus has also ignored the large-scale destruction of habitats that is forcing animals out of their natural environments and into closer proximity with people and other animals. This is not the first animal-human pandemic and it will not be the last. The world has a long history of deadly pandemics that are, like Covid-19, deeply rooted in our treatment of animals and notably, the estimated 70 billion who are raised and killed for food each year around the world. Experts in these areas have continued to warn us that industrial animal farming has caused most new infectious diseases in humans in the past decade - and risks starting new pandemics as animal markets have done. Over the past few decades, there have been several viruses and pathogenic bacteria that have switched species from wild animals to humans.

1.19

1.20

Intensive animal factory farming often involves the use of large amounts of antibiotics. This can and does result in the development of antibioticresistant strains of diseases (also known as "superbugs"), which can be transferred to humans. In spite of increasing concerns being raised, government, even with its current focus on biosecurity, has failed to investigate and satisfy public health authorities that there will not be any further cases of antibiotic resistance in the general public. This leaves people and particularly workers in intensive animal factory farms at serious risk. Researchers led by the University of Sheffield and Bath have recently warned that intensive farming, involving overuse of antibiotics, high numbers of animals, and low genetic diversity are hotbeds for pathogens to spread. Professor Dave Kelly, who led the study, said; "Human pathogens carried in animals are an increasing threat and our findings highlight how their adaptability can allow them to switch hosts and exploit intensive farming practices. "Human activities have had a profound effect on the Earth's ecosystems and biodiversity, particularly among livestock species, such as cattle. Escalating livestock numbers and global trade have been linked with the emergence of zoonotic diseases that pose a significant threat to both animal and human health, with the current Covid-19 pandemic being the most dramatic and serious example to date."

RSPCA Australia as the leading 'Animal Welfare' authority oppose intensive animal agriculture for all the above inherent issues and conclude that



conditions, commonly involving use of hormones, antibiotics and vaccines" and, "the RSPCA opposes intensive farming practices that cause suffering or distress to animals, or that prevent the animal from moving freely and satisfying its behavioural, social or physiological needs". Alarmingly, approximately 40% of Australia's total beef supply and 80% of beef sold in major supermarkets is sourced from the cattle feedlot sector.

The National Feedlot Accreditation Scheme (NFAS) is supposed to exist to ensure the welfare of beef cattle, however it only provides 'guidelines' around food, water, air quality and heat levels, calling in a vet when required. There's no genuine or meaningful monitoring around adherence to the scheme with MLA (Meat Livestock Australia) responsible for 'improving welfare' in the feedlot sector, noting, Aus-Meat Ltd lists the first objective of the NFAS mission as being to 'enhance the marketing prospects for grain fed beef'

Industry representatives have disproportionate influence over the animal welfare standard setting process, resulting in welfare standards being established that fail to adequately protect animals and their very function only reinforces existing inadequate industry husbandry practices. Self-regulation and self-auditing member bodies have no regularity powers or authority and accordingly, all inclusion or reference and reliance on these industry bodies and their literature should be ignored. Self-regulation is a conflicted way of managing animal welfare because at its core it relies on a promise by industry to abide by woefully inadequate animal welfare standards, rather than meaningful monitoring and enforcement mechanisms.

Tens of billions of sentient beings, each with individual complex sensations and emotions, live and die on a high volume, fast paced production line controlled by agri-businesses. The Applicant has completely failed to address these considerations, public interest and expectations and changing government policy direction. The general public including our rural communities increasingly hold high expectations that animals will be treated well and not exposed to cruelty, pain or suffering. This applies equally to animals kept for food as much as to the animals we keep as companions. The Applicant's planning proposal and accompanying SoEE fails to meet or address all these important public expectations.

1.22

1.23



In addition to applicable planning Instruments and regulations, and Government Guidelines; Council must also take the following matters into consideration in line with Section 4.15 of the Environmental Planning and Assessment Act 1979.

The provisions of particular interest are:

the likely impacts of that development including environmental impacts on both the natural and built environments and social and economic impacts in the locality;

1(C) the suitability of the site for the Development;

1(D) any submissions made in accordance with this Act or the Regulations and;

1(E) the public interest.

We note the inadequate and out of date criteria outlined in state legislation which determines that the proposed development is not classified as either Integrated or Designated development in spite of the known risks and impacts associated with intensive animal agriculture and the lack of detail provided by the Applicant in their DA and SoEE.

It is our strong view that given the likely risks and impacts to surface water and groundwater, soil, biodiversity with the associated volume of animal effluent and consequences of run-off, odour, amenity etc, expert advice should be sought and obtained from the relevant State Government

PLANNING FRAMEWORK AND PLANNING INSTRUMENTS



- The proposed development is large scale and does include potentially hazardous, noxious and offensive uses as outlined in Schedule 3 of the Environmental Planning and Assessment Regulation 2000. It is illogical to accept that 1,000 cattle in a feedlot will pose less risks and impacts than 1,001 cattle to local water, biodiversity and sensitive receptors.
- When assessing intensive livestock agriculture, under Clause 36 of the above Regulation, the consent authority is required to consider:
 - (a) the impact of the existing development having regard to factors including:
 - (i) previous environmental management performance, including compliance with the conditions of any consents, licences, leases or authorisations by a public authority and compliance with any relevant codes of practice;
 - (ii) rehabilitation or restoration of any disturbed land;
 - (iii) the number and nature of all past changes and their cumulative effects;
 - (b) the likely impact of the proposed alterations or additions having regard to factors including:
 - (i) the scale, character or nature of the proposal in relation to the development;
 - (ii) the existing vegetation, air, noise and water quality, scenic character and special features of the land on which the development is or is to be carried out and the surrounding locality;
 - (iii) the degree to which the potential environmental impacts can be predicted with adequate certainty;
 - (iv) the capacity of the receiving environment to accommodate changes in environmental impacts;
 - (c) any proposals -
 - (i) to mitigate the environmental impacts and manage any residual risk;
 - (ii) to facilitate compliance with relevant standards, codes of practice or guidelines published by the Department or other public authorities.

PLANNING FRAMEWORK AND PLANNING INSTRUMENTS



- We are concerned that the Applicant's completed and signed

 Development Application form includes potentially inaccurate and
 potentially misleading information under the heading of 'Statement of
 Environmental Effects Standard Form'; notably under questions, 1a and 1b,
 2c, 4a and 4b, 5b, 5c, 5f, and 5g.
- We further note with concern that Council has not updated the obvious issues and anomalies contained in the Glen Innes Severn Council Local Environment Plan (LEP).
- The Beardy Water Catchment (community drinking water), is still void of adequate protection. While the NSW DPI Guidelines suggest an 800-metre buffer to a Potable Water Supply Catchment, **Council has failed to fulfil its obligations** to commence any review or planning process to address these serious risks and impacts for the protection of the local community and public health.
- The LEP still contains land use zoning issues and anomalies. There are more than 3 residential subdivisions in the vicinity of the proposed cattle feedlot. Council has failed to update all current zoning in its LEP which instead continues to list all parcels of land as RU1- Primary Production.

 Further, Council's LEP states that the minimum lot size for RU1 zoning must be 150ha and yet these residential blocks range from 1-10 ha, and another several dozen additional holdings fall under the 150ha requirement.
- The Applicant's DA and SoEE does not adequately or accurately reflect the full scale and accurate impacts of the proposed development taking into account existing development and operations and the proposed combined development which we believe will result in excessive development.

PLANNING FRAMEWORK AND PLANNING INSTRUMENTS

2.11

The Applicant's DA and SoEE does not include a Preliminary Site Investigation or address Clause 7 of State Environmental Planning Policy No 55 - Remediation of Land (SEPP 55) and has therefore failed to demonstrate whether the land is capable of supporting the proposed development. To ensure a comprehensive and informed assessment in line with the planning instruments, full consideration of the accurate and evidenced land capability for the proposed intensive agricultural usage of the land, in combination with the existing extensive agriculture, must be undertaken.

The Applicant has **failed to undertake or submit adequate information**in response to the required assessment of Biodiversity as set out under established methodology under the *Biodiversity Conservation Act 2016* which applies to all land in NSW.

Risks and impacts involving water, soil, amenity, odour, dust, vibration, biodiversity and biosecurity are crucial when undertaking a comprehensive and informed assessment, and rely on evidenced details about buffer zones, and must factor in considerations of local topography and weather and land capacity including all existing operations. The Applicant has failed to demonstrate how they have arrived at their conclusions and assumptions, or even confirm the methodology they have used when forming their conclusions and assumptions.

The Applicant's DA and SoEE includes no detailed or evidenced assessment of public interest or public and community social or economic benefit. The Applicant's DA and SoEE content while new, in this third application, remains largely unchanged, and accordingly the previous hundreds of objections and valid reasons for objection, received by Council, still apply. The Applicant has completely failed to demonstrate how this proposed development is in the public interest.



While the Applicant's SoEE is substantial in quantity, overall, it is largely void of substance and the required level of detail necessary with many critical areas (impacts/risks), not identified or adequately addressed. The Applicant has failed to identify, respond to and address all risks and impacts and cumulative risks and impacts, and has failed to demonstrate how they would monitor, avoid, minimise, mitigate and manage these risks and impacts. These omissions will make it difficult for decision makers to assess the proposed development to the standards required in line with the applicable planning instruments, and community expectations.

It is not sufficient for the Applicant to rely on assumptions and statements indicating they have various levels of "confidence" with many of their non-evidenced control measures, and where many other potential risks and impacts are missing entirely. Such omissions prevent decision makers from undertaking a comprehensive, objective and meaningful development assessment, in line with the applicable planning instruments and community expectations.

We note council's Cultural Plan 2017 incorporates concepts such as "inclusive community", "respect" and "transparency" and yet fails to demonstrate how it will uphold and implement these concepts. The last published ABS statistics (2011) confirm, "Glen Innes Severn is a diverse community" of 8,656 people, with those who identify themselves of indigenous origin making up 488 people (6.6% of the population) - compared to the national average of 2.5%. The local Indigenous population is therefore significant and yet appears to have been disregarded from being an inclusive community, afforded respect and transparency.



Of serious concern, the Applicant's DA highlights a noted lack of consultation with the Ngoorabul people who are identified as the cultural parties for the area, the immediate neighbours, the broader Glen Innes community, and other key stakeholders as required under various NSW planning instruments and council's own integrated strategic and planning commitments. We further contend that this lack of consultation by the Applicant does not align with the objectives and principles outlined in the Glen Innes Severn Council Community Participation Plan, including the concept that, "community engagement will be inclusive, transparent and ensure fair participation."

While the SoEE confirms on page 21, under Section 2.10 CULTURAL HERITAGE, "The generic due diligence assessment involves five steps which are addressed below", the Applicant's Consultant has failed to adequately address all these five steps. The Applicant's cursory and almost dismissive attention to Aboriginal Heritage and the Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales, is indeed highly offensive.

3.4

3.5

In line with the mandatory Cultural Heritage Guidelines, it is imperative that the development should not proceed without a detailed Aboriginal Cultural Heritage Assessment (ACHA) or Aboriginal Heritage Impact Permit (AHIP) being undertaken at the Applicant's expense. We request Council to note the significant lack of available Aboriginal Heritage mapping in the region and refer Council to Appendix E, AHIMS SEARCH, which states, in part;

- (a) AHIMS (only) records information about Aboriginal sites that have been provided to Office of Environment;
- (b) Information recorded on AHIMS may vary in its accuracy and may not be up to date. Location details are recorded as grid references and it is important to note that there may be errors or omissions in these recordings;
- (c) Some parts of New South Wales have not been investigated in detail and there may be fewer records of Aboriginal sites in those areas. These areas may contain Aboriginal sites which are not recorded on AHIMS;
- (d) Aboriginal objects are protected under the *National Parks and Wildlife Act 1974* even if they are not recorded as a site on AHIMS.



It is not sufficient for the Applicant to merely state that the proposed site is disturbed land or that a search of the Aboriginal Heritage and Information Management System, (AHIMS) for Lot 1/DP7243 failed to locate any Aboriginal Heritage details. We strongly disagree with the Applicant's statements, "No other sources of information are available" and, "it is reasonable to conclude that there are no known Aboriginal objects or a low probability of objects occurring in the area". The Applicant has failed to seek or obtain other sources of information and indeed has failed to consult at all.

3.6

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If approved, this development will threaten the health and biodiversity of the local ecosystem. Intensive animal factory farms pose significant negative environmental risks and impacts to our unique rural landscapes. Indeed, developments such as the proposed application have been an ongoing source of environmental damage and land use conflicts. Such instances have included toxic run off, soil, surface water and groundwater contamination, explosions and fires.

Evidenced impacts on biodiversity frequently includes widespread animal displacement, loss of habitat including important wildlife corridors, and the suffering and death of an increasing number of vulnerable, threatened and endangered wildlife. It is now estimated that around 3 billion animals were killed or displaced during Australia's 2019/2020 bushfires. This tragic event has been described as the worst single event for wildlife in Australia, among the worst in the world, and is likely to push some species into extinction. Decision makers now have a clear responsibility to ensure their decisions do not further contribute to this extinction trajectory.

The 'precautionary principle' must be applied in environmental planning decision-making with the conservation of biological diversity and ecological integrity being a fundamental consideration. The 'precautionary principle' requires decision-making to give the environment the benefit of the doubt.

The proposed site's topography and local historical weather patterns confirm that the proposed site is entirely unsuitable for a cattle feedlot. The risks and impacts to the local community, as well as the local Beardy Waters catchment, groundwater, threatened biodiversity and ecosystems



- neighbours and will have a serious detrimental effect on their way of life and peaceful existence and physical and emotional health and wellbeing.
- Globally, evidence confirms and experts agree that industrial, intensive farming such as that proposed by the Applicant pose real and serious threats to public health and safety and the environment including our natural resources and biodiversity.
- Intensive animal agriculture directly contributes to the loss of critical Aboriginal heritage, rapid decline in biodiversity, land clearing and degradation, soil erosion and contamination, lack of surface and groundwater security, pollution including emissions caused by animal agriculture, and appalling animal cruelty all of which are broadly held and valid concerns, in the Glen Innes area and beyond.
- The peaceful 'country life' that community members value and seek is directly threatened by the development of intensive farming facilities that pose a risk to the environment, animal welfare, and in a less tangible but equally important sense the 'livability' of our rural and regional communities.
 - An extreme weather event with heavy rainfall which are becoming more frequent as a result of climate change, would cause the property to be inundated with resulting runoff from the feedlot pens containing organic and mineralised manure constituents to result in a significant pollution event and ecological hazard. Even more concerning is the threat of an effluent holding pond spill as a result of high rainfall, which would cause catastrophic damage to the water system, death of aquatic animals and potentially impact human health. The risks and impacts are extreme based on the evidenced weather history and potential consequences.

3.14

Cattle farming, especially intensive farming in the form of feedlots, is extremely water intensive. The surrounding region and state has been drought declared for years, and we need to protect and preserve this precious resource for the benefit of all current and future generations.



The concentration, storage and dispersal of manure leads to high levels of local air and water pollution. In addition, runoff of nitrogen-rich manure into waterways can contribute to "dead zones". Cattle feedlots generally also cause an imbalance of soil nutrients, particularly of nitrogen (N), increasing the N concentration in soil surface, which may eventually lead to water, air and soil contamination.

There are significant concerns regarding the dispersal of the waste, storage, pollution and odour. On average, a cow produces 20kg of solid waste daily - a staggering amount. This will attract vermin including flies, and will have an extremely negative impact on biodiversity and poses a serious biosecurity risk.

In addition to the manure that will be produced, mortality rates are common with cattle feedlots, meaning large animals will be added to the compost ongoing. This will further exacerbate the presence of unwanted wildlife ("vermin"), impact local biodiversity and pose additional biosecurity risks. The Applicant's DA has not adequately responded to how they would address these risks and impacts.

We note the Applicant refers to offsite effluent management (removal to off-site locations) but has gone outside of the scope of the lodged DA which only applies to onsite effluent management and failed to elaborate or indeed provide any information at all regarding requirements concerning removal of effluent to off-site locations. The information provided by the Applicant regarding the storage, containment and spreading of effluent is patently inadequate and fails to address the serious corresponding risks and impacts involved.

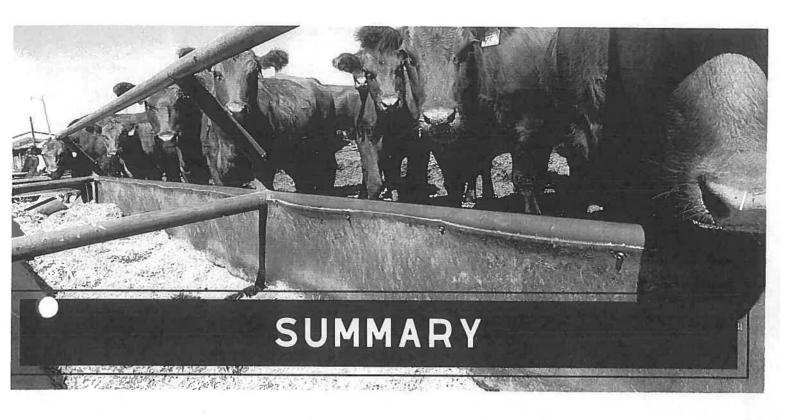
In general, the information provided by the Applicant regarding manure management and the corresponding sedimentation basin and effluent holding pond, stormwater management and cattle mortalities is woefully inadequate for the purposes of a comprehensive planning assessment of the risks, impacts and ongoing cumulative impacts. While the Applicant provides a scant reference to cattle mortality, he provides no evidenced estimates of numbers and assessment of the risks, impacts and land capacity cannot be undertaken.

3.20

3.18



Apart from facilitating private business, the proposed development offers no benefits to the local community. Rather than allowing damaging, intensive animal agriculture to flourish in the region, we urge the Glen Innes Severn Council to instead look at encouraging and approving sustainable ventures that work in harmony with the environment and align with social expectations, council values and enrich the region, thereby improving the health and wellbeing of all current and future generations.

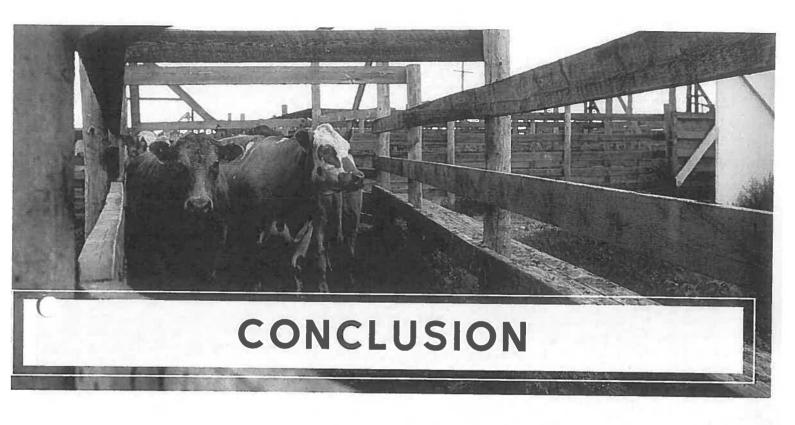


In summary, some of the many serious negative risks, impacts and consequences with intensive cattle feedlots include:

- Waste can emit strong odors and pollute surface water, groundwater and soil, because livestock produce prodigious amounts of faeces and urine. The risks and impacts to the environment, biodiversity and ecosystems are substantial and also include excessive use of and the depletion of precious and limited resources like water.
- Poor waste containment and management practices can lead to outbreaks of disease and heightens serious biosecurity and public health risks and impacts.
- Crowded, dirty and stressful conditions in which animals are kept necessitates the heavy use of antibiotics necessary to control disease and leads to antibiotic resistance, a now global issue for animals and humans alike.
- Ethical and moral considerations including cruelty to animals and public views and expectations about industrialised intensive animal agriculture and a greatly heightened concern about the vulnerable status of Australia's wildlife, biodiversity and ecosystems.

4.5

In their DA and SoEE, the Applicant has failed to identify, respond to and address all risks and impacts and cumulative risks and impacts, and has failed to adequately demonstrate how they



We acknowledge and appreciate the technical complexity of this proposed development and the difficulty and challenges faced by even the most experienced planning staff when assessing such information that frequently requires experienced, expert and scientific evaluation. We also note that in line with the applicable legislation and planning instruments, Council is required to ensure the assessment review remains **independent**, **objective and informed** during the entire process and that the assessment process is strongly founded on informed opinion and evidence.

Glen Innes Severn Council as the primary consent authority, is required to thoroughly assess the adequacy of information provided and the measures proposed by the Applicant, to mitigate any potential risks, adverse impacts including cumulative impacts. This is clearly outlined in the Environmental Planning and Assessment Act 1979 which requires Council give due consideration to social impacts and public interest relating to any proposed development. All these considerations are accordingly a necessary and integral part of any comprehensive, objective and meaningful development assessment in line with the applicable planning instruments.

Glen Innes Severn Council is compelled to act impartially and ensure the correct and consistent application of local, state and federal legislation, including the objective and transparent assessment of planning proposals. Councillors are elected to represent everyone in the community, and apply objective, impartial and informed consideration of matters which hold strong public interest.

5.2

5.3



It is imperative that decision makers don't trivialise, dismiss or ignore public interest, or place the unsustainable, short-term, economic benefits of a privately owned commercial business ahead of the welfare of animals, the environment or the long-term best interests of the broad community. We have a clear moral, social and environmental responsibility to reduce the number of intensive agri-businesses, including cattle feedlots such as that proposed by the Applicant; not expand them or endorse their approval. In addition to the individual risks and impacts outlined in our objection, when combined, these are glaring and serious cumulative risks and impacts where adequate monitoring, avoidance, minimization, mitigation and management would prove to be problematic and indeed, impossible.

The 'precautionary principle' must be applied in environmental planning decision-making, and conservation of biological diversity and ecological integrity should be a fundamental consideration. The 'precautionary principle' requires decision-making to give the environment the benefit of the doubt. The Applicant's professed benefits to the Glen Innes Severn region are negligible and come with an exorbitant and costly price tag of imminent and serious risks and impacts. There is no justification for the extensive and permanent consequences to animals, the local environment including precious resources, and the amenity and public health of the Glen Innes Severn community.

5.5

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The true and often hidden risks, impacts and costs of the industrialisation of animal agriculture impact us all; current and future generations, the planet and all her inhabitants – Animals, the Environment and People. Importantly, in addition to the individual risks and impacts, and cumulative risks and impacts, the 'Precautionary Principle' must be applied in environmental planning decision-making and conservation of biological diversity and ecological integrity, should be a fundamental consideration. The 'Precautionary Principle' requires decision-making to give the environment the benefit of the doubt.

Based on our points of objection, it is our strong view that the Applicant has failed to adequately address or respond to the mandatory assessment criteria as outlined in applicable legislation and planning instruments. This assessment and corresponding decision making must take into account, the 'Precautionary Principle' requiring decision-making to give the environment the benefit of the doubt.



SOURCES AND REFERENCE MATERIAL

Applicant documents

Development Application, Jardana Pty Ltd, 28 October 2020

https://www.gisc.nsw.gov.au/sites/gleninnes/files/public/Redacted Personal info- Development Application Form - 1000 Head Cattle Feedlot - 34 Pedlows Road Ston %281%29.pdf

Statement of Environmental Effects, Agricultural Development Services Australia Pty Ltd (AgDSA), 27 October 2020, Stonehenge Feedlot, Jardana Pty Ltd https://www.gisc.nsw.gov.au/sites/gleninnes/files/public/SOEE - 1000 Head Cattle Feedlot - 34 Pedlows Road Stonehenge.pdf

Council documents

Glen Innes Servern Council Development Control Plan 2014
https://www.gisc.nsw.gov.au/sites/gleninnes/files/public/images/documents/gisc/Development Control Plan 2014
(2).pdf

Glen Innes Severn Local Environmental Plan 2012 Glen Innes Severn Local Environmental Plan 2012 - NSW LegislationGlen Innes Severn Council Land Use Strategy, May 2010 https://www.gisc.nsw.gov.au/sites/gleninnes/files/public/images/documents/gisc/mig/60218-LANDUSESTRATEGY.pdf

Glen Innes Severn Council, Local Strategic Planning Statement, A Strategic Land Use Vision to 2040 FINAL DRAFT LSPS 12 FEBRUARY 2020.pdf (nsw.gov.au)

Glen Innes Severn Council Cultural Plan 2017 - 2021
www.gisc.nsw.gov.au/sites/gleninnes/files/public/images/documents/gisc/council/Council Meetings/201706/Cultural Plan 2017.pdf

Glen Innes Severn Council Local Approvals Policy, Version No 3, 23 March 2017 Local Approvals Policy (2).pdf (nsw.gov.au)

Glen Innes Severn Council Community Participation Plan https://www.gisc.nsw.gov.au/sites/gleninnes/files/public/images/documents/Community Participation Plan 2_1.pdf

New England North West Regional Plan 3036 New England North West Region - Plan - (nsw.gov.au)

Industry documents

Meat and Livestock Australia's guide to best practice husbandry for beef cattle: branding, castration and dehorning Branding | Meat & Livestock Australia (mla.com.au)

National Feedlot Accreditation Scheme Handbook - Rules and Standards of Accreditation NFAS Information | AUS-MEAT

Feedlot Design & Construction - Cattle Crushes, MLA document on different cattle crush designs and uses 025-cattle-crushes-2016_04_01.pdf (mla.com.au)

Handbook of Australian Beef Processing-AusMeat - An overview of the Australian Beef Cattle Industry produced by Aus-Meat Home | AUS-MEAT

Australian Animal Welfare Standards and Guidelines for Cattle, Australian Animal Welfare Standards and Guidelines for Cattle, Animal Health Australia www.animalwelfarestandards.net.au

SOURCES AND REFERENCE MATERIAL

Legislation, Codes of Practice and other documents

Local Government Act 1993, as at 15 October 2020 - Act 30 of 1993 (austlii.edu.au)

Environmental Planning and Assessment Act 1979, as at 14 October 2020 - Act 203 of 1979 (austlii.edu.au)

Prevention of Cruelty to Animals Act 1979 (austlii.edu.au)

National Beef Cattle Feedlot Environmental Code of Practice 2nd Edition (2012) Report

Meat & Livestock Australia (mla.com.au)

Beef Cattle Feedlots: Design and Construction (2016) (Feedlot Design Manual)

Meat & Livestock Australia (mla.com.au)

Beef Cattle Feedlots: Waste Management and Utilisation (2016) (Feedlot Waste Manual)

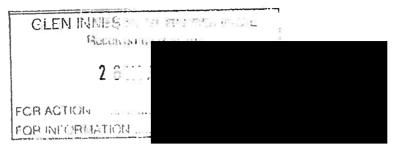
Meat & Livestock Australia (mla.com.au)

Assessment and management of odour from stationary sources in NSW (2006) (NSW S-Factor Guidelines) Technical Notes: Assessment and management of odour from stationary sources in NSW - November 2006

Planning Guidelines - Intensive Livestock Agriculture Development (2019) (nsw.gov.au)

Environmental Guidelines - Use of Effluent by Irrigation (2003) (nsw.gov.au)





Mr. Craig Bennett, MBA CPA The General Manager Glen Innes Severn Council PO Box 61 GLEN INNES, NSW. 2370

Updated with both Signatures

RE: Development Application No. 25/20-21 Jardana Pty Ltd 34 Pedlow's Road 1,000 Head Feedlot

Lot 125 DP659979, Lot 1 DP308507, Lot 126 DP753311, Lot 22 DP753311, Lot 23 DP753311, Lot 2 DP1115100, Lot 3 DP1115100, Lot 1 DP1115100, Lot 1 DP180562, Lot 1 DP114064, Lot 13 DP114034, Lot 4 DP114034, Lot 12 DP114034, Lot 5 DP7243, Lot 2 DP7243, Lot 1 DP7243, Lot 4 DP7243 And Lot 3 DP7243.

Dear Sir:

Thank you for your letter of November 11,2020 regarding the above Development Application "DA".

We wish to register our strong objection to the above proposed DA for the following reasons

Whereas this Environment Impact Study may be substantial in quantity, it largely avoids detail in many necessary areas, particularly when it comes to impacts and risks. Obviously, the Study has portrayed a positive front, however, at the exception of excluding more in-depth information which the Councillors and Community should be made aware of. The EIS should be examined by a totally independent and unbiased Authority, preferably a higher Agency to ensure that the EIS does not breach current Legislations and Council Strategies and to check for any omissions or discrepancies.

It should be noted that in a Meeting held on Tuesday 2nd, June 2020 with the General Manager, Mr. Craig Bennett, Mayor Carol Sparks, Deputy Mayor Di Newman and Director of Development, Infrastructure & Planning, Mr. Graham Price attended by myself and another Community Member that Mr. Bennett and

Mr. Price both stated that they had regrets that they had not sent the DA to a Higher Authority.

This is a complicated Development Application proposal in a Water Catchment area. Most unfortunately, despite public lobbying, the Council has not endeavoured to put a Water Catchment Plan in place. If the Water Catchment Plan were in place as it should be, there would be no possibility for an Intensive Agricultural Enterprise to proceed.

Many of the Sub-divisions within the surrounding areas of the Feedlot are incorrectly zoned despite their size and location. Due to lack of compliance to correct zoning, protection of Residents and Land holders has not been provided by Council to prevent development of a 1,000 Head Cattle Feed Lot to be approved.

Being the third attempt for this Development Application, again, the public response displayed that this is a highly contentious matter in our local Community. GISC Development, Building & Infrastructure need to closely examine their current Policies and Strategies, as we believe there are contradictions when comparing the EIS to GISC Council Guidelines. There is a very real obligation and responsibility for Council to take heed of the multiple concerns and issues in regard to this Development to uphold their integrity, and to protect the Glen Innes Community, the Environment and Biosecurity.

Disruption/Loss of the Amenity

We chose to buy our property 17 years ago in Stonehenge because of the exceptional views and the tranquil environment. Had a 1,000 head Cattle Feedlot been existing within a 2km range from our property or proposed to be developed, we would have most certainly not purchased our property in this location Whereas, we run cattle on our property, they are free range and live a contented and happy life grazing. There are no odours, noise or water supply issues because of our grazed cattle and no effect on our neighbour's lifestyle or amenity.

The proposed commercial operations will affect us negatively in many ways.

These factors include foul odour, water contamination, noise, traffic and visual amenity

Prevailing north east winds will bring odour and contaminated faecal dust into our homes, onto our roof tops and consequently into our rainwater tanks which we rely upon for drinking water. We would be very reluctant to consider drinking our tank water if the DA were to proceed because of potential health risks.

There will be a pungent odour drifting down the Valley into our homes and surrounds which will be most unpleasant. How do you avoid this? Non avoidable! It is not a source of odour that you can switch off, put out or mitigate.

Noise from bellowing cattle permanently enclosed in pens will take away from our tranquillity and peaceful lifestyle and will be detrimental and especially intrusive at night when our children are trying to sleep. This will be a 24 hour continually operating proposal. There is no way to mitigate the noise, more so in that there will be 1,000 animals confined, who will be unable to satisfy their natural behaviours.

Devaluation/Inappropriate Zoning

Zoning of Subdivisions by the Glen Innes Severn Council around the Stonehenge Valley over the last 30 years, has not been adjusted appropriately to reflect and protect the residences in our area. The majority of the Subdivisions all currently fall under RUI zoning (their original status) however, Council has failed change the zoning to R5 or other suitable categories to appropriately reflect the size, location and the purpose of these blocks. It is due to these circumstances, that the DA has the ability be lodged. However, this should not be grounds that Consent should be considered. Council need to be accountable for this.

If the Development Application is approved, it is feasible that residents may hold the Glen Innes Severn Council Liable for the devaluation of their properties and loss of income, lifestyle, and amenity. If the zoning had reflected R5, as it should have, Intensive Agricultural Enterprises would not have been permitted, and therefore this Development Application would have been refused from the very beginning. Local Community have been lobbying GISC for the LEP to be updated over the past two years, however, despite these requests, there has been no progress.

Apart from financial devaluation, homes in residential sub-divisions and small blocks in this area will no longer be attractive to potential buyers who will be reluctant to purchase blocks which have the visibility of the site, foul odour, floating dust, and the noise factor from the Cattle Feedlot Development.

There are 66 homes within a 2km range of the Feedlot proposal which cumulatively would represent a conservative value of greater than \$50 million dollars. According to the Valuer Generals Office, land values will decrease considerably for Hobby Lifestyle blocks if an Intensive Agricultural Enterprise is approved locally. This would leave the residents with a deficit loss of greater than \$12.5 million dollars due to an Intensive Agricultural Development, should it be approved.

Location and Glen Innes Water Supply

A very worrying concern is for the safety and quality of our **Town Water Supply** sourced from the **Beardy Waters catchment area** being compromised by the effluent and pollutants from the Cattle Feedlot during wet periods and heavy downpours. The proposed Cattle Feedlot is to be located uphill from the Beardy Waters.

In the EIS, the area at the proposed allocated site will provide holding ponds for effluent containment as well as piles of manure and carcass compost heaps which can take up to 6 months to break down. Decomposition is slower because of the cooler climate in the New England. During heavy rains in this area and the associated flooding that occurs due to the topographical aspect, inevitably there will be run off, as well as effluent seepage and leaching into the ground water. This could pose a serious risk for water contamination, and health issues if waterborne bacteria such as E-coli and Giardia becoming active. Q Fever and MRSA are also a serious concern associated with Feedlot Cattle, which have not been addressed in the EIS

Contamination will jeopardize the quality of the Glen Innes town water supply and if the EPA has to intervene and investigation is required, this will be a financial disaster for the Glen Innes Severn Council, and a dilemma for the 6,000+ residents of the township.

Please see photos below of the flooding in the Stonehenge Valley in October 2017 which occurred less than 1 km from the proposed site. There have been several other occasions during early July 2016 and again in 2017 when the Beardy Waters flooded in the same area, and the water levels rose higher and encroached as far up as the railway line, just below our boundary fence. It is apparent that floods like this do not occur once in every 100 years or even in every 10 years as suggested, as we have witnessed at least 4 occasions in the past four years when the flooding from the Beardy Waters was extreme. Please see following photos.



Beardy Waters as it normally appears and background with proposed Feedlot site (July 2017)



Moderate flooding of the Beardy Waters River just west of proposed Feedlot site (October 2017)



Flooding of the Beardy Waters River seen in this photo, has been worse in the past (October 2017)

Water Conservation

There is serious doubt about the ability of the project to provide the necessary amount of water for 1,000 head of cattle in addition to the 1,780 cattle the Applicant states are already being run and managed without depending upon the Beardy Waters, The DA states there are currently 11 dams providing 42 megalitres and tanks with a total capacity of 450,00 litres on water on the property.

According to the Meat and Livestock Australia (MLA), the average daily drinking water requirement for feedlot cattle ranges from 50-65L/head/day depending on the feedlot climatic zone and cattle type. This may increase to 80L/head/day if the cattle are grain fed only and during hot periods when cattle drink up to 80L/head/day.

Does the Development really have enough water in their dams and underground springs to service this need? Do the underground springs belong to the Applicant?

Ground Water

The EIS states that the Development will exclusively be using ground water springs to fill the dams. Has the Applicant a Ground Water Access License from NSW Water Licensing and if so, how much is permitted by the Authorities to be used? It is noted in the Water Sampling Tests the that levels of salinity indicate strong characteristics of ground water source; therefore, it would be feasible to suggest that the ground spring water usage for the Feedlot will have a depleting impact on the quantity of water flowing into the Beardy Waters and consequently affect the supply for farmers and residents downstream.

Where will the water be sourced for the Feedlot if we experience another crippling drought and the underground springs dry up? The EIS states that the Feedlot will be exclusively reliant on underground spring water, and that they will not be using the Beardy Waters for water access.

Effluent/Run Off into Beardy Waters

As the DA states that manure and effluent will be spread on-sight, can the runoff be mitigated securely when most of the land is on a downward slope towards the Beardy? What happens when heavy rainstorms occur, which we often experience during Spring and Summer? Local rainfalls of 30mms in half an hour were witnessed in January 2020 creating heavy flooding and water gushing down the hillside into the Beardy Waters. During an event such as this, and if the Effluent Ponds were to overflow or break, how could controls be put into place to prevent serious contamination of the Water Catchment. The health risks would be dire.

Separation/Buffer Distances

The EIS states in the Introduction that effluent that will be irrigated and manure will be spread over large areas over the entire property. There is no reference of separation distance requirements for waste utilisation to sensitive receivers or setbacks from boundaries, roads, and watercourse.

As such, the Separation Distance should be measured from the boundary of the property rather from the Feedlot Pad site.

Manure Management Contradiction

- 3.21. Traffic Generation states that all manure will be utilised on-site, and manure transport will not occur, however,
- 3.3.7 Manure Management states: any excess manure not required for on-site spreading can be removed to off-site locations for utilisation.

There appears to be a contradiction in these two statements.

Is Manure permitted to be carted off site or not? What are the implications if Manure is removed off site?

Animal Welfare

Feed Lot cattle may be financially lucrative for the Producer; however, the cattle are not able to exhibit their natural behaviours and live a very limited life in a confined enclosure, often standing in excrement and mud with <u>no shade</u>. Cattle are fed an exclusive diet of grain (which is not natural and nor beneficial to their health) only for rapid weight gain, until they are ready for slaughter. Liver abscesses are commonplace, as is footrot, botulism, and respiratory disease and as such, all Feed Lot Cattle are routinely administered with hormones and antibiotics to control disease. These hormones and antibiotics likely present in the effluent and waste.

The RSPCA Australia as the leading 'Animal Welfare' authority opposes intensive farming practices that cause suffering or distress to animals, or that prevent the animal from moving freely and satisfying its behavioural, social, or physiological needs.

. Consultation with the Community

As this Development Application has many serious and valid Community concerns a Public Forum should have be organised by Council.

Traffic & Road Safety Accreditation

Intersection of Stonehenge Road / New England Highway

Stonehenge Road & Stonehenge Bridge Suitability

We acknowledge that a Traffic Assessment has been completed by Apex Engineers however, there are still some serious concerns about the level of road safety:

The estimation made by Apex Engineers of 3 B-Doubles per week <u>does not include</u> the existing traffic which is already busy with various trucks, including B-Doubles with stock travelling along Stonehenge Road, and in and out of 34 Pedlow's Road.

Heavy B Double vehicles will be merging from Stonehenge Road onto the New England Highway into a 100km speed limit zone, where they will need to make a wide turn to get out onto the highway from the entrance, obviously at a low speed. The merging cattle/grain trucks turning could present an extremely dangerous situation for the oncoming traffic, as will the trucks turning into Stonehenge Road with traffic behind them. We believe to safely accommodate the Cattle Feedlot traffic; a merge lane should be constructed with appropriate signals from the south eastern side and a pullover lane on the north eastern side on the New England Highway. The Applicant's proposal to restrict truck usage to between the hours of 9.00am to 2.30pm (if adhered to), may not impact the school buses, however, it will impact the commuters and traffic travelling at around 100kms per hour on the New England Highway. It should be noted the New England Highway has become increasingly busy in the past 5 years on the Brisbane to Sydney route due to heavy transports choosing to take this road because of major road upgrade works and dangerous sections on the Pacific Highway.

Why hasn't the RMS been approached to prepare a Traffic Assessment?

The RMS who are accredited for Road Safety Auditing should have been approached to undergo a traffic assessment including their recommendations to meet the expected Road Safety requirements

Stonehenge Road and Pedlow's Road <u>Do Not have Approval</u> for usage by B-Double transports.

Does the Development have Approval to use other surrounding public roads for B-Double and grain transport?

In a recent GISC Business Meeting, Councillor Toms suggested that Council upgrade the Stonehenge Road. We would assume that the road upgrade for the benefit of the Cattle Feed Lot traffic would be the financial responsibility of the Applicant not the local Rate Payers. Additionally, the Stonehenge Bridge on Stonehenge Road has not been assessed to see if it is adequate to cope with the additional stress of the constant heavy weight of the large B Double cattle and grain transport trucks in addition to sporadic events of heavy flooding. What strategy plan, if any, has been put into place for flooding over the Stonehenge Bridge?

Cultural Heritage & Significance

GISC Strategic Priorities

"To manage the natural values of our local area and conserve our heritage to ensure that it is enjoyed by the community, visitors and future generations." It should be respectfully noted, and consideration given to the Stonehenge area which has a special cultural heritage significance to the Ngoorabul people, whom are the Traditional Custodians of the Land. Special traditional ceremonies were held throughout the Valley and sadly over the year's sites were destroyed including a marriage ceremony site and Bora Bora ground. The Aboriginal Land Council in Glen Innes

can verify these facts. It is known that the Ngoorabul people followed along the Beardy Waters through Stonehenge and camped on the Ridgelines. The Oorala Aboriginal Centre at UNE

has stated that is highly probable that there are still relics of significance in this area, even though it has been farmed and cultivated for many years. Aboriginal relics have previously been found in long established cultivated farming areas. It is uncertain if the Stonehenge area has ever been surveyed for Aboriginal artefacts or. Relics.

Are there any landscape features that indicate the presence of Aboriginal Effects?

The Oorala Aboriginal Centre states that the Ngoorabul people, due to the local climate, would camp above the Beardy Waters on the ridgelines. A presumption in the EIS has been made that nothing would be found on the Feedlot sight however, without a survey and inspection, this cannot be confirmed.

The AHIMS Search Site states that:

Information recorded on AHIMS may vary in accuracy and may not be up to date. Location details are recorded as grid references and it is important to note that there may be errors or omissions in the recordings.

Some parts of New South Wales have not been investigated in detail and there may be fewer records of Aboriginal sites in those areas. These areas may contain certain Aboriginal sites which are <u>not recorded</u> on AHIMS.

In summary, in the best interest of our Cultural Heritage and due diligence with respect to the Ngoorabul people, Council should seek a Walk Over with an Indigenous Archaeological expert to Survey this area.

Endangered Species & The Environment

Though the EIS lists 36 endangered animals, it fails to address several species which are endangered in our Region.

The Bell's Turtle (Wollumbinia Bellii) is a native animal which is listed as Endangered nationally and in New South Wales.

The Bell's Turtle is endemic to the New England Tablelands and occurs nowhere else on earth. The Bell's Turtle is native to the upper reaches of the Namoi, Gwydir, and Border River catchments. including Beardy Waters.

Local Land Services Armidale in Partnership with UNE currently are reintroducing the Bell's Turtle to save extinction and have been releasing hatchlings into these Water Catchments, including the Beardy Waters.

The following Freshwater Species are on the Threatened Species Distribution Map for the Department of Primary Industries and are found in this region:

The Southern Purple Spotted Gudeon is listed as a New South Wales Endangered Species.

The Murray Darling Basin Eel Tailed Catfish is listed as a New South Wales Endangered Species.

The Eastern Freshwater Cod is listed as a New South Wales Endangered Species.

The Murray Cod is listed as Critically Endangered by the International Union for Conservation of Nature (IUCN), and is vulnerable under the Environmental Protection of Biodiversity and Conservation Act, and by the Australian Society for Fish Biology.

The ICUN listing states that numbers of Murray Cod have substantially fallen. Murray Cod have been identified in the Beardy Waters.

A Species Impact Statement should have been undertaken to evaluate the impact of effluent on the water quality and native water life in the Beardy, as these fragile animals have diminished dramatically in numbers over the past years. A referral to the EPBC Act administered by the Commonwealth Department of Agriculture, Water and Environment should be implemented.

Tourism

The Feed Lot Development will have no benefit to the Tourism in our Glen Innes Region and a Negative Impact due to the proximity to our Township.

As winds prevail in a northerly direction from the Feedlot, foul odours will be smelt around Glen Innes. Businesses have expressed their concerns on the impact of this odour. This is not conducive to Tourists visiting our region nor the local Economy reliant on Tourism. Stonehenge will not be a desirable tourist destination, again because of the foul odours and the change of the visual amenity.

In summary this Development will be located far too close to residential subdivisions and if approved, will open the doors, to set a precedent for other Cattle Feedlots to be developed in this Valley, in our Water Catchment

Apart from financial gain for private business, the proposed Development offers little benefit for the local Community. There will be a negative impact on the amenity, water catchment, environment, native animals, cultural heritage, tourism, and property valuation. The Development Application has not provided Scientific Evidence to prove that is not the case

We look forward to a thorough and transparent response addressing our serious issues and well-founded concerns which will not only affect us, but all the Stonehenge community and those in the Glen Innes township and surrounds.

Yours sincerely



Cc: Mr. G. Price, Director of Development, Planning & Regulatory Services

Mayor Carol Sparks

Deputy Mayor, Diane Newman

Counsellors Frendon, Parsons, Smith, Toms and Price

Attachments:

Political Donations and Gifts Disclosure Statement

From:

Sent:

Thursday, 26 November 2020 1:50 PM

To:

Council Email

Subject:

Submission - D.A. # 25/20-21 - Jardana Feedlot

Attachments:

SUBMISSION - Jardana Feedlot.pdf

Good afternoon

Attached is a submission against the Jardana Feedlot.

Regards

Enc

The General Manager Glen Innes Severn Council PO Box 61 GLEN INNES NSW 2370

Email: council@gisc.nsw.gov.au

To: The General Manager and Councillors of the Glen Innes Severn Council:

We wish to make a submission **AGAINST** the Jardana Feedlot - development application number 25/20-21.

1. No feedlot development should be allowed near the Beardy Waters catchment area for Glen Innes and groundwater supplies. There is no guarantee, despite claims by the feedlot developer, that effulent and possible contaminants will not leech into our water system. Who will be liable then? The Council for approving the development or the developer? The impact on the native wildlife must also be taken into consideration.

If the water supply ends up being contaminated, what happens to our town then? The flow-on effect to the health and well-being of the residents and the impact on other industries in town far outweighs the approval of one development.

2. The vicinity of the feedlot on the entrance to our beautiful town will detract visually and the smell will also be a negative aspect. The Stonehenge Recreation Park is a very popular spot, which could very well be spoilt by the odour from the proposed feedlot.

Council is supportive of tourism in our area, so why go and spoil a very important part of our environment.

- 3. Current residences will be impacted greatly by the smell, extra trafffic and noise. The value of the three subdivisions already approved (<u>before the feedlot d.a!</u>) will be greatly reduced. Who would willingly buy near a feedlot now not us! Councillors maybe?
- 4. There are surely other areas where the feedlot could go without affecting the social, environmental and economic life of the Glen Innes community and its ratepayers.
- 5. Based on previous submissions overwhelming in support of NOT allowing the feedlot development, it could be seen that Glen Innes residents are not in favour of the development and this needs to be taken into consideration when making a determination.



Glen Innes NSW 2370

Date: 26.11.2020

The General Manager, Glen Innes Severn Council Glen Innes

Dear Sir.

Re; development application number 25/20-21: going before council on the 26th November about the cattle feedlot, there has been a lot of distaste for this amongst the people of the town and surrounds as it is not only dangerous to Beady river but the smell to the town. Growing up on a dairy farm and spending most of my time running the farm when my dad died I have fair knowledge between the smell from grass fed cattle and grain fed cattle, grain fed cattle have a very strong smell which will drift across the town unlike those who graze on grass.

Feedlot cattle also produce a lot more manure and urine, in fact that many cattle will produce tons of it with it all in a river catchment can be dangerous to the health and wellbeing of the people, either swimming or drinking the water. I studied this for months when the town sewerage was put into the Bellinger River, I warned many times with letters in the paper as to the danger. E'coli is dangerous not just a little indicator as people seem to think, I found this out through spending hours in the library, it causes bad staph infections and also causes Child Meningitis. While living there a child died and after I left was told it was from Child Meningitis to my disgust, even the oysters in Urunga couldn't be harvested. Driving across the Bridge you can see the weeds in the river bed from all the nutrients now going into the river, when I lived there, there was constant testing of the river and to my knowledge since there has been none.

When we have heavy storms what happens to the over flow as there will be from the holding ponds and have washouts as I have seen with the sewage in the district I mentioned above, then there are the chemicals also, there is an endangered frog which lives in the area, this is intensive farming and shouldn't be allowed to go ahead in a water catchment area at all, this is so wrong with only a 2 week letter drop and with that there are alarm bells ringing all around town not to mention those who have brought out in the area.

Feedlots are usually miles away from a road especially a highway, with people coming into town they will not want to stay and put up with the smell, there goes the tourists of the town. Then there is the breathing in of the smell which is the bacteria, council should be very careful about letting this development go ahead, especially in a river catchment area, when manure is wet it runs very quickly as I have seen when hosing down the dairy. This feedlot will not generate employment for the town only health issues.

Other issues are the intersection for road trains turning isn't big enough, there is also an endangered water rat which feasts on cane toads, peppered tree frog, platypus, bells turtle and Murray Cod all endangered. All this should also be taken into consideration when the councillors make their decision.

Being in a river catchment area and I plead with council to think of the danger to the town on Glen and the residents, not to mention the smell.

Yours faithfully,

Mail Delivery Reference

26NOV 2020

18 Page Objection to DA 25/20-21 1x

Political Donations and Gift Disclosure Statement 1x

Both documents are signed by

Delivered to Glen Innes Severn Council Church Street Office of 0900 an 26 Nov 2020

CLEN INNES SEVERN COUNCIL Received by Records

Received by:

Date: 2/20002020



Stonehenge NSW 2370

Glen Innes Severn Council

25th November 2020

OBJECTION; DA 25-20/21 Jardana Pty Ltd

The General Manager,

We have received correspondence pertaining to Development Application 25-20/21 Jardana Pty Ltd for an Intensive Agricultural Development, namely a 1000 Head Cattle Feedlot in Stonehenge.

Our position is in that we OPPOSE this Development on several Grounds. Lack of information, planning, mitigation strategies, lack of environmental impact studies and a very strong stance that this development is not suited to this location. It poses Immense Risks and disadvantages to our family, our neighbouring community and the wider community, including, (health implications, environmental hazards, air quality impacts, Noise disturbances, Visual Amenity impacts, Vermin increase, Water Security hazard, natural resource implications, socio-economic impacts, cultural and heritage impacts) and that there has been gross negligence on Councils behalf in ensuring Protection of our Towns Drinking Water Catchment and blatantly ignoring LEP zoning issues.

We have read through both documents as are available and in referencing them to required legislation and guidelines, we can infer that this application is void of adequate information for assessment. In addition; there seems to be a disregard and ignorance in many instances to published guidelines pertaining to Beef cattle feedlot site suitability and compliance.

The Development Application Form

Attachment A is an extract from The Development Application form. Disconcertingly, in this application form, the answers selected are not reflective of the nature of the works being proposed. Most are self-explanatory but we will give an additional explanation for the following items

Item 1. (a) Is the development out of character for the area? The example given (eg. Does the proposal involve a commercial or industrial use in a residential area)

 Intensive Agriculture is out of character for the current use of the area which is for Extensive Agriculture (grazing and cropping) and small enterprise farming and residential living surrounding

Item 3. (c) Will other waste be generated by this development?

Animal Carcasses, Pollution, milling waste, soiled/contaminated feed waste

Item 5. (i) Are there technological hazards associated with this proposal?

Examples of Technological Hazards which pose a real risk in this type of development are; industrial pollution, water pollution, toxic waste, dam failures, effluent holding pond failures, transport accidents, Spontaneous combustion of composting matter, fires, chemical spills and Biological hazards, Disease outbreak, Mass mortality, Groundwater and surface water Contamination

The Statement of Environmental Effects SOEE formerly EIS

The Statement of Environmental effects is missing the required information to assess (for ease of understanding we have put this information into point form).

Importantly we have included the following extract from EIS (SOEE) Guidelines- Cattle Feedlots

The NSW Land and Environment Court has made a number of observations about the adequacy of EISs during its judgements the Court's observations includes:

- The purpose of an EIS is to bring matters to the attention of members of the public, the decision-maker, and the Department of Urban Affairs and Planning so the environmental consequences of a proposal can be properly understood
- The purpose of the EIS is to assist the decision-maker. An EIS is not a decision-making end in itself, but a means to a decision-making end

Index referenced to SOEE

2.1 Subject Site

 Once amalgamated the 16 lots become the land known as the Development site not lot 1/dp7243 and/or lot 1/dp308507 as there will be effluent irrigation and dispersal of compost over vast areas. Subject site would include all the land being utilised / the land such as amalgamated.

2.2 Climate

- The SOEE references the mean annual rainfall of 837mm Mla Feedlot design and
 construction guide reference the first consideration under site selection is Climactic
 conditions where the following extract can be found 'Sites with a high annual moisture
 deficit (low rainfall and/or high evaporation rates) are preferable, with an average annual
 rainfall of less than 750 mm recommended'.
- In addition, our cold winter climate will likely exacerbate odour load
- Why is there no reference to Katabatic wind and inversion under the climate heading?
 A katabatic wind is a drainage wind, a wind that carries high-density air from a higher elevation down a slope under the force of gravity. Looking at topography mapping, the drainage will move down to Beardy Waters and the surrounding land below the feedlot and move in the direction of the Glen Innes Township.

2.3 Receptors and Surrounding land Use

• There is no reference to receptors from effluent irrigation or composting sites

- There is no reference to neighbours in Odour Calculation
- Separation for odour calculations appears to be modelled from the pens only and has failed to example modelling from the areas intended to be utilised for effluent irrigation and application of compost
- Other holdings (farms) are also receptors (even in the absence of a dwelling). They are a place of employment for farmers. Consideration to these properties must be included, how can they be sold on in the future, for other enterprise or dwellings. If there is no regard to them in this development process. (Please see later comments pertaining to buffers)
- We make reference here that there is a holding West of the Property <1ha with a total land area of .33ha (located junction New England Hwy and Stonehenge Road)
- There is no reference to buffers

The following Extract derived from Department of Primary Industries- Primefact NOV 2018 **Buffer Zone**: An area of land set aside to minimise the impacts of land uses on each other. **Separation Distance**: The distance between the point of generation of an environmental impact and a receptor that is sensitive to that impact. A separation distance may be used to specify the width of a buffer zone.

IMPORTANT A buffer zone is also generally accepted as being an area where a landholder has legal control of the land needed to separate their development from adjoining land.

Why are buffers necessary? The separation of land uses incompatible with agriculture and between different types of agriculture, can be an effective way to minimise land use conflict and enable primary producers to better operate, with fewer constraints. It also plays a key role in farm biosecurity and in managing any impacts of agriculture on the environment.

It is essential that any proposed agricultural development undertake a full biosecurity risk assessment using the latest industry Best Practice Management through a Statement of Environmental Effects or EIS. Proponents should also contact the Office of Environment and Heritage, the Environment Protection Authority and the Biosecurity and Food Safety Division of the Department of Primary Industries, for advice on biosecurity and environmental buffers.

It is important that buffer zones built into the design of developments do not rely on any adjacent rural landholding for their development's buffer zones. Incorporating appropriate buffer zones into the planning process, particularly at the early stages of a proposed development, will provide ongoing benefits for primary producers and the public.

Buffers & Land Use Conflict There are a range of causes of land use conflict and it can threaten the ongoing viability of agricultural operations as well as the amenity enjoyed by adjacent land users. Some of these causes include threats to biosecurity, odour, dust, noise, water use, visual amenity, smoke, effluent management, chemical use & spray drift, weed management, as well as other nuisance issues such as stray dogs and trespass.

Duty of care means we must all manage our natural resources taking reasonable steps to prevent harm to the environment, to people and to areas of cultural heritage Prevention is better than cure. Avoiding land use conflict by making better and more informed decisions is far better than trying to manage land use conflict and neighbour disputes after they arise. *Living and Working in Rural areas NSW DPI*

2.4 Topography

- The property falls to the Beardy Waters E to W, high point SE to low point NW by an altitude difference of 100mtrs.
- Referencing the Topography map provided, the feedlot pens are above the low point of the property and subsequently above the low points of Beardy Waters
- Longitudinally the entire western boundary of the property is below the feedlot pens
- The Beardy is the low Point in the Valley
- Additionally, Every Topographic point provided on the map West of the property including beyond the Beardy (which encompasses dozens of other landholders) is below the feedlot pad

This supports that the Katabatic component should be considered in the LUCRA equation

2.5 Land and Soil

- The soil and lands suitability Map display the feedlot pad on LSC CLASS 6
- LSC class 6 Land has very high limitations for high-impact land uses. Land use is
 restricted to low impact land uses such as grazing, forestry and nature conservation.
 Careful management of limitations is required to prevent severe land and environmental degradation.
- This implies this land is restricted in its use.

The information that precedes the table supplied in the SOEE appears to be given to disregard the fact the land proposed for the feedlot pad is LSC class 6 and suited to grazing, forestry and nature conservation. (Not suitable to high impact- Intensive Industry as is feed lotting)

2.6 Surface Water

2.6.1 Fisheries management Act

New South Wales Fisheries department has advised that; if there is literature published in our Community that claims the Murray Cod are in our region as is the case in the below statement found on the Glen Innes Highland page

Catch a Murray Cod

Glen Innes Highlands has an outstanding reputation for Murray Cod, drawing families, celebrities and fishing writers.

There is a responsibility on the consent authority to ensure the correct assessments and investigations are fulfilled by the applicant and included with the SOEE

Legislation that provides for the protection of all threatened fish and marine plants came into effect on 1 July 1998. Threatened species provisions were included as Part 7A of the Fisheries Management Act 1994. This legislation provides for the protection, conservation and recovery of threatened species, and makes provision for the management of threats. Further information may be obtained from the local office of the NSW Department of Primary Industries or Department of Fisheries

Council must request further studies and impact assessments be satisfied by the applicant. Please contact the NSW department of fisheries and DPI to clarify. Be sure to tell them this application pertains to Intensive Agriculture in the Towns Drinking Water Catchment.

2.6.2 Drainage features – Draining to the Beardy Waters, You must responsibly contact Fisheries NSW, DPI NSW, Water NSW and EPA

2.6.3 Glen Innes Drinking Water Catchment- can be found in the councils LEP - MAP DWC 003 gives you the entire view.

IMPORTANT

The following extract is from a published DPI Guideline (Living and Working in Rural Areas) Clearly Displaying that Intensive Livestock Feedlots should be 800 Metres from Potable water supply/ catchments

THE ENTIRE PROPOSED PROPERTY IS IN THE DRINKING WATER CATCHMENT

Please explain why as the authority responsible for our Water Catchment Protection has Council not advised the applicant that this location is not suitable for this Development?

Table 6: Recommended minimum buffers (metres) for primary industries

	ON The describe build in the conservances will be the separation of taken and critical abundance stated and the supplied protects community access, consistent of a separation of high individual and the supplied of the contract of the contract of the supplied of the supp											
			Residential areas & urban development	Rural dwellings	Education facilisies & pre-schools	Rural, tourist accommodation	Watercourses & wettands	Bores & welk	Potable water supply/ catchment	Property boundary	निकार्ट र	
	Piggeries	Housing & waste storage	1000	500F	1000	(H)	100	SSD	800	100	je na j	
	-	Waste utilisation area	700	74)	5/0	250	100	221)	SHOUL	20	חק	
Proposed Use	Feedlots'	Yards & waste storage	1000	500	1000	1000	100	SSD	800	00	100	
·	-	Waste utilisation area	500	250	250	250	100	SSID	600	20	70	
	Poultry	Sheds & waste storage	1000	1,00	1000	,00	100	SSID	800	100	100	
		Waste utilisation area	500	24,0	מקינ	J'90	100	SSI)	800	20	70	
	Dairies*	Sheds & waste storage	900	250	250	250	190	221)	800	100	100	
		Waste utilisation area	900	250	250	250	100	SSD	800	20	20	
	Rabbits	Wet shed, ponds & irrig.	300	150	950	150	100	SSD	800	50	50	
		Dry shed	120	60	120	GD	100	SSID	800	20	70	
	Other Intensive fivestock operations		500	300	400	300	100	SSD	900	100	100	
Current Land Use	Grazing of stock		ψΩ	\$0	·ω	SO	RWP	SSD	BMP	NAI	BMP	BMP- Best Management Practice
		Sugar cano, cropping & horticulture Greenhouse & controlled environment horticulture		900	200	QOS	RVP	SSID	ВМР	NAI	NMP	
	Greenhoi environn			100	7(11)	диц	ų,	SSD	550	50	'311	
	Macadan	nia de-husking	300	300	300	300	50	SSD	SSD	50	5ú	
	Forestry 8	§ plantations	SSD	\$51.3	5513	SSD	SIFIL	55()	550	[\$V\$)	SILK.	
	Bananas	Banenas		150	#LO	11/0	EAD.	CEZZ	550	ESAN:	ВМР	
	furl farms* Rural industries (incl. feed mills and sawmills)		30n	A00	200	2010	90	551)	550	4€V∑I	SSD	
			1000	900	900	500	50	SSD	SSD	SSD	50	
	Abattoirs		1000	1000	1000	1000	100	SSID	900	100	100	

DOX 008 [[22 000 1000 1000 0001 0001

Potentially hazardous or

affersive industry

Protection of Drinking Water Supplies; as in The Local Government Act 1993 makes it an offence if a person wilfully or negligently does any act which damages or pollutes a public water supply (or is likely to do so).

The proposed Development is located in its entirety within the Drinking Water Catchment. There are published guidelines available from the DPI that reference an 800-metre buffer is recommended between Intensive livestock Agriculture and Potable water supply Catchments.

The SOEE references The Glen Innes Integrated Water Cycle Management: Part 2 Strategy Plan (2009)

I would like to make reference to the GISC - Glen Innes 2014 Drinking Water Management Scheme

Firstly, I would encourage this document to be read in its entirety

Hazard Identification and Risk Assessment-Extract

A Risk assessment workshop completed with participation from NSW Health Water Unit, Local Public Health Unit, NSW Office of Water and GISC. The Glen Innes risk assessment identified 34 risks, including 7 very high residual risks (1 in the source water; 1 at the WTP; 3 in the reservoirs; and 2 in the reticulation).

Preventive measures for Drinking Water quality management Glen Innes Severn Council supports a multi-barrier approach to the safe supply of drinking water. Key barriers in the Glen Innes drinking water supply system are: <u>source water protection</u>, extraction management, coagulation, flocculation, filtration and disinfection.

In December 2014 GISC Drinking Water Management Scheme-

Table 26 Improvement plan identifies the following objectives- extract

- Protection of catchment to minimise pollutants entering raw water
- Implementation of appropriate ongoing community consultation and management
 Community involvement and awareness Council encourages community involvement
 and consultation through Council's ordinary meetings, Council's website and community
 surveys

DRINKING WATER QUALITY POLICY- extract

- Manage water quality from catchment to tap: at all points along the delivery chain, from the source water to the consumer's tap
- Contribute to setting industry regulations and guidelines: <u>be an active participant in the</u>
 <u>development of industry regulation and guidelines relevant to health</u> and the broader
 water cycle
- All managers and employees involved in the supply of drinking water are responsible for understanding, implementing, maintaining and continuously improving the Drinking Water Management System.

Protection of the Environment Operations Act 1997

This Act aims to protect, restore and enhance the quality of the environment in NSW and supports the need to maintain ecologically sustainable development. The Act details environment protection licence requirements for scheduled development work and scheduled activities, both premise and non-premise based (see Schedule 1 of the Act). State significant projects will usually require a licence under this Act. Non-scheduled activities, usually associated with water pollution, may also require an environment protection licence

2.7 Ground Water

- This would be where you would reference spring fed dams.
- There is no modelling pertaining to the spring-fed dams or if they are rock aquifers. Water NSW should be engaged and can assist in determining the suitability and then the licensing required IF suitability is determined. (see below)
- Shallow aquifers; if the spring fed dams are shallow rock aquifers 'Highly Likely' these
 would be fractured rock aquifers. If shallow rock aquifer pollution occurs, this WOULD
 impact ALL in this water source.
- The insert of a Water NSW document for a bore from outside of the property is of no benefit to correct modelling pertaining Ground water impact associated to this enterprise.
- WATER NSW Should be Engaged for assessment- be sure to tell them you are assessing a
 DA for an Intensive Cattle feedlot in the Drinking Water Catchment

Water Nsw Domestic and Stock Rights

Under the *Water Management Act 2000*, an owner or occupier of a landholding is entitled to take water from a river, estuary or lake which fronts their land or from an aquifer which is underlying their land for domestic consumption and stock watering, without the need for a Water Access Licence (WAL). This is a domestic and stock right.

However,

It cannot be used for irrigating fodder crops for stock, washing down in a dairy or machinery shed, intensive livestock operations (such as feedlots, piggeries or battery chickens), aquaculture or for commercial purposes (including caravan parks or large-scale bed and breakfast accommodation) other than for the personal use of the proprietors.

A WAL is required for water taken for commercial activities such as irrigation, aquaculture, feedlots, piggeries, poultry farms, recreation and golf/sporting areas.

Additionally;

The NSW State Groundwater Quality Protection Policy (DLWC 1998) and the framework NSW State Groundwater Policy (DLWC 1997) should be consulted for the principles and issues to be considered relating to groundwaters.

There is a risk that underlying groundwater may be downgraded as a result of irrigation with effluent. These risks are greatest when effluent with high quantities of nutrients, salt, pathogens or other contaminants is being irrigated and/or where the groundwater has a current or potential beneficial use (e.g. used for drinking water or flows to a groundwater dependent ecosystem).

Groundwater Quality

A clean and safe supply of groundwater is essential for the drinking water needs of country towns, major industries (especially agriculture) and to support groundwater dependent ecosystems. Groundwater quality decline and contamination creates a serious threat to human and animal health and the degradation of wetlands and rivers.

NSW Groundwater Quality Protection Policy

The goal for the management of groundwater resources in New South Wales is to manage the State's groundwater resources so that they can sustain environmental, social and economic uses for the people of NSW.

The Policy objectives will be achieved by applying the management principles listed below.

1 All groundwater systems should be managed such that their most sensitive identified beneficial use (or environmental value) is maintained.

Once the beneficial use of a groundwater system has been identified, the obligation to protect it lies both with the industry or people involved in the activity which has the potential to contaminate the groundwater, and with the government authorities that regulate the activities. Potential dischargers need to either establish that their activity does not contaminate the groundwater system, or show that their proposal will not affect the beneficial use selected. This is consistent with the 'polluter pays' principle, which requires the costs of pollution prevention, or cleaning up pollution, to be met by the polluter. It must be clearly understood by all members of society that no-one has the right to contaminate groundwater in such a way as to create a significant risk to public health, critical ecosystems or other valued users of water

2. Town water supplies should be afforded special protection against contamination.

Where town water supplies wholly or partly come from groundwater, strategies may be required to ensure that land use activities doesn't adversely affect its quality.

- 3. Groundwater pollution should be prevented so that future remediation is not required.
- 4. For new developments, the scale and scope of work required to demonstrate adequate groundwater protection shall be commensurate with the risk the development poses to a groundwater system and the value of the groundwater resource.
- 5. A groundwater pumper shall bear the responsibility for environmental damage or degradation caused by using groundwaters that are incompatible with soil, vegetation or receiving waters.
- 6. Groundwater dependent ecosystems will be afforded protection.
- 7. Groundwater quality protection should be integrated with the management of groundwater quantity.

- 8. The cumulative impacts of developments on groundwater quality should be recognised by all those who manage, use, or impact on the resource.
- 9. Where possible and practical, environmentally degraded areas should be rehabilitated and their ecosystem support functions restored

Threats to Groundwater Quality; Generally, contamination can be described as coming from either 'point' sources or 'diffuse' sources. Point source contamination may range from land fill sites (for example domestic tip sites and industrial land fill sites), to animal-based waste from abattoirs, cattle feed lots and piggeries. Diffuse source contamination includes the spreading of fertilisers onto agricultural land, urban runoff and the fallout from industrial smoke stacks.

Along with threats from surface activities, there is a very real danger that pumping large volumes of groundwater will result in a deterioration in water quality where poor-quality water is drawn into an aquifer containing high quality water. If groundwater becomes polluted, it is difficult or impossible to clean up completely. The slow rates of groundwater flow and low microbial activity limit any self-purification. Processes which take place in days or weeks in surface water systems may take decades to occur in groundwater. In addition, the costs of remediating groundwater systems are very high. It is, therefore, better to prevent the risk of groundwater contamination than to deal with its consequences.

Ecologically Sustainable Development

Ecologically Sustainable Development (ESD) provides the basis for the protection of groundwater quality in NSW. In Australia, the Federal and State Governments have endorsed the National Strategy for Ecologically Sustainable Development (Commonwealth of Australia, 1992). The ESD strategy has three core objectives: • to enhance individual and community wellbeing by following a path of economic development that safeguards the welfare of future generations; • to provide for equity within and between generations; and • to protect biological diversity and maintain essential ecological processes and life-support systems. Both the national ESD strategy and the Inter-Government Agreement on the Environment (IGAE) have adopted the 'precautionary principle' as one which should provide a basis for policy making and program implementation at all levels of Government. The precautionary principle states that:

'Where there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation.' The precautionary principle is particularly applicable to groundwater management in NSW. There are often long-time scales associated with shifts in the condition of many groundwater systems and our knowledge of groundwater is often poor

Integrated approach

This Policy adopts an integrated approach to groundwater management. This means that groundwater issues must be considered in relation to surface water management and land use planning decisions. Decisions should consider interactions between groundwater quality, quantity and dependent ecosystems as well as the possible impacts of using groundwater on soils and vegetation and surface water systems.

2.8 Flora and Fauna

2.8.2 ENVIRONMENTAL PROTECTION AND BIODIVERSITY CONSERVATION ACT 1999

The Development proposes to spread effluent that has a real risk of running offsite to
the Beardy Waters and/or causing groundwater contamination. It proposes to pump
waters from spring fed dams (Aquifers) The required action is to carry out risk and
impact assessments/ecological impacts for the surrounding environment and ecological
habitats within the vicinity see office of Environment and Heritage/ Environmental
protection and Biodiversity Conservation Act

Chelonia

Western Sawshelled Turtle, Bell's Turtle

Conservation status in NSW: Endangered Commonwealth status: Vulnerable

In NSW, currently found in four disjunct populations in the upper reaches of the Namoi, Gwydir and Border Rivers systems, on the escarpment of the North West Slopes. A separate small population exists in Queensland and though disjunct, recent studies indicate all populations are the same subspecies. Recent surveys have demonstrated that the species is more widely distributed than formerly thought, locally abundant in some areas yet also sparse in habitat that appears suitable. Distribution Maps available office of environment and heritage

Piscifauna

Murray Cod -

Commonwealth status: Critically endangered

Australian Government Department of Agriculture, Water and Environment-

Murray cod are listed as **critically endangered** by the IUCN, and as vulnerable under the Environmental Protection of Biodiversity and Conservation Act, and by the Australian Society for Fish Biology. The IUCN listing states that numbers of Murray cod have substantially fallen. *Murray Cod listed as a nationally threatened species under the EPBC Act means that any action that is likely to have a significant impact on the species will need to be referred to the Commonwealth Environment Minister for a decision as to whether assessment and approval is required. It is an offence for any person to undertake an action that is likely to have a significant impact on a matter of national environmental significance (including a nationally listed threatened species) without approval.*

This is applicable as our GISC through the Glen Innes highlands website states

Catch a Murray Cod

Glen Innes Highlands has an outstanding reputation for Murray Cod, drawing families, celebrities and fishing writers.

Stygofauna

Diverse subsurface community of fauna that inhabit the pore spaces and voids of groundwater environments, termed 'stygofauna'. Stygofauna include a broad range of organisms which include 'macro' invertebrates and vertebrates that can be seen with the naked eye, 'micro' organisms termed 'meiofauna' (invertebrates that can only be seen with a microscope) and bacteria (biofilm) communities. They have many values, including the following: some are rare or

unique; the ecosystems surviving in aquifers and caves are amongst the oldest surviving on earth;

and they have water quality benefits, biodiversity value and add to the ecological diversity in a region.

2.9 Wetlands

As the dams are of spring fed means Water NSW Licensing is required

2.4.1 ENVIRONMENTAL PROTECTION AND BIODIVERSITY CONSERVATION ACT 1999

Ramsar Convention, are a matter of National Environmental Significance (MNES) under the EPBC Act.

Ramsar wetland type classification - Inland Wetlands **Y — Freshwater springs**; oases.

2.10 Cultural Heritage

• The SOEE states the (AHIMS) investigation was carried out for 1 lot – Lot 1/DP7243. The Development application form and SOEE clearly states the application applies to 16 lots.

GISC Cultural Plan 2017-2021

what is important to us?

Cultural significant and valued assets that are important to the community are the heritage buildings and homes, the central parks and gardens, sporting grounds, the National Parks and Lookouts and the friendly, welcoming community spirit within the Glen Innes Severn Local Government Area. Rural aspect to our town is very distinctive giving Glen Innes a great country feel.

Our Community - The Ngoorabul People an Extract from this reading by Mrs Karen Potter GIALC reads. *Gathering areas, where celebrations and ceremony took place, included Dundee and Stonehenge areas.*

What Have We Got? Our Cultural Assets – Places/Activities- extract items of importance to the community

- -Green environment parks and open spaces, National Parks;
- -Heritage buildings and homes;
- -Stonehenge Reserve and Balancing Rock;

Strategic priority # 4. Environment and Heritage (EH) Manage the natural values of our local area and conserve our heritage to ensure that it is enjoyed by the community, visitors and future generations. Preserve and build on existing cultural assets.

Consultation should take place with LALC and heritage impact assessments on other heritage items.

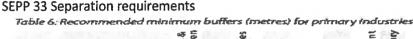
Proposed Development

In this section much of the information is suggestive and seems to be for the purpose of distraction. We will itemise in point form areas where factual reference is lacking. Please remember the Proposed development is fundamentally and evidently in the wrong location in the first instance.

- The Development site should for any measurement be identified as the collective 16 lots as are to be amalgamated
- All references are made to Lot 1/ DP7243, the site should be the 16 lots as applied for in the Development application
- Why would there be no consideration for shade? Shade should be a requirement for any proposal involving animals. In addition, at an altitude where UV is 15% greater than sea level, the Atmosphere is thinner (the heat felt on skin is extreme in direct sun) a responsible operator would provide shade. Shade should be afforded to all animals. This displays no intention to comply with animal welfare considerations.
- The manure pad is not located in or designed in compliance with national feedlot guidelines
- The proposed construction site does not comply with fundamental guidelines for feedlot construction and location
- The proposed location for pens, effluent holding pond, manure pad and compost are too close to public roads and watercourses and boundaries
- The compost windrow and carcass compost sites are not located to comply with guidelines
- There is insufficient vegetation/tree screening, the facility size would warrant a much larger tree screen. A 20m deep tree screen is not deep enough; in addition there are 3 other sides to consider.
- Why is there not a plan for advanced trees in the plantation?
- There is inadequate information pertaining to the effluent irrigation in the effluent management proposal.
- Withholding periods for grazing stock on land that has received effluent, not identified
- Cumulative impacts of whole farm have not been modelled, referenced or considered
- Effluent irrigation application should be applied via drip irrigation to minimise the propulsion of harmful and offensive microorganisms into the air (there are many reported cases of organisms travelling several kilometres via spray irrigation, this is a dangerous health, biological and ecological hazard)
- Effluent poses an immense risk to ecological processes there is no reference to the protection of the groundwater
- Pedlows Road is a public road, untreated effluent cannot be used on public roads
- Effluent cannot be applied within 100 metres of waterways (in this case this would also apply to spring fed dams as they are from spring fed means/ groundwater/ above or in the vicinity of aquifers)
- The Minimum setback from property boundaries and public roads has not been adhered to for the site of pens or in the proposal for effluent and composting application / waste management (see the applicable map) applicable setbacks have not been observed
- Effluent and compost map outlining the areas intended for effluent and compost spreading has failed to adhere to the required buffers from Property Boundaries, Public Roads and Water Courses or Spring Fed Dams
- The Application form states Manure will be utilised on site the SOEE states both on site and if there is any excess manure not required can be removed to off-site locations. Which is it? where is it? Transparency?
- There is no modelling undertaken or exampled for 'cumulative impacts'; the proposed site currently grazing cattle is a load to the same area. There should be modelling of the impact incorporating 'grazing of land/Current use with feedlot proposal' and how this

cumulative impact is reflected on environmental impact loading, waste, effluent compost, groundwater, odour, public health and safety, environmental health, ecological systems, Biodiversity impacts

- Where has the Biodiversity Conservation act been addressed, it must be addressed, including the impact of the 'whole farm'?
- It is important for your attention... it is <u>not at all</u> an adequate mitigation technique to think that Councils Water Treatment plant will Clean up the Pollution and Contamination caused by this development.
- It is the applicant who needs to scientifically prove the development will pose <u>no Impact</u> to the Environment, Water and Community
- Sepp 33 Offensive Development has not been addressed adequately; in addition, this is another consideration that the development is not suitable to the Drinking Water Catchment





Department of Environment and Conservation; Environmental guidelines effluent irrigation Guidelines; extract

Effluent can pose environmental, public health or agricultural resource risks if not managed appropriately and the information in this Guideline will support the establishment of safe effluent irrigation reuse schemes.

Effluent is a hazard to Groundwater, surface water, ecological systems, biosecurity, public health and safety

Land use conflicts When planning an effluent irrigation system, it is essential to consider the potential for land use conflict due to incompatibility with other land uses in the locality. Nuisance caused by the generation of odour, dust or noise must be considered and minimised to protect community amenity. Activities that have the potential to significantly impact on the environment and possibly create land use conflicts are generally subject to environmental impact assessment procedures. Consideration of these impacts is particularly important for intensive animal industries such as piggeries, feedlots, abattoirs and tanneries.

Treatment and disinfection The major risk associated with human or animal contact with effluent are from infection by microorganisms, such as bacteria (e.g. Salmonellae), viruses (e.g. Hepatitis sp.), protozoa (e.g. Giardia and Cryptosporidium) or helminths (tape worms).. The likely level of pathogens in the final effluent product is assessed by knowledge of the

specific treatment processes and by measurement of indicator organisms such as faecal (or thermotolerant) coliforms.

AGAIN.

NONE OF THE BELOW BUFFERS HAVE BEEN OBSERVED IN THE SOEE FOR WASTE UTILISATION

IMPORTANT- Waste utilisation should not take place in a Drinking Water Catchment

Table 6: Recommended minimum buffers (metres) for primary industries एवंदि Handrend de buffer unther noutreauxes will be the separation of scarce and could a mediance sustemy that poperty construction of the contract of the contract of the publication of the time of the distance of the contract of the contract of the publication of the contract of the davelopmen Jesidential prens & catch men Property bounds Potable water COUNTS Piggeries' Housing & waste storage HXXH REEL SHO 800 Waste utilisation area

WES

((2)

SHITCH

800 TO() 100

Yards & waste storage 500 Waste utilisation area 551) Feedlot Waste utilisation should be exempt from the Drinking Water Catchment

14XXX

1000

21/1

1000

Negates the Development

Secondly -

No Consideration in SOEE

LUCRA

Please explain why Katabatic inversion was not calculated in the LUCRA assessment

KYRR

- There is a property west of the Property <1ha the total area is .33 ha
- There should be a calculation taking in regard the cumulative impact

We would anticipate an environmental scientist should be able to model this or explain why this would not apply. As there is no one in Council suitably qualified, we request the EPA or suitable Government agency be engaged.

Traffic Impact and Safety

There seems to be inadequate information and disregard to the requirements to satisfy the Traffic impact assessment. Is there not already regular traffic to the location that has not been included in the data provided. Had the applicant been made aware the liability for these upgrades would be his responsibility. Why has the information not been provided to address the risks and safety consideration for this requirement including the cumulative consequences. It would seem the applicant is 'deferring' this responsibility. The Traffic Impact assessment is incomplete and cannot be assessed.

Environmental Management Plan

We don't know that the applicant has an understanding of his responsibility for an EMP or that like other areas of omission is the intent to defer or ignore this. In its current state the EMP cannot be used for considerations.

Property Blight-

There are very real implications that cannot be ignored in considerations, in that of 'Property Blight' this is the reduction in marketability and value of land as a result of a consent authority determination. This poses a 'Likely Impact' to properties 'in the locality'. There then becomes very real implications on accountability of such decisions. Consent authorities must in determination consider Section 4.15 EP&A Act (1) (b) the likely impacts of that <u>development</u>, including <u>environmental</u> impacts on both the natural and built <u>environments</u>, and social and economic impacts in the locality. 'Likely impacts' in this context means 'a real chance or possibility'. There are several case studies available from the LEC that demonstrate economic impacts in terms of 'locality' and consent authorities are most certainly required to consider loss as an 'economic impact'.

We have spoken to the Valuer Generals Office, and Developments that impact on the amenity or are offensive and visually prominent pose real implications for the Value of land 'in the locality' please see 'Attachment B' for the guide to the Valuation method. This will also impact the rateable value for revenue.

At this time the applicant has NOT provided any scientific evidence to satisfy our very real concerns for the safety of our family, our children in particular and Community Health and safety issues. After the last DA was approved, we asked several councillors ...could they guarantee this type of development will not be detrimental to our children's health (as we reside in close proximity to the proposed site, we are a highly visible receptor) none were able to confirm or offer assurance, yet the development was approved. The applicant hadn't displayed any ability or intention to comply with legislation or guidelines and nor had Council. Unfortunately, again we have found no evidence that displays the applicant understands the implications of this type of Development. Using assumptions in place of true data and scientific evidence does not display or warrant the applicant as a suitable operator for this type of development, the applicant has not been able to display the suitability of this location for this enterprise... Why is this? Because it cannot be satisfied, the site is fundamentally not appropriate for Intensive Agricultural Enterprise.

We would like to know please, from the outset; this location is identifiably unsuitable for this type of Development- Why has the applicant not been directed to prepare a development proposal for an alternate location?

IMPORTANT; It is the applicant's responsibility to provide the required content for the DA, associated SOEE and EMP.

It is the applicant who needs to scientifically prove the development will pose <u>no Impact</u> to the environment, water and Community, having failed to do so... it is the Council who should reject it! Council is obligated to Protect their Community, Public Health and Safety, Environment and Water Source for this and future generations.

Kind Regards,





References;

Development Application Form DA 25-20/21 Intensive Cattle Feedlot Statement of Environmental Effects – DA 25-20/21 Glen Innes Severn Council Drinking Water Management System - December 2014 Department of Primary industries-Living and Working in Rural Areas Department of Primary Industries- Prime fact NOV 2018 Department of Planning Industry and Environment NSW GOV State Planning Portal Department of Environment and Conservation; environmental guidelines; effluent irrigation NSW Department of Urban Affairs and planning—Cattle Feedlots EIS Guidelines MLA Feedlot Site selection Environment Planning and Assessment Act **Biodiversity Conservation Act** Protection of the Environment Operations Act NSW Office of Heritage and Environment Living and Working in Rural areas NSW DPI Local Government - Air Quality toolkit Water NSW **NSW Health** NSW Gov Planning Guidelines – Intensive livestock Agriculture Development **NSW Government Valuer General** NSW Groundwater Policy Framework Groundwater Quality Protection Policy

STATEMENT OF ENVIRONMENTAL EFFECTS STA	NDARD FOR	M
A Statement of Environmental Effects is to be submitted with all development applications of proposals having negligible environmental impact, e.g. internal allegations are proposals having negligible environmental impact, e.g. internal allegations are proposals having negligible environmental impact, e.g. internal allegations are proposals having negligible environmental impact, e.g. internal allegations are proposals having negligible environmental impact, e.g. internal allegations are proposals having negligible environmental impact, e.g. internal allegations are proposals having negligible environmental impact, e.g. internal allegations are proposals having negligible environmental impact, e.g. internal allegations are proposals having negligible environmental impact, e.g. internal allegations are proposals having negligible environmental impact, e.g. internal allegations are proposals having negligible environmental impact, e.g. internal allegations are proposals having negligible environmental impact, e.g. internal allegations are proposals having negligible environmental impact, e.g. internal allegations are proposals having negligible environmental impact, e.g. internal allegations are proposals and proposals having negligible environmental impact, e.g. internal allegations are proposals and proposals are proposals and proposals are proposals a	שניים למיים	designated
1. CONTEXT AND SETTING (Site Analysis)		
(a) is the development out of character with the area (eg. Does the proposal	a Yes	√ No
(b) Will the development	Yes Yes	€/ No
be visually prominent within the existing landscape? mpact on any item of iteritage or cultural significance?	Yes	™ No
2 TRANSPORT, TRAFFIC AND ACCESS		
(a) Will local traffic movements and volumes be affected?	m Yes	TO/ No
(b) Will additional requirements to provide access be required?	Yes	√ No
(c) is a Traffic Study required?	Yes	⊒ No
3. WASTEDISPOSAL	103	
(a) How will effluent on disposed of?	Sewer	of On-Site
(b) Will the proposal lead to direct discharge of stormwater or waste into a		W No
natural water system?	_ Yes	
(c) Will other wastes be generated by this development?	2 Yes	No No
4. SOCIAL AND ECONOMICAL IMPACTS		
(a) Will the proposal affect the amenity of surrounding residences by overshadowing, loss of privacy, increased noise or vibration?	Ti Yes	Z No
(b) Will the proposal have any economic consequences in the area?	Yes	52 No
5. ENVIRONMENTAL IMPACTS (air, soil, water, flora and fauna)		
(a) Could the proposal have any impact on the local climate?	Yes	□ No
(b) Could the proposal result in soil contamination?	Yes Yes	JE No
(c) Could the proposal cause erosion and/or sedimentation of watercourses during construction or after completion?	Yes Yes	No No
(d) Will excavation and/or filling be required? (e) Will the proposal	Yes	II No
emit fumes, steam smoke vapour or dust?	72 Yes	a No
involve removal of vegetation?	Yes	₹ No
(f) Could the proposal affect native habitat?	Yes	No
(a) Could the proposal disturb any aboriginal artifacts or relics?	7 Yes	No
(h) It ine nite subject to natural hazards (please tick as appropriate):	Ti Yes	□ No
Bushfire Dibsidence Dangerous Goods	□ Flooding	
Toxic Weste	Other!	
(please apoly)	7 Yes	9 No
(j) Have any of the following land uses or activities been undertaken on the sit where the proposed development will involve any disturbance of soil? (service station, sheep and/or cattle dip, intensive agriculture, mining or extractive industry, waste storage and/or treatment facility manufacture of chamicals, asbestos or asbestos products)	e ta Yes	NO NO
6. DESCRIPTION OF IMPACT/S		
THE IMPACTS ON TRAFFIC, EXCAVATION AND DUS		
DOCUMENT OF STATEMENT OF CHURCH	MIENTAL	EFFECTS
AND TO A THAT WHEN IN THE PROPERTY OF STATE OF THE STATE	and an anid to have a	WISHING SW SIMPLE

Attachment B



Home - Land values - How do we value land? - Vull atten method

How do we value (and?

Valuation method

Valuation assumptions and considerations

Valuation terms

Quality assurance

Your Notice of Valuation and land tax assessment

Where can you learn more about your land value?

What if you have concerns?

Valuation method

We use a mass valuation approach to value land

Valuers can make individual valuations when needed. But for most land, we use a mass valuation approach that follows these steps:

1. Group similar properties	Properties in a group have similar attributes and are expected to experience similar changes in value. These groups are known as components.
2. Select primary and reference benchmarks	Benchmark properties represent most properties in a component. Reference benchmarks represent higher and lower valued properties and other subgroups.
After the second	Valuers analyse property sales, including vacant land and improved properties. They then adjust the sales price to:
	 remove the value of improvements
3. Analyse a broad range of	 reflect the property market as at 1 July in the valuing year.
sales evidence	See the benchmark component report for sales the valuer used to value the benchmark properties in your component for the 1 July 2019 valuing year.
	See the valuation sales report for some sales valuers considered during the valuation process.
t aurustrass vas eri set sautra strang da serina fin set sartigung dipunya ya ya danak ba sa	Valuers individually value the primary benchmark to calculate the rate of change from last year. They consider factors such as the land's:
	most valuable use
4. Value the primary benchmark	 zoning, heritage restrictions or other use constraints
benchmark	size, shape and features
	location and views
	 nearby development and infrastructure
and to the Maintenin and Maintenin to the contract of the Cont	The rate of change is called the component factor.
5. Value the reference benchmarks	Valuers review the values of the reference benchmarks against the component factor. They do this to check the quality of the proposed valuations.
6. Apply the component factor	Valuers apply the component factor to the properties in the component. This determines each property's new land value.
7. Check for quality	Our quality assurance process ensures new values are accurate and consistent. For more information, see Quality assurance.
•	AMERICAN MARKATER WAS ARREST TO THE PROPERTY OF THE PROPERTY O

Political Donations and GITTS DISCIOSURE STATEMENT

Political Donations and Gifts Disclosure to Council

If you are required under section 147(4) or (5) of the Environmental Planning and Assessment Act 1979 to disclose any political donations or gifts (see page 1 for details), please fill in this form and sign below.

				ト(ト(ト)(address or other description) ハタフラインハェント
Person!		.ICANT?		YES/NO	-ON/	
(circle relevant option)		ING A SU	IBMISSION IN RELATION TO AN APPLICATION?		YESY NO	
Reportable	political donations or gifts	Reportable political donations or gifts made by person making this declaration or by other relevant persons	or by other relevant per-	sons		
• Sta incl	State below any reportable political donation include Australian Business Number (ABN).	State below any reportable political donations or gifts you have made over the 'relevant period' (see glossary on page 2). If the donation or gift was made by an entity (and not by you as an individual) include Australian Business Number (ABN).	it period' (see glossary on pa	ge 2). If the donation or gift was made by an entity (and not by you as an ii	ndividual)
• Fy	If you are the applicant of a plannir planning application, OR If you are a person making a sut	If you are the applicant of a planning application state below any reportable political donations or gifts that you know, or ought reasonably to know, were made by any persons with a financial inferest in the planning application, OR if you are a berson making a submission in relation to an application, state below any reportable political donations or gifts that you know, or ought reasonably to know, were made by an associate.	nations or gifts that you knov any reportable political dona	le political donations or gifts that you know, or ought reasonably to know, were made by any persons with a mandial interest in the state below any reportable political donations or gifts that you know, or ought reasonably to know, were made by an associate.	persons with a mancia o know, were made by	ıı interest ın the y an associate.
Donation or gift?	Name of donor (or ABN if an entity), or name of person who made the gift	Donor's residential a address or other official person who the made the	ddress or entity's registered I office of the donor address of egift or entity's address	Name of party or person for whose benefit the donation was made or person to whom the gift was made	Date donation or gift was made	Amount/ value of donation or gift
		2				
		Please list all reportable political donations and gifts-additional space is provided overleaf if required	ns and gifts-additional	space is provided overleaf if required		

By signing below, I/we hereby declare that all information contained within this statement is accurate at the time of signing.

Activity Type: Development/Applications/Political Donation Declaration Name(s): Application No: 25.11.20 Signature(s): Date: Office Use Only:

Document Name: <Application/Identifier> Political Donation Declaration <Customer Name>

Sent:

Thursday, 26 November 2020 1:38 PM

To:

Council Email

Cc:

Carol Sparks; Dianne Newman; Andrew Parsons; Glenn Frendon; Jeffrey Smith; Colin

Price; Steve Toms

Subject:

Development Application Number 25/20-21 - Jardana Feedlot

Attachments:

Feedlot 3.pdf

Dear Councillors,

Copy of my objection to Development Application Number 25/20-21 for your information.

Regards,



STONEHENGE 2370

24 November 2020

Mr C Bennett MBA CPA

General Manager

Glen Innes Severn Council

PO Box 61

GLEN INNES 2370

Dear Mr Bennett,

Re: Development Application Number: 25/20-21

Property: 34 Pedlows Road, Stonehenge

I wish to object to the above Development Application on the following grounds:

On the Development Application Form completed by the Applicant – Statement of Environmental Effects Standard Form on Page 5 it asks:

CONTEXT AND SETTING:

Will the development be visually prominent within the existing landscape?

The applicant has ticked "no". I believe it will be very visible from Surrey Park Court, Sharman Road, Lynch Road, East Pandora Road and the New England Highway. On Page 35 of the Statement of Environmental Effects it states that "A native vegetation screen is proposed along the western edge of the development site. Plants will be planted prior to the commencement of construction and will be maintained. Due to the staging of the development, the visual screen will be established prior to the completion of the entire feedlot." Native trees do not grow well in the cold climate of Stonehenge as it is colder here than in the township of Glen Innes. These trees would take 20 years to grow to a height to screen the feedlot from sight. There is no mention to planting a buffer zone on the northern side but no amount of trees would hide the feedlot from the residents who live on Sharman Road, East Pandora Road and Lynch Road anyway as they all overlook the feedlot.

TRANSPORT, TRAFFIC AND ACCESS:

Will local traffic movements and volumes be affected? Once again the applicant has ticked "no". Why then has he said that truck movements will be outside school hours? To my mind this is admitting that there could be some disruption to traffic. Records show that 13,000 vehicles (13% trucks) travel on the New England Highway every day. In the every local pears I have lived here I have been repeatedly almost run off the road by trucks who fail to see my indicator when I am turning right into to the left hand side of the road to avoid being hit by a truck. There is no turning bay into Surrey

Park Court or Stonehenge Road which makes this a very dangerous stretch of highway for turning vehicles. When I walk along each morning I notice that vehicles travel at great speed along the highway with trucks overtaking cars between Surrey Park Court and Stonehenge Road. They would no doubt have difficulty in stopping in time to avoid a collision with another large vehicle if one was turning in or out of Stonehenge Road.

Will additional requirements to provide access be required? This should be a definite "yes" as the applicant was told previously that he would have to finance any upgrades to Stonehenge Road/Pedlows Road at his own expense if he wished B-Doubles to access these roads. These two roads are clearly marked on the RMS map as NOT BEING B-DOUBLE APPROVED.

WASTE DISPOSAL:

Will the proposal lead to direct discharge of stormwater or waste into a natural water system? The applicant has answered "no". Feedlots are not recommended to be constructed anywhere with rainfall over 720mm per year. My records that I have kept since 2014 show the following: 2015 (1032mm), 2016 (987mm), 2017 (1002mm). The fact that we have very cold winters here with low evaporation rates only adds to the problems associated with this feedlot.

Will other wastes be generated by this development? Once again "no". How can the applicant state this when there will be effluent run off, piles of manure and dead composted animals which will then be spread all over the property? On Page 23 of the Statement of Environmental Effects Matt Norton states that "A feedlot" of this size generally has a mortality of approximately 1% which, with an annual throughput of 3,623 head, results in approximately 36 mortalities per year." Add to this the 1780 head of cattle which graze naturally on the property and which would most likely incur mortalities as well, this is quite a large number of carcases to bury under compost.

SOCIAL AND ECONOMICAL IMPACTS:

Will the proposal affect the amenity of surrounding residences by overshadowing, loss of privacy, increased noise of vibration? Again the answer was "no". Of course there will be increased noise from 1,000 head of cattle in a feedlot. This feedlot will have serious impacts to health and safety. This development will affect such as issues as water, air, noise, visual, odour, vibration and disease.

Will the proposal have any economic consequences in the area? The applicant should've answered "yes". State Revenue informed me that value usually goes down around a feedlot because of the offensive nature of the development. This development will cause certain losses in land value and residential property values. Has Council thought about how this feedlot could cause huge losses to the value of residents' homes that are situated in close proximity to the feedlot and how this will impact on the economic situation of the Glen Innes township? If people cannot sell their homes near a feedlot in the future, this could have a very detrimental effect. I am quite certain that people moving to the district would not choose to purchase property at Stonehenge with all the possible pollution. Who would choose to live next to a feedlot? Would you?

On Page 22 of the SOEE it states that "The 1,000 head proposed feedlot has been designed as an opportunity feedlot which will be utilised to finish cattle when market conditions allow for it. As such the feedlot may be empty when cattle are in short supply. At the full capacity, the feedlot will require an average of six B-double movements per week (3 in, 3 out)". B-DOUBLES ARE NOT REGISTERED TO TRAVEL ON STONEHENGE ROAD AND PEDLOWS ROAD AS SHOWN IN THE RMS MAP ON PAGE 7 OF APPENDIX J – TRAFFIC IMPACT STATEMENT.

On Page 23 of the SOEE it states that "The feedlot has been designed for long-term sustainability and has an indefinite lifetime. However, as it is an opportunity feedlot, it may remain empty for long periods. Should the feedlot be decommissioned, infrastructure not required for the ongoing operation of the property will be removed and all effluent and manure applied to paddocks. The sedimentation basin and effluent holding pond will be filled in and the site returned to pasture." I find it very unbelievable that the applicant will spend \$420,000 constructing this feedlot, to then decommission it, especially when it goes on to say further down the page that it will have an annual throughput of 3,623 head of cattle. I imagine that this feedlot will run to full capacity all year round.

On Page 29 of the SOEE it states "Any excess manure not required for on-site spreading can be removed to off-site locations for utilisation", yet on Page 25 it says "As all manure will be utilised on-site, no manure transport will occur". There is a table on Page 26 showing that there will be no manure removed. So I find this all very misleading and not very transparent.

On Page 30 of the SOEE – Table 7 – S-Factor Calculation Mr Matt Norton calculates the Separation Distance as 653m. This is even lower than the 1919 calculated by Eco Logical in the previous DA in February. I disagree with his calculation. He quotes S2 as Single rural dwellings with the smallest property on Surrey Park Court exceeding 1ha. Our Rate Notice says that we are **Residential-Non Urban** AND there is a property on the highway which is only .33ha. This changes the separation distances substantially and I calculate it as being 2162 metres.

On page 30 of the SOEE Mr Matt Norton says that "The NSW Health Q Fever Control Guideline states that Q Fever can be transmitted several kilometres, usually in dust." He also mentions that "The risk of Q Fever must always be considered when making the decision to live in a rural area." Yes, that is true but why compound the problem and add to the risk of Q Fever by allowing a feedlot to be built near a large number of homes and in the town's drinking water catchment? We chose to live here but did so not suspecting that a feedlot would be built in the middle of all the homes several years later. It would be a different story if the feedlot was already constructed and we decided that we still wanted to live here. That would never have happened as no way would I want to live near a feedlot!! This Council has failed the community very severely by not updating the GISC Local Environment Plan. Not only has the Council neglected to address the Water Catchment Protection but has also failed to rezone residential blocks at Stonehenge.

A report from Apex Engineers was included in the previous DA and the applicant has submitted a report from the same firm in the current DA (Appendix J – Traffic Impact Statement). It states on Page 8 of this report that there will be 6 B-Double (19m long) movements in and out of the feedlot site per week. Yet on Page 7 the RMS map clearly shows that Stonehenge Road and Pedlows Road ARE NOT APPROVED FOR B-DOUBLE TRUCKS.

Feedlots are known to produce large quantities of methane gas and the composting process produces carbon dioxide which will add to climate change. The carcase composting, sediment basin and effluent holding pond have the potential to attract more flies and mosquitoes which could lead to neighbours contracting Ross River Fever or Barmah Forest. These diseases have been known to incapacitate health for many years. There are people living in Surrey Park Court who have lung conditions, cancer and MRSA. The effect of air borne dust could have a very serious effect on their health. In the **Beef Cattle Feedlots: Waste and Utilisation Document** it states that wet manure in pens has an odour factor 50-100 times stronger than dry manure. This is a smell I do not wish to experience when I get the easterly winds blowing the odour directly to my home.

The site of the feedlot is approximately 10m to a property boundary. In Living and Working in Rural Areas – Table 6 Recommended Buffers for Primary Industries it is recommended that it should be 100m. The applicant also doesn't own ALL land within the buffer.

At the Council Meeting on 26th June, Councillor Dianne Newman read quite a lengthy letter from concerned residents regarding an unsealed road at Wellingrove and the health risks associated for residents who have asthma. At the completion of the recitation she stated that it might be time to start listening to the concerns of ratepayers. It would be wonderful if Councillors would give the same consideration regarding this feedlot. People living in close proximity to the feedlot will also be subjected to dust, plus odour and possible noise pollution. What will happen to the people who are already suffering from cancer, MRSA and lung conditions and will be exposed to contaminants? Two people died of smoke related asthma during the bushfires last year. It is quite possible that the same thing could occur from dust emanating via the feedlot, especially anyone travelling along Stonehenge Road (which is a public road) and is in very close proximity to the feedlot. The nearby residents will be subjected to pollutants falling onto their roofs and washing into their tanks. They will have to buy drinking water as they did with the bushfires last year when the water was undrinkable. Many people in town already buy their water. They have stated "who would drink THAT water". They are extremely worried about further pollutants in their water via effluent run off from the feedlot.

Council has been very remiss in not updating its water catchment policy and LEP resulting in no protection for residents. Some members of Council think that it is only a small number of people who are objecting to the feedlot. I can assure you it is quite the opposite. In June this year a number of concerned residents conducted a doorknock and collected 600 signatures from members of the public who OPPOSED the feedlot. If there had been more time available to canvas the whole town I am sure there would have been far more signatures. Only a handful of people were in favour of the feedlot, the remainder were horrified and angry at the idea. Perhaps Council should have considered undertaking a similar venture or holding a public meeting so that they could gauge residents' true feelings on the matter. I feel also that once again this is being rushed through to the meeting on 17th December. This does not give much time for Council staff to assess all the information.

Stonehenge could almost be classified as a small village (some people refer to it as exactly that). Our postal address here is stonehenge (not Glen Innes). We share the same postcode but are separate entities. Why then should a feedlot be approved in an area which Council allowed to be subdivided into residential homes? It seems totally unfair to me!

I have noticed that in this DA there will now be no shade over the feedlot. Current standards for animal welfare state that animals should be able to seek shade, shelter, food and form social groups. Why are feedlots still permissible in this day and age when the practice of caged chickens is being phased out? If the applicant wishes to build a feedlot why can't it be built elsewhere, away from sensitive receptors and the town's water drinking catchment?

In conclusion I wish to thank you for taking the time to read this submission. I think Councillors should study this new Development Application thoroughly, as once again there is contradictory and misleading information. I can only hope that on noting all the flaws in the DA that you act on them accordingly. I feel that there are too many detrimental aspects involved and this DA should not be approved.

Yours faithfully

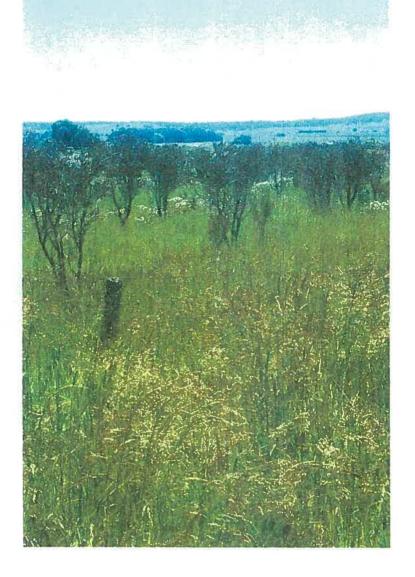




This is a photo taken from Surrey Park Court, looking across the New England Highway directly at the feedlot site. It clearly shows that the feedlot will be very visible from the highway and many homes in the area. I will have a clear view of it from my loungeroom window. It is also highly visible from East Pandora Road, Sharman Road and Lynch Road as these roads all overlook the proposed site.

This is a statement from the SOEE, Page 35 "A native vegetation screen is proposed along the western edge of the development site. Plants will be planted prior to the commencement of construction and will be maintained. Due to the staging of the development, the visual screen will be established prior to the completion of the entire feedlot."

I find this a very confusing statement. There does not seem to be a clear timeframe as to exactly when these trees will actually be planted. To my way of thinking this seems to give the applicant an avenue to not be required to plant any windbreak trees at all. Once again, a case of misleading information.



This is a photo taken at property on the New England Highway. Please note that these native trees were planted approximately ten years ago and have not reached a substantial size.

In an article called 'GLENRAC'S Tree Planting Programs, a Tale of Family Memories' on 5 November, 2019 I note that at Stonehenge states that "between 7000-8000 trees and shrubs have been planted on his property, with not all surviving due to the extremities of heat, frost and flood that are common to the New England".

At the Council Meeting on 23 April 2020 when Councillor Colin Price voted in favour of the feedlot he then states that "eucalypt trees should not be used as a windbreak as they do not grow well out there". This is exactly what I have mentioned in my two previous objection letters. Certain types of eucalypt trees and natives such as callistemons, melaleucas, grevilleas, etc do not grow well in the cold climate of Stonehenge. It is colder here than in the township of Glen Innes and I have lost so many natives trying to establish a garden here. It has taken 15 years for my pine trees to grow to a suitable screening height. Is this how long we will have to wait for the feedlot to be hidden from sight?

Political Donations and Gifts Disclosure Statement

Political Donations and Gifts Disclosure to Council

If you are required under section 147(4) or (5) of the Environmental Planning and Assessment Act 1979 to disclose any political donations or gifts (see page 1 for details), please fill in this form and sign below.

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		Please list all reportable political donations and gifts—additional space is provided overleaf if required	ns and gifts—additional	space is provided overleaf if required		

By signing below, hare hereby declare that all information contained within this statement is accurate at the time of signing.

Signature(s): Date: 25/11/2020Name(s):

Office Use Only: Application No: Date Received: Activity Type: Development/Applications/Political Donation Declaration

Document Name: <Application/Identifier> Political Donation Declaration _ <Customer Name>



STONEHENGE 2370

20 November, 2020

The General Manager
Mr Craig Bennett MBA CPA
Glen Innes Severn Council
PO Box 61

GLEN INNES SEVERN COUNCIL

Received by Records

2 6 12 2223

FOR ACTION: TSO

FOR INFORMATION MESS. TTP

Dear Mr Bennett

Glen Innes NSW 2370

Submission regarding Development Application 25/20-21

34 Pedlows Road, Stonehenge

I wish to register my objection to the proposed DA and submit the following points:

1. **Use of B-doubles** – Stonehenge Road and Pedlow's Road are NOT approved for B-Double use. ALL information in Appendix J and any reference to B-double use in the DA MUST be disregarded. Refer to RMS Website

2. Following is a list of points where this DA goes against DPI recommendations;

- The site is highly visible -- Ref (National Guidelines for Beef Cattle Feedlots in Australia 2.7.4. Visual Amenity -- highly visible sites should be avoided
- The site is in a high rainfall zone Ref (Beef Cattle Feedlots Design and Construction Page 3 Site selection Criteria Climate "Sites with high annual moisture deficits (low rainfall and /or high evaporation rates) are preferable, with an average annual rainfall of less than 750mm recommended)"
- Carcase Composting Site The site is approximately 10m to a property boundary/public road. Ref (DPI: Procedure - Disposal of large animals by Composting)
 - Composting is to be undertaken in an open paddock or field
 - There needs to be control of run-on and run-off from rainfall
 - There is a requirement to further process or remove large bones
 - There is a possibility that the community may see a risk associated with composting. The community and neighbours in particular should be informed of the on-site actions
 - A stockpile of excess organic matter is required for windrow use and maintenance

- At the site PPE must include respiratory protection
- Facilities for decontamination of personnel and equipment exiting a composting site should be provided
- Site selection requires protection of water resources, property, **public view** and **reduction of disease risk**
- The site should be at least 200 metres from homes and public roads
- The site should be at least 60 metres from water sources or visible bed rock outcrops
- Consideration must be given to the bunding of the area to arrest potential run-on and run-off /to the site
- Effluent/compost will be dispersed into a potable water catchment Ref (Living and Working in Rural Areas – Table 6 Recommended Buffers for Primary Industries – Feedlot Waste Utilisation area – 800m from potable water supply) The whole property is within a Potable water supply.
- Feedlot yards and waste storage area are in a potable water catchment Ref (Living and Working in Rural Areas – Table 6 Recommended Buffers for Primary Industries – Feedlot Yards and Waste Storage area – 800m from potable water supply) The whole property is within a Potable water supply.)
- The site is approximately 10m to a property boundary Ref (Living and Working in Rural Areas – Table 6 Recommended Buffers for Primary Industries – Feedlot Waste Utilisation area – 100m from a property boundary.)
- The site is approximately 10m to a property boundary Ref (Living and Working in Rural Areas – Table 6 Recommended Buffers for Primary Industries – Feedlot Yards and Waste storage – 20m to a property boundary.)
- The site is approximately 10m to a road Ref (Living and Working in Rural Areas Table 6
 Recommended Buffers for Primary Industries Feedlot Yards and Waste storage 100m to a
 road.)
- The site is approximately 10m to a road Ref (Living and Working in Rural Areas Table 6
 Recommended Buffers for Primary Industries Feedlot Waste Utilisation area 20m from a
 road.)
- The Applicant does not own ALL land within the buffer/Separation distance Public roads and private land fall within the separation distance. Ref (DPI Prime Fact – Buffer Zones to Reduce Land Use Conflicts With Agriculture - Page 1 – "A buffer zone is also generally

accepted as being an area where a landholder has legal control of the land needed to separate their development from adjoining land.

3. Points which have NOT been addressed in the DA

The Environmental Management Plan does NOT provide information for the animal composting process.

There is NO RISK ASSESSMENT provided for the animal composting process.

There is NO RISK ASSESSMENT provided for the Impact to human Health – the applicant appears to have little understanding of Q-fever and the associated risks in feedlots. The fact neglected is that feedlot cattle are forced to live in their own excrement and when it becomes dry you have a high density of stock producing faecal dust which contains the Q-fever pathogen. To compare this risk with normal grazing displays a lack of knowledge. Feedlot workers are usually required to be vaccinated against Q-fever for this reason. Q-fever has also been known to travel several kilometres in irrigated effluent.

The Environmental Management Plan does NOT provide information on the method/disposal of sediment when cleaning the sediment tank.

The Environmental Management Plan does NOT provide information as to the highly likely problem of not being able to irrigate because soil moisture levels remain above Field Capacity during prolonged wet periods. This problem is compounded with high clay soils which have a naturally high Field Capacity

The DA provides NO protection that activities will NOT occur at night or outside normal working hours.

The DA does NOT address Riparian land management to mitigate the potential nutrient overload.

The DA does NOT indicate the position and size of the Buffer tree planting to the west side. No buffer is offered to protect residents to the North of the feedlot.

The DA provides NO protection to neighbouring farmers or to water users downstream in terms of water quality or biosecurity. To state that Glen Innes residents are protected by their water treatment plant completely ignores ALL water users downstream – the Beardy Waters is part of the Murry Darling Basin. Legislation refers to the water quality, "entering a water catchment".

- **4. SEPARATION DISTANCE CALCULATIONS** Ref (National Guidelines for Beef Cattle Feedlots in Australia, Appendix B Page 44 52)
- Note that this article says that Feedlots are rarely operated in areas of greater than 750mm of rainfall. Note that public roads i.e. Stonehenge and Pedlows Road both fall within the DA's calculated separation distance of 653 metres. Separation distances are regarded by the industry as absolute minimums.
- The separation distances should be calculated as follows:
- S1 = 57
- S2 = 1.0 (rate notices state that the subdivisions are "Residential Non Urban" and the smallest lot size is 0.33 Ha)
- S3 = 1.2 "there are many sensitive receptors located directly downslope of the site, where the falling grade between the nearest point of the feedlot complex and the receptor is greater than 2% and there is an associated risk of katabatic drainage" it is approximately 880m to the Beardy Waters and the fall is approximately 28m giving a slope of 3%). Photos clearly demonstrate katabatic drainage in the valley.
- \square S4 = 1.0 (crops only)
- \square S5 = 1.0 (normal frequency)
- Therefore S = 68.4 and the separation distance is 2162 metres





5. Contradictions:

Page 25 of the DA "As all manure will be utilised on-site, no manure transport will occur" and then on Page 29 "Any excess manure not required for on-site spreading can be removed to offsite locations for utilisation."

P35 "A native vegetation screen is proposed along the western edge of the development site. Plants will be planted prior to the commencement of construction and will be maintained." – directly following – "due to the **staging** of the development, the visual screen will be established prior to the completion of the entire feedlot." As there is NO timeframe then this may NEVER provide visual or other effects.

Page 40 "All buildings should be set back at least 15 metres from the front property boundary (with frontage to a public road) — All buildings and structures will be set back several hundred metres from the property boundary." In fact the CDA will be 10m, Pens 87m, Waste storage area 93m, Carcase composting 93m from the Property boundary.

GISC WH&S Policy — as the DA proposes to have the CDA within 10m of a public road, the WH&S of GISC would be affected. Staff would be exposed to high risks of air borne diseases and dust. It is GISC responsibility to provide a safe work- place for all staff.

Animal Welfare – Current standards for animal welfare state that animals should be able to exhibit normal behavioural patterns – that is seek shade, shelter, food and be able to form social groups. Feedlots do not allow these to occur and to design a feedlot today without shelter would be against all sensible thoughts.



Political Donations and Gifts Disclosure Statement

Political Donations and Gifts Disclosure to Council

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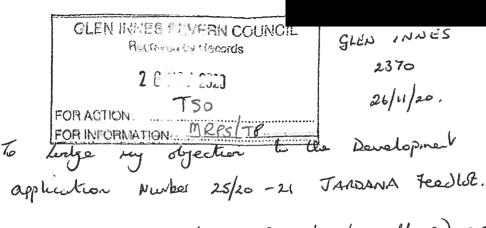
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By signing below, I/we hereby declare that all information contained within this statement is accurate at the time of signing.

Signature(s): Date: 2l/l/2020 Name(s):

Activity Type: Development/Applications/Political Bonation Declaration

Document Name: <Application/Identifier> Political Donation Declaration <Customer Name>



- 1) This development should not be allowed as it is inside the level water catchinent cereer and reary affect the borns chanling water.
 - 2) Does not comply with the consuls our regulations.
- 3) Possible detrimental environmental consequences water supply, adores, etc. 4) within metres of the highway,

Political Donations and Gifts Disclosure Statement

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Glen Innes NSW 2370

The General Manager

PO Box 61

Glen Innes

26 th Nov 20

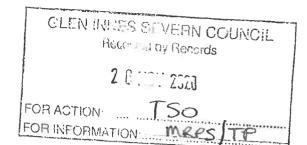
Dear Sir,

OBJECTION TO STONEHENGE FEEDLOT

We wish to express our concern regarding DA No 25/20-21 proposing a feedlot at Stonehenge. The development of a feedlot in this location puts the Glen Innes water supply at risk and as such should be rejected by council. A secure water supply is one of the greatest assets of Glen Innes and it should not be put at risk.

Yours faithfully





Re Jardana tadlot Ne strong object to the testar and main concern is the Water Catcherant of our local water dury. He visual inhair also odous a vechile noise from trucks What about the beorecrity of Pollution Starting your CLEN WIFE STATE COUNCIL H. Jacords year Enne 2-6 ... 2323

Sent:

Thursday, 26 November 2020 2:09 PM

To:

Council Email

Subject:

Attn: General Manager

Objection to DA 25/20-21 - Jardana Feedlot

We write to Council regarding our objection to the above DA.

This application again glosses over not only the impact the environment via the contamination of the TWS, but also the large impact with will have to the surrounding houses and area. The air will have contaminated particulates, will smell, the visual impact will be immense (ask anyone who has ever lived near a feedlot) not to mention the noise and increased traffic danger with large trucks turning on and off the highway.

Γhe supplied Risk Matrix is a joke.

There will be not time for GISC to act in the event of overtopping of the effluent pond, and to believe that this can be address by extra treatment of the TWS is ridiculous. Reactive, not proactive to say the least. GISC Drinking Water Quality Policy States "GISC will use a risk-based approach in which potential threats to water quality are identified and managed"

To say the acoustic risk is 1 is not even believable, there is the proposition that this will be a 24 hour business, or will start at 6 am – in town there is an expectation that people will not be mowing their lawns etc before a certain time, surely the rural resident's are entitled to the same level of comfort in their own home.

The air quality will be severely impacted and when the wind is blowing the wrong way the close by neighbours will not even be able to open their window. Not only due to the smell but also because of the contaminants that will be picked up from the feedlot.

GISC needs to consider all relevant matters while looking at this DA and if all legislation is followed correctly you will have no choice but to refuse this DA.

We have made not any pollical gifts of any kind at any time.

Regards

From:		
Sent: To: Cc:	Thursday, 26 November 2020 2:22 PM Council Email	
Subject: Attachments:	Development Application No. 2520-21 1000 Head Cattle Fee	edlot_finapd
Dear General Manager,		
Please see attached Development Application Land: 34 Pedlows Road, St	response to: No. 25/20-21 1,000 Head Cattle Feedlot tonehenge	
Should you require any addit	tional information in relation to the attached, please contact	
Kind regards,		
	ntended for the addressee named and may contain confidential information blease delete it and notify the sender. Views expressed in this message are necessarily the views of	
This message is intended for	the addressee named and may contain confidential information. If you ar	e not the

This message is intended for the addressee named and may contain confidential information. If you are not the intended recipient, please delete it and notify the sender.

Views expressed in this message are those of the individual sender, and are not necessarily the views of or any of its entities.





26 November 2020

The General Manager Glen Innes Severn Council PO Box 61 GLEN INNES NSW 2370

Email: council@gisc.nsw.gov.au

Dear Sir

Development Application No. 25/20-21 1,000 Head Cattle Feedlot Land: 34 Pedlows Road, Stonehenge

Jardana Pty Ltd, (Jardana), is proposing the development of a 1,000 head feedlot (Stonehenge Feedlot) on Lot 1/DP7243, located on Pedlows Road, Stonehenge approximately 6 km south/southeast of the Glen Innes town centre. The feedlot will be constructed with an initial capacity of 300 head with progressive expansion to 1,000 head as required.

"The feedlot will be located in a controlled drainage area (CDA) which will ensure all clean, upslope water is diverted around the feedlot and all contaminated runoff from the feedlot is controlled and retained in a 1.1 ML sedimentation basin and an 8 ML effluent holding pond. Effluent holding pond will be constructed to the full capacity as part of the initial development. Effluent will be irrigated from the effluent holding pond as required to maintain the available capacity. Manure will be spread on-site."

Air/ Noise

The National Guidelines for Beef Cattle Feedlots in Australia indicate that feedlots can be a source of fugitive odour and dust emissions, and these Guidelines are endorsed by the proponent. The National Guidelines recommend a noise, dust and odour impact



25 November 2020

assessment. The odour assessment criteria have been designed to take into account the range of sensitivity to odours within the community and to provide additional protection for individuals with a heightened response to odours. To support the potential impact it is suggested that Dispersion modelling and variable separation distance formulae provide a more robust scientific modification; this office would suggest the proponent seeking endorsement from the NSW Environment Protection Authority that the methods applied and results obtained are consistent with the Guidelines.

Water Quality/Drinking Water Management

It is noted that on page 16, Statement of Environmental Effects, that the property is located within the drinking water catchment for Glen Innes. Any overflow or spill from the effluent storage pond would therefore drain into the river which a primary source of drinking water. The Glen Innes Integrated Water Cycle Management: Part 2 Strategy Plan (2009) discusses the issue of raw water quality being impacted by rural activities. It states that the impact on raw water quality by then current rural activities is not a concern as the water treatment plant is designed to deal with contaminants in the raw water. NSW Health notes that the risk to raw water quality should be reviewed if activities in the catchment change.

The Glen Innes Water Treatment Plant sources raw water from Beardy River, which flows into the off-stream storage at Beardy Waters Weir, built in 1932. Beardy Waters Weir has a design capacity of 650 ML; however, siltation has reduced the operating capacity to 488 ML. In 2004, Council installed an aerator at Beardy Waters Weir to reduce blue-green algae outbreaks. The aerator is also used to control manganese levels in the Beardy Waters Weir.

Under normal operating conditions, the Glen Innes drinking water supply system's primary water sources are Beardy Waters Weir and Red Range Road Bore, with the Glen Innes Aggregates Off- stream Storage being used for emergency storage.

This office wrote to Glen Innes Severn Council in December 2019 highlighting Council's Cryptosporidium Risk Assessment Rating from NSW Health's Cryptosporidium risk

25 November 2020

assessment of drinking water supplies. *Cryptosporidium* is a microorganism found in water that can cause serious gastrointestinal disease. Livestock and sewage can be sources of *Cryptosporidium* that can infect humans. *Cryptosporidium* is of particular concern for water supplies because it is not controlled by normal doses of chlorine. A high standard of filtration or an alternative disinfection, such as ultraviolet light, is needed to control *Cryptosporidium*. The assessment identified the need to optimise the operation and monitoring of filters to better manage the *Cryptosporidium* risk.

Catchment protection measures are essential and this includes limiting access of stock and inspection of on-site wastewater management systems.

This office has concerns that there may be significant potential for increased poor water quality of receiving waters as a result of an intensive cattle feedlot. Potential risks include increased nutrient load with increased Blue Green Algae Blooms, and high turbidity water with increased pathogen load that will compromise drinking water quality and safety during heavy rain events.

This office would recommend a comprehensive assessment of the potential impacts the development may have on the catchment and Glen Innes drinking water supply system's primary water source, Beardy Waters Weir.

Should you require any additional information in relation to the above, please contact





Glen Innes NSW 2370

25/11/2020

General Manager

Glen Innes Severn Council

Grey St

Glen Innes NSW 2370

Dear Sir

I wish this letter to recorded as in opposition to this current and any other proposed developments of high-density stock farming i.e. Feedlots, wholly or partially within the water catchment area of the Glen Innes Town Water Reserve.

My objections are based on three points

- 1- <u>Possible contamination of the Beardy Waters Reservoir</u>, our water reserve including the offstream reverse is replenished from Beardy Waters and this can be polluted be the Effluent of the proposed development.
 - All rain falls and water movements in the Beardy Waters Valley flow to the Beardy Waters River . There is a creek system that runs from the homestead at the end of Pedlows Rd Stonehenge directly to the Beardy Waters . Directly in the area of the proposed Feedlot! I fully understand that settlement dams will be part of this development, but I have also seen strip storm that have overflow dams in our area, and between the late 1980s to 2010 I have witnessed three One in a Hundred Year Floods , heavy rains will came again.
- 2- The decline of town residents due to the overpowering odour form a feedlot positioned to our South East. Winds from the West, South West and South East are prominent during the colder wetter months and this is the time that the sickening odour bellows form yards of these types of development. The example of Rangers Valley Feed Lot ,the smell of the wet yards can be recognized at Wellington Vale, Deepwater, and Dundee on the direction of the wind. So think of our Great Celtic Festival that will struggle with the restriction of the current events being totally decimated by a stench that you can not hide from at the Standing Stones And what about the living conditions of the residence in that effected valley?
- 3- The loss of tourist's dollars. Imagine the long-term reactions of the touring public when they stop at sites such as the , Balancing Rock, Stonehenge Recreation reserve, the Welcoming Stones at Tuts Gully, Strawberry Patch , The Sanding Stones and Martins Lookout. They could be greeted by what could be the same as stock truck parked beside you, complete with sewage running out the shoots onto the ground. What do you think the tourist will do? Just drive on don't stop!

This is my opinion on this matter, I have been a permanent residence of Glen Innes since 1982. I have work on sapphire mines and seen dams leak and breech. I have worked on roads and bridges and seen devastation of floods, and I had the misfortune to have work on and near Rangers Valley Feedlot.

Again I Formally state that I am AGAINST the allowing of a feedlot development at Stonehenge within the Beardy Waters Valley

Yours Sincerely

Sent:

Thursday, 26 November 2020 2:26 PM

To:

Council Email

Subject:

Submission regarding Development Application No. 25/20-21 (Jardana Pty Ltd -

1,000 Head Cattle Feedlot)

Attachments:

Submission to GI council re Stonehenge feedlot 26Nov2020.pdf

Dear Madam/Sir

Please accept the attached written submission regarding Development Application No. 25/20-21 (Jardana Pty Ltd - 1,000 Head Cattle Feedlot) that is due by 4pm today, Thursday 26 November 2020.

Sincerely,



The General Manager Glen Innes Severn Council PO Box 61 GLEN INNES NSW 2370

Re: Submission regarding Development Application No. 25/20-21 (Jardana Pty Ltd - 1,000 Head Cattle Feedlot)

Dear General Manager

I am writing to express my objection to the proposed development by Jardana Pty Ltd of a 1,000 head cattle feedlot at Stonehenge (Development Application No. 25/20-21) as described in the Statement of Environmental Effects (SOEE) prepared for the project and dated 27 October 2020.

My specific concerns are detailed below, and I believe the Development Application should not be approved until these items are properly and responsibly addressed.

Section 2.8 of the SOEE relating to threatened species of fauna fails to note that all effluent irrigation and manure utilisation areas are upslope from Beardy Waters and are likely to impact on aquatic fauna. In particular, Beardy Waters is known to have a population of the Bell's Turtle (*Wollumbinia bellii*) which is listed as endangered under the Commonwealth of Australia's Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act), and listed as endangered under the New South Wales Biodiversity Conservation Act 2016 (BC Act). Furthermore, Bell's Turtle is endemic to the Northern Tablelands region. This unique species ONLY occurs in high elevation streams in the upper headwaters of the Murray-Darling Basin within our region.

Section 2.8.2 of the SOEE states "As the feedlot is proposed on existing farming land which has been subject to extensive historical clearing, no clearing of native vegetation will be required. As such, an EPBC referral is not required." This statement fails to acknowledge that aquatic fauna in general, and the endangered Bell's Turtle in particular, are not directly reliant on terrestrial native vegetation. Aquatic species and Bell's Turtles within Beardy Waters are, however, completely reliant on water quantity and water quality within the stream.

Contrary to the above quote, an EPBC referral IS required because:

(a) runoff from 55 Ha effluent irrigation area and runoff from the 115 Ha manure utilisation area will flow into a ~2500 metre frontage of Beardy Waters and will increase nutrient loads and will lead to eutrophication and algal growth during low flow periods that will directly impact on Bell's Turtle populations adjacent to, and downstream of the proposed development, and

(b) given that the 11 spring fed water storages on the property are claimed in section 3.1.5 of the SOEE to have remained full even during the recent drought, and given that 20 ML of water is required per year for the 1000 head feedlot (SOEE section 3.1.5), surface water harvest and/or groundwater extraction for the proposed development will remove at least 20 ML of water per year that would have otherwise naturally flowed on the surface or by groundwater into the ~2500 metre frontage of Beardy Waters. This reduction in in-flow is likely to lead to nil or low flows that will directly impact on Bell's Turtle populations adjacent to, and downstream of the proposed development.

Sincerely,

Sent: Thursday, 26 November 2020 3:01 PM

To: council@gisc.nsw.au Subject: General manager

Dear Sir/madam, Objection Letter

I have so many concerns about the Development Application number 25/20-21 - Jardana Feedlot site.

The Primary issue being the huge amount of effluent that will run off into Glen Innes water supply, during rain.

I feel the council are not looking into the long term, not taking in the interest of Town & District People, future housing in that area,

The Smell and Dust from the feedlot as Tourist travel on the New England Highway, not to mention Diseases

It is outdated practice for unstainable future, also impact on Health and safety, of the whole Community.

I do not want any Development of any Feedlot, in the vicinity of Glen Innes Township.

Regards

Rate Payer

Glen Innes NSW 2370

Sent from

for Windows 10

Sent:

Thursday, 26 November 2020 3:30 PM

To:

Council Email

Subject:

DA No 25/20-21

The Manager Glen Innes Severn Council Dear Sir/Madam

My silent but strong objection to this Development Application

Water security for Glen Innes is seriously at risk of contamination if Glen Innes Severn Council approves this Development Application and it is constructed and in operation.

As the majority of Glen Innes residents are fully reliant on town water sourced from the Beardy River and have no viable alternative, and because this Development being in the Beardy River catchment area will have the potential to contaminate the Beardy River, then this Development must be rejected.

Another reason for rejection of this Development Application might be the detrimental affect it's approval and consequent operation will have on the many residents in the surrounding area, whom may find habitation will be uncomfortable at least and possibly even unbearable.

The above factors alone must be primary considerations for Glen Innes Severn Council to reject this Development Application.

Yours faithfully

Glen Innes

Sent:

Thursday, 26 November 2020 3:25 PM

Council Email To:

Subject:

Attachments:

25/20-21 Objection letter 25-20-21 Objection Letter -

pdf



Thursday, 26 November 2020

The General Manager Glen Innes Severn Council

Email: council@gisc.nsw.gov.au

Dear Sir or Madam,

RE: Development Application No: DA 25/20-21- Jardana Feedlot - 34 Pedlow Road Stonehenge

This is the third development application for a 1000 head intensive cattle feedlot at Stonehenge being challenged by Glen Innes residents, I request that Council consider the following objections in their decision regarding this new development application.

The applicant's property and the proposed site fall within the towns *Drinking Water Catchment*, Glen Innes Severn Council (GISC) have not updated the LEP to protect the towns water as other Councils have done. GISC during the previous two (2) DA applications from this applicant have acknowledged that the LEP requires updating to protect the water but have failed to act. Council are choosing to ignore and not adopt the DPI's guidelines suggesting an 800-metre buffer to Potable Water Supply Catchment, this means 800-metres outside a Drinking Water Catchment. Community protection is the responsibility of Council, legislation supports that this responsibility falls on Council.

Reference: "DPI Living and Working in Rural Areas" - Page 90 - Reference DPI table 6: Minimum buffers (metres)

Geological and hydrogeology surveys need to be completed at the proposed site as this area has shelf rock formations with aquifers running through down to the Beardy River. With the level of effluent calculated to be produced by the proposed intensive feedlot operation, there is a significant risk that these shelf rock formations will aid in feeding concentrated levels of effluent into ground water and the Beardy River.

Water from "springs" on the applicant's property, during the height of the drought was being pumped into other dams across the property and is proposed to be used for intensive agricultural purposes, I do not believe this is an allowable use of spring water as per Water NSW guidelines and request that this be investigated, considered, reported on and presented openly to Council members, prior to Council making its determination on this DA.

As per page 40 of the SOEE, the applicant believes that the site is "screened by existing trees" when it is not. Suitable visual barriers have not been considered by the DA, the amenity of the site will be dramatically changed and negatively impacted, by the approval of this feedlot, the proposed site IS currently able to be clearly seen from;

- 1. Sharman Road Lambs Valley,
- 3. Lynch Road subdivision, and
- 2. Stonehenge Road subdivision,
- 4. the New England Highway.

Suitable visual barriers in the form of mature (full grown) non-native trees, needs to be properly considered as the applicant believes the site is currently screened. Only mature trees will be suitable, planting small juvenile native trees will either not grow in the PH of the soil or take 10-15 years to grow to a height and width to provide a significant visual barrier.

As previously pointed out Council, the Sharman Road subdivision, certificate 1143/12 dated 28/06/2012, when approved for development should have been zoned as R5, Surrey Park was zoned as R5 but was then changed to RU1, the LEP states that the minimum lot size for RU1 zoning is 150ha to protect agricultural land, this was adopted prior to the Sharman Rd subdivision, it was a failure of council to zone correctly and is for consideration if the Sharman Road subdivision should have been approved in the first instance. Zoning any of the 3 subdivisions close to the proposed site correctly would mean a 4.9km buffer requirement between intensive agriculture and residential housing.

All 3 subdivisions fall below this threshold, as do others, this has been pointed out to Council verbally and in writing on several occasions, these are large lot residential properties that are not being adequately protected from intensive agriculture developments, it is Council's responsibility to correctly address this.

I hold grave concerns for the value of my property, it will be devalued with the approval of a feedlot, I have been informed by the valuer general's office that my property value will be affected by a feedlot being approved within km from my property, especially with our property being situated above the proposed site, we will be looking down into it. The location is incompatible with its proximity to a high number of residential homes.

I am concerned that the prevailing winds coming up the valley with the addition of the feedlot will have detrimental effects of air quality and effluent on my roof being washed into my drinking water, I will need to install and maintain a higher quality water purifying device. Q-Fever is also a concern, these are serious health concerns that I feel are not being considered adequately by Council, the applicant will be brining animals onto the property from other locations, there are no biohazard checks listed for animals entering the property. Wind measurements listed in the applicants SOEE are taken from the Airport the other side of Glen Innes, the winds to the south of the town through the valley are significantly different than north of town, readings should be taken from the site location not the airport as the topography is vastly different.



NIL donations / gifts made to GISC

Thursday, 26 November 2020 3:49 PM Council Email Sent:

To:

Objection-Development Application No. 25/20-21 Subject:

Attachments: Objection letter DA 25_20-21

Please find attached objection letter.



The General Manager Glen Innes Severn Council council@gisc.nsw.gov.au

Re. Development Application No. 25/20-21

As required by the Local Government and Planning Legislation, I hereby state that I have not made nor accepted any political donation in the past 2 years.

Dear Sir/Madam,

and I have recently taken up residence in our new home on Already in those 2 months we have had our drinking water tainted with the dust from nearby agriculture works.

I have serious concerns about our health and the health of other residence in the area if this intensive feed lot is permitted so close to sensitive dwellings and within the drinking water catchment for our lovely township.

who works in the Wind Industry, qualified to say that the nearby residents have right to be concerned regarding the smell and health risk.

Glen Innes in known for its strong winds and with the Glen Innes Airport (BOM sample point) nearly 20km from

the feedlot sight, I can tell you the wind is not the same at these two points. If the wind is so low, why does the applicant have a Wind Turbine on his property (regardless of whether it works, it is a big investment for an area that supposedly has low wind)

Strong West to South West winds are frequent across the Beardy Valley, this will bring further smell and dust in the direction of the 6 properties on Sharman rd.

In the evening, the regular South Easterly change will blow directly over Surry Park estate from the propose site, I fear this will be constant and relentless for the residents.

Some further points for your consideration.

- 1. The Applications SOEE does not show our dwelling or the other three dwellings under construction in road. The application also states that it will not be visually prominent. This is not true, our property and at least 2 others overlook the proposed 3Ha site in full view. This will devalue our properties if allowed. I would happily invite any Councillors to visit our property on road to see it from our perspective.
- 2. The controls outlined for Q-fever is to control the dust by watering the internal roads. I would like it noted that the application states that this water will be "water" reclaimed from the effluent. I find this a poor assessment of the risk and using Urine/effluent to control dust unacceptable and it will in fact increase the risk and likelihood of health implications and it will increase the airborne waste in a closer vicinity to sensitive dwellings.

- 3. The claimed vehicle movements of 159(trucks) only accounts for 1-way travel. This equates to 318 times in a year will there be a B-Double movement at the intersection of Stonehenge road and New England Highway. The numbers stated are not accurate representation of the increases traffic at this intersection. Even if the Trucks arrive full and leave full, the numbers are not accurate. The attached APEX report states 6 (six) B-Double movements a week, this will be close to the actual number. Trucks for Feedstuffs will visit the intersection twice for each stated movement. I have major concerns that this increased traffic at this intersection will dramatically increase the risk of accidents.
- 4. The report on the intersection shows that a B-Double leaving Stonehenge road and going south onto New England Highway must enter the oncoming lane to make the turn. This is unacceptable in a 100KM/hr zone without room for oncoming traffic to avoid such a movement. Has Main Roads been consulted with this DA? Rangers Valley and the Wind farms have had to widen their intersections, I do not see how this wouldn't require widening. No accident because of this increased B-Double activity is acceptable!
- 5. The APEX report utilises the Transport NSW Restricted Access Vehicle Mapping. This mapping shows that Stonehenge rd is NOT an approved route for B-Double vehicles (19m). Figure 4 of the report is filtered to 25m B-Double.
- 6. The DA states the estimated water requirements, when you bring it back to a daily average per head, it is claimed that the requirement will only be 54.79 L/Day. Anyone who has owned cattle knows that in normal grazing during summer you can double this figure, let alone in an intensive feeding situation. This also does not allow for water to clean waste or dust control. I do not believe this water estimate in this application is accurate.
- 7. It is reported in the DA that there are considerable amounts of Threatened/Endangered Species likely to be in the area. I fear that the health of the beardy river will be affected by the increased manure being spread over the pastures on this property. In a significant rain event, the runoff from the entire property will end up in the Beardy. While manure is good for pastures, concentrated amounts of these nutrients ie Ammonia, is harmful to the river life and promotes algae growth. I believe this has been something that has plagued the towns water supply in recent time and should be prevented happening again.

This council needs to be making decisions that will save the environment we love here in GI and not endanger it further.

Finally, DPI guidelines recommend that such a feedlot NOT be put within 800m of Drinking water catchment. These guidelines are in place to protect the community and environment. There needs to be a very good reason to ignore these guidelines and I do not believe that an intensive feedlot that will create 1 part time/casual job is good enough reason to jeopardise the health of the community.

Saying that the water treatment system is designed to deal with the raw elements is not good enough reason to ignore the DPI guidelines. This is saying it is ok to let the raw effluent into the river cause we can filter it.

Best practice would be to not allow it in the first place, keep the Feedlot out of the towns Drinking water catchment. Council have acknowledged the need for the protection of the drinking water catchment and this DA should not be approved until this need is actioned. Here is your chance to make a statement to the rate paying community that you are serious about protecting their waterways and drinking water supply.

I hope you have had adequate time to read and consider all my points on this DA which the community has strong feelings about, such a decision should not be rushed.

Regards

Sent: Thursday, 26 November 2020 3:47 PM

To:

Council Email

Cc:

Carol Sparks; Jeffrey Smith

Subject:

Objection to proposed intensive cattle feedlot development application

To the general manager and councillers,

I write to you in regard to the intense cattle feedlot development application proposed for the Stonehenge Valley, within the town water supply catchment area.

I have so many concerns about such a development at this site, the primary issue being the huge amount of effluent that WILL run off into the Glen Innes water supply during heavy rain.

Having grown up on a dairy farm I've witnessed first hand just how quickly manure can wash downhill during heavy rain, and although this happens to a small degree with cattle grazing in the paddock there are earthworms, dung eetles and bacteria breaking down the manure constantly in pastures, not so in a small enclosure filled with cloven hooved cattle compacting the earth, or on concrete.

According to my research a beef steer in a feedlot can produce anything from 5.5kgs of manure to 40 plus kg of manure PER DAY! The average amount being around 30kg per day, but for an easy round figure I'll do some estimates on 20kgs per day.

20kg x 1000 animals = 20 000kgs of manure produced per day. x 7 days = 140 000 kgs of manure produced per week....

If the pens are cleaned out and a storm with a huge amount of rain falls 8 hours after the pens have been cleaned out there will be 5000kgs of manure being slowly washed downhill.

If this storm occurs 12 hours after the pens have been cleaned there will be 10 000kgs of manure already in the pens.

18 hours- 15 000kgs of manure. 4 hours- 20 000 kgs of manure.

Then there the urine!
....3.5gallons per day-13.25 litres
x 1000 head =13 250 litres of urine
EVERY DAY!!
× 7 days =132 507 litres per week!

ALL OF THIS IN 3 HECTARES!!??

HOW can it NOT wash into the water supply??

In only one month!

Manure x 30 days =600 000kgs!

Urine x 30 days = 397 500 litres

I used conservative figures too 😔

Who knows how many truck loads that would be? I don't. ...yet.

If there becomes too much effluent on the property then the development application suggests that the effluent will be shipped off the property, has there been a licence obtained to give permission for the effluent to leave the property? That would NEED to be obtained BEFORE the DA be approved, wouldn't it? Where would the effluent be dumped?

In summer this year, when it finally rained, I witnessed 2 brand new dams without any water in them, become filled with water and overflowing after only 2 storms, 1 storm each day, 2 days in a row, both with heavy falls of 4 inches/100mm!!

Large volumes of topsoil and sheep manure was washed onto the road surface. This was around 10km from the proposed feedlot site. WHEN such storms occur even effluent holding ponds would overflow, there would be no way to stop it.

The details in the DA show that the average rainfall is less than it actually is, but I guess that is because we've added the recent drought figures into the mix, 'WATER NSW" tells a different story showing an average rainfall of between 800mm and 1200mm of rain annually for the district. Their statistics show 600mm and 900mm of rain has fallen this year with the storm season ahead of us.

- •Contamination of the water supply would not only be detrimental to human health but also to the native wildlife hat call the area home. Some of those animals are the Rakali (white tailed rat) that is capable of eating the cane toad, platypus, peppered tree frog, Bell's turtle, Murray Cod, all are on the endangered species list. There are also many other native animals living along the water-course including echidnas, blue tongue lizards, water dragons, black snakes, and birds that visit the creek including magpies, finches, parrots, budgies, galahs, cockatoos and kookaburras. There are also many other animals that drink from the waterway including livestock. I believe that WE ALL as a community have the responsibility to protect these precious creatures, don't you?
- Water requirements for a feedlot of this size. ...a cow may drink between 3 gallons/11.3 litres to
 30 gallons/113 litres per day.
 I'll do conservative calculations on fifteen litres per day

15 x 7 days =105 litres per day per cow

105 x 30 days = 3 150 per cow x 1000 cows = 3 150 000 litres of water necessary per month for drinking.

How much water is needed for cleaning?

How much water will be taken from our precious drinking supply?

Where will water come from when the stored water on the property is used?

As a guide a proposed feedlot would need to demonstrate access to approximately 24 megalitres of high security water per annum. Also recommended an emergency supply to cater for 48 hours during summer.

• The stench and the airborne diseases are a huge concern! The site is too close to family homes, the highway and the town. There are many other sites that are not near the water supply, family dwellings, the highway and Glen Innes township. Why not put the feedlot at a site without these issues?

•FLIES!!

The amount of flies that would breed in the manure and then fly into family homes, shops, schools, EVERYWHERE spreading disease and being a nuisance is incalculable!

•The area is of significant Aboriginal cultural heritage.

•Tourists will see and smell the feedlot whilst driving on the highway and decide not stop in Glen Innes to spend their money.

Now, at this point in this letter I have downloaded and read the

30 page ENVIRONMENTAL IMPACT STUDY GUIDELINE

produced by the NSW Department of Urban Affairs and Planning. I see issues that I hadn't yet considered.....noise pollution and 'dust' are two of them.

I know that when I lived 4km away from the cattle saleyards the noise from the unhappy cattle would keep me awake for hours the night before the sale, I'd hate to hear that 24/7.

•Soil....have geotechnical laboratory reports, according to the Australian standard AS 1289: methods for testing soils for engineering purposes,

confirming the suitability of the soil on the site, been obtained?

Would this feedlot be industry accredited?

IF the development were to go ahead would the feedlot conform to ALL of the national guidelines of feedlots in Australia?

On further reading of the EIS guideline my concerns are basically summed up by the the paragraph named....

"Justification for the proposal" and I quote:

'The principles of ecologically sustainable development are:

- a) the precautionary principle namely, that IF there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation.
- b) inter-generational equity namely that the present generation SHOULD ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations.
- c) conservation of biology, diversity and ecological integrity.
- d) improved valuation and pricing of environmental resources'. End quote.

Is there actually a benefit for the community if this feedlot is built?

There are so many other much more suitable sites that this kind of development would prosper without destroying the beautiful Stonehenge Valley and Glen Innes township.

ask that you all read EVERY letter of objection that you receive from our community and base your decision on nat's good, fair, and the right thing to do. Thank you.

God bless you all.

Kind regards,

Maybole.

TO WHOM IT MAY CONCERNO
WE WISH TO ADVISE THAT WE ARE VEHEMENTLY AGAINST THE PLAN FOR
"INTENSIVE CATLE FEEDLOT AT STONEHENGE.
WE ARE OF THE OPINION THAT IT SHOULD BE OBVIOUS TO EVERYOWE
THAT THE SITE IS TOTALLY RIDICULOUS, FOR THE FOLLOWING REASONS
1. THE MOST IMPORTANT REASON, IN OUR OPINION. (S, THE TOWN
WATER SUPPLY, BEING AFFERTS.
2. RESIDENTIAL AND TOURIST AREAS ARE TOO CLOSE (SURERY
SUCH AN ENTERPRISE ES SHOULD BE OUT IN SOME BROADER
LANI)SCAPE),
(3. CONSIDER THE SMOW, WATERING REQUIREMENTS FOR THE STOCK
CONSTANT NOISE 1,000 HEAD OF CATTLE COULD MAKE AND A
BLOT ON THE LANSLAPE OF OUR BEHUTIFUL CHEN ENNES
AREA.
THERE ARE VARIOUS OFFER REASONS, IN OUR OPINIONS,
BUT WE JUST WANT YOU TO KNOW THAT WE ARE VERY
MUCH AGAINST THIS EVER HAPPENING IN THIS AREA.
5.4NED:
SIGNED:
ADD RESS:
CHEN INNES!
ALTHRUS OF UFINE OCHEO
GLEN INNES SEVERN COUNCIL Receirs 20 to Receirds
2 6 2523
TCO
FOR INFORMATION: MIKE IT

CLEN INTES SEVERN COUNCIL Received by Records To:- The General Manage FOR INFORMATION TO MEPS Glen Innes Severn Shire Council. Dear Council Members. as a resident of this beautiful e little Township of Glen Innes, I hope that I am wrong in the perception of the loss of your lack of forward thinking. How can you ever contemplate the chance of contamination of our drinking water.? I hope common sence (as in the Common wealth of our town) will prevale. Please provide The Best outcome for all residents and visitors, Present & Fature. Yours in anticipation of the Correct Outcome Glen Innes 2870.

Sent:

Thursday, 26 November 2020 12:24 PM

To:

Council Email

Subject:

Objection to Stonehenge Feedlot

I strongly oppose the proposed Feedlot at Stonehenge.

Pollution from seepage would inevitably degrade Beardy Waters, hence our town drinking water.

The stench would pervade the whole area and definitely across the town area.

The putrid stench from Rangers Valley feedlot can be smelt for many kilometres when driving in that area, I know this from experience.

The beauty of the countryside, a great tourist attraction, would be awfully degraded.

The people on small lots who have bought and built in the immediate area in good faith and hope for a happy future will have their quality and enjoyment of life permanently ruined. Financial and pleasure degradation for _hem.

It will be a heinous act of Council approves this third application.

Glen Innes

Sent: Thursday, 26 November 2020 11:54 AM

To:

Council Email

Cc:

Carol Sparks;

Subject:

Development Application by Jardana Pty Ltd

To the General Manager

I am compelled to write this objection to the DA by Jardana Pty Ltd for the Feedlot as I find the concept absolutely unconscionable, and were the Council to allow this to go ahead, I would indeed lose all confidence in the Councillors. As a rate-paying citizen and permanent resident of Glen Innes, I would be furious, and indeed, ropable.

In Part B the applicant states that the proposed development is rural, when in fact it is commercial, a money-making venture which rides roughshod over the people of Glen Innes and surrounding areas.

Dertaining to the Environmental Effects Standard Form, 1) a) Context and Setting, the applicant states that the development is not out of character for the vicinity, where in fact it certainly is. Such a feedlot would affect the drawcard of Glen Innes to tree-changers, tourists, and the residents of Glen Innes and surrounding areas. It is stated in b) 1) by the applicant that the feedlot would not be visually prominent, I find this hard to believe. In b) 2) The applicant states that there would be no impact on the heritage/cultural significance, when in fact the impact would be detrimental and dire. First nations people would be horrendously impacted by the proposed development.

As to 2) Transport, Traffic, and Access, with regard to a) the applicant states that local traffic movements and volumes would not be affected, I find this hard to believe, given that in c) the applicant states that a traffic study is required.

Regarding 3) Waste Disposal a) the fact that effluent will be disposed of on site rings very big alarm bells, as to whether being within the water catchment area of the local area this would be very dangerous and detrimental to the health of residents. That in b) stormwater or waste or waste would end up in the natural water system, the applicant's answer in the negative is very, very hard to believe. And in c) will other wastes be generated, the answer to this question would obviously be yes, not no as stated. Decomposing cattle would be a huge waste generated, in blowflies and stench, so close to town.

Pertaining to 4) Social & Economic Impacts, in a) the applicant states that the amenity of surrounding residences would not be affected. This is a blatant false statement. We in Glen Innes pride ourselves on our "clean, highland living", how could this continue with the blot of a feedlot so very close to the town? And b) the applicant states there would be no economic consequences, in fact, the consequences would be extremely detrimental, property values would surely plummet, and we, the residents of Glen Innes and surrounding areas, would suffer financially.

As to 5) the environmental Impacts, in both a) climate and b) soil contamination the applicant has stated no. I seriously question this. In e) the applicant states that fumes would be generated. This would negatively impact the population of Glen Innes and surrounding areas. Having lived for 12 years in Emmaville, whenever the wind was prevailing from the south-east, the pungent and sickening fumes generated by the Rangers Valley feedlot we as residents were badly affected, and that feedlot is a lot further away than the Jardana would be. In f) I find it almost inconceivable that native habitat would not be impacted, along with no effects on g) aboriginal artefacts.

As to h) whether the site would be subject to toxic waste and i) technological hazards, both produce very big Red Flags.

I find that if council were to approve this Development Application, which to me and so many others is unconscionable, civil unrest would occur in our beautifully peaceful area.

BLIND FREDDY can see that this Development Application should be refused. Not only are there grammatical errors in the application, (ie "Pedlow's" Road, and impacts "has" rather than "have" been addressed), but the applicant has not even signed the application but rubber-stamped it instead. I believe that ignorance cannot be tolerated, especially when such far-reaching negative consequences are concerned.

As a ratepayer and permanent resident I implore Council to deny this application categorically, and in no uncertain terms.

Yours sincerely



Sent:

Subject:

Thursday, 26 November 2020 11:07 AM

To: Council Ema

Council Email
Objection DA25/20-21
DOC261120.pdf

Attachments: DOC261120.p

Stonehenge. NSW 2370

24th November, 2020

To: Glen Innes Severn Council, The General Manager, Mr Craig Bennett MBA, CPA PO Box 61 Glen Innes, NSW 2370, Email: council@gisc.nsw.gov.au

Re: Objection to Development Application DA 25/20-21

1000 Head Cattle Feedlot

Property: 34 Pedlows Road, Stonehenge.

Dear Sir.

I strongly object to this development application in the Valley of Stonehenge. The Applicant dismisses the residential properties in Surrey Park Court Rd, and East Pandora Rd, which are Small Acreage Residential, as being insignificant, as we are zoned RU1. The Zoning in these Large Lot Residential Areas is incorrect and Council needs to adjust buffer zones accordingly to 4.9 klms from primarily Residential Properties. Rezoning of these areas to R5 is a priority that Council has ignored for a long time and has been extremely negligent from the beginning of the developments in these areas.

Airborne Dust and Pathogens

has Multiple Resistant Staphycoculous Aureus commonly known as MRSA and she was infected by dust particles from cattle dung, carrying MRSA. Since being infected has had to present to hospital in a very sick condition and remain in isolation for a week or so, being treated by fully gowned nurses with a drip of heavy duty antibiotics. This occurs up to four times a year. It is now on a constant treatment of antibiotics that have to be sourced through government health department. These oral antibiotics now play merry hell with digestive system but the alternative doesn't bear thinking about. Nowhere in the DA is MRSA mentioned. There are many other airborne diseases aside from Q Fever, which are not even mentioned by the Applicant and are irrelevant as far as his DA is concerned..

Research by Johns Hopkins University has shown that the dust spread will be wind borne over a far greater distance than is shown in the application and indeed will take in the whole of Glen Innes. This doesn't take into account the pollution of the nearby town water supply catchment, by overflow runoff. We live in a high wind (note the Windfarms) and high rainfall area. Our rainfall is higher than recommended by the Feedlot Association and the strong prevailing winds will spread disease carrying dust pathogens far and wide.

Council's Duty of Care

When the Rural Residential development applications were approved by the Council the proximity to the town's water supply played a large part in the approval process and new houses had to have Eco Septic systems so that runoff from these septics were purified. Quite a number of these dwellings are closer to the water catchment than the proposed feedlot is. In downpours it is hard to imagine that overflow from the feedlot will be able to be contained. I believe some of the effluent that will be on the ground will overcome any effort to contain it and overflow into the catchment. This is the Town Drinking Water Catchment and should be protected at all costs.

I believe that the Council has a duty of care to protect the health and safety of all residents.

Traffic Flow to Stonehenge Road

The Applicant has had a Traffic Impact Assessment prepared by Apex Engineers. It states quite correctly that the New England Highway is an accepted B Double approved Route. *Figure 2* shows proposed access to Pedlows Road via Stonehenge Road. *Figure 3* shows that neither Stonehenge Road nor Pedlows Road are approved B Double Roads. Have the RMS been notified of the proposal.

If an upgrade to Stonehenge Rd & Pedlows Rd is required, which will also include a Bridge over the Beardy Waters, plus a 2 lane bitumen B Double approved access Road, who will foot the Bill the Ratepayers or the Applicant?

The access to the Highway which is only single lane in each direction, without turning lanes, does not allow enough time for a B-Double to build up speed in a 100 klm zone. This creates a great danger for traffic travelling on the highway. The allocated time of 5 seconds is certainly not enough for a fully loaded B-Double to get entirely onto the highway and would still only have minimal speed in low gears. I have a Heavy Vehicle Licence and would certainly be using all of the road available to make my turn left or right to or from the highway. Several hundred metres up the Highway there were Semi Trailers entering Taylors Property. They were going completely off the bitumen opposite the driveway entrance on the highway to be able to gain entry squarely into the property. I personally viewed several near accidents on a daily basis.

Stonehenge Road is a public road that carries local traffic and it traverses through the buffer zone of the proposed feedlot. This would subject regular legitimate traffic travellers to the dangers of being subjected to the dangers of feedlot infections.

I believe that some parcels of land included in the buffer zone have caveats attached to their titles. This, I believe, would exclude their ability to be used in a buffer zone and therefore the whole proposed buffer zone is insufficient for purpose.



Political Donation + Gifts Disclosure Statement 08 MIL is attached.

Political Donations and Gifts Disclosure Statement

Political Donations and Gifts Disclosure to Council

If you are required under section 147(4) or (5) of the Environmental Planning and Assessment Act 1979 to disclose any political donations or gifts (see page 1 for details), please fill in this form and sign below.

Disclosure Statement Details

Name of p	erson making this disclosure	statement	Planning application re address or other desc	eference (e.g. DA number, planning application to cription) DA 25 2		roperty
Person's in	terest in the application	You are the APPLICANT?		YES	/NO	
(circle rele	vant option)	You are a PERSON MAKING A SUBMISSIO	N IN RELATION TO AN AI	PPLICATION? YES) ио	
• S ir • If	itate below any reportable politica notude Australian Business Numl you are the applicant of a plann lanning application, OR	ber (ABN). sing application state below any reportable political	ant period' (see glossary on pa donations or gifts that you kno	sons age 2). If the donation or gift was made by an entity (; w, or ought reasonably to know, were made by any p ations or gifts that you know, or ought reasonably to	ersons with a financ	ial interest in the
Donatori or gitt?	Name of donor (or ABN its entity), or name of person wh made the gitt		the donor, nodress of	Name of party or person for whose periefit the donation was made; or person to whom the gift was made.	Date donation or gift was made	Amount value of donation or gift
HIL	MIL	NIL		NIL	NIL	NIL
		Please list all reportable political donat	ions and gifts—additional	space is provided overleaf if required		
	below, I/we hereby declare to the control of the co		urale at the tim	e of signing.		
COSC STREET, NAT	: Development\Applications\	Date Received: Political Donation Declaration Political Donation Declaration Custome				

Sent:

Thursday, 26 November 2020 11:05 AM

Council Email To:

Fwd: Objection DA25/20-21 DOC261120.pdf Subject:

Attachments:

24th November, 2020

To: Glen Innes Severn Council, THE GENERAL MANAGER, Mr Craig Bennett, MBA, CPA, PO Box 61 Glen Innes NSW 2370

Dear Sir,

I would like to strongly oppose DA25/20-21. 1000 Head Cattle Feedlot

Land: 34 Pedlows Road, Stonehenge. Lot 125 DP659979, Lot 1 DP308507, Lot 126 DP753311, Lot 22 DP753311, Lot 23 DP753311, Lot 2 DP1115100, Lot 3 DP1115100, Lot 1 DP1115100, Lot 1 DP180562, Lot 1 DP114064, Lot 13 DP114034, Lot 4 DP114034, Lot 12 DP114034, Lot 5 DP7243, Lot 2 DP7243, Lot 1 DP7243, Lot 4 DP7243 And Lot 3 DP7243.

On reading the DA application, I note on page 10, Figure 3, Sensitive Receptors Land use that there are approximately 63 Properties Counted. I also note that the Applicant states that these properties do not count to him as all are zoned RU1.

The closest Residential Estate is Surrey Park Court Estate in which there are 17 Residential Properties, all under 10 hectares, which should be zoned R5 Large Lot Residential. These properties are incorrectly zoned as in RU1 Residential Accommodation is prohibited.

The Council Zoning is incorrect and needs to be addressed immediately by Council as it would affect the buffer zone required by an Intensive Cattle Feedlot by extending the buffer zone to 4.9klms instead of the current 1000 metres.

In Surrey Park Court Estate have

- a) 17 Dwelling Properties
- b) A beekeeper
- c) A registered B & B
- d) A registered Day Care Centre (now not operating, but was approved for several years)
- e) Water Systems as in Tank Water supplying Dwelling Properties and Septic Treatment Systems.
- f) These are all prohibited in Zoning RU1

According to Council Zoning, Surrey Park Court is treated as R5 but zoned and as RU1. This is sheer Negligence and lack of Due Diligence on Councils behalf.

The above Zoning issue also applies to most of East Pandora Road Estate. Glen Innes Severn Shire Council should attend to Zoning issues immediately and thus introduce the correct Buffer zone of 4.9klms to the DA 25/20-21.

I would also like to point out that in the Statement of Environmental Effects

1. Context and Setting that the site will be

b) i) be visibly prominent with the existing landscape.

The Applicant has ticked box NO.

Attached is a photograph taken from the intersection of Surrey Park Court Rd and The New England Highway.





The site is very visible from the New England Highway and Surrey Park Estate. Screening trees that may have been or are being planted, will take years to grow and provide a visibility barrier. All traffic on the Highway will be able to see and smell the Feedlot. I believe Tourism will be greatly affected.

2. Transport, Traffic Access.

b) Stonehenge Road, after the intersection of the New England Highway is a one lane, gravel road with a 100klm speed limit, passing over a narrow water culvert bridge which floods when the area receives decent rainfall. It is not a B Double Classified Road and I believe the Traffic Assessment Report lacks accountability.

Ref 2. Photographs below taken after a rainfall event in August 2020 rainfall





The Glen Innes Severn Shire Local Disaster Plan 2008, states under ROAD CLOSURES 3. a) The New England Highway may be cut for 4 to 6 hours by the Beardy Waters at Stonehenge.

The water rises to nearly the highway on Stonehenge Road and to Balancing Rock in the Recreation Area, overflowing to The New England Highway.

Flooding in this area would greatly impact the water levels, and run off the land where waste and dead carcasses have been spread, Catchment Dam levels if overflow occur, would overflow into Beardy Waters. It has happened before in 2010 and 2012 according to the SES and will happen again if we get high rainfall for which Stonehenge is known.

Council LEP 2012. 7.2 Drinking Water Catchment, states that

(1) The objective of this clause is to protect Drinking Water Catchment by minimising the adverse impact of development on the quality and quantity of water entering Drinking Water storages.

- 1. The new Dams on the Feedlot Properties are cutting off the natural flow of spring Dam Water runoff into the Catchment area as was previously allowed, therefore cutting off the **quantity** of the water entering a Beardy Water.
- 2. How can allowing water run off into a Beardy Waters from an Intensive Cattle Feedlot property not have a direct impact on the **quality** of the Drinking Water.

It is sheer Council Lack of Due Diligence to allow this type of Development in a Drinking Water Catchment area, according to your own LEP, regardless of the ability of your water treatment plant to filter out the putrid run off.

5. Environmental Impacts (air, soil, water, flora and fauna)

e) Will the proposal:

i. Emit fumes, steam, smoke, vapour or dust.

The YES box has been ticked.

I am concerned about Dust.

The Dust carried by wind around an Intensive Cattle Feedlot carries many different Pathogens. Q Fever was mentioned and dismissed in the DA as irrelevant as we can be vaccinated against it and living on the highway with cattle trucks passing is part of country living.

What wasn't mentioned it MRSA. Multi Resistant Staphylococcus aureus. A disease that can kill. It is passed in the air in a radius up to 45 kilometres according to John Hopkins Bloomberg Hospital in its study on Diseases distributed by Cattle Feedlots in the USA and the Netherlands. If the dust settles on the skin of someone who has had an operation it can penetrate the site and can kill in less than 24 hours depending on where it enters the body. The patient then carries this insidious disease in their system for life and has to take massive doses of antibiotics daily to prevent recurrence.

MRSA and it's six years since it. spend a lot of time in Glen Innes Hospital in isolation. It's a dangerous disease. Many people in our area are older and have operation sites on their bodies. Remember, MRSA can kill you quickly. Pneumonia is also carried by dust from cattle Feedlots.

https://www.baltimoresun.com/news/environment/bs-xpm-2012-10-11-bal-bmg-study-links-living-near-livestock-with-drugresistant-infection-20121011-story.html

https://www.onegreenplanet.org/news/if-you-live-near-a-factory-farm-youre-breathing-poop/https://eos.org/editors-vox/is-living-near-a-farm-bad-for-your-health

This DA 25/20-21 needs to be rejected on so many different issues.

Please Councillors, Mr Bennett, Mr Price, and anybody else involved in the Council evaluation of this DA, note that if this Feedlot is approved there are several more waiting for the precedent to be set. There is also another DA in town for a 106 Residentail Homesite Development. What would you

rather see the town of Glen Innes do. Expand by 106 families who may not come if the smell permeates the town, or grow by maybe 1 extra employee on the Feedlot and all southern expansion of your beautiful town grind to a screaming halt.

I know what I prefer

I strongly oppose the DA25/20-21. 1000 Head Cattle Feedlot at 34 Pedlows Rd. Stonehenge.

Yours sincerely



Stonehenge. NSW 2370

Political Donation. Gift Disclosure Statement of MIL atlached.



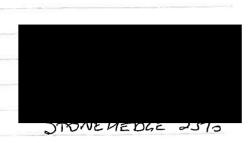
Political Donations and Gifts Disclosure Statement

Political Donations and Gifts Disclosure to Council

If you are required under section 147(4) or (5) of the Environmental Planning and Assessment Act 1979 to disclose any political donations or gifts (see page 1 for details), places fill in this form and sign below

		nt	Planning application reference (e.g. DA numb	er, planning application title or reference, p	roperty		
			Advance and allowed and advantage at	25/20-21			
erson s interest i	n the application rou are	BIG PUTTERCHATT		YES/NO			
(circle relevant option) You are a PERSON MAKING A SUBMISSION II			N RELATION TO AN APPLICATION?				
State be include a lf you an planning.	low any reportable political donation Australian Business Number (ABN) e the applicant of a planning applic application, OR). cation state below any reportable political donat	y other relevant persons niod' (see glossary on page 2) If the donation or g ons or gifts that you know, or ought reasonably to reportable political donations or gifts that you kn	know, were made by any persons with a finance	ial interest in the		
Marie Stan a	ne of Bonox (or ABN if an y), or name of person who to the gift	Dianor's residential address or caddress or other official office of the person who the made the gift or entity?	donor, address of the donation was mad		Amount/ value of donation or gift		
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	P	lease list all reportable political donations	and gifts—additional space is provided over	eaf if required			

	GLEN INVITES OF VERN COUNCIL
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ie ie	OR ACTION TSO OR INFURNATION MRESTE



The General Manager Glen Innes Severn Council 265 Grey It Chen INNES 2370

Re: Development application No 25/20-21
34 Peollows Rd, Stonehenge

Raising my concerns and disapproval of proposed feed lot at Shonehenge.

Points of concern

1. Naste & Containation.

Rong effluent into the Searchy ever which becomes the towns noter supply.

2. Odor issues

Smello arising from the feedlot plus utilizing the moture waste to fertilize the property.

3. Troffic

I reside at

There is no turning lane of the highway into Stonehenge Rd.

I have witnessed Vehiclis cavaing near

decidents due to the 100 kms zone and the tightness of the turn into a gravel road.

sith the adoltieral trucks being this road for stock arriving and departing, grain trucks, client and staff vehicles traffic will increase dramatically on this unsealed road.

4. Real Estate Values

People have prohased acreage in a most crea for the views, peace and tranguality. This Westyle would be disripted along with a massive decrease in land valves of this proposed feed lot were to go shood.

Looking forward to your response to my



Sent:

Thursday, 26 November 2020 3:53 PM

To:

Council Email

Subject:

Development Application No.25/20-21 Jardana Pty Ltd 1,000 Head Cattle Feedlot.

Attachments:

General Manager GISC Re Development Application Jardana Pty Ltd 2020.pdf

Mr Craig Bennett, General Manager, Please see attached letter re the above.

Regards

The General Manager
Glen Innes Severn Council
PO Box 61
Glen Innes NSW 2370

Dear Sir,

Re: Development Application No. 25/20-21, Jardana Pty Ltd 1.000 Head Cattle Feedlot.

My name is and I am a Descendant of the Ngoorabul People whose lands this development if approved will be built.

I have viewed the Development Application and associated reports for this development on the Glen Innes Severn Council website.

The developers Jardana Pty Ltd have done a desktop assessment on the OEH Aboriginal Heritage Information Management System (AHIMS) to determine if there is anything of Aboriginal Cultural Heritage value on Lot 1 DP 7243 with a Buffer of 1000 metres of the development site which has come up negative.

To conclude that there are no known Aboriginal objects (AHIMS Search) or a low probability of objects occurring in the area because the land is disturbed land and has been extensively cleared and cultivated historically is disrespectful to the Ngoorabul People and Aboriginal Australians generally.

The development site is located on a slope in the vicinity of a nearby permanent water source, Beardy Waters and is between known Aboriginal Sites (Which are located outside the 1000 metres AHIMS Search Zone) and is located in a valley where our Mob would have hunted and lived.

Every Knowledge Holder, every Archaeologist and every Trained Aboriginal Site Officer knows that not all Aboriginal sites are registered on AHIMS this is because Aboriginal Cultural Heritage in New South Wales has not been investigated in detail and there may be fewer records of Aboriginal sites registered in some areas.

These areas may contain Aboriginal sites which are not recorded on AHIMS and this is stated on page two of the AHIMS Search record.

Unfortunately a desktop search of AHIMS has become a short cut for developers so that they can tick the box to avoid paying Aboriginal People to conduct Aboriginal Cultural Heritage Assessments of development sites as well as avoid having to pay further costs if something of Aboriginal Cultural Heritage is found.

Looking at the Glen Innes Severn Council Cultural Plan it is good that Council acknowledges the Ngoorabul people as traditional custodians of the land and pays respect to Elders past, present and future.

The Cultural Plan also acknowledges that Conserving Aboriginal Heritage and respecting the Aboriginal community's right to determine how it is identified and managed will preserve some of the world's longest standing spiritual, historical, social and educational values.

As a Ngoorabul Descendent who values my Aboriginal Cultural Heritage I am requesting that Council put these words into action and direct Jardana Pty Ltd to have Aboriginal Sites Officers from the Glen Innes Local Aboriginal Land Council conduct a Aboriginal Cultural Heritage Assessment of the development site before even considering approval of this development.



Tingha NSW 2369

Sent:

Thursday, 26 November 2020 3:54 PM

To:

Council Email

DA Development Application No. 25/20-21 Applicant: Jardana Pty Ltd **Subject:**

Development: 1,000 Head Cattle Feedlot . Submission

Dear General Manager,

I entreat you to consider the effect this proposed development has on my economic circumstances and those of most of our, on average, low economic status residents dominant in our community.

I admit it will generate a couple of temporary cementing and levelling jobs for few weeks or days, and one possible temporary casual part time job thereafter, but the community costs will involve:

- 1. Loss of income to tourists industry providers. As residents on Rummery's Hill often smell the Rangers Valley feedlot many kilometres away, I'm convinced residents and tourists here will be put off by the visual appearance and odour at times emanating from such a proposal. We have many very successful tourist festivals and attractions here. The majority of businesses in our town rely on these activities. Please ensure they remain successful.
- 2. Increased rates and costs to town residents whose water has been affected by a misguided approval of intensive animal production closely within our water catchment area. The aforementioned low income rate payers would ultimately need to pay for a more sophisticated and expensive filtration system. They would also need to buy potable water in the event of Q-fever or other transmissible disease infections which could easily originate from this proposed hospital/isolation system and the carcass decomposition system proposed in the DA. The run off in times of heavy rainfall must end up in the town's water supply.
- 3. The reduced land values for the many residential subdivisions in the immediate area, and as tourism and other industries suffer in a chain reaction, the land values of residences in Glen Innes as a whole will suffer.
- 4. Class actions from the residents who have suffered great economic costs will increase the council's insurance premiums and hence rates to Glen Innes property holders.

Yours sincerely.



Glen Innes

Sent:

Thursday, 26 November 2020 3:57 PM

To: Subject: Council Email DA No. 25/20-21

Attachments:

As a rate paying resident I object to the proposed DA No.docx

The General manager,
Please find attached objection

As a rate paying resident I object to the proposed DA No. 25/20-21, for which we have been given a paltry two weeks to reply to.

The proposed feedlot is just too close to town. Odours and dust will travel the four or five kilometres to town. The Statement of Environmental Effects may look good on paper, but the truth is dust and odours will travel to town in our winds. It is not uncommon for us to get wind speeds of 70 kms/hour and up to 80 kms/hour. Just look at weatherzone records. I'm sure the tourists we are trying to attract will spread the word on how stinky the town is if this DA goes ahead

And the thought of this feeding into main our water supply catchment is ridiculous.

To check a few shaky flaws in the expert's Statement of Environmental Effects:

2.6.3GLEN INNES DRINKING WATER CATCHMENT

"The property is located within the drinking water catchment for Glen Innes. The Glen Innes Integrated Water Cycle Management: Part 2 Strategy Plan (2009) discusses the issue of raw water quality being impacted by rural activities. It states that the impact on raw water quality by rural activities is not a concern as the water treatment plantis designed to deal with contaminants in the raw water."

Too great a faith in our Glen Innes drinking water treartment plant. I'm sure it has enough to cope with already.

3.1.7ANIMAL WELFARE AND BIOSECURITY

"A farm biosecurity plan and emergency animal disease action plan has been prepared for the proposed feedlot (Appendix H). A heat load risk assessment has also been completed (Appendix I). This identified that, given the temperate Glen Innes climate, shade is not required for the feedlot"

With Global warming a fact of the present day, we can now expect weeks at at time of temperatures around and exceeding 30 degrees right through summer.

3.4.1COMMUNITY AMENITY

"The risk of Q Fever to the surrounding dwellings has been considered. The NSW Health Q Fever Control Guideline(Q Fever Guideline)states that Q Fever can be transmitted several kilometres, usually in dust. As such, the key to minimising the risk of Q Fever transmission from the feedlot is dust control which is discussed in Section 4. One of the studies identified in the Q fever Guideline, Tissot-Dupont et al., (2004), refers to aQ Feveroutbreakin the UK which resulted from transfer of contaminated hay along a major transport route. The other studies refer to outbreaks resulting from the grazing of cattle, sheep or goats and associated activities. These activities are all common in the Glen Innes region, with the New England Highway being a major agricultural transport route. The risk of

STATEMENT OF ENVIRONMENTAL EFFECTSStonehenge FeedlotJardana Pty LtdPage 31contracting Q Fever must always be considered when making the decision to live in a rural area."

So we are supposed to expect Q fever just living in Glen Innes? Any increased risk of Q fever is not acceptable.

3.4.2SURFACE WATER

"This is proposed as the feedlot is inthe Glen Innes drinking water catchment and thismonitoring provides further confidence that any impact from the feedlot can be identified early and the impacts quantified"

Confidence is not fact.

3.4.7EMERGENCIES AND NATURAL DISASTERS

"Given the significant elevation difference between the feedlot site and the banks of Beardy Waters, flood risk is extremely low. No further flood mitigation required. Alternative escape routes are available to the property."

This is suppposition.

3.4.1COMMUNITY AMENITY

"S5 –9am and 3pm wind speed and direction plots for Glen InnesAirport, sourced from BOM, do not indicate winds with a high frequency, greater than 60%, towards any sensitive receptor."

9am and 3pm wind speeds are much lower than wind speeds between these times in daytime. Check Weatherzone data.

STATEMENT OF ENVIRONMENTAL EFFECTSStonehenge FeedlotJardana Pty LtdPage 375PLANNING FRAMEWORK

5.1GLEN INNES SEVERN COUNCIL

5.1.3.2Chapter 4 -

"Rural DevelopmentChapter 4 controls apply to all development, such as the proposed feedlot, in the RU1—Primary Production zone. The aims and objectives of this chapterare:

•To enhance the character of the rural areas"

Hardly

"In recent dry years, demand from feedlot space across the country has remained high as cattle cannot be sustained on pastures."

This is just not true. Take a drive in the country around Glen Innes.

"a fifth-generation farming family."

Sob sob! The guy (Pedlow) is a bully decended from an SP Bookie. That's the real history of how the family became wealthy.

"To reduce potential for rural land use conflict. The proposed development has been designed and sited in accordance with the National Guidelines and NSW S Factor guideline. There is extensive separation between the proposed development and the nearest sensitive receptors."

There are many close residents who will refute that they are sparated by a great enough distance.

"STATEMENT OF ENVIRONMENTAL EFFECTSStonehenge FeedlotJardana Pty LtdPage 34Table 9–Environmental Risk Assessment and Management Plan"

This plan actually admits in the poential risks:

"Increase in contaminants in surface water resulting in algal blooms or damage to aquatic biodiversity." "Due to the low residual risk to groundwater, ongoing monitoring is not proposed." No monitoring?

"Odour and dust have the potential to cause environmental nuisance. • Excessive dust emissions have the potential to cause adverse health impacts (e.g. asthma)." "Due to the low residual risk to community amenity, no monitoring is proposed." No monitoring?

This proposal is deeply disturbing to most residents of the nearby Glen Innes town and sattelite settlements.



Sent:

Thursday, 26 November 2020 4:20 PM

To:

Subject:

FW: Jardana Feedlot Objection

Jeff

For registration as objection to the feedlot.

Regards

Graham

Graham Price

Director of Development, Planning & Regulatory Services
Pirectorate of Development, Planning & Regulatory Services



GLEN INNES SEVERN COUNCIL 136 Church Street PO Box 61 Glen Innes NSW 2370



Glen Innes Severn Council. NOTICE & DISCLAIMER

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e opinions expressed in this message are the personal views of the sender and do not necessarily represent the corporate opinions or policies of en Innes Severn Council, unless expressly stated.

Please consider the environment before printing this email

Sent: Thursday, 26 November 2020 2:22 PM

Subject: Jardana Feedlot Objection

Please pass to correct area. I have just picked up Examiner article on this subject.

At least to reach cut off time today.

1.Our home of the overlooks the Beardy valley with 180 view.

We. are concerned of the smell & the affect on our drinking town water.

This feedlot due to the location has the potential of affecting the value of our property which is residential. Also we understand that there are sub-divisions in the feedlot area that will have a negative impact for people to build on this area.

Glen Innes has a wonderful life style which attracts people to live here. Small rural blocks are part of lifestyle. Surely council want to attract more residence.

Can see no benefit to the local grazing industry wanting an additional feedlot when we have the established Rangers Valley Feedlot which markets there product Globally. I have eaten their meet in Jakarta & Hong Kong.

My understanding (which may be wrong) is our Council has us as a Green Town . If so how can the Council support such a project.

Have to see Sorry do not have more time to comment.

Your Faithfully

Sent:

Thursday, 26 November 2020 4:00 PM

To:

Council Email

Subject:

Objection to planing application DA 25/20-21

Attachments:

cattle feedlot Glen Innes.docx

I thank you for the opportunity to submit the attached objection.

Yours in kindness



"If we could live happy and healthy lives without harming others... why wouldn't we?"

This email is privileged and confidential.

If you are not the intended recipient, please delete the message and notify the sender.

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expressed approval of the sender. We ask you to respect copyright laws of both images and intellectual property that might be contained in either the email or its attachments.

Please think before you print, do you really need to print this out?

This objection has been prepared by

in response to a planning application for a 1000 head Intensive Cattle Feedlot at 34 Pedlows Road, Stonehenge by Jardana P/L.

Who we are cattle?

is a world-renowned not-for-profit organisation dedicated to the protection of farmed animals. Our sanctuary, based in victoria, currently offers refuge to just over 450 orphaned, abandoned, neglected or surrendered farmed animals. Since inception in 2003, provided sanctuary and hope to approximately 5,000 rescued farmed animals. Many of these animals have come into our care via council pounds or have been surrendered directly to by farmers or hobby farmers.

Further provides a much needed voice for farmed animals world-wide, encouraging a more compassionate way of living.

The inspiration of the second in was a pig, rescued in 2003. Since that time the second has had the unique experience, for an animal advocacy organisation, to work directly with these animals, and in doing so we have been fortunate to gain much insight into their behavioural and emotional needs.

Basis for our objection

The proposed facility:

- will deny animals their expression of natural behaviours
- will compromise animals' physical and psychological welfare
- is not in keeping with the public's expectation of how animals should be treated
- does not consider RSPCA opposition to intensive farming of animals
- increase risks to animal and human health
- will pose a risk to the surrounding environment, heritage and bio-diversity.

Whilst numerous are the reasons for an objection to this application, given the unique position of our objection rests largely with the animal welfare implications of such a facility.

Background

Since the 1960s, the intensification of animal-based agriculture has increased exponentially, in pursuit of savings on space, land, water, labour and feed. As a result, large numbers of pigs and poultry (and to a lesser degree cattle, goats and sheep) - otherwise naturally free-roaming animals - have become confined *en masse* in large industrial sheds and more recently outdoor feedlots. This production method is often referred to as "intensive" farming. However, the use of the term "intensive" is a misnomer as it can lead the general public to believe the level of care the animals receive under this farming method is focused on a higher level of individual care and treatment given the common use of the expression "intensive care" as applying to people. More accurately, "intensive" in this sense reflects the intense number of animals confined into small areas. The result sees the hapless animals severely confined and denied the ability to satisfy their basic behaviours and needs which gives rise to potential physical and psychological issues. Moreover, intensive animal agriculture risks "treating animals as disposable resources" (Hodges 1999).

Initially the welfare of animals housed under these factory-like conditions went largely unnoticed, as few members of the public knew of, or witnessed, the conditions under which the animals were kept and the

subsequent animal welfare issues that arose. However, recent times have seen this change largely as a result of whistle-blowers, both from within the industry and external animal activist groups.

Increased scientific research over recent years into animal cognition and emotion is informing us that animals, in particular farmed animals, are far more cognitively aware and socially complex than previously thought. The result is driving change within industry to provide better care for the animals to increase productivity and sustainability. Outside of the industry it is causing many people to review their dietary choices and companies to invest in plant based foods.

Who are cattle?

Cattle are large ruminants (animals whose stomach are made up of four compartments). They have evolved from the wild Auroch to graze and browse a variety of grasses, herbs and leaves over vast tracks of land. They do this by using their large tongues, in a manner much like a hand, to rip off mouthfuls of grass. They too are selective in which plants they prefer and the stage of growth of these. Much of their day is spent eating and ruminating, this generally occurs in three major bursts of activity. They shy aware from pastures that have become contaminated by the faeces of animals.

Lattle have been shown to have individual personalities who form strong bonds with others and even harbouring grudges over a period of time. Cognitive aware are cattle and although they may process information differently from humans, they have been shown to experience a range of emotions akin to our own.

Feedlots present many challenges to cattle both physical and psychological. The most notable is that their digestive systems are not suited to consume the feedstuffs offered by these confinement facilities. Producers often turning to antibiotics to combat health conditions that arise, even using antibiotics prophylactically. Other health issues faced by animals in confinement facilities include, but not limited to, heat stress, acidosis, bloat and liver abscesses. The hapless animals are forced to stand in crowded areas in their own and others excrement which leads to further health issues including respiratory conditions, eye problems, leg and body scald.

Feedlots frustrate the natural behaviours of cattle to move about, select who they wish to be with, and grazing and grooming opportunities. All of which is in contravention of the five freedoms as set out by the rambell Committee in 1965.

Unacceptable treatment of animals

In 1965 the U.K. Government set up the Brambell Committee to look at the biological needs of animals in human care. They came up with five internationally recognised measures to determine how animals are coping in their environment. These are known as the five freedoms and they are: (1) freedom from hunger and thirst; (2) freedom from discomfort; (3) freedom from pain, injury or disease; (4) freedom to express normal behaviour; and (5) freedom from fear and distress. Cattle kept in feedlots are intelligent sentient beings, they too are social and curious animals whose welfare is seriously compromised by the confinement's ability to fully meet these basic standards of freedom.

Lessons from COVID 19

At a time when the world is looking with heightened concern towards the links between human health and the confinement of animals used for food consumption the time has come, not to increase animal-based protein production, rather to explore new and novel means of plant-based foods.

Global Plant News reported on 12/05/20 in an article titled "The rise of plant-based protein" that in response to an increased global demand by consumers for plant-based foods that "...an increasing number of meat processors are looking to diversify their offering to meet the changing needs of consumers. The role of plant-based protein may also be expedited as a result of coronavirus, as consumers across the world become increasingly aware of their personal health and immunity, as well as how and where their food is sourced".

Community expectations not met by intensive animal industries

The 2016 Productivity Commission Inquiry Report into the Regulation of Australian Agriculture states: "[F]arm animal welfare is a policy area that is expected to evolve over time as community attitudes evolve and as new scientific evidence becomes available."

The same report also notes:

"[A]nimal welfare regulations are not meeting community expectations about the humane treatment of farm animals."

The RSPCA does not support the intensive farming of animals.

The Weekly Times, online edition of 23/11/20 records under "The top 10 agriculture trends of the next decade", that "van Delden reports...a big shift in the number and scale of cattle, sheep and pigs farmed in the future, in favour of horticulture and cropping, driven by the triple global trends of the greater preference and affordability of plant proteins and plant-based meats, consumer concern about the high methane emissions of livestock production, and greater competition for land use.

Evolving public opinion about animal welfare

A 2018 report commissioned by the Federal Department of Agriculture and Water Resources entitled *Australia's shifting mindset on farm animal welfare* states:

"95% of people view farm animal welfare to be of a concern and 91% want at least some reform to address this."

We expect this figure to continue to increase once people become further informed of the inadequacies of ustralia's animal protection legislation when applied to food production animals. For example, most people are not aware that Codes of Practice circumvent the *Prevention of Cruelty to Animals Act*. What this means is that farmed animals, in this instance cattle, can be subject to acts of cruelty and housed in conditions that would not be legally permissible should the animals be classed as domestic pets.

The proposed facility would be at odds with the vast majority of the Australian public's expectations about the proper and kind treatment of animals.

In a digital age where information is so readily available the way in which farmed animals are treated in Australia is becoming increasingly transparent, with the industry are having to respond with better practices. Australia has one of the fastest growing plant-based populations in the world, and there are an increasing number of individuals and organisations holding the animal agriculture industry to account for their treatment of animals. The severe confinement of cattle where they cannot meet their behavioural needs is out of touch with community expectations and not something that speaks to council's vision for a sustainable future.

Risk to the environment

The NSW Water Management Act of 2000 states its object as "the sustainable and integrated management of the state's water for the benefit of both present and future generations. This act is based on the concept of ecologically sustainable development – development today that will not threaten the ability of future generations to meet their needs. The Act recognises:

• the fundamental health of our rivers and groundwater systems and associated wetlands, floodplains, estuaries has to be protected".

In contrast to this, this development proposal raises serious concern for the potential of water contamination. Industrial agriculture is the leading cause of water pollution in the United States, Australia should not follow suit.

Threat to human health

Intensive animal industries and their associated use of antibiotics are increasingly been seen as a threat to human health.

-Conclusion

Given the growing body of scientific evidence that speaks to the sentience of cattle and their ability to suffer under intensive farmed conditions, coupled with concerns over unacceptable environmental and human health implications, the public benefit is not served by the granting of this application, therefore it should be denied.

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GLEN INNES SEVERN COUNCIL
Risk causal by Renords
2 6 NOV 2020 NSW 2370
FORACTION: TSO
General FOR MERS/TE
This Letter is a response to the Circular
To our Community Regards The Jardana Geedhot
Development Application Number 25/20-21
Environmental Phanning and Assessment
(a) Have the NSW Environment Protection Authorities
E been approached and requested to make an
assessment of this situation.
<u> </u>
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Gen Innes
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GLENCOE NOW 2365
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THE GENERAL MANAGER
GLEN INNES SEVERN COUNCIL
SLEN INNES CLEW 2370
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Political Donations and Gifts Disclosure Statement

Political Donations and Gifts Disclosure to Council

If you are required under section 147(4) or (5) of the Environmental Planning and Assessment Act 1979 to disclose any political donations or gifts

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Dogument Name: <Application/identifier> _ Political Donation Declaration _ <Customer Name>

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Application No:_

Date Received:

By signing below, I/we hereby declare that all information contained within this statement is accurate at the time of signing.

Signature(s): Date: 25.11.20 Name(s):

Office Use Only:

Gien innes

The General Manager
Glen innes Severn Council
Town Hall Office
265 Grey Street
Glen Innes

CLEN INNES SEVERN COUNCIL Receive seconds
2 0 111 2550
FCR ACTION: TSO
FOR INFORMATION MRPS TP

Jordana Feed Lot-Submission

Regarding the above feed lot,we wish to lodge an objection to its establishment because of its effect on the environment,water supply,pollution, noise,nearby residences and traffic flow.

After considering all the available information, on the application, in the press and online, it is obvious that this feed lot will have a far greater effect than is shown on the application.

These lots are designed with a slope in one direction for total drainage, but if manure is allowed to accumulate, settlement ponds will not cope in the event of storm rain, and the town water supply is close by.

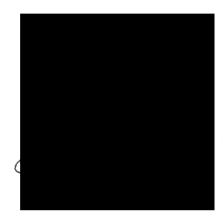
Because of overlooked Council zoning, residences have been built on Agricultural land, and these people now have to suffer smell and noise.

It is hard to believe that after Council has heavily promoted Glen Innes as a tourist destination, it will allow this possible eyesore to be placed on the main southern entrance to the town.

There is little doubt that in the future the

applicant if successful will want to increase the size of the lot.

Many local people do not want this lot to be placed where indicated, and it is hoped that Council will see many faults and evasions in the application.



GLEN INNES SLYERN COUNCIL Glen lines, 23/0 Recoinsulty Necords 26, 11, 20 To the General Manager, FOR INFORMATION: MRES ITE express my concerns re the D.A. for the proposed feedlet at Standlerge. I say no to any farming experiment which is given free reign to pollute over postine rivers and Carinking water, To say commed will rectify polluted water afterwards is not good enough. Like closing the pen gaks after the cons have betted! Council have a questionable track record of water management so this does not inspire confidence with the township and surrounds Pollution of the water source has implications as for downstream (as the water flows, Have towns further on been consulted - hars Australia been asked? Hardly and rei Any planning approval based on rectifying environmental pollution is not sound farming practise.

Dur waterways are home to threatened species of fish according to the no fishing notices which abound. There is also a whitefailed water not which is endanged which lives here in pristine waters. Our wildlife is protected but not by our council,

Unanswered concerns who is to monitor the water quality before during and after feedlot impact of How ofken will it be monitored? and will reports be made public? People in my area rely on water tanks for water. Dust from the feedlot will settle on our root tops and be washed into the tranks. Not good for our health! Nor is it if we get a fever or anything else we should, according to the Etatement of the Environmental effects, realise we are all enemy collateral or farming unwisely collateral, Intensive tarming has no place in 2020 and we should be modelling our farming for the future. Not the financial future of one family. This report tries to alleviate the applicant of any responsibility for polection of the environment and the polection of the environment and the people of Ohen Severn shire. It is undiscerningly ambiguous, Check with any lawyer. any planyer. The glatement that Aboriginal rights are hereby, relinquished because we don't know I any connections are of Govenor Bourke in 1835 declaring Australia as terra nullius or no one lives

here so it's up for grades, If council accepts this racist and of so shorts afted thinking I certainly will be taking this further. The whole valley is reversed by Aberrainal people who for over 80 Morrand years stood in owe and hold ceremonies at the remarkable rock
sites and breathtaking Standhange
circle.

I came to Glen Innes attracted by peace and quiet so noise and light pollation four seven, and yes they do exist, are counterproductive. Jours sincerely

received by 26.11.20.4.10pm.

GLEN INNES SEVERN COUNCIL
RECORDED TO RECORDS

7 E 2227

FOR ACTION MRRS TE

GLEN INNES 2370 26/11/2020

To: The General Manager
Glen Innes Severn Council
265 Grey Street, GLEN INNES

We write as ratepayers concerned about, D.A. no. 25/20-21 received by Council, for a '! 000 Head Cattle Feedlot', to be situated immediately south of the Glen Innes township.

We wish to object to this development application on the following grounds:

- *The likely effects of pollution on the drinking water catchment area
- * The close proximity to residential and tourist sites
- * The likely consequences affecting air, odour, water and noise factors
- * Socially and economically detrimental to the Community and ratepayers
- * A bio-security hazard to local farmers
- * Little regard for history the recent drought water shortages a 'river' that had ceased to flow and a weir that was reduced to a trickle
- * Traffic hazards a recent personal experience of 'duelling' with a semi-trailer intent on negotiating the turning into Stonehenge Road from the New England Highway.

A 'Political donations & gifts Disclosure Statement' is attached as required.



Political Donations and Giffs Disclosure Statement

Political Donations and Gifts Disclosure to Council

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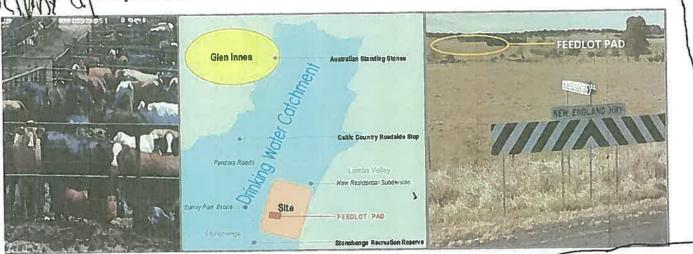
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Important Notice

Sircular to Our Community

s in Receipt of a New DA for a 1000 head Intensive Cattle Feedlot at Stonehenge.



FAMILY POPERTY POPERTY STATES TO THE STATES OF THE STATES

It is important that the whole Community is informed as this impacts us all.

This is the 3rd application for this Development, the last attempt resulting in a legal challenge by the Community.

In addition to Planning Instruments and Regulations, Published DPI, MLA 2012a, and Government Guidelines; Council must also consider in their evaluation;

ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979 - SECT 4.15

- (1) (b) the likely impacts of that development including environmental impacts on both the natural and built environments and social and economic impacts in the locality,
 - (c) the suitability of the site for the Development
 - (d) any submissions made in accordance with this Act or the Regulations
 - (e) the public interest.

At this stage it is important for the Community to send submissions to council as they <u>must</u> consider all submissions put forth in this process.

Note-Unfortunately most submissions through the last process were disregarded as they were grouped 'Pro-forma'.

A 1000 Head Intensive Cattle Feedlot...

Should not be in OUR Town's Drinking Water Catchment!

It will be in close proximity to Residential and Tourist Sites

It will Destroy the Amenity

It will have detrimental consequences, effecting - Air, odour, Water, Visual, Noise & Vibration
It will be socially and economically detrimental to the Community and Ratepayers!
It will Be an enormous Biosecurity Hazard to Local Farmers and our Environment!

Council must stop this!

Plans are available for inspection at Councils Church Street Office or
Online at Glen Innes Severn Council Website - Building and Development - Advertised Development
Submissions are Due to Council by 4.30pm Thursday NOVEMBER 26th

ATTAL THE GENERAL MANAGER
CHURCH ST. GLEN INNES 2370

REGARDS FEEDLOT, STONEHENGE,

I ENDORSE ALL OBSECTIONS AS
ATTACHED FORM.

GLEN	INNES SEVERN COUNCIL
	Received by Reporte

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FOR ACTION: TSO

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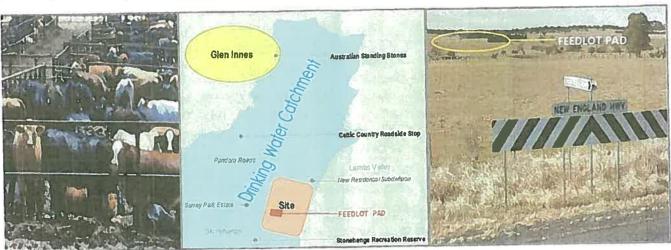
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UZEN ANNES NSW 2370

Important Notice

Circular to Our Community

Council is in Receipt of a New DA for a 1000 head Intensive Cattle Feedlot at Stonehenge.



Development Application Number: 25/20-21 - Jardana Feedlot

It is important that the whole Community is informed as this impacts us all.

This is the 3rd application for this Development, the last attempt resulting in a legal challenge by the Community. In addition to Planning Instruments and Regulations, Published DPI, MLA 2012a, and Government Guidelines; Council must also consider in their evaluation;

ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979 - SECT 4.15

- (1) (b) the likely impacts of that development including environmental impacts on both the natural and built environments and social and economic impacts in the locality,
 - (c) the suitability of the site for the Development
 - (d) any submissions made in accordance with this Act or the Regulations
 - (e) the public interest.

At this stage it is important for the Community to send submissions to council as they <u>must</u> consider all submissions put forth in this process.

Note- Unfortunately most submissions through the last process were disregarded as they were grouped 'Pro-forma'.

A 1000 Head Intensive Cattle Feedlot...

Should not be in OUR Town's Drinking Water Catchment!

It will be in close proximity to Residential and Tourist Sites

It will Destroy the Amenity

It will have detrimental consequences, effecting - Air, odour, Water, Visual, Noise & Vibration
It will be socially and economically detrimental to the Community and Ratepayers!
It will Be an enormous Biosecurity Hazard to Local Farmers and our Environment!

Council must stop this!

Plans are available for inspection at Councils Church Street Office or
Online at Glen Innes Severn Council Website - Building and Development - Advertised Development
Submissions are Due to Council by 4.30pm Thursday NOVEMBER 26th

do not approve of this feedlet, to close to town a our water supply smell will also be a problem.

GLEN INNES SEVERN COUNCIL
Received by Records

2 6) 2929

FOR INFORMATION: TP/MR PS

From:

Sent:

Thursday, 26 November 2020 9:06 AM

To:

Council Email

Subject:

Objection to DA 25/20-21

Attachments:

Objection DA 25 20-21.pdf;

sclosure Statement.pdf

Attention of The General Manager,

Please Find attached

Objection to DA 25/20-21

also attached is the

Public Disclosure Statement for which there are NIL Donations or Gifts To declare.

Should you require further information please contact

Kind Regards,

26.11.2020

Political Donations and Gifts Disclosure Statement

Political Donations and Gifts Disclosure to Council

If you are required under section 147(4) or (5) of the Environmental Planning and Assessment Act 1979 to disclose any political donations or gifts (see page 1 for details), please fill in this form and sign below.

Disclosur	Disclosure statement Details		i			
Name of D	Name of person making this disclosure statement	siatement	Planning application reference address or other description)	Planning application reterence (e.g. LIA number, partning application the or reterence, properly address or other description) $DA~25/20-24$	me or rererence, prop	епу
Person's int (circle relev	Person's interest in the application (circle relevant option)	You are the APPLICANT? You are a PERSON MAKING A SUBMISSION IN RELATION TO AN APPLICATION? Association	N RELATION TO AN AF	PPLICATION? YES NO		
Reportable	Me political donations or gifts made by person i State below any reportable political denations or gifts you include Australian Business Number (ABN). If you are the applicant of a piaroning application, OR planning application, OR if you are a person making a submission in relation a		r by other relevant per period (see glossary on pa gillons or gifts that you knot ny reportable political don	naking this declaration or by other relevant persons have made over the relevant period (see glossary on page 2). If the donation or gift was made by an entity (and not by you as an Individual) low any reportable political denailors or gifts that you know, or ought reasonably to know, were made by any persona with a financial intense is an application, state below any reportable political denaitors or gifts that you know, or ought reasonably to know, were made by an associated an application, state below any reportable political denaitors or gifts that you know, or ought reasonably to know, were made by an associated.	and not by you as an in ersons with a finencial r know, weso mado by	dividue) Interest in the an associate.
Donaton orgift?	Name of donor (or ABN if an entity), or name of person who made the gift	n Donor's residential address or entity's registered o address or other official office of the donor, address of person who the made the gift or entity's address	entity's registered e donor, address of y's address	Name of party or person for whose benefit the donation was made; or person to whom the gift was made.	Date donation or gift was made	Amount value of donation or gift
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		or gifts	ons or gifts			
		NII - FUIRE				
		Please list all reportable political donation	is and gifts—additional s	reportable political donations and gifts—additional space is provided overleaf if required		

By signing below, live hereby declare that all information contained within this statement is accurate at the time of signing.

Name(s)		
	1.2020	
<u>:</u>	26.11.2020	
gnature(s): Date:		
Signatu		

		'Name>
Date Received:	ofitical Conation Declaration	Political Donation Declaration <customer< th=""></customer<>
Office Use Only: Application No:	Activity Type: Development'Applications\Po	Document Name: <application identifier=""></application>



General Manager Glen Innes Severn Council PO Box 61 GLEN INNES NSW 2370

RE: OBJECTION TO DEVELOPMENT APPLICATION NO. 25/20-21

PROPOSED 1,000 HEAD CATTLE FEEDLOT

34 Pedlows Road, Stonehenge. Lot 125 DP659979, Lot 1 DP308507, Lot 126 DP753311, Lot 22 DP753311, Lot 23 DP753311, Lot 2 DP1115100, Lot 3 DP1115100, Lot 1 DP1115100, Lot 1 DP180562, Lot 1 DP114064, Lot 13 DP114034, Lot 4 DP114034, Lot 12 DP114034, Lot 5 DP7243, Lot 2 DP7243, Lot 1 DP7243, Lot 4 DP7243 And Lot 3 DP7243

Dear Sir / Madam,

1.0 INTRODUCTION

We, the Inc., have prepared this letter to outline our objections to Development Application No. 25/20-21 (referred to as "DA" in this submission) involving a proposed "1,000 head cattle feedlot" (referred to in this submission as "the proposed development") at the above listed property.

In preparing this letter we have taken advice from a town planner and our legal representatives.

The Environmental Planning and Assessment Act, 1979 (as amended) (EP&A Act) defines "development" under Section 1.5, which states:

1.5 Meaning of "development"

(cf previous s 4)

- (1) For the purposes of this Act, development is any of the following—
 - (a) the use of land,
 - (b) the subdivision of land.
 - (c) the erection of a building,
 - (d) the carrying out of a work,
 - (e) the demolition of a building or work,
 - (f) any other act, matter or thing that may be controlled by an environmental planning instrument.
- (2) However, development does not include any act, matter or thing excluded by the regulations (either generally for the purposes of this Act or only for the purposes of specified provisions of this Act).
- (3) For the purposes of this Act, the **carrying out of development** is the doing of the acts, matters or things referred to in subsection (1).

All activities associated with the proposed development including works and ongoing operations, are required to be assessed and taken into consideration in determining this DA by the consent authority under Section 4.15 of the EP&A Act.

Failure to take into consideration the relevant matters arising out of the proposed development in determining this DA exposes the determination authority to 3rd party appeal. Should Council not assess the application including all its relevant matters for consideration, this will expose rate payers to unnecessary costs where a 3rd party is successful in any appeal.

Bearing this in mind, ask Council to consider the proposal with an abundance of caution and take a conservative approach.

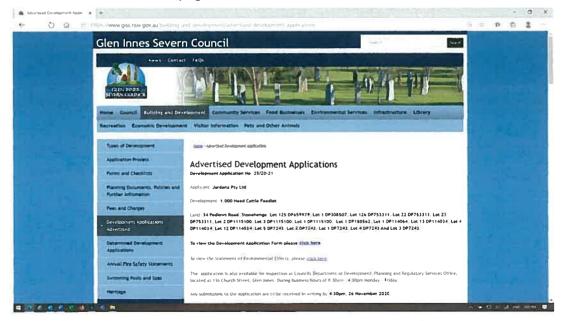
Where the consent authority does not have the expertise in-house to fully consider all the relevant technical matters which may require scientific evaluation, it is not the role of to undertake such scientific evaluations for the consent authority or for the applicant, rather the DA should readily include the relevant scientific evaluation in the information submitted with the DA. And, where the consent authority does not have the relevant expertise, we ask that Council take appropriate steps to obtain assessments from suitably qualified experts to assist the reporting of the DA for the consent authority's consideration prior to the determination of the DA.

It is noted that Council has adopted the Glen Innes Severn Council "Community Participation Plan" (CPP) which states Council's community engagement principles aim to ensure:

- Community engagement will be inclusive, transparent and ensure fair participation.
- Community engagement is about informed decisions not necessarily full consensus.
- Communities will be engaged around decisions that are yet to be made.
- Engagement activities aim to build trust and understanding.
- Engagement activities will only occur when there is a real opportunity for people to influence or change decisions or services.
- Engagement will have a clear purpose, objectives and approach.
- Activities will be timely, appropriate and not raise unrealistic expectations.

We ask that Council staff implement these principles in an "open and transparent" process as is articulated in the CPP.

The following Section details our reasons to object to the DA based on the information available on Council's webpage as shown in the screen shot extract below:



We have completed the Council's "Disclosures of Political Donations and Gifts" as attached.

2.0 REASONS FOR OBJECTION

2.1 Insufficient Information in Biodiversity Assessment

Insufficient information has been submitted with the DA to demonstrate that the land is capable of supporting the proposed development without an unacceptable impact on the terrestrial and aquatic environment of the site and nearby lands using the current required methodology established under the *Biodiversity Conservation Act* 2016. The current established methodology applies to all land throughout NSW including Greenfield, Brownfield, inclusive of even existing urban development sites, let alone rural sites irrespective of existing mapping.

Until the applicant furnishes to Council as part of their DA the required well established assessment under the *Biodiversity Conservation Act 2016*, it cannot be concluded that the proposed development will not result in an unacceptable impact.

2.2 Traffic Safety Issue

The scale of the proposed development will result in unacceptable adverse safety impacts on the regional and local road networks as the information submitted with the application is not prepared by an accredited road safety auditor with respect to the truck movements entering and exiting from the proposed development. Therefore, the impacts cannot have adequately considered by the applicant with respect to all of the relevant matters arising from the proposed traffic impacts of the proposed development.

The information at Appendix J Traffic Impact Assessment of the submitted SEE does not include accurate swept path movements into and out of the local road network with the New England Highway. The swept paths included are merely estimates using "grainy" screen shots from which appear to be NSW Spatial Information Exchange aerial photography (however the base aerial photography is not referenced or accredited).

2.3 Traffic Impact Assessment incomplete

At page 22 of the submitted Statement of Environmental Effects under the chapter heading "3 Proposed Development" and the heading "3.1 Overview" the application acknowledges a number of its components require construction works.

The cumulative impact of the existing site development in combination with the proposed development has not be adequately considered by the applicant and has been ignored in the traffic impact assessment.

By way of example, the traffic generation summary at 3.2.1 of the submitted SEE at page 25, acknowledges that the existing usage of the land will be operational at the same time as the proposed feedlot, however is dismissive of the existing traffic movements:

"Heavy-vehicles will be required to transport cattle to and from the feedlot as well as feed and commodities into the feedlot. Some cattle are produced on the property or are grazed on-site prior to entering the feedlot. These cattle would be trucked to the site regardless of the feedlot development and have not been considered for truck generation. As all manure will be utilised on-site, no manure transport will occur. Commodities grown on-site (grain and silage) have also been excluded from truck generation."

The information at Appendix J Traffic Impact Assessment of the submitted SEE does not include any details of the existing site operations in combination with the proposed development. The Traffic Impact Assessment is silent on any traffic movements associated with the existing site operations. The application fails to include specific details as to existing current traffic conditions along the New England Highway at the intersection with Stonehenge Road as there are no traffic counts.

2.4 Land Capability Assessment Inadequate

The provisions of Clause 7 of State Environmental Planning Policy No 55 – Remediation of Land (SEPP 55) requires the consent authority to consider whether the land on which the development is proposed is contaminated, and if the land is suitable in its contaminated state (or will be made suitable after remediation) for the proposed development, and if the land requires remediation that this will be carried out prior to being used for the proposed development. To enable the provisions of Clause 6 of SEPP 55 to be fully considered by the consent authority, the applicant will need to furnish a Preliminary Site Investigation in accordance with SEPP 55 Guidelines. The current information submitted with the DA does not adequately address SEPP 55 and therefore has failed to demonstrate the land is capable of supporting the proposed development.

2.5 Insufficient Information Odour Assessment

The information submitted with the DA has failed to demonstrate its methodology as to how any buffer zone/s have been considered, located and proposed in the development. Without details which demonstrate the methodology, then the information is incomplete and insufficient.

As a minimum, the applicant should engage a suitably experienced air quality scientist to consider the proposal in combination with the existing site operations to demonstrate the cumulative impacts have been all considered and mitigated as necessary. This would ordinarily require baseline air quality data given the site already has existing operations and scientific modelling in a pre and post development scenario.

Given the existing site usage has not been taken into consideration as part of the proposed development, the buffers proposed are inadequate and will result in ongoing land use conflicts if approved in the submitted form.

2.6 The real resultant cumulative impacts of the proposed development have not been considered by the applicant

Given the issues raised above the real cumulative impacts of the proposed development have not be considered by the applicant and conversely cannot be assessed by the consent authority. In this regard, the true land capability for the proposed intensive agricultural usage of the land in combination with the existing "extensive agriculture" processes have not been considered by the applicant.

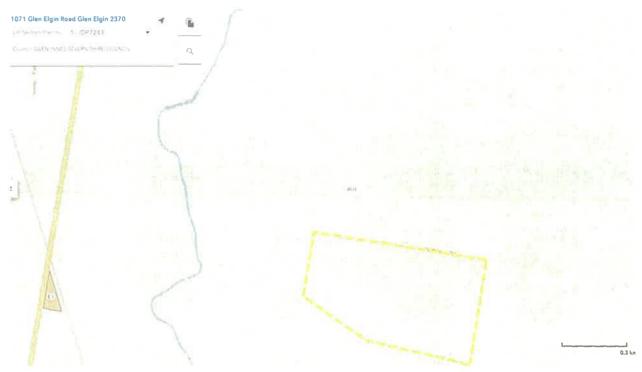
2.7 Inadequate public benefit analysis

The applicant has not analysed within their development proposal the direct and indirect public benefits of the proposed development, even in comparison with the existing site development, and as such has not demonstrated the social and economic welfare of the community will be suitably supported if the proposal is supported by the consent authority.

2.8 Water Quality

Works associated with the proposed development and ongoing operations associated with the proposed development usage will be located within 40m of an existing tributary of Beardy Waters.

The existing "blue line" information is shown in the following extract from NSW Planning Portal base topographic mapping.



NSW Planning Portal Allotment of land site of Feedlot Pens outlined in dashed yellow lines. https://www.planningportal.nsw.gov.au/spatialviewer/#/find-a-property/lot

2.9 Inadequate Environmental Management Plan

Currently, the Environmental Management Plan (EMP) is inadequate, as it does not detail what specific impacts of the proposed development are deemed to be the minimum acceptable given the existing baseline levels of amenity currently enjoyed by adjoining and nearby properties. To establish the baseline dataset requires scientific investigations and monitoring. The EMP doesn't detail any baseline measures or what minimum acoustic, air quality, water quality and traffic levels are currently enjoyed such that the existing amenity of the locality can be maintained measured and indicates inadequate ongoing monitoring measures for a number of environmental considerations going forward.

As such, the Environmental Management Plan would in fact manage nothing! It seeks to shift the burden to council to manage compliance matters rather than self-responsibility which is not in accordance with the relevant guidelines.

The applicant should furnish to Council a detailed EMP which includes specific targets which have been assessed by the technical experts who have assisted with environmental impact considerations in the preparation of the DA and then accepted by the Council as the minimum required responses.

2.10 Excessive Scale of Development

The applicant seeks to hide the true impacts of the proposed development for failure in taking into consideration the existing site development and its existing impacts, this is likely because in combination the proposed development will result in a scale of development which can be described as excessive for this site.

2.11 Council has a direct conflict of interest

The entire proposed development including all of the activities associated with processes resulting from the usage are required to be considered by the consent authority. This is no different to other developments such as warehousing or distribution operations or even mining projects which involve transportation and central distribution locations.

In this instance, the process to sell the cattle fed on-site is required to be considered and to this effect as Council is the owner and operator of the cattle sales yards, the Council has a pecuniary interest or a direct conflict of interest as the outcome will have direct ongoing financial benefits for the Council with the sale of each head of cattle from the proposed development.

2.12 Not in the public interest

Given the previous number of submissions, the list of reasons detailed above, and as was evident with the previous DAs for this proposed development, which we have noted in this current DA largely remains unchanged from earlier DAs, the proposed development remains not in the public interest and should not be supported until all relevant matters for consideration have information furnished by the applicant to enable the DA to be fully and comprehensively assessed.

Kind Regards,



26 November 2020

From:

Sent:

Thursday, 26 November 2020 9:18 AM

To:

Council Email

Subject:

Attachments:

DA Jardana Pty Ltd.docx DA Jardana Pty Ltd.docx

Attention Craig Bennett, General Manager, Please find attached letter regarding objection to Jardana Pty Ltd DA No.25/20-21. Many Thanks



26th November 2020

The General Manager, Mr Craig Bennett Glen Innes Severn Council Grey Street Glen Innes. NSW 2370

Dear Sir,

Subject: Objection to the proposed Development Application for Jardana Pty Ltd. DA No.25/20-21 for 1,000 head feed lot development –34 Pedlows Road. Stonehenge. NSW

When this development was first put forward on 7th February 2020 D.A No. 11/2020 I made an objection to this development then.

Subsequently the surrounding residents saw fit to become an incorporated body and went to the Land & Environment Court, which subsequently ruled that the Glen Innes Severn Council did not demonstrate that regard was had to clause 5.18 of the LEP. On 10th September 2020 7.34PM Form 33, UCPR 12.1 Notice of Discontinuance with the seal of the Land and Environment Court. Refer to Councils Business Paper Ordinary Council Meeting 24th September 2020, Annexures B Item 12.1.

Mr Owen Pedlow – of Jardana Pty Ltd has applied for a D.A No. 25/20-21. Advertised in the Glen Innes Examiner Thursday November 19, 2020. Page No. 2 under OUR COUNCIL.

I believe that this Development should not be approved for the same reasons, it is too close to the Beardy River system which supplies water to the residents of Glen Innes. Run off from this development as it is an intensive livestock development, would be substantial. Potential ground water pollution.

Soil erosion is a further possibility.

Removal of the waste products would increase heaving traffic load on the Road to Jardana Pty Ltd. Plus the removal of cattle off to abattoirs.

Vehicles like B-Doubles if exceeds the limit of 19 metres in length would mean a further required of a turn in and turn off situation being developed off the New England Highway, which is not the Councils responsibility, it would the Roads and Maritime's cost and execution.

The effects it would also have on the surrounding community – smell as well as the devaluation of their properties due to the closeness of the development. Smells travel when the wind blows and it comes from all directions. This cannot be controlled.

Page 2.

I believe the Glen Innes Severn Council should ask the EPA to actually look at this Development and provide their expertise as to the validity of this development and how suitable it would be, being so close to built up areas, as well as the River system.

Trusting you will take my objection on board.

Yours faithfully,



From:

Thursday, 26 November 2020 9:23 AM Sent:

Council Email To:

Objection letter 1000 head feedlot Feedlot objection Letter.docx Subject:

Attachments:

Development application DA112/2018

300-1000 head cattle feedlot

I	as the property owner of	amb's valley Glen Innes would like to
S	strongly object towards to application being 1000 head for	eedlot on the property 34 pedlows road
S	Stonehenge Glen Innes.	

Firstly with being in a large open view of the feedlot area as our property facing south west we would have large extensive views of the apposed feedlot along with 6 other lots with 4 new dwellings built and 2 being built at present this will affect not only the landscape but have large environmental effects as well as health to the property owners from the large amounts of dust, odour coming from the feedlot, this feedlot has been opposed 3 times now and the application has also listed there is possibility to have airborne diseases up to 7kms away! How can this be in the application stage once again when the community of Glen Innes is 5kms from the apposed feedlot?

The feedlot will output large amounts of dust in dry weather even being listed in the plans to have scheduled amounts of water carted and admitted to the feedlot there would have to be large amount received to stop the amount of dust being admitted out into the environment and to 30+ houses being within under 1km of the feedlot.

Another effect towards the feedlot would be the large amount of increased traffic along the Armidale highway, pedlows road and glen leigh road. With large trucks pulling in and out of pedlows road it could cause a large accident and structural road damage to the Armidale highway and pedlows road, also in this case how would the feedlot be approved with there being no turn off bay into pedlows road? The risk of B-doubles turning into pedlows road could cause a huge accident and quiet some risk of turning large trucks into traffic onto the Armidale highway. Another large affect is the small/tight narrow bridge on pedlows road as with large amounts of heavy trucks carrying stock could affect the structure and/or possible collapse the bridge after large extensive of use.

As owning the property at for 3 years now, we have just commenced building a quiet family friendly home, this feedlot could have drastic effects on the devaluation of the property with it being the overlook of the large feedlot with 90% of the 10.6 acres looking over the Armidale road/ Stonehenge valley. We have invested large amounts of money into the property/ properties in the shamans Road area with costs of over \$600,000, and my argument being will the Glen Innes Severn council chip in for the devaluation of the properties...? I THINK NOT!!!

Family homes for young children have been built in this area and this application has been objected 3 times now by thousands of Glen Innes residence and this is still being approached to being applied for a Devolvement application?

As well as all other people in the area overlooking the feedlot I do highly believe that this development application will have larger effects on property's then being a good thing for the owner. With also being just a few hundred metres from the main town water supply the beardy river this could have huge effects on not only people in the area but the whole town of Glen Innes and surrounding areas that use this water supply. I do not understand how this has not been picked up by the EPA as an environmental hazard?

Council should seriously consider the repercussions of approving this feedlot and be prepared for legal action (once again) to compensate for financial and emotional burdens that would develop if the feedlot was to go ahead.

The land and environmental court will be taken upon to action this matter once again if this application get approved at any level.

For myself to be building a new dwelling on the top of power 1km away from the beardy waters, I do not understand why a household of possibly 5 people has to have the highest rating environmental earth safe septic system but yet we can have a 1000 head feedlot right next to the water supply... seems quiet strange to me and it seems a bit contradicting for the Glen Innes Council.

I will be following this up once again and do hope there is no progression with this application as it has been Knocked on the head 2 times now and has not progressed.

Regard

REGARDING PROPOSED FEEDLOT STONEHENGE.

To my wife and me this feedlot doesn't seem too much of a concern.

But to most of the Stonehenge's it has consumed there conservation with no positive outlook on the proposal.

So I am presuming that you will have plenty of rebukes regarding this proposal.

and I have lived at Stonehenge Road for approximately 30 years and absolutely love the place. Great people and area to live, there's no doubt about it New England is Stonehenge to us and others, so yes when something i.e. Feedlotting is proposed it does prick your ears and you certainly think is that a good thing for the area or not?

 $l^\prime m$ not going to start out by throwing all the bad points about lotting at you because $l^\prime d$ say plenty will.

What I would like you to do is read this letter and understand that I do have a little knowledge about lotting and the ramification to it.

I have been a for around vears and of them are at Rangers Valley Feedlot approximately two days a week on average, dealing with water and waste issues. As you will know the Valley has just over 1000 head by about 45167 which makes them marginally bigger than what is proposed. But scale it back and the problems are the same just not as magnified. Rangers Valley Feedlot without any fear of contradiction is the best employment business Glen Innes has and the spin off to that place is phenomenal. Yes they have their problems but with the team they have working through them things get done and money gets spent and let's face it that is what the area needs cash flow for businesses and families. So I don't like knocking any proposal that has a future in the town that puts bread on the table that's not detrimental to our environment and is maintained. We all want to see Glen Innes grow.

But there are a lot of down side to Lotting be 1000 head or 50000 same things go with the territory. When I say these things I'm only talking as a bystander that comes and goes from the Feedlot and believe me happy to leave not because of the people just the air, noise and smell which never goes away, there is a point when you enter the area that burns the senses but you get use to it, you need to smell my car the next morning to understand that Feedlots stink with a smell that I have smelt at 15klms away so no one is safe, just wind dependant.

So keep that in mind when you sign off on the application, the phone calls you will get when that smell reaches neighbors and yes it will reach neighbors.

Will this feedlot be worth it?

Have you ever seen a cockatoo or galah that's full on grain it can't get airborne very hard on windscreens.

Grain trucks will be breaking to gain entry to Stonehenge Road at all hours I feel sorry for the neighbors, as truckies do they like to stop, shake the dust and check the load, plenty of grain will be spilt, mice, rats and birds don't miss the opportunity for a free feed, let's hope the fatalities on the road due to the bird life is only birds because they do block your vision in a car, especially on a highway.

I'm unsure on his feed rasher for the proposed development but the sound of a hungry steer can keep you up at night and on warmer nights with windows open what use to be peaceful can become irritating and more phone calls.

I won't go on about water quality, quantity and disposal but the Valley's had its share of issues and still trying to fine tune it and there not in a town catchment area so good luck.

There are plenty of other things I could talk about feedlotting good and bad but we do have to feed the people, I'm just not sure if it's the right position to do it.

Stock 250 cattle in a paddock and passing people will say that's good country put them in a pen and all they will say is that's cruel.

I'm not totally against it but you have to ask yourself does this country really need to view a feedlot from the road especially when tourism is our biggest draw card, there's plenty off country, they have

will do the same job and less threatening to the environment and let's face it if you can't make money out of cattle in a paddock then how's it going to work feedlotting.

This letter is not so much about Feedlots but more about Stonehenge and our beautiful landscape, please chose wisely.

Yours Sincerely



GLEN INNES SEVERN COUNCIL

2 6 ... / 2020

FOR ACTION:

FOR INFORMATION ...

From:

Sent:

Wednesday, 25 November 2020 5:16 PM

To: Subject: Council Email Fwd: Feedlot

----- Forwarded message ------

Date: Wed, Nov 25, 2020 at 5:08 PM

Subject: Feedlot

Mr Craig Bennett General Manager 25th November 2020-11-25 Glen Severn Council PO BOX 61 OBJECTION TO DA:25/20-21 Dear Sir,

Please add my name to objections against the feedlot application.

The Feedlot's placement is actually against your own State Legislation, that a Feedlot not given approval in a drinking water catchment.

Pedlow has ticked "yes" for dust on his application; huge amounts of water are going to go missing from our source, dealing with this "dust".

Run off of effluent from 1000 head of Cattle will reach our Beardy the main source of our drinking water, are we actually expected to live with heavy chemicalized water?

ear the spread of Q fever and the Town covered in E-coli Bacteria. I fear my fears aren't unreal.

It is against every positive move Council has ever made, why is one Man's insane repeated application for a Feedlot which will negatively affect a small pretty country town of 6000 people, why is this so important?

hy am I hearing it's a done deal?

what so many people don't know about this, people thought it had all been put to bed.

Pedlow doesn't have my permission to adversely affect my health. Neither does Council.

If no one has really heard of Glen Innes, except for the Standing Stones and this feedlot is approved I can assure you we are all going to be making a lot of media noise until normal common decency has been shown to prevail. Yours truly

Glen Innes 2370 Sent on the go with Vodafone Get Outlook for Android From:

Sent:

Wednesday, 25 November 2020 9:00 PM

To:

Council Email; Carol Sparks; Dianne Newman; Glenn Frendon; Andrew Parsons; Colin

Price; Jeffrey Smith; Steve Toms

Subject:

Submission regarding Development Application 25/20-21

Attachments:

Submission rerarding DA 25 20-21.docx

Dear General Manager and GISC Councillors,

Please find attached the following:

• a submission regarding Development Application 25/20-21 34 Pedlows Road, Stonehenge.

• a completed Political Donations and Gifts Disclosure Statement.

Regards,

Political Donations and Gifts Disclosure Statement

Political Donations and Gifts Disclosure to Council

If you are required under section 147(4) or (5) of the Environmental Planning and Assessment Act 1979 to disclose any political donations or gifts (see page 1 for details), please fill in this form and sign below.

CISCIOS	Disclosure Statement Details						
Name of	Name of person making this disclosure statement	statement	Planning application reference address or other description)	ference (e.g. DA n ription)	Planning application reference (e.g. DA number, planning application title or reference, property address or other description)	tle or reference, pro	perty
			-02/52 AC	75 12-	DA 25/20-21 34 Pedious Rd Stanchesage	Stoneh	SAC
Person's	Person's interest in the application	You are the APPLICANT?			YES	NO)
(circle re	(circle relevant option)	You are a PERSON MAKING A SUBMISSION	JBMISSION IN RELATION TO AN APPLICATION?	PLICATION?	YES) NO) NO	
Reporta	ble political donations or gifts	Reportable political donations or gifts made by person making this declaration or by other relevant persons	or by other relevant per	sons			
•	State below any reportable political donation include Australian Business Number (ARN)	State below any reportable political donations or gifts you have made over the 'relevant period' (see glossary on page 2). If the donation or gift was made by an entity (and not by you as an individual) include Australian Business Number (ABN).	nt period' (see glossary on pa	ige 2). If the donation	n or gift was made by an entity (a	and not by you as an	Individual)
•	If you are the applicant of a planning analysis of the second of the sec	in the control of the	onations or gifts that you knov	w, or ought reasonab	oly to know, were made by any pe	ersons with a financia	al interest in t
•	If you are a person making a sul	If you are a person making a submission in relation to an application, state below	any reportable political dona	ations or gifts that yo	state below any reportable political donations or gifts that you know, or ought reasonably to know, were made by an associa	know, were made b	y an associa
Donation or gift?	Name of donor (or ABN if an entity); or name of person who made the gift	Donor's residential a address or other official person who the made the	ddress or entity's registered Loffice of the donor, address of egiff or entity's address	Name of party or the donation was the ciff was made	Name of party or person for whose benefit the donation was made; or person to whom the diff was made	Date donation or gift was made	Amount vof donatic
			П				
		Please list all reportable political donations and gifts—additional space is provided overleaf if required	ins and gifts—additional s	space is provided	overleaf if required		

By signing below, I/we hereby declare that all information contained within this statement is accurate at the time of signing.

Name(s	The state of the s	
Signature(s): Date:	25/1120	

Date Received:		<customer name=""></customer>
Date R	itical Donation Declaration	Jocument Name: <application identifier=""> _ Political Donation Declaration _ <customer name=""></customer></application>
Application No:	Activity Type: Development/Applications/Political Donation Declaration	: <application identifier=""> F</application>
Office Use Only:	Activity Type: De	Document Name

East Lismore

NSW 2480

The General Manager

Mr Craig Bennett MBA CPA

Glen Innes Severn Council

PO Box 61Glen Innes NSW 2370

Submission regarding Development Application 25/20-21

34 Pedlows Road, Stonehenge

Dear Mr. Bennett,

As required by amendments to Local Government and Planning Legislation I make a public disclosure that I am not in receipt of any donations or gifts in relation to lodging or commenting on this development proposal.

I strongly oppose this Development Application for a 1000 head Feedlot on Pedlows Road, Stonehenge for the following main reasons:

- 1. damage to tourism and destruction of the quaint picturesque nature of the town.
- 2. threat to the Glen Innes Drinking Water Catchment
- 3. the risk of Q-fever to the township, neighbouring residents and travellers on the New England Highway
- 4. misinformation and contradictions in the Development Application
- 5. cruelty to animals
- 6. should have been categorised as a 'Designated Development'

1. Damage to tourism.

Tourism is a vital and significant contributor to the local economy in Glen Innes. According to the latest ABS Census the tourism output in Glen Innes is estimated at \$47.337 million, which is 5.4% of the total output. The largest sub-sector in Glen Innes Severn is Accommodation & Food Services with tourists expenditure supporting \$27.070 million.

By comparison \$43.524 billion is generated by tourism in New South Wales from a total output of \$1.213 trillion (3.6%) and \$140.137 billion is generated by tourism in Australia from a total output of \$3.839 trillion (3.7%). These figures confirm that Glen Innes currently holds a very positive reputation as a tourist destination. This source of income to the community needs to be protected.

Glen Innes has worked incredibly hard to establish successful events such Minerama, Gemorama, The High Country Writers Festival and the Celtic Festival which attract many visitors to the area annually. Tourists also

visit outside those event dates to experience the quaint, old world charm of the township and the scenic countryside.

I strongly believe that having an intensive feedlot 6km from the township and visible from one of the most heavily used and major highways leading into the town would damage tourism. An online petition collected over 2100 signatures of people opposing the development. When you read the comments left by signatories many said they frequently visited the area and would be choosing an alternative tourist destination in future if the feedlot goes ahead which would be extremely detrimental to the local economy.

2. Threat to the Glen Innes Drinking Water Catchment

According to the DA 640 tonnes of raw manure will be harvested annually from the feedlot and that a feedlot of that size will likely result in approximately 36 mortalities per year. The manure and dead cattle will be composted onsite and then spread around the paddocks of the property which are all **LOCATED WITHIN THE DRINKING WATER CATCHMENT FOR GLEN INNES.**

The dangers of allowing feedlots within Drinking Water Catchments have been identified and some States and Local Government areas in Australia have developed Catchment Management Plans which exclude feedlots from Drinking Water Catchment Areas. Please see the following exert from *National Guidelines for Beef Cattle Feedlots in Australia*, published by Meat & Livestock Australia in association with the Australian Lot Feeders' Association and the Feedlot Industry Accreditation Committee.

'In some states, catchment management plans have a formal status in legislation and regulation. Like regional plans, catchment management plans usually cover a number of local government areas and their requirements may already be reflected in the respective local government plans. However, catchment management plans are generally a newer form of planning and their requirements may not always be addressed by local plans. Checking whether a catchment management plan exists and what is its official status is recommended to anyone considering developing a feedlot. For example in Queensland and Victoria, feedlots are excluded from Declared Catchment Areas which are the areas immediately surrounding municipal water supply dams.'

Glen Innes Severn Council does not have a Catchment Management Plan which puts the Glen Innes community and their water supply at risk. Is there a reason why GISC could not implement their own Catchment Management Plan to also exclude feedlots from Drinking Water Catchment Areas?

Despite GISC not having a Water Catchment Management Plan it does have the Glen Innes Severn Local Environmental Plan 2012 which Council must consider when approving a DA. Can GISC assure the public that the DA in question adequately addresses all the points in clause 7.2?

7.2 Drinking water catchments

- (1) The objective of this clause is to protect drinking water catchments by minimising the adverse impacts of development on the quality and quantity of water entering drinking water storages.
- (2) This clause applies to land identified as "Drinking Water Catchment" on the <u>Drinking Water</u> Catchment Map.
- (3) Before determining a development application for development on land to which this clause applies, the consent authority must consider the following—
- (a) whether or not the development is likely to have any adverse impact on the quality and quantity of water entering the drinking water storage, having regard to the following—

- (i) the distance between the development and any waterway that feeds into the drinking water storage,
- (ii) the on-site use, storage and disposal of any chemicals on the land,
- (iii) the treatment, storage and disposal of waste water and solid waste generated or used by the development, (this is of significant concern and not adequately addressed in the DA)
- (b) any appropriate measures proposed to avoid, minimise or mitigate the impacts of the development.
- (4) Development consent must not be granted to development on land to which this clause applies unless the consent authority is satisfied that—
- (a) the development is designed, sited and will be managed to avoid any significant adverse impact on water quality and flows, or
- (b) if that impact cannot be reasonably avoided—the development is designed, sited and will be managed to minimise that impact, or
- (c) if that impact cannot be minimised—the development will be managed to mitigate that impact.

Lastly GISC has an obligation to uphold the Australian Drinking Water Guidelines and their own Drinking Water Policy so that they supply the public with 'safe, high-quality drinking water' to the community.

Listed in the GISC Drinking Water Quality Statement Policy it says that Council will 'manage water quality at critical points along the delivery chain from source water to consumer' and that GISC will also use a risk-based approach in which potential threats to water quality are identified.' The proposed site for the feedlot is located within that delivery chain and should be identified a potential threat to the water quality.

3. Risk of Q Fever

I do not believe the DA has adequately addressed the risk or mitigation of Q Fever associated with this feedlot. There is no risk assessment provided for the risks to human health. There are only two short paragraphs discussing Q fever in the DA and the only method of prevention mentioned is to control the dust.

The NSW Health Q Fever Control Guideline (Q Fever Guideline) states that **Q Fever can be transmitted** several kilometres, usually in dust. Q Fever can also be spread through contaminated animal urine or faeces. The feedlot is to be located 6km from the Glen Innes Township and 1.2kms from residences.

The applicant has stated that there is an adequate buffer zone between the proposed site and the nearest receptors however the **applicant does not own the entire buffer zone**. The Department of Primary Industry states that 'a buffer zone is also generally accepted as being an area where a landholder has legal control of the land needed to separate their development from adjoining land.' Included in the buffer zone are other owner's private land and a number of public roads including The New England Highway. Tourists, travellers and other animal transportation run the risk of Q Fever infection when traveling on The New England Highway as it passes through this buffer zone.

NSW Government Health explains that 'people living on or near a high-risk industry (e.g. neighbouring livestock farms, stockyards housing cattle/sheep/goats, meatworks, land being fertilised with untreated animal manure)' could potentially contract Q Fever. In this instance you have people living 1.2kms away from a feedlot which according to the DA will be fertilising nearby paddocks with untreated cattle manure and using effluent to irrigate paddocks and for dust suppression on internal roadways. Spray irrigation

creates aerosols and under high pressure can spread pathogens up to 1km (sourced from Use of Effluent for Irrigation from the Department Environment and Conservation.).

There is no mention in the DA about how the staff or visitors of the feedlot should protect themselves while onsite. NSW Government Health recommends being vaccinated, wearing protective clothing including a P2 respiratory mask is required and following certain procedures which help reduce risk. According to the DPI facilities for decontamination of personnel and equipment exiting a composting site should also be provided in a feedlot such as this but are not included in the DA or the plan. How will employees ensure that machinery, equipment and themselves are clean and adequately decontaminated before leaving the feedlot?

4. Misinformation and contradictions in the DA

On the DA in the Statement of Environmental Effects Standard Form the applicant has ticked NO boxes for several items that are highly questionable.

- 1. CONTEXT AND SETTING (Site Analysis)
- (a) Is the development out of character with the area (eg. Does the proposal involve a commercial or industrial use in a residential area)?

 No

The development will definitely be out of character with the area. Currently the area is an example of the beauty of the New England highland which locals and tourists love. That area is incredibly scenic with its open rolling paddocks, exposed granite rocks and deciduous trees. While there is currently active farming happening in the area it is sparsely grazed by free roaming cattle which adds to the quaint countryside feel the area is known for. Seeing, hearing and smelling 1000 cattle confined in pens and not provided any shade is not appealing to tourists as they are approaching the township via the New England Highway.

- (b) Will the development:
- i. be visually prominent within the existing landscape? □ No

The feedlot will be visible to all traffic traveling on The Glen Innes Highway and to many surrounding residences.

- 2. TRANSPORT, TRAFFIC AND ACCESS
- (a) Will local traffic movements and volumes be affected?

 No

There is no doubt that there will be more truck and vehicle movement generated by this feedlot. This is a very busy major highway with no turning lane for large or slow moving vehicles. This is potentially a dangerous situation.

- 3. WASTE DISPOSAL
- (c) Will other wastes be generated by this development? □ No

Yes there will be other wastes in addition to effluent generated by this development. The DA itself states that it will **640 tonnes of raw manure** will be harvested annually from the feedlot. It also states that a feedlot of that size will likely result in approximately 36 mortalities per year. With the average weight of a cow weighing 450kgs that would amount to **16,500 tonnes of dead cattle.** There will also be grain and feed waste produced.

SOCIAL AND ECONOMICAL IMPACTS

(a) Will the proposal affect the amenity of surrounding residences by overshadowing, loss of privacy, increased noise or vibration?

No

The amenity will certainly be affected for surrounding residences. The feedlot will be visible for many neighbouring properties. There will also be unpleasant odours, noise (cows will moo outside operating hours), dust, and increase in flies.

(b) Will the proposal have any economic consequences in the area?

No

Neighbours properties will be devalued. Some have received confirmation of this through professional land evaluation. Likely to affect tourism with a direct financial loss to local businesses.

- Stonehenge Rd and Pedlow's Rd are NOT approved for B-Double use despite the DA claiming they are.
- Page 25 of the DA "As all manure will be utilised on-site, no manure transport will occur" and then
 on Page 29 "Any excess manure not required for on-site spreading can be removed to offsite
 locations for utilisation."

5. Cruelty to animals

The current standards for animal welfare state that animals should be able to exhibit normal behavioural patterns – that is seek shade, shelter, food and be able to form social groups. Feedlots do not allow this type of natural behaviour to occur and in the DA for this feedlot it claims that **no shade will be provided** for the animals. I find this barbaric and inhumane.

7. Should have been categorised as a 'Designated Development'

According to The NSW Department of Planning, Industry and Environment Designated Development refers to developments that are high-impact developments (e.g. likely to generate pollution) or are located in or near an environmentally sensitive area (e.g. a wetland). This feedlot is a high-impact development which will be producing animal waste/pollution which have numerous biohazard risks. It is also located within an environmentally sensitive area of a drinking water catchment.

There are two ways a development can be categorised as 'designated development':

- the class of development can be listed in <u>Schedule 3</u> of the EP&A Regulation as being designated development, or
- a LEP or SEPP can declare certain types of development to be designated.

In Schedule 3 of the E&A Regulation it lists the following as 'Designated Development':

13 Composting facilities or works

Composting facilities or works (being works involving the controlled aerobic or anaerobic biological conversion of organic material into stable cured humus-like products, including bioconversion, biodigestion and vermiculture)—

- (a) that process more than 5,000 tonnes per year of organic materials, or
- (b) that are located—
- (i) in or within 100 metres of a natural waterbody, wetland, coastal dune field or environmentally sensitive area, or
- (ii) in an area of high watertable, highly permeable soils, acid sulphate, sodic or saline soils, or

- (iii) within a drinking water catchment, or
- (iv) within a catchment of an estuary where the entrance to the sea is intermittently open, or
- (v) on a floodplain, or
- (vi) within 500 metres of a residential zone or 250 metres of a dwelling not associated with the development and, in the opinion of the consent authority, having regard to topography and local meteorological conditions, are likely to significantly affect the amenity of the neighbourhood by reason of noise, visual impacts, air pollution (including odour, smoke, fumes or dust), vermin or traffic.

Even though the DA is for a feedlot it will also essentially be a composting facility as all the raw manure and mortalities will be composted on-site. Organic bioconversion of raw organic materials will used to break down the manure and carcases which will be spread over the property which is located within a **Drinking Water Catchment**.

21 Intensive livestock agriculture

- (1) Feedlots that accommodate in a confinement area and rear or fatten (wholly or substantially) on prepared or manufactured feed, more than **1,000 head of cattle** or 4,000 sheep (excluding facilities for drought or similar emergency relief).
- (1A) A facility or confined area operated on a commercial basis for the keeping or breeding of horses that accommodates more than 400 horses (excluding facilities for drought or similar emergency relief).
- (2) Dairies that accommodate more than 800 head of cattle for the purposes of milk production.
- (3) Pig farms—
- (a) that accommodate more than 200 pigs or 20 breeding sows and are located—
- (i) within 100 metres of a natural waterbody or wetland, or
- (ii) in an area of high watertable, highly permeable soils or acid sulphate, sodic or saline soils, or
- (iii) on land that slopes at more than 6 degrees to the horizontal, or
- (iv) within a drinking water catchment, or
- (v) on a floodplain, or
- (vi) within 5 kilometres of a residential zone and, in the opinion of the consent authority, having regard to topography and local meteorological conditions, are likely to significantly affect the amenity of the neighbourhood by reason of noise, odour, dust, traffic or waste, or

This development is for an intensive livestock agriculture for a 1000 head feedlot located within a Drinking Water Catchment. It is also likely to significantly affect the amenity of surrounding residents with noise, odour, dust, traffic increase, potential biohazard/exposure to Q fever.

Why was this DA not categorised as a Designated Development?

Lastly this isn't an issue with the DA itself but with the Councillor voting process and conflicts of interest. I am aware that last time a similar DA from the same applicant was voted on by the Councillors on 23rd April 2020 Councillors Glen Fendon and Jeff Smith made themselves recuse on pecuniary grounds as they have relatives who own properties near the proposed site. I assume they will again make themselves recuse for this vote too.

There is reason to believe that Councillor Dianne Newman should also lodge a notice of Conflict of Interest in regards to her close association with the applicant and his family members. Allegedly one of her family members has also been in dispute with the applicant regarding property in Glen Elgin and this may influence her voting.

Concern is also held by community members that Councillor Steve Toms has a personal relationship with and may feel indebted to the applicant who spoke on his behalf when nominations were being counted for Mayor in 2007

I hope my concerns and those of the many other community members who submit their objections will be seriously considered when Councillors vote on the matter.

Regards,

From:

Sent:

Wednesday, 25 November 2020 9:53 PM

To:

Council Email

Cc:

Subject:

Feedlot development

For the attention of the General Manager, The Mayor and Deputy Mayor

I have been following the developments re the Feedlot being proposed near the town of Glen Innes. I was surprised that the proprietor of this feedlot is now trying for the third time to get approval to build this feedlot. I had thought the matter finalised and that it was NOT going ahead.

, have serious concerns that our water supply will be badly affected by this development. The owner cannot mitigate circumstances where we receive very large falls of rain in short periods. Events that are more likely to happen with increasing human induced climate change weather patterns.

I was especially surprised that council approved this feedlot to be built so close to town. The failure to build a waste disposal/recycling centre away from our town should have been a warning for another development in such close proximity to the town, its population, its amenities for tourism, and health and well-being of the community. We now have a situation where our recycling centre and the accumulated household rubbish has run-off towards our town, poisoning an area at the South-West end of town that should not have to deal with such spoiling. Why would Council do this again to our community?

The other concern, that council needs to consider, besides extra dust (when long periods without rain occur, a very likely prospect), smell when the wind is south easterly or south westerly, and constant sound of animals calling out is the inhumane aspect of a feedlot. I understand it is smaller than the Rangers Valley Feedlot, however its the same concept. Large animals crowded together. Despite the proprieter Bying there will be sun shelter up, with temperatures regularly much higher than the average we would expect, large heat producing animals crowded together is cruel to the extreme. PLEASE REFUSE THIS DEVELOPMENT. It does not offer economic benefits to this town, instead it takes it away from us. It only enefits the person proposing this development.

Glen Innes

From:

Sent:

Wednesday, 25 November 2020 9:59 PM

To:

Council Email;

Subject:

RE: DA 25/20-21 - JARDANA FEEDLOT

Attachments:

Feedlot - od

General Manager Glen Innes Council

Dear Sir

RE: DA 25/20-21 - JARDANA FEEDLOT

I wish to lodge my objections to the proposed Feedlot at Stonehenge. If this is allowed to go ahead it will impact greatly on the surrounding residential properties which are in close proximity.

such a Feedlot will give off a very unpleasant odour which residents will be forced to endure when the wind changes in their direction.

Such a large number of cattle will cause a great deal of noise pollution which will be very annoying to the surrounding residents, particularly at night.

Any runoff from large downpours of rain will most likely impact on the town's water supply. This is totally unacceptable.

If this proposal is approved by Council the value of all surrounding residential properties will decrease enormously.

Attached iste required Disclosure Statement.

Regards



Glencoe NSW 2365

Political Donations and Gifts Disclosure Statement

Political Donations and Gifts Disclosure to Council

If you are required under section 147(4) or (5) of the Environmental Planning and Assessment Act 1979 to disclose any political donations or gifts (see page 1 for details), please fill in this form and sign below.

Name of	Name of person making this disclosure statement	statement	Planning application re	Planning application reference (e.g. DA number, planning application title or reference, property	title or reference, pro	perty
			address or other description)	ription)		
			25/20-21-	JAKDANA FEEDOF	(
Person's I	Person's interest in the application	rou are me APPLICANT?			YES /NO	
(circle rel	(circle relevant option)	You are a PERSON MAKING A SUBMISSION IN RELATION TO AN APPLICATION?	NELATION TO AN AF		YES! NO	
Reportal	ble political donations or gift	Reportable political donations or gifts made by person making this declaration or by other relevant persons	by other relevant per	sons		
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Donation or gift?	Name of donor (or ABN if an entity), or name of person who made the gift	Donor's residential ad address or other official person who the made the	cress or entity's registered office of the donor; address of gift or entity's address	Name of party or person for whose benefit the donation was made, or person to whom the gift was made.	Date donation or gift was made	Amount value of donation or gift
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		Please list all reportable political donations and gifts—additional space is provided overleaf if required	s and gifts—additional	space is provided overleaf if required		
3						

By signing below, thereby declare that all info-Signature(s): Date: 35-//-30 Name(s):

curate at the time of signing.

Date Received

Office Use Only: Application No. Date Activity Type: Development/Applications/Political Donation Declaration

Document Name <Application/Identifier> Rolitical Donation Declaration _ <Customer Name>

From:

Sent:

Wednesday, 25 November 2020 11:03 PM

To:

Council Email

Subject:

DA 25/20-21 - Jardana Feedlot

Attachments:

Feedlot

25 November 2020

General Manager Glen Innes Council

Dear Sir

RE: DA 25/20-21 - JARDANA FEEDLOT

vish to lodge my objections to the proposed Feedlot at Stonehenge for a number of reasons:

- 1. The planned site of the feedlot is within the water catchment of Glen Innes and any run-off from the facility would end up very quickly into the local water supply. Council may tell us that the water is fit to drink but will it still be contaminated with chemicals such as antibiotics and other medications normally used with livestock?
- 2. I have nothing against feedlots, such as Rangers Valley, when they are placed well away from residential areas but to approve a feedlot close to residential areas and within their water supply catchment area is ludicrous and in my opinion absolute stupidity. People bought their properties to get away from the closeness of towns and cities and to enjoy a more relaxed lifestyle not to have everything ruined by an unwanted addition to their local area.
- 3. The proposed feedlot would be a biosecurity hazard for local farmers because of the increased number of cattle from many areas which could introduce unwanted diseases from where they came. The local environment would also be affected by any such unwanted diseases brought into the area.
- 4. Has the economic impact to the residents and the community been fully addressed? If this DA is approved then the value of those residences in the local area are going to decrease and if they decrease then the rateable value of those properties will also decrease and the rates the council would receive would also decrease. It looks like a local local
- 5. It appears that planning errors have been made in the past and have not been corrected by the current council or previous councils. This should be done before any consideration is given to the new feedlot. We may find out then, that with these corrections made, no approval for the feedlot would be able to be given.
- 6. Would the council approve a new dump in the area proposed for this new feedlot? I don't think so! They would want it to be out of site of residential and tourist areas. The council should be thinking of what the local residents want and what the tourists want to see and do and I am sure it is not a smelly, noisy and unsightly feedlot which would greatly reduce residential values and absolutely ruin the tourist value of the area and the reputation of the Glen Innes Severn Council.

I hope that the council reconsiders then rejects this DA now and for any future DA applications for a feedlot in this area.

Regards



Political Donations and Gifts Disclosure Statement

Political Donations and Gifts Disclosure to Council

If you are required under section 147(4) or (5) of the Environmental Planning and Assessment Act 1979 to disclose any political donations or gifts (see page 1 for details), please fill in this form and sign below.

(and not by you as an inropersons with a financial to know, were made by or gift was made.	Name of	Name of person making this disclosure statement		Planning application reference (e.g. DA number, planning application title or reference, property address or other description) $ \frac{1}{2} 1$	pplication title	or reference, prop	Serty.
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If you are a person making a submission in relation to an application, OR If you are a person making a submission in relation to an application, As If you are a person making a submission in relation to an application, As If you are a person making a submission in relation to an application, State below any reportable political donations or gifts that you know, or ought reasonably to know, were made by the formation of donation state below any reportable political donations and gifts—additional space is provided overleafilf required. Please list all reportable political donations and gifts—additional space is provided overleafilf required.	Reporta	ble political donations or giffs State below any reportable political include Australian Business Numbe	made by person making this declaration or by other redonations or gifts you have made over the 'relevant period' (see girl (ABN).	elevant persons glossary on page 2). If the donation or gift was made by	y an entity (and	I not by you as an insons with a financial	idividual) interest in the
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By signing below, I/we hereby declare that all information contained within this statement is accurate at the time of signing.

Signature(s): Date: 25/11/22 Name

Office Use Only: Application No. Date Received: Activity Type: Development/Applications/Political Donation Declaration

Document Name < Application/Identifier> Political Donation Declaration _ < Customer Name>

From:

Sent:

Thursday, 26 November 2020 7:14 AM

То:

Council Email

Subject:

Objection to Feedlot Council Nov Meeting 2020

Attachments:

Objection to Feedlot for 26 nov 2020 Council Meeting.docx

Please find attached a letter attention General Manager, Directors and Councillors.

Thank you,

C/O The General Manager Mr Craig Bennett.

Dear GM, Directors and Councillors,

I write as a resident and ratepayer of Glen Innes Severn Council. I ask you the following questions which I hope you will be able to respond to and urge you to reconsider your decision to approve the recent Feedlot Development Application.

1. Water security. Without adequate Environmental planning into the impact study how are you sure that runoff from this feedlot will not impact on our water quality and security?

The evaluation of the effect of run-off into waterways and catchment area and impacts on water quality is not clear. We have just been through one of the worst droughts where we saw the true value water security. The health of our creeks and rivers is VITAL. How can you be sure that this feedlot business will not impact our water?

2. A vision for Glen Innes. Is your vision for the future of Glen Innes a cramped paddock of unhappy cows?

When we are trying to be a destination for people to live and visit "Highland Country" how can you include a mass feedlot in this vision? The first thing people will see, smell and hear as they come to town is a 1000 trapped beasts stuck in a pile of their own excrement. Will you want this included in advertising at the Visitor Information Centre?

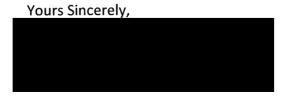
3. Animal cruelty. Do you really believe that we have the right to treat animals in this way?

When farmers clearly have the space to farm in other more humane methods and provide their animals much more quality of life in the Glen Severn region. Are you prepared to be responsible for the cruel imprisonment of millions of cows in this Feedlot's life span? Surely if cattle and meat is our trademark it should be marketed as free-range happy cow country.

4. Quality of life for residents. Why did you find the employment of two people and the increased profits for one farmer as more important than the quality of life of more than 250 residents who made submissions on this matter?

The local residents of neighbours and everyone in the town may be affected by your decision to approve this Feedlot. Can you really say that this is worth it for the development of one persons' business. If so I hope that you continue to enjoy this feeling as the feedlot affects thousands of residents and visitors to our beautiful town, especially their closest neighbours.

I ask that you act in the public interest and future of our beautiful little town – don't let this be a BIG mistake for GISC.



GLEN INNES NSW 2370

25 November 2020

The General Manager Glen Innes Severn Council Grey Street GLEN INNES NSW 2370

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GLEN INNES STAFRN COUNCIL Reconsor de Marcids
2 5 11 1 2020
FOR ACTION: TSO FOR INFORMATION: MEPS/7P
FOR INFORMATION

Dear Sir

RE: DEVELOPMENT APPLICATION 25/20-21 – JARDANA FEEDLOT

I wish to address my concerns regarding the possible passing by council of the abovementioned Development Application.

The location of the proposed feedlot is going to have an adverse impact on our community for decades to come. Its closeness to the New England Highway, closeness to residents living in the Stonehenge area, and closeness to the town's water catchment, are issues that need to be considered very carefully.

Take into consideration how this development will affect the traffic on the New England Highway with heavy vehicles turning into and leaving the site.

Also, to be considered will be the odour, which depending on the direction of the wind could make it very unpleasant for anyone living in the area, or for tourists who stop to look and take photos of the Balancing Rock. Also carried in the air will be dust, flies, noise, and disease, which are not conducive to sightseeing.

I am totally against this application being passed. Stonehenge is very scenic, and this feedlot will certainly put a 'big, black blot' on the area.



From:

Sent: Wednesday, 25 November 2020 2:35 PM

To: Subject: Council Email
Feedlot Objection

Attachments:

Objection.docx

Dear Mr Bennett,

Please find below my letter of objection regarding the Feedlot application on Pedlow rd.

Yours Faithfully

ີ 3: hard copy to follow

25th November 2020

Mr Craig Bennett

General Manager

PO Box 61

Glen Innes Severn Council

Dear Sir

Re: Objection to DA:25/20-21 Jardana Feedlot

I am writing to you to voice my concerns regarding the Feedlot Development Application known as DA: 25/20-21.

Some of my concerns include the location of Feedlot; the effluent it produces will run off into our Towns water supply. May I bring your attention to Page 16 of The Environmental Impact Statement (EIS) attached to the development application, specifically:

2.6.3 GLEN INNES DRINKING WATER CATCHMENT

The property is located within the drinking water catchment for Glen Innes. The Glen Innes Integrated Water Cycle Management: Part 2 Strategy Plan (2009) discusses the issue of raw water quality being impacted by rural activities. It states that the impact on raw water quality by rural activities is not a concern as the water treatment plant is designed to deal with contaminants in the raw water. Regardless, the sensitivity of the receiving surface water values needs to be considered in the design of the feedlot and sizing of the effluent holding pond

The EIS acknowledges that the feedlot will *in fact* impact the drinking and household water of the Glen Innes drinking water catchment. That necessarily means that the drinking water of the more than 6,000 residents of Glen Innes will be affected. I suggest that it is an unreasonable risk to more than 6,000 people for the economic benefit one individual developer. Further to this, it is also unacceptable that more than 6,000 people should bear the

burden of its possible/likely negative consequences as I doubt the developer is included in the people that are forced to drink the contaminated water.

As stated, The Glen Innes Integrated Water Cycle Management: Part 2 Strategy Plan (2009) discusses the issue of raw water quality being impacted by rural activities, however this water management plan was release in 2009, some 11 years ago, and I believe I can confidently say that the plan was written quite some time prior to its public release. That aside, the Glen Innes Integrated Water Cycle Management: Part 2 Strategy Plan (2009) makes no specific reference to intensive agriculture (such as a feedlot), in close proximity to rural residential development and certainly not an intensive development that is located within a sensitive receiving surface of the Glen Innes catchment area. Whilst the EIS states that this issue needs to be "considered", it is my view that this makes a mockery of current best practice in relation to catchment water management and water quality guidelines.

The EIS offers no explanation as to how the contaminated water will be treated and this raises further questions that residents have a right to be answered and answered in detail. Just a few of the questions and issues to be addressed include the following:

- Does our Water Treatment Plant have the capacity to treat heavily nutrient-laden water?
- How much and what type of chemicals will be used to bring the contaminated water to a quality that meets the Australia and New Zealand Drinking Water Standards?
- Have these chemicals been linked to adverse human health effects?
- Has Council considered any links of heavily nutrient rich water on human health?
- Is there an issue of bioaccumulation in humans?
- Will rate-payers be expected to pay for the ongoing treatment of contaminated water or is this to be a cost borne by the developer?

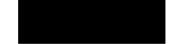
Having been a resident of Glen Innes for search years I have seen Glen Innes grow and flourish with Tourism - from humble market tables at the Celtic Festival to a well organised and World acclaimed Celtic Festival. The huge amount of work and gains that have promoted Glen Innes as a tourist destination, will slowly unravel once it becomes common knowledge that its ... "Welcome to Glen Innes, please enjoy your heavily chemicalized coffee that once had cattle excrement passed through it, have a Great Day. Whilst this may seem facetious, it

is sadly quite close to the mark. I find it extraordinarily reckless for Council to jeopardize the amazing marketing and tourism work that has been undertaken over a period of decades for the sake of one individual's economic windfall.

It is with great sadness that I even have to look at writing yet another objection to this feedlot that may I suggest is just in the wrong place. I am not anti-development, not at all, but development must be sustainable, it must consider intergenerational equity and it must enhance rather than diminish our beautiful township.

In conclusion, I would ask that I receive confirmation that my submission has been received and will be added to the papers that are considered by Council in relation to this development. I also DO NOT expect a rude and inappropriate response from you, as was received following my first objection to this proposal. Any such behaviour or correspondence will be relied upon as a formal conduct complaint.

Yours truly



The General Manager, Glen Innes Severn Council, PO Box 61, Glen Innes NSW 2370

Re: Development Application No. 25/20-21

1,000 Head Cattle Feedlot at 34 Pedlows Road, Stonehenge

I wish to voice my objection to approval of the above feedlot application.

I still have concerns about a number of issues and I strongly feel that anyone living in close proximity to this development will be greatly affected as I've stated in previous objections.

My primary issue is air pollution as Surrey Park Court is so close to the development. Our principal winds during summer are from the east/south easterly direction. That is exactly the direction of the feedlot from our estate/village.

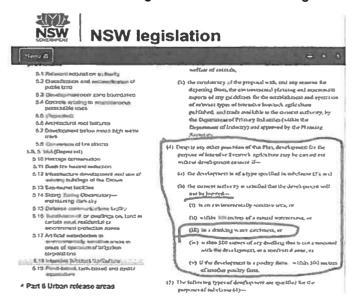
The Applicant states that dust issues are covered in the Statement of Environment Effects document. The only thing I can find there is paragraph 3.4.1 Community Amenity (as below) covering Q fever and using effluent to water dust areas. I believe this will not be adequate during strong east/south eastly winds. We have had medical advice regarding this and have been told that Q Fever protection is advisable.

Is the Applicant or GISC prepared to immunise all residents living nearby?

3.4.1 COMMUNITY AMENITY The risk of Q Fever to the surrounding dwellings has been considered. The NSW Health Q Fever Control Guideline (Q Fever Guideline) states that Q Fever can be transmitted several kilometres, usually in dust.

Further to the dust issue, any resident outside the town area relies on tanks for their water consumption! Any airborne dust or disease would contaminate these. The recent bushfires highlighted how easy this could happen and they were further away than this feedlot will be. Is the Applicant or GISC prepared to pay the costs to have regular testing of our tanks to ensure their quality?

Also, I don't believe that GISC can approve this application with a clear conscience as it would contravene the NSW Legislation. Refer the following extract.



Yes, normal farming has leaching into a water stream but is minor compared to what would happen if there was a malfunction regarding the effluent from a feedlot constructed above it as in this case. I understand the town water is not the best so extra chemicals to combat contamination would only make it worse. Why should residents live with this possibility?

An added concern is the visibility of the proposed feedlot. I cannot believe it will not be visible to surrounding residents and vehicles passing along the New England Highway. Not a good look for the southern town approach. Will it deter new residents to the area?

After reading the APPLICATION and the STATEMENT OF ENVIRONMENTAL EFFECTS on Land Use Buffers, I cannot see how this is adequately addressed. Yes, the associated buildings and other structures most of which already exist) will not be visible but the actual feedlot is clearly in a highly visible area. How is this topsoil stockpile & vegetation screen going to work to hide the feedlot? I presume it will be constructed with sediment pond soil removal. Will it be constructed high with extra soil brought in from elsewhere and shrubs on top of it? Or will it be lower with trees on top? Either way, they will need to be advanced plants with plenty of height to hide the pens. Most plants (unlike the town area) are slow growing or would not tolerate the altered soil content.



Also, this screen is only shown as being on the western or highway side. What about the residents on the northern side of the property?

Waste disposal is another concern. I have a farming background and realise that there will be some odour when spreading this but know that it will dissipate when on the ground. What I am concerned with is how close to existing properties which adjoin the applicant's properties will this be spread. Some of these dwellings are close to the boundary of the applicant's property.

As seen in the following paragraph, no mention has been made as to a buffer zone from them re this effluent/manure spreading.

• Effluent will be irrigated from the effluent holding pond as required to maintain the available capacity. Manure will be spread on-site.

Signed by



Stonehenge NSW 2370

24th November, 2020

Disclaimer: I do not and have never contributed to any political party

The General Manager, Glen Innes Severn Council, PO Box 61, Glen Innes NSW 2370

Re: Development Application Number: 25/20-21

Property: 34 Pedlows Road, Stonehenge

CLEN IN 15 SEVERN COUNCIL
Heading by Reports

2! 2321

FOR ACTION: TSO
FOR INFORMATION: MRPS TP

This is an objection to DA No 25/20-21.

After reading the NSW legislation on Intensive Livestock Agriculture (4) (6) (111), I believe that with the total amount of land belonging to the applicant and that same amount of land being in the town water catchment area, the consent authority being Glen Innes Severn Council have no other option but to dismiss this feedlot application once and for all.

Had Council carried out their care of duty to the ratepayers in the area of said feedlot, a rezoning of all smaller acreage properties from RU1 to RU5 which they should have been originally then this would have negated any Feedlot Applications being submitted by this applicant now or in the future.

Also, with a 106 lot subdivision development application for Hunter Street and Council trying to entice people to relocate to the region: YES approve a subdivision, No not a feedlot.

Another point of interest is how the applicant stated in his report that the feedlot was going to cost \$420,000 but in the next breath says that it may have a very low number of cattle intermittently. What a load of rubbish. The applicant is only interested in making money which I might add will not benefit or contribute to the economy of the town, so said Feedlot will be running 24/7, 12 months of the year to recoup his set up costs.

As far as travellers passing through and stopping to look around or people taking up residence, with this feedlot on the edge of town, is Council giving a guarantee of no airborne pollution or stench coming through the town. I THINK NOT!

Signed by



Stonehenge. NSW 2370

24th November, 2020

Disclaimer: I do not and have never contributed to any political party.

We believe that this feedlot would jeopardize the quality of the Glan Innes town water repply for the following reasons.

I If there is a beauty fall of rain the runoff from this facility would run into the Marily Mirer which is very close & up slope from the river.

I The smell from this development would affect quite a few landholdowin the area because they are very close to this facility

3 The run off from this development could affect the water quality of the town water supply because it could be build up of blue green algae: This would then affect the health of everyone who uses water from the town supply.

Therefore for the above reasons and others that have been noted by other citizens of the town & district we direct that the G.S. S.C. ile not approve of this sevelopment.

your faithfully

CLEN AGGES TO WERN COUNCIL tick in a Lay Macords

FOR ACTION.....

FOR INFORMATION NRPS/TO

TSO

Glen Innes Seven Council

I would lodge an objection to the

proposed Tedlot application number 25/20

My understanding is that the TSO

Jardana Teedlet.

proposed to locate in the catchinent area for the

Four water supply. Contamination is possible

or could happen at any time in the feeture no

matter what gurantees ere proposed, why take

(a risk with the health of the towns people.

Durley the Developer could dend a more suitable

locationi 12. no danger to the town

Yours Sincerely

Glen Innes.

Glan Inner Severn Council,

0

I am writing to the Courier to lodge an objection to Development aplication number 25/20-21 jardana feedlot as a resident of Glow Innes the fact that the Feedlot. will be within the towns eatchment there is no chance of keeping the water from being policited from run off from 1000 head of catte in Time of Leavy flood rain we are X farmers +. Lave no objection with feed lots but the health of the town would be at risk. We have had town water problems. before but nothing as big as the risk of an overflui from a feed lot. We are a townst town o seems any problem with water or smell from the feed lot would be water a reason not to come here or come to live here.

Regards

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CLEN INNES SEVERN COUNCIL Received by Records 20-11-2020 General Hanager 25 137 2320 FOR INFORMATION: dear Si I am writing to protect the observement application for Tardana Earlist No 25/20.21 I have lived in fler I mores for over Seen many changes in this town some good some of am hoping that the film I men council will not development, as I feel it will have very to this town. We have to postert our water supply and this could be very detrimental to the town if council agree's to this development. It could also have a Buraccisty Hazard to and Enceronment. as a rate payer of am praying that counsil will not approve this development as it will be detrimental to the Community . your Fathfully

GLEN INNES OF VERN COUNCIL Recurred by Records 25-110/2020 Gler Inno Definitley no Feed het that will unpact on the town water supply. 23/11/20,

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GENERAL MANAGER. GLESINSES. COUNCIL IN REGARDS TO FEEDLOT STONEHENGE.

I. HAM. STRONGLEY AGAINST THE FEED LOT

ONE THE SMELL ON AND OFF NOT GOOD. THE DANGER OFF POLLUTHOTHE WEIR INTOWN TO MUTCH TO GAMBELL ON

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KILL ALL THE GRASS. FILL ALL THE SOIL WITH.

DROPPINGS. MORE THEN IT TAKES. WILL TAKE

YEARS. CLEAR. EVEN IF IT STOPED. THE FEED LOT

LOTER S.D.

GOED LUCK. WITH YOUR. ABSTECTION TO FEED LOT

CLENINGES SEVERN COUNCIL
RICES IN RECORDS

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CLENINGES SEVERN COUNCIL
RICES IN RECORDS

CRANTION TSO

CRANTION MRPS TP

From:

Sent:

Wednesday, 25 November 2020 11:02 AM

To:

Council Email

Subject:

DA 25/20-21 Feedlot Objection Leter

Attachments:

DA 25 Feedlot Letter of Objection.pdf; DA 25 Feedlot Letter of Objection0001.pdf

Dear Sir

Please find attached my letter of objection in regard to the above Feedlot DA.

Yours faithfully

24 November 2020

Mr C Bennett General Manager Glen Innes Severn Council P O Box 61 GLEN INNES NSW 2370

Email:

Dear Sir

RE: DEVELOPMENT APPLICATION NO: DA 25/20-21 34 Pedlows Road, Stonehenge, NSW

I refer to the above DA and wish to express my objections to the proposed Feedlot in its present location, being within 2-3kms south of my residence.

Firstly, I would like to enquire as to why this DA is not earmarked as a Staged Development as the Applicant clearly states it will be carried out in two stages, initially for 300 head of cattle with the remaining construction being developed at a later date. Could this also be a Designated Development?

Secondly, to my knowledge, Stonehenge Road has not been zoned for B-Double trucks regardless of their size. The applicant states he intends to have such trucks coming into and going out of his property. Bearing in mind the outgoing trucks will have maximum weight on board who is going to be responsible to maintain Stonehenge Road to survive these movements over time. NOT the residents!!

The SEE states the property's lowest point is in the northwest adjacent to Beardy Waters with the slope across the site as 3% in a northerly direction. That means odour, dust and noise will mostly travel in my direction with S-SE winds being a frequent occurrence in Stonehenge. Q Fever can travel up to 8kms around the site which means the sensitive receptors identified in the SEE are too close and will put the local residents in jeopardy of this very nasty disease which emanates from cattle, sheep and goats.

My only source of water is from my rooftop into my water tanks. Any fallout from the feedlot blown in my direction means my water will be contaminated. I do not have access to the town's water treatment plant to purify whatever is going to land on my roof. To say the water will be safe for Glen Innes residents is a nonsense because I am one of them and my drinking water is at risk.

Our Mayor quite clearly believes in climate change and as stated in the Glen Innes Examiner on Thursday, 19 November 2020 "Scientists are quite clear we shall experience more catastrophic fire weather, hotter temperatures, and that rainfall is declining in our region. She allegedly stated "the long term health and prosperity of Glen Innes' families, farmers and businesses relies on urgent climate action."

Bearing this in mind, how does the Council think a 1,000 head Feedlot, by three times per annum, i.e. 3,000 head, will remain safe, clean and not pollute the town's only source of drinking water with the Applicant's land sloping downward towards Beardy Waters. We have this year received almost 1,000 mls of rain to date. What would this amount of rain do for the drying of the Feedlot pads.?

I draw your attention to Page 13, Clause 2.5.1.1 of the SEE which states "soils on the property are identified as Land and Soil Capability (LSC) Class 3, 4 and 6 (Table 3, Figure 5). Class 3 and 4 land is suitable for cropping and grazing with appropriate land management practices. Class 6 land is generally, highly limited for agricultural production. Satellite imagery indicates the presence of exposed granite in areas south of the feedlot site. This indicates shallow, rocky soil. LSC classes do not account for the suitability of the land to be used for intensive livestock activities such as the proposed feedlot and are focussed on more extensive livestock or plant production activities."

Furthermore it states "The Feedlot site is mapped as LSC Class 6 land with the feedlot site being located on the lower slopes of this land. Current land management practices indicate this area is suitable for improved pastures".

Under Table 3 LSC Class 6 clearly states "Land has very high limitations for high-impact land uses. Land use is restricted to low-impact land uses such as grazing, forestry and nature conservation. Careful management of limitations is required to prevent severe land and environmental degradation."

My question to you and to our Councillors is, do you honestly believe you are sufficiently qualified to correctly assess this DA? Past experience has proven Council have been grossly inadequate with their assessment. I firmly believe this DA should be referred to the DPI, EPA, and Independent Planning Commission for their assessment before any decision can be made.

I would like to remind Councillors it is their role as Facilitators between Council and Ratepayers to not simply "rubber stamp" Council's recommendation but to think for themselves and to question the viability of this Feedlot. Having a closed session prior to the livestreaming of Council's monthly meeting is inadequate and could not be described as being transparent. The people (Ratepayers) of this town deserve a better quality Council than they have previously been forced to accept. It is time for the people of this town to be given their due consideration as a majority. This feedlot by its own statement will only employ **one** casual, part time worker other than during construction. Where then is the long term benefit to this community?

Yours faithfully

Cc: Carol Sparks
Col Price
Steve Toms
Glenn Frendon

Diane Newman Andrew Parsons Graham Price Geoff Smith

GLEN INNES SEVERN COUNCIL
Received by Records

25 NOV 2020

The General Manager Glen Innes Severn Council.

FOR INFORMATION MCPS TP.

ation number 25/20-21 re proposed feedlot at

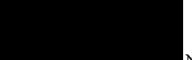
Issue: Objection to Development Application number 25/20-21 re proposed feedlot at 34 Pedlows Road, Stonehenge.

I declare that I have received or made any political donations or gifts in relation to the lodging of my objections to this development application.

and I own two properties in the direct area of the proposed feedlot. Both these properties rely on tank water only for our drinking water. In recent years we have had our water contaminated by silt from dust storms and ash particles from bushfires. This either left our water discoloured or smelling of smoke which was carried by the wind to our tanks. We are very concerned that air born pathogens could also be carried to our drinking water tanks from the feedlot. I am also concerned that on hot days or when the wind is blowing in the wrong direction our home is going to get the full impact of the odours produced by the feedlot. I believe it is nonsense to say that feedlots do not smell and that those smells are carried by the prevailing winds to the other areas.

There is also the situation with possible contamination into the town's water supply via the catchment where the proposed feedlot is to be built. My family have lived at Glen Innes (which is very close to the proposed feedlot) since I was a child. In that time I have witnessed flood waters right across this catchment area. I do not believe that the proposals come close to keeping effluent and other waist out of the water catchment in the time of floods.

I am also concerned that there has not been enough consideration and planning given in relation to the impact of large cattle truck and other service vehicles entering and leaving the proposed sight.



NSW 2370

GLEN INNES SEVERN COUNCIL

2 5 1137 2920

FOR ACTION.

TSO

To: The General Manager Glen Innes Severn Council.

Re: Objection to Development Application Number 25720-21 Phroposed feed lot at 34 Pedlows Road, Stonehenge.

As required by amendments to Local Government and Planning Legislation I make a public disclosure that I am not in receipt of or have made any political donations or gifts in relation to lodging this or any other development proposal.

My objections to this proposal are as follows:

- and I own two properties in the immediate area affected by this proposal. Both these properties rely solely on rainwater tanks for our drinking water as well as all other household use. One of these properties we currently reside at and we are shortly planning to build a dwelling on the second property for the family. I am very concerned about the risk of air-born contaminants entering our drinking water supply. In the past we have had dust storms blowing in from out west which deposited large amounts of silt in our water tanks causing the water to turn brown. We have also had fine ash particles from the recent bushfires which left our drinking water smelling and tasting like burnt ash. Both these events deposited sediment into our drinking water and travelled at a much greater distance from us than anything coming from the proposed feed lot. Can the applicant or the council give me a 100% guarantee that there will be no risk to my family's health due to air-born contamination of our drinking water? If such an incident were to occur from whom could we seek redress? Would it be the applicant, the council itself or the individual councillors who voted in favour of this development?
- We purchased our home and second property in the hope of seeing our investment grow for our family and our future retirement within this community. The feedlot and problems associated with it such as smell and air-born contamination will have a negative impact on the value of our investment.
- 3. Any feedlot will produce an unacceptable amount of odour for those living in the immediate area. People living near Rangers Valley feedlot say that they can smell the feedlot on certain days? At one time I frequently travelled the road to Beaudesert in Queensland and I can assure you that I could quite easily tell when I was nearing the township of Beaudesert by the horrific odour produced by the feedlot that was situated just outside the town. But we are asked to believe that unlike other feedlots this proposed feedlot will not produce any undue odours. I believe that this is simply not true.
- 4. I believe there has been an underestimation of the suggested impact of traffic flow expected on that section of the New England Highway caused by the movement of vehicles entering and leaving the site. I believe that the development application had underestimated or glossed over the actual impact of traffic in the immediate area.

- 5. Given recent drought conditions and the fact that those conditions are very likely repeatable in a country like Australia I believe that this development application has underestimated the amount of water required for this operation. If that is the case where does the developer believe this extra water will come from? On the other side of the coin Glen Innes and the surrounding area has been impacted by floods in the past. Having worked in this LAC as a police officer for a number of years I have direct knowledge of the severity of flooding and its impact on the township and surrounding areas, as I hope would every member of the elected councillors. When such an event occurs as it will inevitably do what will stop all those waste products from the feedlot being deposited into the town drinking water catchment.
- 6. It is an unescapable fact that the applicant's property is situated in the town's drinking water catchment and while normal agricultural practices may have a low element of risk to the town water supply the proposed feedlot increases that risk exponentially by the very nature of its location. The community rely on our council members to act in a responsible manner to safeguard the health of this community and one of the most fundamental issues is the integrity of our town water supply. There are very clear guidelines in relation to acceptable distances and positioning of such ventures to drinking water catchments and I cannot believe that elected council members themselves are not mindful of their obligations in this regard.
- 7. I am concerned at the speed that council appears to be attempting to rush through this application with very minimal time for discussion or debate by this community considering the monumental impact it may have. If as we are being led to believe there are no major issues then why the rush to get this application through without full and frank discussion by the community that this council is elected to represent.
- 8. I also believe there has been argument about council's failure to zone the blocks in the immediate area as RU1 instead of R5 as not all blocks are over a certain size. This would have a detrimental affect on those ratepayers in the area of the proposed development. If that is so then the council has an obligation to correct any of their prior mistakes or oversights before any further development applications should be considered. Council made the decision to allow the sub-division's in the area near the proposed feedlot. Members of this community invested their time and hard earned money into their homes on those subdivisions. I do not believe that council is acting in good faith and with the best intentions to those same ratepayers by allowing such a development to be dropped in the middle of what has now become a residential area.
- 9. I am concerned about the timing of both applications just prior to Christmas at a time when members of the community a busy preparing for the festive season and not really thinking about writing objections to a feedlot. Given that it is such an important issue for this community I am very surprised that council has not made a greater effort to gauge the feeling in the community. I have spoken to dozens of community members and have only found three who supported the idea and one of those three was the applicant himself. Surely if I can canvas people's views on such an important issue for this community than council could have conducted a similar survey without requiring people to go to the trouble of making written objections. Council now requires a public disclosure about not being in receipt of any donations. Will any

- objections without this disclosure be culled in a similar way that 255 legal objections to the first application were culled down to 15?
- 10. I have concerns that there may be a perceived conflict of interest with some elected councillors having a potential conflict of interest by way of a close relationship with the applicant. If that is so, have any councillors made known this conflict or recused themselves from voting?
- 11. In considering this application it appears that the council is at odds with its own goals and expenditures to develop a tourist industry in this community. I cannot believe that council would ask businesses and ratepayers to donate their effort and money into developing a tourism industry only to have council members vote to place a smelly feedlot at the entrance to the town allowing tourists and visitors to get a good whiff of our local country air.
- 12. With reference to the location of this proposed development I am interested to know if the EPA has been consulted by council about this application, given the possible health issues which could affect this community. As a ratepayer I would request that if the council has not already taken the prudent step of forwarding a copy of this DA application to the EPA for their advice/assessment that the council immediately seek advice from the EPA to ensure they are fully apprised of any potential problems and dangers. A copy of the EPA report should also be made public prior to any further consideration of this application.

GLEN INNES NSW 2370

GLEN INNES SEVERN COUNCIL

2 5 1 2020

FOR ACTION

TSO

To: The General Manager Glen Innes Severn Council.

Re: Objection to Development Application Number 25720-21 Phroposed feed lot at 34 Pedlows Road, Stonehenge.

As required by amendments to Local Government and Planning Legislation I make a public disclosure that I am not in receipt of or have made any political donations or gifts in relation to lodging this or any other development proposal.

My objections to this proposal are as follows:

- 1. and I own two properties in the immediate area affected by this proposal. Both these properties rely solely on rainwater tanks for our drinking water as well as all other household use. One of these properties we currently reside at and we are shortly planning to build a dwelling on the second property for the family. I am very concerned about the risk of air-born contaminants entering our drinking water supply. In the past we have had dust storms blowing in from out west which deposited large amounts of silt in our water tanks causing the water to turn brown. We have also had fine ash particles from the recent bushfires which left our drinking water smelling and tasting like burnt ash. Both these events deposited sediment into our drinking water and travelled at a much greater distance from us than anything coming from the proposed feed lot. Can the applicant or the council give me a 100% guarantee that there will be no risk to my family's health due to air-born contamination of our drinking water? If such an incident were to occur from whom could we seek redress? Would it be the applicant, the council itself or the individual councillors who voted in favour of this development?
- 2. We purchased our home and second property in the hope of seeing our investment grow for our family and our future retirement within this community. The feedlot and problems associated with it such as smell and air-born contamination will have a negative impact on the value of our investment.
- 3. Any feedlot will produce an unacceptable amount of odour for those living in the immediate area. People living near Rangers Valley feedlot say that they can smell the feedlot on certain days? At one time I frequently travelled the road to Beaudesert in Queensland and I can assure you that I could quite easily tell when I was nearing the township of Beaudesert by the horrific odour produced by the feedlot that was situated just outside the town. But we are asked to believe that unlike other feedlots this proposed feedlot will not produce any undue odours. I believe that this is simply not true.
- 4. I believe there has been an underestimation of the suggested impact of traffic flow expected on that section of the New England Highway caused by the movement of vehicles entering and leaving the site. I believe that the development application had underestimated or glossed over the actual impact of traffic in the immediate area.

- 5. Given recent drought conditions and the fact that those conditions are very likely repeatable in a country like Australia I believe that this development application has underestimated the amount of water required for this operation. If that is the case where does the developer believe this extra water will come from? On the other side of the coin Glen Innes and the surrounding area has been impacted by floods in the past. Having worked in this LAC as a police officer for a number of years I have direct knowledge of the severity of flooding and its impact on the township and surrounding areas, as I hope would every member of the elected councillors. When such an event occurs as it will inevitably do what will stop all those waste products from the feedlot being deposited into the town drinking water catchment.
- 6. It is an unescapable fact that the applicant's property is situated in the town's drinking water catchment and while normal agricultural practices may have a low element of risk to the town water supply the proposed feedlot increases that risk exponentially by the very nature of its location. The community rely on our council members to act in a responsible manner to safeguard the health of this community and one of the most fundamental issues is the integrity of our town water supply. There are very clear guidelines in relation to acceptable distances and positioning of such ventures to drinking water catchments and I cannot believe that elected council members themselves are not mindful of their obligations in this regard.
- 7. I am concerned at the speed that council appears to be attempting to rush through this application with very minimal time for discussion or debate by this community considering the monumental impact it may have. If as we are being led to believe there are no major issues then why the rush to get this application through without full and frank discussion by the community that this council is elected to represent.
- 8. I also believe there has been argument about council's failure to zone the blocks in the immediate area as RU1 instead of R5 as not all blocks are over a certain size. This would have a detrimental affect on those ratepayers in the area of the proposed development. If that is so then the council has an obligation to correct any of their prior mistakes or oversights before any further development applications should be considered. Council made the decision to allow the sub-division's in the area near the proposed feedlot. Members of this community invested their time and hard earned money into their homes on those subdivisions. I do not believe that council is acting in good faith and with the best intentions to those same ratepayers by allowing such a development to be dropped in the middle of what has now become a residential area.
- 9. I am concerned about the timing of both applications just prior to Christmas at a time when members of the community a busy preparing for the festive season and not really thinking about writing objections to a feedlot. Given that it is such an important issue for this community I am very surprised that council has not made a greater effort to gauge the feeling in the community. I have spoken to dozens of community members and have only found three who supported the idea and one of those three was the applicant himself. Surely if I can canvas people's views on such an important issue for this community than council could have conducted a similar survey without requiring people to go to the trouble of making written objections. Council now requires a public disclosure about not being in receipt of any donations. Will any

objections without this disclosure be culled in a similar way that 255 legal objections to the first application were culled down to 15?

10. I have concerns that there may be a perceived conflict of interest with some elected councillors having a potential conflict of interest by way of a close relationship with the applicant. If that is so, have any councillors made known this conflict or recused themselves from voting?

11. In considering this application it appears that the council is at odds with its own goals and expenditures to develop a tourist industry in this community. I cannot believe that council would ask businesses and ratepayers to donate their effort and money into developing a tourism industry only to have council members vote to place a smelly feedlot at the entrance to the town allowing tourists and visitors to get a good whiff of our local country air.

12. With reference to the location of this proposed development I am interested to know if the EPA has been consulted by council about this application, given the possible health issues which could affect this community. As a ratepayer I would request that if the council has not already taken the prudent step of forwarding a copy of this DA application to the EPA for their advice/assessment that the council immediately seek advice from the EPA to ensure they are fully apprised of any potential problems and dangers. A copy of the EPA report should also be made public prior to any further consideration of this application.

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24th November 2020

General Manager Glen Innes Severn Council PO Box 61 Glen Innes 2370 GLEN INNES SEVERN COUNCIL
Received by Records

2 I. 100. 2020

FOR ACTION:

FOR INFORMATION :

Dear Mr Bennett,

Re: DEVELOPMENT APPLICATION NUMBER 25/20-21 Pedlow's proposed 1,000 head cattle feedlot.

Developments of this type under the current zoned classification require community consultation. Is this the community consultation process, how long will the consultation process be and what process is in place to communicate with our community?

Given that this proposal follows from an earlier abandoned attempt do the previous objections still stand or do they have to be resubmitted? I previously provided a letter outlining specific health-related objections to the proposed feedlot. As the Council continues to correspond with me on this matter I am of the understanding that there is some acceptance of potentially unfavourable health outcomes from this development. As such, it would seem to me that just communicating with a limited adjacently located group of Glen Innes Severn Shire citizens is inadequate as the whole township is potentially affected disadvantageously.

The environmental statement attached to the proposal carries quite a few errors with regard to accuracy. For example, residents who have purchased adjacent land prior to this proposal and would now have to live in a close by location seeing, smelling and hearing the feedlot functioning. The environmental statement makes no effort at all to explain how this type of facility can be accommodated in our water catchment in such a way as to guarantee that no contamination of our water supply will occur. There are numerous known zoonoses related to livestock management. Surely prudence would encourage proper protection of our water supply in this regard. This might be understood in the context of Covid 19. This is a new and previously unknown human pathogen. Situations evolve and plans need to include contingency management of the unexpected but quite possible developments.

Covid 19 has also generated considerable discussion regarding the negative impacts that can arise by way of impaired mental health due to anxiety, stress and depression. Even in our relatively unaffected area of Glen Innes Severn Shire I have had quite a few consults with patients who are not coping well with this situation. Surely it must be understood that repetitive vicarious development proposals of this type can have a similar effect.

Yours faithfully,

Political Donations and Gifts Disclosure Statement

Political Donations and Gifts Disclosure to Council

If you are required under section 147(4) or (5) of the Environmental Planning and Assessment Act 1979 to disclose any political donations or gifts (see page 1 for details), please fill in this form and sign below.

Disclosure Statement Details

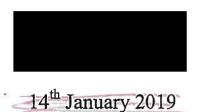
By signing below, I/we hereby declare that all information contained within this statement is accurate at the time of signing.

Nam	
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Date:	24.11.20
Signature(s): Date:	
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The General Manager Glen Innes Severn Council Grey Street Glen Innes 2370



Dear Sir,

Regarding DA 112/2018 Feedlot Stonehenge

Fundamentally I think that this is an ill-advised proposal.

My reasoning is as follows:

Potential risks to the town water supply.

Despite whatever measures are undertaken to water down surfaces a considerable amount of dust will potentially be generated.

Winds from the south east of Glen Innes occur approximately 10% of the time. Dust from feedlots and sale yards have been shown to carry increased concentrations of E.Coli bacteria. Many residents of the area collect rainwater for drinking. There is a possibility therefore of particulate and bacterial contamination. Q fever, similarly, is associated with such facilities. Although the employees of the site can be largely protected by vaccination the non-vaccinated cannot. Q-fever is considered an environmental rather than just an occupational disease.

Studies have been undertaken regarding the greatly increased fly populations associated with these facilities. This matter is considered as significant by feedlot managements and can be very difficult to control satisfactorily.

The MLA has a publication regarding water consumption by feedlots. A 1,000 animal site would require approximately 24 mega litres annually. This volume can be imagined as a 10m wide creek that is 1m deep and 2.4km long. Are not our water resources above and below the ground already under stress?

Talking with residents at Emmaville will provide the information that at times the Ranger's Valley feedlot provides malodorous contamination of the air over the township.

The proposed route/access will result in road surface damage the cost of which will fall back upon the rate payers.

A feedlot of this nature is viewed as industrial agriculture. There are many reasons why it is a poor option for producing beef.

Finally, as a local medical practitioner I would advise that if a feedlot were to come into existence as per the proposal then it would be time to consider whether continuing residence in Glen Innes was appropriate.

(If required, references can be provided to validate these comments other then the road issue which is an opinion).

Yours sincerely,



cc: Copy sent to Mayor of Glen Innes Severn Council Glen Innes Examiner

Sent:

Tuesday, 24 November 2020 10:13 PM

To:

Council Email

Subject:

Objection Letter - DA 25/20-21 - Jardana Feedlot - 34 Pedlows Rd

Attachments:

20-21 Objection Letter -

Hello,

Please find attached my objection Letter for DA 25/20-21 - Jardana Feedlot - 34 Pedlows Rd.

I will also deliver a paper copy of my letter to the Grey St office tomorrow.

Kindest Regards,

Monday, 23 November 2020

The General Manager Glen Innes Severn Council Email: council@gisc.nsw.gov.au

Dear Sir or Madam.

RE: Objection Letter - DA 25/20-21- Jardana Feedlot - 34 Pedlow Road Stonehenge

This is the 3rd Feedlot development application the Glen Innes residents are objecting to, the location is incompatible with the Drinking Water Catchment for the town, it is in too close proximity to residential homes and tourist sites and is highly visible from homes and the highway. The SOEE states that there are existing trees offering visual screening, this is not the case. The proposed site can be seen from Stonehenge Road, the Highway and from residential properties surrounding it. It is a consideration that full grown mature trees be planted to offer screening so the amenity of the site can be maintained, that juvenile or native trees not be used as the PH of the soil will not allow native trees to grow significantly and juvenile trees will take 10-15 years growth to provide any of the required screening.

Glen Innes Severn Council have known and acknowledged that the LEP is lacking protections for the *Drinking Water Catchment* but have yet to update the LEP to protect the towns water as other Council's and the greater Sydney water catchment (Sydney Water) have done. Council are choosing not to adopt the DPI's guidelines suggesting an 800-metre buffer from intensive livestock agriculture, to Potable Water Supply Catchment, that is 800-metres outside a Drinking Water Catchment. Community protection is the responsibility of Council. The proposed site is NOT suitable.

With the prevailing winds coming up the valley and through town, I hold concern regarding the detrimental effects of air quality in and around the town and to residential properties close to the site, of which there is a significant number. The proposed site is only 6km from town, what guarantees, and safeguards are provided that the feedlot will maintain good practices and protect residential houses in the 3 subdivisions surrounding the DA site. I hold concerns over Q-Fever, if there was to be an outbreak, it has been proven in other outbreak cases that it, Q-Fever, can be contracted when carried in dust on the wind up to 2 km from an outbreak site. These are serious health concerns that I feel are not being considered adequately by Council. It would be negligent of council to approve this DA with the possibility of future legal repercussions stemming from health issues that are could be caused by this application.

Traffic at the Stonehenge turnoff from the New England Highway to enter the feedlot site has not been considered by the SOEE. Safety and the flow of traffic needs consideration, there will be an increase of traffic, by way of large B Double cattle trucks needing to slow to then turn left and right across traffic into Stonehenge Road to access the feedlot. Currently it is one lane on The New England Highway north and south bound, trucks needing to turn will slow traffic from 100km significantly. Consultation pertaining to The New England highway should be a consideration of Council, The New England Highway is State with Stonehenge Road a consideration of Local Council. Consultation with State or RMS pertaining to the proposed development should be made for the safety of roads into Glen Innes. I feel a second lane should be installed for this additional traffic so large cattle trucks needing to turn into Stonehenge Road to access the proposed feedlot can do so safely without impacting the safety of other vehicles.

The known risk to the residents of Glen Innes, surrounding properties and visitors to the area is to great and the prosed site is not the appropriate place for a feed lot of any size.

Kind Regards

References: "DPI Living and Working in Rural Areas" - table 6 - Page 90

Sent:

Tuesday, 24 November 2020 12:44 PM

To:

Council Email

Subject:

1000 Feedlot DA at Stonehenge

As an Aboriginal woman and a Ngoorabul descendent who was born, raised and lived most of my life in Glen Innes, I object to the approval of the DA application from Jardana Pty Ltd for a 1000 Head Feedlot at Stonehenge being approved by the GISC unless an onground Aboriginal Cultural Sites Assessment is completed prior to approval.

Thanks

Get Outlook for Android

Sent:

Tuesday, 24 November 2020 12:43 PM

To:

Council Email

Cc:

Carol Sparks; Dianne Newman; Glenn Frendon; Andrew Parsons; Colin Price; Jeffrey

Smith; Steve Toms

Subject:

FAO Craig Bennett, General Manager & GISC Councillors

Dear Craig, Mayor, Deputy Mayor and GISC Councillors,

Re: Development Application No. 25/20-21; Applicant: Jardana Pty Ltd; Development: 1,000-Head Cattle Feedlot

Apart from my personal objection to feedlots in general on environmental and humanitarian grounds; and major concerns I have about water and soil contamination so close to Glen Innes and its water supply, I have looked at the DA and the Statement of Environmental Effects for this DA, and I have detailed concerns about two issues:-

(1) Aboriginal Cultural Heritage

The applicant has indicated there will be extensive excavation of this property, which is why the environmental statement rightly looks at the possibility of significant Aboriginal cultural heritage impacts, yet concludes there is "low" probability of discovering Aboriginal cultural heritage in the application's lifetime. "Low" is not "none" or "no" and I suggest that council request the applicant commission a complete Aboriginal Cultural Heritage Assessment of the site and surrounding areas, particularly of the entire Beardy Waters region in a similar manner to the studies conducted on Burragorang region, from Warragamba Dam to the headwaters of the entire catchment. See attached submission around another water-related matter in

NSW: https://www.parliament.nsw.gov.au/lcdocs/submissions/64951/0015%20Dr%20Jim%20Smith.pdf. <a href="https://www.parliament.nsw.gov.au/lcdocs/submissions/gov.au

(2) Bushfires

The applicant has indicated there is no risk of bushfires to this development on the basis of a lack of flammable vegetation. This can hardly be ascertained at this stage by council, an environmental statement, or the applicant, particularly in a fire season already widely noted by fire authorities to be at increased risk of grass fires. See this report: <a href="https://www.gleninnesexaminer.com.au/story/6861103/six-areas-begin-bush-fire-danger-period-early-in-www.gleninnesexaminer.com.au/story/6861103/six-areas-begin-bush-fire-danger-period-early-in-www.gleninnesexaminer.com.au/story/6861103/six-areas-begin-bush-fire-danger-period-early-in-www.gleninnesexaminer.com.au/story/6861103/six-areas-begin-bush-fire-danger-period-early-in-www.gleninnesexaminer.com.au/story/6861103/six-areas-begin-bush-fire-danger-period-early-in-www.gleninnesexaminer.com.au/story/6861103/six-areas-begin-bush-fire-danger-period-early-in-www.gleninnesexaminer.com.au/story/6861103/six-areas-begin-bush-fire-danger-period-early-in-www.gleninnesexaminer.com.au/story/6861103/six-areas-begin-bush-fire-danger-period-early-in-www.gleninnesexaminer.com.au/story/6861103/six-areas-begin-bush-fire-danger-period-early-in-www.gleninnesexaminer.com.au/story/6861103/six-areas-begin-bush-fire-danger-period-early-in-www.gleninnesexaminer.com.au/story/6861103/six-areas-begin-bush-fire-danger-period-early-in-www.gleninnesexaminer.com.au/story/6861103/six-areas-begin-bush-fire-danger-period-early-in-www.gleninnesexaminer.com.au/story/6861103/six-areas-begin-bush-fire-danger-period-early-in-www.gleninnesexaminer.com.au/story/6861103/six-areas-begin-bush-fire-danger-period-early-in-www.gleninnesexaminer.com.au/story/6861103/six-areas-begin-bush-fire-danger-period-early-in-www.gleninnesexaminer.com.au/story/6861103/six-areas-begin-bush-fire-danger-period-early-in-www.gleninnesexaminer.com.au/story/6861103/six-areas-begin-bush-fire-danger-period-early-in-www.gleninnesexaminer.com.au/story/6861103/six-areas-begin-bush-fire-danger-period-early-in-www.gleninnesexa

Council can hardly be unaware of significant community concerns around this feedlot, primarily about its proximity to water supplies and to town. The applicant has indicated there will be <u>no economic impact</u> on the region (either positive or negative) and result in temporary employees for construction, with the possibility of one full-time employee after that.

The personal gain of one applicant versus the ongoing enjoyment of feedlot-free community amenity in and around the Beardy Waters <u>must be duly weighed up when deciding to approve this application, please.</u>

Yours sincerely,

(Ratepayer at:

Deepwater, NSW 2371; and

Glen Innes, NSW 2370)

Sent:

Tuesday, 24 November 2020 12:53 PM

To:

Council Email

Subject:

Proposed cattle feedlot

To the General Manager,

I am horrified to hear that council is considering a feedlot so close to Glen Innes. Consider the smell that would come from this. And being on the south west side of Glen innes the smell would blow through the whole town. Then there would be the noise of cattle mooing day and night, also carried on the wind. I can testify to this, as I live in Glencoe, and when the local farmers pen their cattle in the paddocks nearby the noise and the smell can be very bad when the wind blows in our direction. Now I am not complaining about this at the disruption if only for short periods but to have a cattle feedlot so close to residents and town is alarming.

What about tourism, Glen Innes relies a lot on this. Imagine driving into Glen Innes and being greeted with the wonderful smell of cattle poo. I would just keep driving and not stop. The Celtic Festival would be affected by this. I nighly likely as the wind blows from the south in May.

Pollution of the water catchment should be enough to refuse this application. As we know our water is most precious and this feed lot would be in the catchment area.

And well a biosecurity hazzard, that goes without saying.

Then there is the humane side of feed lots. Cattle force fed grains suffer from all sorts of indigestion problems as this is not their usual food, including excess methane. The poor animals being shut up and force fed. Any caring person could see this is not a natural form of farming. Why help perpetuate animal misery, we have enough of that already with chicken and pigs being intensively farmed.

I urge council to refuse this development application and protect the residents of Glen Innes. regards,

Sent: Tuesday, 24 November 2020 12:26 PM

To:

Council Email

Subject:

Objection to Development Application No. 25/20-21

Att: General Manager

Dear Mr Bennett,

I'm writing to voice my opposition to Development Application No. 25/20-21.

I strongly oppose this development both on environmental and ethical grounds.

Feedlot operations are a cruel and unnecessary part of rearing livestock for consumption and I do not condone them in any way.

This particular development is completely inappropriate also due to its proximity to a town water supply which will at real risk of contamination.

Plus, the visual impact and smell will affect residents and tourists (according to the environmental report) ... welcome to Glen Innes!

There is NO benefit to the local community (according to the report).

It is a mistake to interpret a lack of vocal community opposition to this proposed development. I'm sure you're aware that the general public are largely unaware of their rights and obligations, uninspired by their leaders, and over compliant.

The council has an obligation to act on behalf of the entire community, not just those with greater funds and influence... and in these times of great change, old thinking and a "she'll be right" attitude just aren't good enough!

This is the sort of issue that has motivated me (and others I believe) to run for council in the next election. I don't have faith in the current lineup to act in the best interests of our community.

Please include my name and objection in any discussion with Councillors.

hope that good sense will prevail and that approval for this application is denied.

Kind regards.

Sent from my iPhone

GLEN INNES SEVERN COUNCIL Received by Records

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FOR INFORMATION

FOR ACTION: MRPS / TP

24.11.2020

To the Glen Innes Severn Council Once again I Bodge a protest against the proposed bud-lor at Stonehenge known as Tardana Phy Eld. It is too close to the Beardy River + 100 chosen to the Town. The oder from traped. Pos the dust it will neath will be deremental to the town + district The Beardy flows along the Boundry of Many property & Jean See, from my back gate, where the bred-108 will be Wedo NOT want another feed-lot in oin district, Raspeis Valley is sufficient for our area. yours sincerty

Att. General Manager GISC

Re Feedlot Development Application 11/2020. Lot 1, 34 Pedlow's Rd Stonehenge.

I OBJECT TO THIS DEVELOPMENT

GLEN INNES SEVERN COUNCIL
REceived by Records

2 (12. 232)

FOR ACTION: TSO
FOR INFORMATION: MRPS TP

This proposed development contravenes NSW legislation. Here's the relevant section of your own (GISC) Local Environment Plan.

5.18 Intensive livestock agriculture

- (1) The objectives of this clause are-
 - (a) to ensure appropriate environmental assessment of development for the purpose of intensive livestock agriculture that is permitted with consent under this Plan, and
 - (b) to provide for certain capacity thresholds below which development consent is not required for that development subject to certain restrictions as to location.
- (2) This clause applies if development for the purpose of intensive livestock agriculture is permitted with consent under this Plan.
- (3) In determining whether or not to grant development consent under this Plan to development for the purpose of intensive livestock agriculture, the consent authority must take the following into consideration—
 - (a) the adequacy of the information provided in the statement of environmental effects or (if the development is designated development) the environmental impact statement accompanying the development application,
 - (b) the potential for odours to adversely impact on the amenity of residences or other land uses within the vicinity of the site,
 - (c) the potential for the pollution of surface water and ground water,
 - (d) the potential for the degradation of soils,
 - (e) the measures proposed to mitigate any potential adverse impacts,

- (f) the suitability of the site in the circumstances,
- (g) whether the applicant has indicated an intention to comply with relevant industry codes of practice for the health and welfare of animals,
- (h) the consistency of the proposal with, and any reasons for departing from, the environmental planning and assessment aspects of any guidelines for the establishment and operation of relevant types of intensive livestock agriculture published, and made available to the consent authority, by the Department of Primary Industries (within the Department of Industry) and approved by the Planning Secretary.
- (4) Despite any other provision of this Plan, development for the purpose of intensive livestock agriculture may be carried out without development consent if—
 - (a) the development is of a type specified in subclause (5), and
 - (b) the consent authority is satisfied that the development will not be located—
 - (i) in an environmentally sensitive area, or
 - (ii) within 100 metres of a natural watercourse, or
 - (iii) in a drinking water catchment, or
 - (iv) within 500 metres of any dwelling that is not associated with the development, or a residential zone, or
 - (v) if the development is a poultry farm—within 500 metres of another poultry farm.
- (5) The following types of development are specified for the purposes of subclause (4)—
 - (a) a cattle feedlot having a capacity to accommodate fewer than 50 head of cattle,

- (b) a goat feedlot having a capacity to accommodate fewer than 200 goats,
- (c) a sheep feedlot having a capacity to accommodate fewer than 200 sheep,
- (d) a pig farm having a capacity to accommodate fewer than 20 breeding sows, or fewer than 200 pigs (of which fewer than 20 may be breeding sows),
- (e) a dairy (restricted) having a capacity to accommodate fewer than 50 dairy cows,
- (f) a poultry farm having a capacity to accommodate fewer than 1,000 birds for meat or egg production (or both).
- (6) For the avoidance of doubt, subclause (4) does not apply to development that is prohibited or that may be carried out without development consent under this or any other environmental planning instrument.
- (7) In this clause—

environmentally sensitive area has the same meaning as in clause 1.5 of State Environmental Planning Policy (Exempt and Complying Development Codes) 2008.

residential zone means Zone RU4 Primary Production Small Lots, Zone RU5 Village, Zone RU6 Transition, Zone R1 General Residential, Zone R2 Low Density Residential, Zone R3 Medium Density Residential, Zone R4 High Density Residential, Zone R5 Large Lot Residential, Zone B4 Mixed Use, Zone B6 Enterprise Corridor, Zone E3 Environmental Management or Zone E4 Environmental Living.

What part of 'Part (4) (b) (iii)' is so difficult for you to understand?



23.11.2020

Sent:

Tuesday, 24 November 2020 10:41 AM

To:

Council Email

Subject:

Development Application Number 25/20-21

Attachments:

3061_001.pdf

Dear Sir,

Please find attached our letter regarding the above Development Application

Kind regard



This email message and any accompanying attachments may contain information which is commercially confidential and/or is subject to legal privilege. If you are not the intended recipient, do not read, use, disseminate, distribute or copy this message or attachments. If you have received this message in error, please notify the sender immediately and delete this message. Before opening any attachments, please check them for viruses and defects.



330 Grey Street PO Box 133 Glen Innes NSW 2370 DX 6051 Glen Innes

T 02 6732 1777 F 02 6732 3208

E mail@listonlegal.com.au www.listonlegal.com.au

Our Ref:

WHL:DMB:16063

23 November 2020

The General Manager Glen Innes Severn Council PO Box 61 GLEN INNES NSW 2370

Email: council@gisc.nsw.gov.au

Dear Sir

RE:

DEVELOPMENT APPLICATION NUMBER: 25/20-21 PROPERTY: 34 PEDLOWS ROAD, STONEHENGE

We act on hehalf of adjoins the property referred to in the above development application.

The executor, behalf.

objection concerns the pollution risks to the Beardy River in wet times and possible overflow of pollutants onto itself.

In addition, he cites smells and is particularly concerned about when the wind is from the east and south-east.

Finally, a is also concerned about a possible decline in value of the property as a result of the feedlot next door.

Yours faithfully
LISTON LEGAL

WH Liston
Principal
wliston@listonlegal.com.au



Bill and Staff wish you the compliments of the season and advise that this office will close Wednesday 23 December 2020 at 5:00pm and re-open Monday 11 January 2021 at 9:00am.

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To the General Manager.

I strongly object to the approval of the proposed deedlot at Itanehenge. This feedlot will have a detrimental affect on Glen lanes: by affecting the air, water, the smell will affect townism and feeture home owners. It will be a biologand to our community and the tatepayers. The location of the feedlot will detrimental to the economy in losses in some areas to residental property values and land value. Many enimals will be impacted to the proposed feel ot and many are already endangered our area needs to be protected and conserved to be enjoyed by the commenty, towists and future generations

RATE PAYER & HOME OWNER.

CLEN INMES SEVERN COUNCIL
Received by Burgards

24 110/ 2020

Submission on DA 25/20-21

I wish to make a submission on DA 25/20-21 for a feedlot at Stonehenge.

FOR ACTION: TSO

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I oppose the granting of approval for this development application TORMATION.

In particular, I am concerned about three aspects of the impact of this development.

1. Animal welfare

The provisions for animal welfare in this application are woefully inadequate.

That anyone would argue there is no need for shade for the cattle in the feedlot beggars belief and is a sure indicator that the welfare of the animals runs a very poor second to the profit motive.

Providing each cow with 18m2 (a large market stall) and no shade can hardly be characterised as caring about the welfare of the animals.

Many people like grain fed beef because it is more tender, but when the truth comes out about production methods people turn away. This is demonstrated through the decision of Coles to move back to selling grass fed beef.

Indeed. Coles Online have advertised:

"GRASS FED INDIVIDUALLY SELECTED TO HIGH STANDARDS 100% AUSTRALIAN BEEF FREE TO ROAM NO ADDED HORMONES."

Woolworths have taken similar steps and include the following product description in their advertisement for mince:

"Woolworths Grass fed Beef comes from free range, pasturefed cattle with no added hormones. This means that they have been raised with the freedom to roam and graze on natural pastures for their entire life."

These companies are not "radical lefties" but hard-nosed business realists. They know the market is shifting and are responding to consumer demands.

City consumers, in particular, where the major markets for fresh produce are, are demanding more from industry. They want quality meat but not at the expense of the animal's welfare.

One has only to look at how fresh food is marketed today with "RSPCA Approved" branding and the focus on "free range" with eggs and other foodstuffs to see that the world has changed.

What all this says is that so-called "old ways" are no longer acceptable. It is no longer good enough to say things like "It has always been done this way" or "But others are doing it". That is the excuse of the naughty child when caught out by a parent or teacher, not the approach of a responsible adult.

2. Changing market and consumer demands

In recent years there has been a move among a growing number of consumers to demand greater transparency from food growers and suppliers about their methods and the treatment of animals raised for food.

Many consumers today are turning away from meat for moral and ethical reasons.

It is no longer good enough just to have a sausage on your plate.

Consumers want to know where their food has come from and how it was produced.

An example of thus is in the case of commercially produced eggs.

Egg producers have been forced to take notice of, and react to this change by moving away from caged chickens to free range.

Investors have also, in recent years, become more active in seeking out ethical and "green" investment opportunities.

This is the way of the future, like it or not.

There will be great changes for meat producers in particular.

Feedlots will need to take far greater account of, and prioritise, animal welfare, or they will become a thing of the past.

The market for meat products is shifting. Consumers are increasingly concerned about the ethical treatment of all farm livestock, in free range eggs, grass fed beef etc.

There has also been a massive growth in ethical investment, reflecting this same cultural shift on the part of investors and consumers.

3. Impact on local community, particularly nearby residents

It is not acceptable that one family should make profits at the expense of the amenity and disadvantage of the rest of the community, especially those living nearby who may be affected by dust, noise and visual impacts.

CONCLUSION

Like in most areas of life, there is usually a right way and a wrong way.

For all the reasons outlined above, we should not allow the building of more cattle feedlots.

This development is the wrong way and should be rejected.

I have made no political donations or gifts in the last two years.



Glen Innes 2370 23/11/2020

THE GENERAL MANAGER GLEN INNES SEVERN COUNCIL

24.11.20.

Dear Sir,

do strongly object to the development of The JARDANA FEEDLOT. STONEHENGE The placement of 1,000 head of cattle at this site will I believe have a very negative impact on our torn's drinking water as well as being a biodiversity hazard to our local farmers & our clean environment

urs sincerely,

GLEN INNES SEVERN COUNCIL

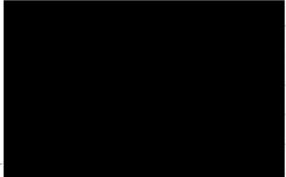
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FOR INFORMATION MRPS

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the object to approval being quin to the construction of a feed lot because it will impact on. yler Innes, towns dienking water ealthment and well have detremental consequences effecting - air, odour, water, visual, moise a Vibration



GHEN INNES 2370



GLEN INNES STAFFIN COUNCIL Received to, Hundre's

2 4 1.07 2020

* 7	Feed lot at Stonehenge.
Dear	council members,
Please, ti	rink about Glen Innes people.
Please, 4h	ink about our water.
Please, H	ink about the smell to nearby
resident	
Please,	it should'nt be so close
to town	
There is	s plenty land to put it away
Joon toli	270.0
	Please consider again.
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	GLEN INNES SEVERN COUNCIL Received by Records
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FOR ACTION: TS O

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22nd November, 2020

Stonehenge, NSW 2370

The General Manager
Glen Innes Severn Council

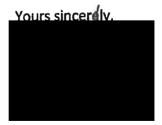
Dear Sir,

I am writing to express my opposition to the lodged development application 25/20-21 lardana Feedlot.

I strongly believe that this proposed development will have a negative impact on the surrounding area and its residents.

- It is of concern that the feedlot will be located in the catchment area of the town's water supply. This is a major environmental consideration.
- The site proposed, being located close to residential areas will have a negative effect on those residents and their lifestyle.
- I fail to see how this development will provide any economic value to current landholders of the area.

I urge council to consider all objections to this development as it is simply in the wrong location. The proposal of the feedlot on this particular site is highly offensive to those who have already purchased in this area.





The General Manager
Glen Innes Severn Council

Dear Sir.

I am writing to express my concern and objection to the lodged development application 25/20-21 Jardana Feedlot.

I strongly believe that this proposed development will have a negative impact on the surrounding area and its residents on a number of levels.

- The environmental impact is of real concern as the feedlot will be situated in the catchment
 of the Glen Innes town water supply. This will have an undesirable effect for all of the town's
 residents.
- 2. The location of the feedlot will have a direct unacceptable impact on the vista and amenity of the area. This is of particular concern given its close proximity to residential areas.
- 3. The constant mournful noise, foul odour and impaired air quality will be detrimental to the local resident's quality of life, mental health and general wellbeing.
- 4. The proposed location is poorly suited to such an enterprise given the effect on tourism and risk of potential accidents on the highway.
- 5. I do not believe that such a facility will provide an adequate economic benefit to the community to justify the negative impacts financially and personally on residents in the immediate area and the ratepayers of Glen Innes Severn local council area.

I urge council to consider all objections to this development with a focus on the health and wellbeing of all of its residents.

Yours sincerely,

CLEN IN LES SEVERN COUNCIL
Received by Records

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DEAR. MANAGER, FOR ACTION

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FOR ACTION: TSO
FOR INFORMATION: MRKS/TP

GLEN, INNES. 23:11:20

I AM TOTALLY AGAINST THIS FEED LOT APPLICATION, BECAUSE IT WILL GIVE GLEN INNES A BAD NAME. EMAGINE TOURISTS STOPPING TO TAKE PHOTOS OF THE BALANCING ROCK FOR INSTENSE. THE SMELL FROM THE FEEDLOT WOULD DETOUR ANYONE FROM COMING BACK. WE CAN AVOID THIS BY STOPPING IT. NOT TO MENTION THE WATER THAT IS SO CLOSE. IT MAKES ME FEEL SICK JUST TO THINK OF IT. WE NEED SO MANY TOURIST TO OUR TOWN SO GLEN CAN PROSPER AND REAP THE BENEFITS FROM THIS. PLEASE STOP THIS APPLICATION AS GLEN INNES POESN'T NEED THIS. IT'S BEEN A VERY BAD 2020 AND WE DON'T NEED THIS TO MAKE THINGS WORSE. I CAN'T UNDERSTAND WHY ANYONE WOULD WANT A FEEDLOT IN THAT POSITION IN THE FIRST PLACE, NOT TO MENTION THE HOMES AND THE FARMERS NEAR BY, THEY WOULD BE AFFECTED BADLY.

TIS A REDICKULOUS
APPLICATION

HE MUST BE MAD

TO EVEN THINK OF IT.

SUBMISSION IN RESPECT OF DA 25/20-21

Applicant: Jardana Pty Ltd

Development: 1,000 Head Cattle Feedlot

CLEN INNES CEVERN COUNCIL
Received by Records

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FOR ACTION: TSO
FOR INFORMATION: MESSATE

FOR INFORMATION: MESSATE

I OPPOSE the granting of approval for this Development Application.

I have made no political donations or gifts in the last two years.

I note that this is, at least, the third Development Application in relation to this proposed development.

A number of aspects of this proposal cause me concern. They include:

- 1. Location within the water catchment area
- 2. Community / Public Interest and Consultation
- 3. Inconsistencies and omissions in the supporting documents
- 4. Local Employment generation (or rather lack of it)
- 5. Environmental factors / Air and Wind
- 6. Surface and Ground Water Issues
- 7. Animal welfare considerations and impacts
- 8. Traffic

1. Location within water catchment area

My first concern relates to the location of the proposed development within the water catchment for the Beardy Waters, the water supply for Glen Innes.

Not only is this development within the water catchment, it is only just over 100m from a watercourse that feeds directly into the Beardy Waters and appears (from the maps and diagrams in the report) to be less than 800m from Beardy Waters at its nearest point. The report also fails to consider another watercourse to the south of the planned feedlot pens that runs directly into Beardy Waters.

The feedlot pens are situated on the top of a hill that runs, on all sides, down to watercourses that feed into the Glen Innes water supply, yet the report considers only the Beardy Waters, and even that in such a minimalistic way as to be totally unacceptable.

The last time an application for this development came before Council one of the issues that came to light was that the Council had never developed a plan of management for the Beardy Waters.

I am astonished that another application for the same development finds us in the same position.

There should be no major developments allowed in the water catchment until Council has developed and implemented a plan of management for our water supply.

We as a community, deserve this level of protection and security of our water supply.

Meat and Livestock Australia, in their information brochure "#1. Feedlot Site Selection" make the point that, in relation to protection of water resources, "Feedlot developments are required to demonstrate that surface water quality and riverine ecosystems can be protected." Yet, the Statement

of Environmental Effects for this development proposal puts all responsibility for protecting water quality back on to Council's water treatment facility and processes. This is not good enough.

The Glen Innes Integrated Water Cycle Management: Part 2 Strategy Plan (2009), upon which the Statement of Environmental Effects relies, is 11 years old. If the plan has been reviewed since, as even the plan envisaged, the Statement of Environmental Effect (SEE, the report) does not reference a later version, and hence should be seen as inadequate and lacking, and its conclusions invalid.

The section of the Plan referenced does not mention feedlots but refers only to fencing of riparian zones. It does not consider the more concentrated presence of contaminants from feedlots if their holding ponds were to breach and/or run off effluent were to enter the water system.

Even Council's strategic plans are only 10 years duration!

After the impact on town water from the drought and issues with water quality, it is not good enough to rely on a statement in an 11-year old plan about the capability of the Council's water treatment plant.

A study from North Dakota State University in 2013 identified the risk of contamination of water supplies through runoff following:

"A rainfall event following land application of manure, overapplying manure or misapplying manure also may cause runoff." (See attached, p2)

Water Quality of Runoff From Beef Cattle Feedlots, S Rahman, Scherer, A Rahman, J Lang, North Dakota State University, 2013.

Even if the proposed measures relating to the feedlot pen itself and containment of water runoff within the CDA is effective, the manure is planned to be distributed across the property and this may cause a risk of contamination to the water supply. This risk is not addressed in the Statement of Environmental Effects. In fact, this document does not even acknowledge the existence of the watercourse only 100m from the feedlot pens that feeds directly into the Beardy Waters. As a result, it does not address the potential for contamination of this watercourse. This is yet another reason to reject the document and the development application.

The GeoLINK report into soils on the site, conducted for the previous DA and included as an appendix in the SEE, stated that an overall irrigation strategy, including crop removal, would also be critical to maintaining baseline environmental parameters. This has not been done.

In previous consideration of applications for this development, Council used a measure of 100m distance from a watercourse to decide that approval was warranted. I hope that, this time, Council uses a more appropriate measure.

The DPI "Living and Working in Rural Areas; Handbook" contains a table that says feedlots should be more than 800m from "potable water supply / catchment" (see attached image). This suggests that the development is inappropriate in its current location.

For all the reasons above, the application should be rejected.

2. Community / Public Interest and Consultation

The SEE claims that because the site is "disturbed land" there is low likelihood of any items of Aboriginal cultural significance ... without even asking the local Aboriginal community. This is totally unacceptable, especially when Glen Innes is hosting the First Nations Festival in 2021.

Has this proposed development, and are other proposed developments, considered by Council's Aboriginal Advisory Committee?

If not, then the message in all of this to our local Aboriginal communities is, in effect, "You can dress up and dance for us but we will not talk to you or, more importantly, listen to you".

It is clear from the previous application for this feedlot and the local activity in both the print, online and social media that there is significant community concern about this development and, for many, outright opposition. Council has a responsibility and role to represent and reflect local community views on contentious developments and other issues.

In considering the comments on the previous development application the Council report identified that it had received "240 pro-forma submissions".

For Council to minimise the consideration of what might be described as "form letters" is insulting to the community members who have sought to make their views known to Council. When a community member makes a written submission in any form that should be counted as one submission because it demonstrates the level of community feelings and views about an issue. Many people are unable to make the time available, or just don't have the words, to develop their own individual submission. This does not mean that they do not feel strongly on an issue.

Council also has an important role in ensuring that proposed developments do not unfairly advantage one individual, family or business enterprise at great cost and impact to the rest of the community.

3. Inconsistencies and omissions in the supporting documents

The SEE, in section 2.9, claims that the closest RAMSAR listed wetland is over 1,000 km away, totally ignoring the Little Langothlin Nature Reserve which is less than 50km from the proposed site of the feedlot. If level of attention to detail is typical of the report then it should be rejected out of hand.

The report references, and relies on, a Council Plan that was developed in 2009 and set for review in 2014. This is totally inadequate.

The SEE does not even mention the watercourse only 100m from the feedlot pens, which flows directly into Beardy Waters. This seems a glaring omission, given that it was explicitly acknowledged the last time an application for this development came before Council in early 2020.

The report says that sufficient water can be sourced from onsite dams that are spring fed. The closest of these to the feedlot pens is over 500m. This means that extensive use of pumping will be necessary to transport the water to the feedlot. This issue is not addressed in the report.

The SEE states on page 25, in Section 3.2.1 Traffic Generation, (probably because permission to transport manure off site was rejected in April 2020) that "As all manure will be utilised

on-site, no manure transport will occur.", yet on page 29, in Section 3.3.7 Manure Management, the report states "Any excess manure not required for on-site spreading can be removed to off-site locations for utilisation."

Because of these inconsistencies, inaccuracies and omissions, and likely others in the report, the developer should be told to go away and try again. In other words, the application should be rejected.

4. Local Employment generation (or rather lack of it)

Unlike the earlier application, which tried to make the case that this development would generate significant local employment, at least this report is honest enough to say that there will be little, if any, additional employment generated locally.

It is not valid to say that additional orders for equipment or additional small construction jobs will lead to additional employment. It may, and even this is arguable, make more efficient use of local available contactors and suppliers, but is unlikely to lead to any new jobs being created.

In terms of employment generation, one is left to wonder "Why bother with all this effort if no extra long-term jobs will be created?"

This lack of employment generation supports rejection of the application.

5. Environmental factors / Air and Wind

The SEE takes wind readings from the Glen Innes Airport, which is located over 20km to the north of the proposed feedlot site and applies them to this development. This is totally unacceptable as the local ecosystems can vary immensely.

The report does not directly address the potential impact of dust, odour, wind and noise on local residents, what it calls sensitive receptors, because it does not use local data. This should be remedied before any consideration is given to this application.

Because of this lack of appropriate local data, the application should be rejected.

If the application is approved, then a condition should be imposed that appropriate local testing be undertaken at the expense of the developer prior to any work commencing. Further, this condition should include a provision that if the subsequent reports cause any concerns in relation to dust, odour, wind or noise impacts on nearby residents then the approval is null and void.

6. Surface and Ground Water Issues

The SEE, while discussing groundwater, acknowledges only one nearby bore. It fails to even consider the potential impact on the multiple other bores. For example, are all of these bores accessing the same aquifer of different aquifers? If different aquifers, are they interconnected and how does water move between them? What would be the impact if contamination occurred as a result of this development? The developer should be required to undertake hydrological studies to assess any

impact on other groundwater users in the local area before this application is even considered by Council.

The proposal to spread manure (including rotted carcasses) on surrounding land raises the question of monitoring the impact of this process, particularly in terms of its impact on the soils and quantity, quality and content of any runoff water after rain events going into local watercourses or groundwater.

The quality and reliable supply of potable drinking water is too important to ignore. On this basis the application should be rejected.

The soil investigation report by GeoLINK states that:

"With any such proposal, monitoring of both the soil and surface water would be critical to ensure that the balance of nutrients, compounds and elements are staying consistent with the environment prior to the proposal occurring. An overall irrigation strategy, including crop removal, would also be critical to maintaining baseline environmental parameters."

Soil Investigation: Jardana Feedlot Proposal, GeoLINK Aug 2019.

Appendix B of SEE by AgDSA, October 2020

If the application is approved, it should have stringent conditions to require development of an overall irrigation plan and have it approved by Council prior to any work commencing, monitoring water quality at all stages of the activity and reporting the results of those tests publicly at regular intervals.

7. Animal welfare considerations and impacts

The SEE proposes that no shade be provided over the feedlot pens because of the "temperate Glen Innes climate".

This fails to take into account the increased impact of UV radiation at altitude.

The report states that the provision of shade will be reviewed annually but gives no information about criteria to be used or responsibility or reporting of the outcomes of any review.

In a publication of Meat and Livestock Australia (MLA) giving advice about beef cattle feedlots, it is stated that:

"The National Feedlot Code of Practice recommends a maximum stocking area of 25 m₂ per Standard Cattle Unit (SCU). In circumstances where a feedlot operates at a lower stocking area (>25 m₂ per SCU) the feedlot manager is responsible for justifying the greater density and for obtaining approval from the appropriate authority. Stocking areas lower than 20 m₂ per SCU can encourage increased pen dust loads and require higher capacity for sedimentation and holding ponds."

FEEDLOT DESIGN AND CONSTRUCTION series, Brochure 9. Overall pen layout.

Meat and Livestock Australia 2016

This development application proposes 18m²/SCU, which is the equivalent of two gazebos. In other industry literature an area of 300 sq ft per cow, which equates to 27m² is recommended.

These figures suggest that, whatever the justifications in the report, the proposed pen sizes are woefully inadequate to address the welfare needs of the cattle being penned.

The report references actions in the event of a "mass death event" but does not quantify the risk in this regard.

Because of these deficits the application should be rejected.

If the application is approved there should be a condition imposed that pen sizes be increased dramatically and shade structures constructed for the cattle.

8. Traffic

Traffic movements are averaged across the year to come up with a figure of approximately 3 19m B-Double trucks entering and leaving the property per week via the intersection of Stonehenge Road and the New England Highway.

This averaging is misleading because many of the truck movements will be concentrated into shorter periods of time when cattle are delivered to the property or taken from the property for sale and slaughter. This concentration of truck movements is not considered in the report.

The intersection of the New England Highway and Stonehenge Road is in a 100km/h speed zone. It does not have a turning lane in either the north-bound or south-bound directions. This makes it a very dangerous situation to have large trucks turning at this intersection.

While certain management strategies are proposed relating to on-site parking and internal roads, there is no mention of monitoring, reporting nor od consequences should thee actions not be carried out in an appropriate way at regular intervals.

The report states that the intersection of Stonehenge Rd and the New England Highway is, effectively, the front gate of the development. At the same time there is no mention of the developer taking on responsibility for the upkeep of Stonehenge Road, even though they will derive a direct financial benefit from their use of the road. The road will also be subjected to considerable additional heavy traffic as a result of this development. It is not fair that the ratepayers subsidise what are, in effect, direct business costs for this enterprise, by having to maintain the road.

Because of these traffic implications the development should be rejected.

At the very least, if the application is approved, it should be with additional conditions that:

- turning lanes be installed on the New England Highway (RH turn heading north and LH turn heading south) at cost to the developer.
- If the turning lanes are unable to be installed then the development should not proceed.
- Cost of upkeep of Stonehenge Road from the New England Highway to the property entry will be at cost to the developer.

CONCLUSION

There are many reasons, as outlined above, to be concerned at this development proposal.

The interests, values and wellbeing of the local community should take precedence over the interests of an individual business enterprise.

The previously disclosed lack of a management plan for our water supply represents gross neglect over time by Council. No further development should be allowed in the water catchment until such a management plan is developed and implemented.

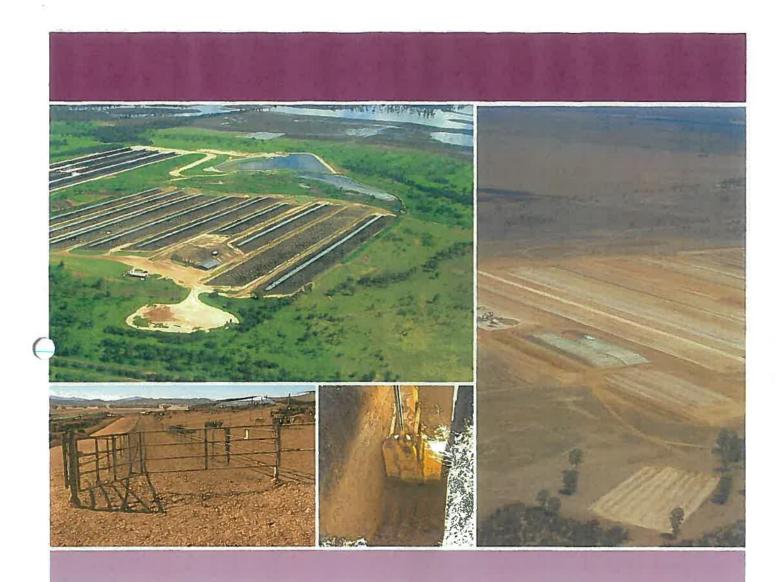
I urge you to REJECT this proposal.



Glen Innes 2370 23/11/2020

Attachments:

Feedlot Design and Construction – Site Selection, MLA Information brochure #1 Feedlot Design and Construction - Overall pen layout, MLA Information brochure #9 Water Quality of Runoff From Beef Cattle Feedlots, S Rahman, Scherer, A Rahman, J Lang, North Dakota State University University, 2013.



FEEDLOT DESIGN AND CONSTRUCTION

1. Feedlot site selection

Figure 1. Distribution of feedlots in Australia in relation to climatic zones (2013)

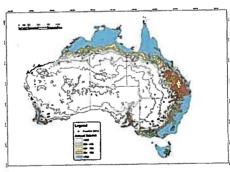


Figure 2. Distribution of feedlots in Australia in relation to mean annual rainfall (2013)

Introduction

A feedlot must be appropriately sited to ensure its economic viability, environmental sustainability and management performance.

Poor site selection can complicate the approval process and lead to costly licence conditions. It may also significantly increase capital costs (e.g. through excess earthworks or high infrastructure costs) and operating costs through long distances for transporting commodities, livestock or finished cattle.

After a site has been selected, the feedlot layout must be planned. This is the main opportunity to maximise operational efficiency and livestock performance whilst minimising initial capital and ongoing maintenance costs. Plans should also allow for potential expansion.

Design objectives

Feedlot site selection should maximise

- economic efficiency of construction
- cattle health, welfare and performance
- social benefit

while minimising

- ongoing maintenance costs
- any adverse environmental impact

Important issues to be considered include

Regional issues

- prevailing climatic and seasonal conditions
- proximity to major arterial road networks, other feedlots or intensive livestock facilities, abattoirs, saleyards and other services
- available labour
- feedstuffs

Site-specific issues

- suitable topography for construction costs and site drainage
- distance to nearest receptors for odour, dust, noise or visual, aesthetic impact
- distance to nearest potable water supplies (i.e. artesian, reservoirs, water catchment areas)
- legal security of an adequate supply of potable water
- risk of impacts on groundwater
- risk of impacts on surface water quality
- access to construction materials (e.g. clay and gravel)
- absence of archaeological and heritage sites or artefacts
- likely impact on threatened or endangered species or ecological communities
- risk of flood or bushfire
- site access in respect to traffic and road safety
- availability of land and suitability of soil for by-product waste utilisation

Mandatory requirements

Any feedlot development must comply with relevant Australian Commonwealth, state and local authority codes and regulations (see *National Guidelines for Beef Cattle Feedlots in Australia, MLA 2012*).

Some form of local or regional scale development plan is likely in most states. These plans normally include

- a degree of control on the types of developments allowed
- details of the level of planning and regulatory scrutiny applied
- provision for public comment on significant developments.

While some types of development are excluded in particular areas, most states identify areas where certain types of development such as feedlots are allowed.

However, various Commonwealth and state acts and regulations may influence feedlot site selection where they override local authority planning schemes. Examples include policies associated with

- native vegetation and clearing
- agricultural land conservation
- flora and fauna

All feedlot planning should comply with the National Guidelines for Beef Cattle Feedlots in Australia (MLA, 2012a) and with the National Beef Cattle Feedlot Environmental Code of Practice (MLA, 2012b).

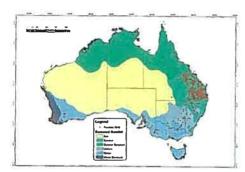


Figure 3. Distribution of feedlots in Australia in relation to seasonal rainfall (2013)

Site selection criteria

Climate

Climatic conditions affect both the environmental performance of a feedlot and the welfare and performance of the cattle in the facility. Environmental problems associated with wet conditions include odour, run-off and manure buildup while high summer temperatures with high humidity may result in animal welfare issues.

Sites with a high annual moisture deficit (low rainfall and/or high evaporation rates) are preferable, with an average annual rainfall of less than 750 mm recommended. Figure 2 shows the distribution of feedlots in Australia as related to mean annual rainfall, with most being in areas with less than 750 mm of rainfall. Summer-dominant rainfall is also preferable as pens under with winter-dominant rainfall tend to remain wet throughout the winter months. This can lead to excessive odour, reduced cattle performance and the formation of muddy dags on slaughter cattle. Figure 3 shows the distribution of feedlots in Australia in relation to seasonal rainfall.

Excessive heat load in cattle can be an issue in areas of high temperature and high humidity. Figure 1 shows the distribution of feedlots in relation to climatic zone, with few feedlots in critical areas. Excessive heat load in cattle can be managed through appropriate diet and the provision of shade (see Section 16 – Shade).



Winter-dominant rainfall with a low evaporation rate can result in wet pens and potential odour nuisance.

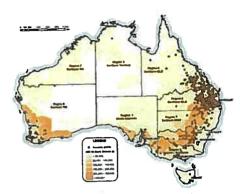


Figure 4. Distribution of feedlots in Australia in relation to grain growing zones (2013)



A natural slope of 2-4% allows for drainage and minimal earthworks for site development. Steeper slopes may encourage



Local topography may cause fog and odour to drift down a valley undispersed.

Access to feedstuffs

Reliability of supply of feed commodities such as grain and roughages (hay, silage) is critical. The existence of other major intensive livestock and industrial users of grain combined with high inter-annual variability in seasonal conditions can affect this reliability, so proximity to major bulk storage and rail facilities can be a worthy consideration. Most feedlots are sited within major grain growing regions as shown in Figure 4. Roughage is also an important component of feed and can be expensive to transport long distances. If the feedlot site is not suitable for producing silage, close access to grain or cotton by-products is important.

Site topography

Sites with a uniform natural slope of two to four percent will help minimise the cost of earthworks by providing the fall required within the drainage system. It will be more difficult (and expensive) to design and implement adequate drainage on a low gradient, but practical feedlot construction can be accomplished with sufficient earthworks.

There should be sufficient depth of soil to accommodate the excavation (cut and fill and borrowing) necessary for earthworks during construction. This applies particularly to areas where sedimentation basins and holding ponds might be located.

Local topography

As feedlot odours drift downhill under still weather conditions it is undesirable to site a feedlot at the top of a confined valley with sensitive receptors below. Sites should be avoided where katabatic drifts can carry offensive odour to receptors. Katabatic drifts can travel many kilometres in the relatively still conditions of early morning or late evening where little or no odour is dispersed.

Native vegetation

Clearing native vegetation can be subject to various regulatory controls. State and local council requirements must be checked before commencing any feedlot development that may involve vegetation clearing. Although clearing may be possible under certain conditions (e.g. with offset plantings), it may be necessary or easier to consider an alternative site. Retention of native vegetation can provide a benefit in minimising the environmental impacts of a new development as well as providing a sensitive and secure visual amenity buffer to the local community.

Sufficient land

Sufficient land is needed for the feedlot complex (pens, cattle handling, feed mill and commodity storage, effluent ponds and manure storage) and should include provision for potential expansion.

A reasonable rule of thumb for the feedlot complex area should be at least three times the pen area. The pen area is the maximum number of cattle multiplied by the stocking density. Hence, a 5000 head feedlot at 15 m²/head requires 7.5 ha of pens and the total feedlot complex would require about 22.5 ha of land. Additional land will almost certainly be needed for effluent irrigation and some solid manure disposal, along with a buffer zone between the development and nearby sensitive receptors.

Threatened and endangered species

To protect threatened and endangered species, the following potential direct or indirect issues may need to be assessed

- endangered or threatened ecological communities or ecosystems
- critical habitat for endangered or vulnerable species
- wildlife corridors
- wetlands of international, national or state importance (e.g. RAMSAR, High Ecological Significance in Great Barrier Reef catchments)
- · migratory species

Some of the above matters are covered by the relevant Commonwealth and state legislation (e.g. the Commonwealth Environment Protection and Biodiversity Conservation Act 1999, the EPBC Act) under bilateral agreements. This means compliance with federal and state legislation can generally be assessed simultaneously by the relevant state agency. In general however, it is not desirable to locate feedlots near National Parks as these are sensitive areas and have frequent visitors.

Water supply

Security of an adequate water supply is vital. A feedlot requires a secure, highly reliable water supply that is correctly licensed, of sufficient capacity and of suitable drinking quality for livestock. That security must be in both a legal (i.e. a legal right to the required volume) and a physical sense (i.e. the physical ability to pump, store and deliver the required volume of water). In areas where water usage is regulated this usually necessitates having an industrial or similar high security water licence, allocation or entitlement. A secondary or emergency water supply is also desirable to enable ongoing supply in the event of a failure of the primary supply.

Water uses at a feedlot include

- drinking water for cattle (and horses)
- dust suppression
- feed processing
- · cattle and vehicle wash down
- general cleaning
- landscaping
- staff and office amenities
- dilution of feedlot effluent before application on land.

More information about water requirements for feedlots is provided in *Section 4*.

Protection of water resources

Feedlot developments are required to demonstrate that surface water quality and riverine ecosystems can be protected. In determining water access, developments that alter environmental flow regimes, particularly in regard to the transfer of licences or allocations, should be considered in consultation with the relevant authorities that have regulations and policies to deal with these issues.



Nearby vegetation can provide a visual buffer for a feedlot, but could constrain areas for liquid and solid waste utilisation and limit expansion.



A feedlot site with sufficient land for infrastructure development and for potential expansion.



Security of water, both in quantity and quality, is critical for feedlot development.



Feedlots should be sited outside of the 1 in 100 year flood coverage area and have road access during major flooding.



Geotechnical information of the site is gained by excavating test pits, sampling and analysing the engineering properties of the soil material.

Flooding

Feedlot sites should generally be above a 1 in 100 year average recurrence interval (Q₁₀₀) flood height. In some cases it might be possible to protect the site using levees or similar structures. However, as levees will affect the hydraulic characteristics of streamflow (in particular flood heights) their installation may not be allowable. Some state and local governments also have guidelines which stipulate that waste utilisation areas need to be above specific flood heights (e.g. Q20 or Q50 floods). These local guidelines should be consulted. Consideration should also be given to all-weather road access during periods of severe flooding.

Geotechnical qualities

It may be possible to use soil and gravel materials available on the site or materials borrowed from sites close by for construction purposes. This particularly applies to clay that might be used as a lining material in feedlot pens, the feedlot drainage and effluent storage systems, composting pads and silage storage bunks. The suitability of soil for earthworks is assessed on the basis of its geotechnical qualities. This is discussed in more detail in Section 7.

Manure and effluent utilisation areas

Unless pen runoff can be disposed of totally by evaporation (see Section 12), suitable land will be needed for the irrigation of effluent.

Depending on the local demand for manure, suitable land may also be required on the property for spreading the solid manure. The utilisation area(s) should be arable agricultural land with

- soil without any serious limitations on plant growth (such as plant nutrients, available water capacity and structural issues)
- an area large enough to sustainably utilise the nutrients likely to be applied, without risk to surface or sub-surface water supplies
- a climate capable of reliably producing dryland crops, or with reliable access to water for irrigation (expansive waste utilisation areas may be required where it is only possible to undertake dryland cropping).

It may be possible to use land of lesser quality (i.e. land with some significant limitations) but a higher level of management (and monitoring) will generally be required to overcome the constraints. Grazing of effluent disposal areas removes only small quantities of some nutrients such as phosphorus and is therefore generally not a preferred strategy in an effluent disposal program. Additionally, there are withholding periods of up to three weeks before stock graze pastures that have received effluent application, to protect both people and animals from potential pathogen transfer.

Manure and compost may be used off-site, in which case land availability for manure utilisation is of less importance than the availability of land for effluent reuse. Further details on managing the sustainable utilisation of the nutrients in manure and effluent are described in the manual for Beef cattle feedlots: waste management and utilisation.

Conservation of agricultural land

State legislation and/or the local authority planning policy may consider the conservation of agricultural land. For example, in Queensland Good Quality Agricultural Land (GQAL) and Strategic Cropping Land (SCL) are agricultural lands that are protected from most non-agricultural developments. While effluent and manure disposal areas should be on arable agricultural land, the converse is true for the actual site of the feedlot complex. When siting a feedlot, consideration should be given to its likely effects on agricultural land conservation.

Salinity and groundwater

The lining of feedlot structures with clay or similar liners will generally result in the feedlot complex posing a minimal risk to landscape salinity or groundwater contamination. The application of feedlot effluent and manure to land may increase soil salinity, especially in low rainfall zones, and this may directly or indirectly increase deep drainage and groundwater recharge. Accordingly, areas that may not be suitable as manure and effluent utilisation areas, or that may require expensive or intensive management and mitigation measures, include the sites with one of more of the following

- shallow water tables or springs
- · existing salinity problems
- · highly permeable soils.

The guidelines for feedlot developments also recommend a minimum separation distance from bores. The significance of the above is generally higher in areas where seasonal rainfall is frequently higher than soil evaporation (e.g. winter rainfall areas in southern Australia). Where possible, sites with any of these problems should be avoided.

Community amenity

Community amenity is afforded by maintaining the environmental attributes that contribute to physical or material comfort of community members. Nuisance is caused by the unreasonable loss of amenity and can be related to odour, noise, dust and increased traffic associated with the operation of the feedlot on local roads. Central to whether loss of amenity is reasonable or not is the frequency, duration and magnitude of the events that might threaten amenity. A secondary, but important, consideration is the context in which the threat occurs and the prior experience of those being exposed.

Air quality

Feedlots can be a source of fugitive odour and dust emissions. These emissions are termed fugitive since they are not emitted from a readily controlled point (e.g. a duct, vent, chimney or stack) and it is therefore impossible to readily capture or contain them.

Once emitted into the atmosphere, the significance of these fugitive emissions (or the likelihood of their causing a nuisance) is largely dependent on the atmospheric dispersion and dilution that takes place between the source of the emission and the potential receptor. For coarser particulate emissions, such as feedlot dust, some degree



Manure and effluent utilisation area adjacent to a feedlot site.

of settling will take place between the source and the receptor. Vegetation buffers can be useful in diminishing the impact of odour and dust emissions.

The amount of dispersion, dilution and settling after emission is a function of distance – the required distance varying with the prevailing atmospheric stability. Ways of determining the required distance (or distances) include

- fixed separation distances
- odour and particulate dispersion modelling
- variable separation distance formula (where the applicable distance is a function of the scale of the operation, the level of feedlot management applied, the atmospheric conditions commonly experienced at the site and the nature of the surrounding terrain).

Fixed separation distances are typically absolute minimums and may not be considered adequate for larger feedlots. Dispersion modelling and variable separation distance formulas have a more robust scientific basis, but require a substantial body of information to estimate and characterise the emissions. It is often not well suited at an investigatory or preliminary stage. In such cases, the use of variable separation distance formulas can provide a reasonably conservative guide as to what are the likely required separation distances. Separation distance guidelines can be found in Appendix B of the National Guidelines for Beef Cattle Feedlots in Australia (MLA, 2012a).

Noise

Ambient noise levels in rural areas are usually low (<30 dB), particularly at night. As a consequence any new, unusual or particularly loud noise is likely to be noticed, measurable and therefore have some potential to cause a nuisance — more so than if the same noise was to occur in a busy urban environment.

Factors affecting the amount of noise reaching a receptor include the

- nature of the surrounding terrain
- vegetative state of the buffer zone or surrounding terrain
- atmospheric conditions
- frequency and tonal qualities of the noise.

In beef cattle feedlots, common sources of noise emissions include

- stock handling activities (such as loading, unloading, moving, drafting)
- vehicle movements (including feed trucks, trucks delivering commodities and livestock transport trucks)
- feed milling and handling
- other plant and equipment.

For the 'normal' noise emissions from the feedlot complex, the separation distances typically required to mitigate air quality impacts will usually afford protection from noise impacts at these same receptors. Exceptions to this may include

- less common or intermittent noises (e.g. noise from construction activities)
- frequent or unusual nighttime activities (e.g. night-time milling and mixing of feed, livestock deliveries)
- · traffic noise along roadways servicing the feedlot.

Confining noisier activities to daytime and, where unavoidable, evenings, will normally minimise the risk of adverse noise impacts. However, in instances such as the loading or unloading of cattle in summer (particularly where daylight saving applies) animal welfare considerations may preclude confining operations to such times. The design capacity of the feed mill and mixing facilities could be such as to avoid routine operation at night. Selective use of access routes to the feedlot can reduce specific off-site noise issues.

Visual amenity

In designing and siting a feedlot, due consideration should be given to its visual impact. Advantage should be taken of any natural screening provided by topography or vegetation. Highly visible sites should be avoided. Where a site is visible, buffers of trees or earth mounds can be developed between the site and nearby vantage points.

As with noise complaints, the separation distances required to address air quality impacts often provide for significant mitigation of visual impacts at nearby residences or townships, particularly in low-relief terrain. The ongoing maintenance and management of the feedlot and its associated infrastructure in a clean and tidy condition will generally assist the positive visual impact of the facility.

Roads and traffic

When selecting a feedlot site, the following impacts of traffic should be considered

- · local road network
- · internal road infrastructure
- · traffic noise
- · road safety.

Local and state governments generally have criteria by which they judge the significance of an impact on the road network. Typically these will involve a threshold increase in road traffic volumes or pavement loads that correspond to what would otherwise be expected with the 'normal' growth in the Australian economy (e.g. the average percent increase in national GDP).

National and state standards apply to road design in Australia. These standards cover a diverse range of matters, not the least of which is road safety. Owing to the volume of heavy transport they can generate, feedlot developments may require the upgrading of roads and bridges to comply with the standards. Common requirements include the need for all-weather access and the upgrading of turnoffs and road junctions servicing a development. Such upgrading work may particularly apply on major roads where the higher traffic volumes trigger the need to install slip and turning lanes. The feedlot may be required to contribute some or all of the cost of any upgrading work necessary.

Owing to low ambient noise levels in rural areas (particularly at night), traffic noise may require specific consideration. In such cases, noise-related conditions such as curfews on traffic movements or having designated access routes may be applied.

Consideration should also be given to enabling access to the facility by B-double, B-triple and road train transport where applicable. This will reduce the ongoing operating costs of the feedlot.

Proponents are encouraged to consult with the responsible authority early in the planning stages to identify any standards and road requirements, identify whether the proposal needs to be referred to a roads authority and the arrangements for upgrading public roads.

Mining leases

Searches should be undertaken to ensure that the proposed feedlot will not be located on an existing or possible future mining or gas lease.

Archaeological and heritage issues

Impacts on Aboriginal, European and natural heritage need to be considered during the assessment process for a feedlot development. Most state governments maintain registers of known sites and these should be consulted before selecting a development site. Notwithstanding the status of a property in these registers, it is still possible that a detailed site assessment will be required before gaining development approval or consent. Proponents are encouraged to consult with the responsible authority early in the planning stages to identify any requirements. The selection of sites with no heritage issues is an advantage.

Local plans or planning schemes

These plans are normally made and administered by a local government authority (e.g. a shire or local council). Typically these local plans establish zones or similarly designated areas where certain types of development are allowable after some relatively basic considerations. Other developments may require more intensive scrutiny and consideration (i.e. impact assessment).

Where local government areas encompass rural areas, there will normally be rural or agricultural zoning which allows most traditional agricultural activities (e.g. cropping or grazing) to take place with few, if any, approval requirements. Often, feedlot developments are allowable in these rural areas or zones after some form of impact assessment. However, in some cases (e.g. in a rural zone where the dominant land use is horticultural, such as orchards or vineyards frequented by tourists), a feedlot development may be a prohibited development (i.e. not allowable even with impact assessment).

Copies of local plans are usually available for perusal or purchase at the offices of local government authorities. Increasingly, these documents are freely available on the Internet. It should also be noted that these plans are subject to frequent revision, and the fact that a previous development was allowed does not mean a new one will be permitted.

Regional plans

Regional plans are normally a 'big picture' version of local plans. They are an increasing common strategic planning instrument, particularly where sensitive areas such as riverine wetlands overlap a number of local government areas.

It is common for local plans to be drafted to accommodate the requirements of any regional plan, and consequently compliance with a local plan will provide compliance with the regional plan. Nevertheless, some local plans predate regional ones and there may be some specific requirements, additional to those of the local plan, which need to be addressed. Local government planning departments can provide advice on these matters.

Catchment management plans

In some states, catchment management plans have a formal status in legislation and regulation. Like regional plans, catchment management plans usually cover a number of local government areas and their requirements may already be reflected in the respective local government plans. However, catchment management plans are generally a newer form of planning and their requirements may not always be addressed by local plans. Checking whether a catchment management plan exists and what is its official status is recommended to anyone considering developing a feedlot. For example in Queensland and Victoria, feedlots are excluded from Declared Catchment Areas which are the areas immediately surrounding municipal water supply dams.

Access to building materials

Consideration should be given to the on-site availability or nearby off-site access to the following

- suitable clay for lining of feedlot pens, drains, effluent holding ponds, manure storage and composting pads
- suitable gravel for construction and maintenance of feedlot pens, drains, composting pads, roads, cattle lanes and hard stand areas
- suitable materials for road base and sub-grade
- concrete aggregate (if mixing on-site) or ready-mixed concrete.

Clay pits and quarries for even moderately sized feedlots may themselves require a development approval and licence and as a result, an environmental impact assessment or similar report.

Labour availability

Feedlots can have a significant requirement for labour – about one person for every 750 to 1000 head of capacity. In larger operations where these requirements cannot be met by family or staff residing on-site, proximity to towns, villages or a nearby source of potential employees may be a significant consideration in determining the scale and location of the proposed development. Consideration may also need to be given to the provision of on-site accommodation if the feedlot is located some distance from major residential areas.

Electricity

Most feedlots require reliable, 3-phase power. Due to the cost of installing overhead supply it is desirable to locate a new feedlot where 3-phase power already exists.

Development staging

The staging of feedlot developments is quite common. Staging a development can help establish that

- predicted impacts of the final development are reliable
- impacts are capable of being properly managed
- success in managing the impacts can be reliably monitored.

This can be advantageous to both the developer and the regulatory agencies.

Further reading

Guidelines for the establishment and operation of cattle feedlots in South Australia, Department of Primary Industries and Resources (SA) and Environment Protection Authority, 2006, Adelaide.

Guidelines for the Environmental Management of Beef Cattle Feedlots in Western Australia, Bulletin 4550, 2002, WADo Agriculture (ed.), Western Australia Department of Agriculture, Perth, WA.

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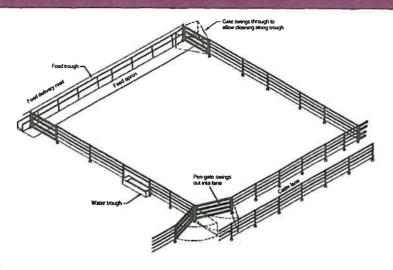
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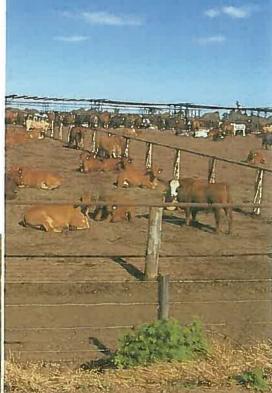
Commonwealth of Australia 1999, Environment Protection and Biodiversity Conservation Act 1999 (the EPBC Act).



3D Feed Pen Layout







FEEDLOT DESIGN AND CONSTRUCTION

9. Overall pen layout

Introduction

The production pens are the main animal housing unit for a cattle feedlot. Sound design will ensure optimum animal performance, good animal welfare and high standards of environmental performance.

Design objectives

The design objectives for a feedlot production pen are to

- provide an environment for cattle where production performance and animal welfare are maximised
- promote safe access for cattle to and from the pen
- minimise environmental impacts such as odour and dust
- promote drainage to provide a comfortable environment for cattle and minimise environmental impact
- optimise the management and removal of manure from the pens
- minimise ongoing maintenance costs
- provide a safe working environment for pen riders and other feedlot personnel.

Mandatory requirements

Apart from pen slope and pen floor permeability, the National Guidelines do not provide any specific design requirements for production pens. Pen slope is addressed in Section 10 – Pens and drainage systems, and pen floor permeability is discussed in Section 8 – Bulk earthworks.

The National Feedlot Code of Practice recommends a maximum stocking area of $25~\text{m}^2$ per Standard Cattle Unit (SCU). In circumstances where a feedlot operates at a lower stocking area (> $25~\text{m}^2$ per SCU) the feedlot manager is responsible for justifying the greater density and for obtaining approval from the appropriate authority. Stocking areas lower than $20~\text{m}^2$ per SCU can encourage increased pen dust loads and require higher capacity for sedimentation and holding ponds.

The Australian Animal Welfare Standards and Guidelines for Cattle (DAFF, 2013) state

S10.1 A person in charge must ensure a minimum area of 9 m² per Standard Cattle Unit for cattle held in external pens.

G10.10 Feed yard facilities should comply with the requirements of the National Beef Cattle Feedlot Environmental Code of Practice, 2nd Edition, as amended or superseded.

Design choices

Once a particular feedlot layout has been chosen, the next step is pen design (see Figure 1). Factors requiring consideration include

- stocking density
- bunk space per head
- pen slope
- pen head capacity
- access to the pen
- provision for shade, if required.



Pen design choices



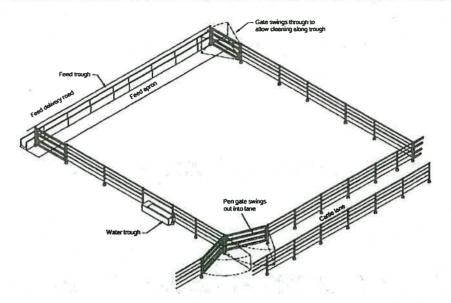


Figure 1. Production pen design parameters

The dimensions of a feed pen depend on the capacity of the pen, stocking density and the amount of feed bunk required. Figure 2 shows how stocking density (SD), feed bunk length (FBL) and pen capacity relate to the dimensions of a typical feedlot pen.

Pen dimensions

Pen dimensions are determined by the combination of stocking density, bunk length per head and pen capacity as per the figure below.

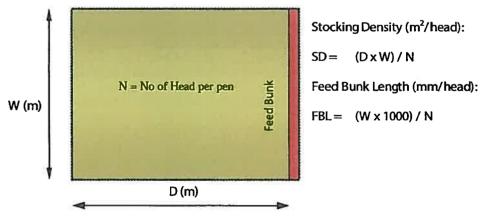


Figure 2. Pen dimensions

The following tables show the different dimensions for 100, 150 and 200 SCU pens as affected by stocking density and bunk space per head. Pens with smaller capacities can be narrow, presenting problems for the use of pen cleaning machinery.

Table 1. Pen dimensions for a 100 SCU pen

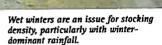
Stocking density [m]	10)		15		200	
Bunk space (mm/head)	250	300	250	300	250	300
Width, W (m)	25.0	30.0	25.0	30.0	25.0	30.0
Depth, D (m)	40.0	33.3	60.0	50.0	80.0	66.7

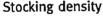
Table 2. Pen dimensions for a 150 SCU pen

Smelling threshy facil	į 16.			116	.(6)	
Bunk space (mm/head)	250	300	250	300	250	300
Width, W (m)	37.5	45.0	37.5	45.0	37.5	45.0
Depth, D (m)	40.0	33.3	60.0	50.0	80.0	66.7

Table 3. Pen dimensions for a 200 SCU pen

Stocking Rusing (mr)	10.		78		.20	
Bunk space (mm/head)	250	300	250	300	250	300
Width, W (m)	50.0	60.0	50.0	60.0	50.	60.0
Depth, D (m)	40.0	33.3	60.0	50.0	80.0	66.7





Stocking density has a significant influence on the environmental performance of a feedlot since it partly determines the average moisture content of the pad. Every day, cattle add moisture to the pen surface by manure (faeces and urine) deposition.

Figure 3 shows the estimated moisture added to the pen surface each year for cattle of various weights kept at different stocking densities.

This simple calculation assumes that cattle excrete 5% of their liveweight each day and manure is 90% moisture. Heavy cattle (750 kg) at 10 m²/head can add over 1200 mm of moisture per year (3.3 mm/day). During winter, if this exceeds the evaporation rate (depending on location) the pad remains moist, and odour and cattle comfort problems can develop. On the other hand, light cattle kept at 20 m²/head contribute less than 1 mm of moisture/day. In summer, evaporation readily removes this moisture and dust can become a problem.

The choice of stocking density to achieve a balance between a pen surface that is too dry and one that is too wet depends on local climate and cattle size.

Following the USA example, feedlots in Australia initially stocked pens at about 10 $\rm m^2/head$ but experience has shown that this stocking density is appropriate only in drier zones (annual rainfall <500 $\rm mm/yr$). For most feedlots in the grain belt, a stocking density of about 15 $\rm m^2/head$ achieves an optimum outcome for cattle, pen environment and pen maintenance.

The effect of added moisture is a particular issue for covered feedlots where, for economic reasons, stocking densities are high (around 2.5-6 m²/head). See Section 44 - Covered housing systems.



Low stocking densities under low rainfall conditions can lead to dust, especially in the late afternoon.

Even though rainfall is excluded, the added moisture can exceed 2000 mm/year and pen surfaces quickly become wet. Under these circumstances, a bedding material must be used to absorb the moisture and this bedding should be removed every few weeks.

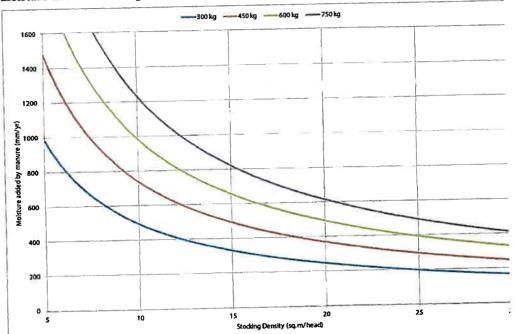


Figure 3. Effect of stocking density and cattle liveweight on moisture added to pen surface

Feed bunk space (per head)

The length of bunk space required per head is discussed in Section 19 – Feeding systems. Typically, this is in the range of 200 mm/head to over 300 mm/head.

Pen capacity (no. of head)

It is convenient to size pens to match multiples of deck sizes of livestock transport vehicles. A double deck semi-trailer would carry about twenty-six 450 kg cattle per deck giving a total load of 52 head. (Refer to the Land Transport Standards and Guidelines for loading densities of cattle on livestock transport vehicles. DAFF, 2013). A B-double load would be approximately seventy-eight 450 kg cattle.

Many commercial feedlots have a range of pen sizes from 50 head to 300 head. In custom feeding operations, a variety of pen sizes allows management to cater optimally for different sized customer consignments. When large consignments of cattle are fed, poor performers may be drafted off during the feeding period and may end up in 50 and 100 head pens before a quick sale. Many managers prefer to hold cattle in 80–100 head group sizes prior to trucking and/or container (carcase beef) lots depending on the combined weights of each consignment. The smaller pens are generally located closer to the cattle receival and dispatch facilities.



A range of pen sizes allows management to cater for different sized consignments.



Trees left in pens invariably die, and are difficult to clean around.



All pens should have signs noting the pen number. This sign configuration allows pen number to be read by both feed truck operators in the feed alley and pen riders in the back of the pen.

Pen slope

Section 10 - Pens and drainage systems discusses the selection of appropriate pen slope.

Pen orientation

If shade is to be installed at the feedlot, pen orientation can be important. Rows of pens running north-south generally make the design of shade structures easier. This is discussed in *Section 16 - Shade*.

Water trough location

The many options for locating water troughs in pens are discussed in Section 20 – Water trough design and sewer systems.

Each pen should preferably have access to two water troughs so that cattle can have access to water if one trough blocks. Water troughs can be placed in a subdivision fence line or in the rear centre of the pen.

Obstructions in pens

Obstructions within pens should be as few as possible as they interfere with cattle movement, pen cleaning machinery and good pen drainage. Trees should not be left in pens as they invariably die and are difficult to clean around.

Signage

All pens should have a small sign with the pen number. This sign should be at the top end of the pen along the feed bunk so that feed truck operators can locate the correct pen when delivering feed. It is also useful to be able to identify the pen number from the cattle lane with another sign on the entrance gate from the stock lane to the pen.

Further reading

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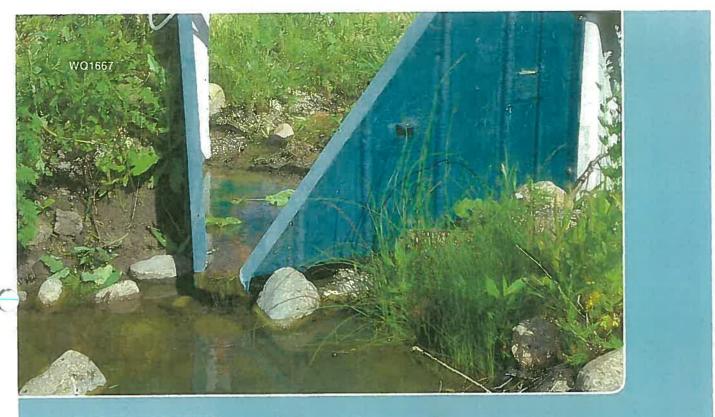
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Water Quality of Runoff From Beef Cattle Feedlots





JUNE 2013

unoff quality from the feedlot surface is important when adapting best management practices for minimizing environmental concerns, especially surface water and ground water pollution. Feedlot runoff can end up in surface water streams, which may be detrimental to fish and aquatic life and may cause eutrophication (a process by which a water body becomes abundant in plant nutrients and low in oxygen).

Runoff is likely to occur from open feedlot pen surfaces when rainfall or snowmelt occurs. A rainfall event following land application of manure, overapplying manure or misapplying manure also may cause runoff. The focus of this publication is to discuss feedlot runoff quality.

Various criteria have been developed to characterize water quality, including physical characteristics, chemical constituents and bacterial content. Water quality criteria are set to protect water for humans and aquatic life.

Runoff from a feedlot may transport large quantities of organic matter, nutrients and pathogens. If feedlots are not managed properly, uncontrolled runoff from beef cattle feedlot pens may pollute public waters, thus may pose a risk to aquatic life, as well as recreational and drinking water.

The Clean Water Act requires management practices to control runoff from feedlots. Runoff is a significant transport mechanism for water-soluble pollutants (nitrate, nitrite, ortho-phosphate).

Excess amounts of nitrogen in water may cause depletion of oxygen in the water and may affect aquatic life and organisms. Nitrogen has different forms, but total nitrogen (TN), ammonium nitrogen (NH₄-N), organic nitrogen, nitrite (NO₂-) and nitrate (NO3-) are concerns in runoff.

Total nitrogen is the sum of total Kjeldahl nitrogen (TKN), ammonia and nitrate-nitrite. Nitrate and ammonium are highly soluble and readily transfer with runoff and may end up in the water stream. Nitrate can leach into ground water and may pose ground water contamination. By implementing nutrient management practices, nutrient loss in runoff may be reduced.

Similarly, phosphorus (P) is an essential nutrient for plants and animals. Phosphorus in runoff may be present as dissolved reactive phosphorus or orthophosphate (ortho-P) and may cause eutrophication or other water quality problems. Eutrophication is caused by excessive amounts of phosphorus and nitrogen in a water body, causing algae problems.

Runoff from feedlot pen surfaces must be controlled and prevented from entering surface and ground waters. Runoff management practices may include settling basins or vegetative filter systems to reduce solid and nutrient loads.

Knowledge of runoff quality from beef cattle feedlot pens would be useful to design effective management practices to protect water quality. This publication is intended to share runoff quality measurements from three beef cattle feedlot pen surfaces under North Dakota management and climatic conditions.

Runoff Sample Collection, Analysis and Reporting

Runoff samples can be collected manually (grab samples) or by using an automatic sampler (ISCO automatic sampler or other automatic device) after a rainfall event. For automatic sampling, runoff may be collected in a bucket and sampling occurs from there. Samples may be collected at various times throughout the year to have a better understanding of nutrient concentrations in runoff.

Samples can be sent immediately in a cooler after collection to any water quality analysis laboratory for nutrients, pH and conductivity analysis. Otherwise, it can be frozen at minus 4 C (25 F) and shipped later for analysis. Keep in mind that you should minimize the time between collection and analysis. A list of water quality laboratories may be found in publication WQ1341, "Drinking Water Quality: Testing and Interpreting Your Results."

Generally, various forms of nitrogen (TKN, ammonium, nitrite-NO2 and nitrate NO3), various forms of phosphorus (total phosphorus, ortho-P) and potassium are of most interest in runoff. Additionally, total solids (TS) and total suspended solids (TSS) also may be analyzed. In most cases, laboratories will report results in percentages, parts per million (ppm), milligrams per liter (mg/L) or milligrams per kilogram (mg/kg).

> 1% = 10,000 ppm 1 ppm = 1 mg/L

North Dakota Case Studies

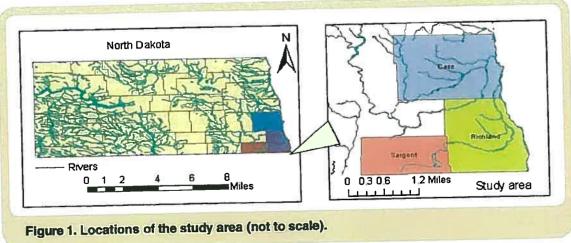
Runoff samples from three existing feedlot pen surfaces (hereafter Feedlot S, Feedlot R and Feedlot C in Sargent County, Richland County and Cass County, respectively) were collected immediately downstream from the pen surfaces. Study locations are presented in Figure 1. Standard methods of analysis were used to analyze runoff samples for determining nutrient and solid concentrations.

Feedlot R was constructed in 2009 and designed for 500 head of beef cattle with two pens, but only one pen was operational. Runoff samples were collected from the operational pen only. The pen is 250 feet by 200 feet, with a pen surface slope of about 5 percent.

Feedlot C was constructed in 2011. The pen is 375 feet by 164 feet, with a maximum capacity of 192 beef cattle. It has six pens with clay soil and an overall slope of about 5 percent. The average annual rainfall for this location is about 19 inches based on 21 years of data.

Feedlot S was constructed in 2006 and has five pens. It has a capacity of 999 head of beef cattle. Out of the five pens, runoff samples were collected from one pen, which always was occupied with cattle. The overall slope of the pen surface is about 3 percent and it has fine, sandy-loam soil. The average annual rainfall for this location is about 19 inches based on 21 years of data.

Runoff samples were analyzed for ortho-P, total phosphorus (TP), ammonium-N (NH₄-N), nitrate-N (NO₃-N), total Kjeldahl nitrogen (TKN), total nitrogen (TN) and potassium (K) using standard methods.



Results

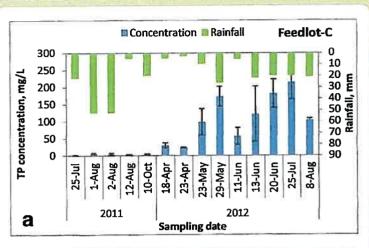
A selection of the measured nutrients and solids in runoff from different feedlot pen surfaces are listed in Table 1. Knowledge of runoff quality from beef cattle feedlots would be useful to producers so they may adjust management practices to protect downstream water from nutrient pollution. Stakeholders or engineers also may find this information useful to design best management practices downstream from a feedlot pen to protect water quality.

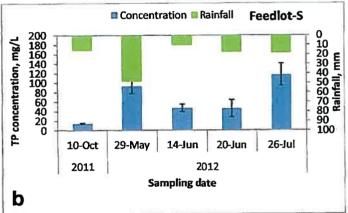
Total phosphorus (TP) concentrations in runoff from different feedlots are presented in Table 1 and Figure 2. The average TP concentration ranged from 0.69 to 214.21, 14.31 to 117.19 and 5.97 to 36.06 mg/L for Feedlot C, Feedlot S and Feedlot R, respectively. According to Environmental Protection Agency Ecoregions V (North Dakota) recommendations, the maximum allowable TP concentration for the rivers and streams is 0.067 mg/L.

Table 1. Summary of runoff quality averaged over entire sampling period for each feedlot.

Parameters	Feedlot C	Feedlot S	Feedlot R
TS, mg/L	4,196a*±2,837	3,012b±990	3.731a±1,919
TSS, mg/L	1,504a±2,007	221b±287	1,281a±1,690
TP, mg/L	105.36a±78.76	63.56b±37.58	25.41c±8.92
Ortho-P, mg/L	19.14ab±14.05	20.52a±7.54	17.52b±7.50
NH ₄ , mg/L	25.52a±24.03	13.54b±12.37	13.95b±11.25
NO ₃ , mg/L	$0.52b \pm 0.67$	3.33a±6.56	1.31b±2.77
TKN, mg/L	91.76b±76.76	54.22c±29.66	113.89a±55.90
K, mg/L	465a±540	496a±143	503a±234
рН	7.47b±0.39	7.77a±0.44	7.69a±0.29
EC, µS/cm	4,125a±2,091	3,048b±808	2,076c±771

Note: *Averages within a row followed by different letters are significantly different at $P \le 0.05$ according to Duncan multiple range tests.





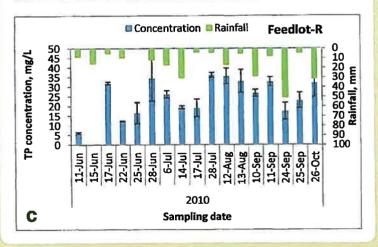
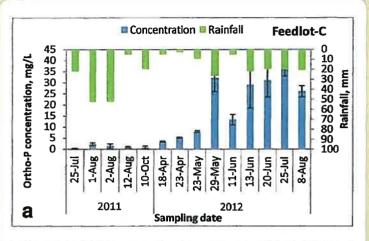
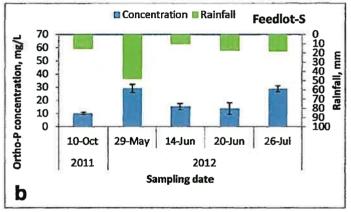


Figure 2. Total phosphorus (TP) concentrations in runoff from different feedlot pen surfaces during different sampling events. The error bar represents the standard deviation.

If runoff from these feedlots (Feedlot C and Feedlot S) reached a river or stream, TP concentration might exceed the EPA Ecoregions V recommendation or North Dakota's maximum limit criteria of Class I streams (0.1 mg/L). According to Chapter 33-16-02.1 of the North Dakota Century Code, the quality of Class I streams must be suitable for aquatic life, swimming, boating and other recreational uses, and it must meet the bacteriological, physical and chemical requirements of the Department of Municipal and Domestic Use.





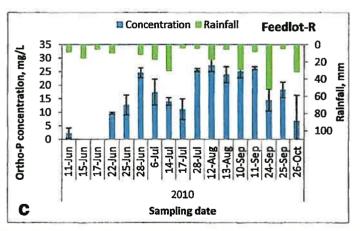
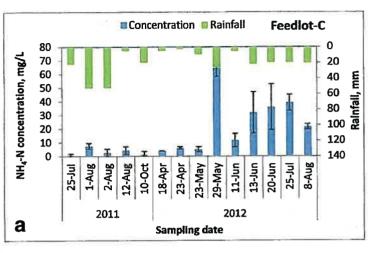


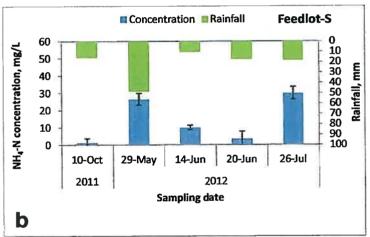
Figure 3. Total ortho-phosphorus (ortho-P) concentrations in runoff from different feedlot pen surfaces during different sampling events. Error bars represent the standard deviation.

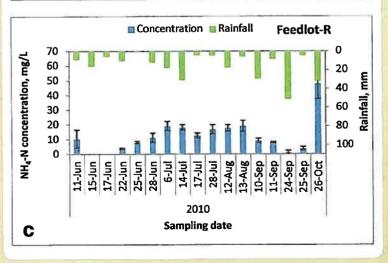
Trends of ortho-P concentration in runoff samples from different feedlots are presented in Figure 3. The average ortho-P concentration ranged from 0.36 to 36.0, 10.24 to 29.07 and 2.25 to 27.34 mg/L at Feedlot C, Feedlot S and Feedlot R, respectively. When Feedlot C was fully operational in 2012, the ortho-P concentration in feedlot runoff increased significantly. This concentration might have come from the previous year's nutrient accumulation.

The ortho-P fraction of TP in the runoff was less in Feedlot C (18.6 percent) compared with Feedlot S (32.2 percent) and Feedlot R (68.9 percent). The average ortho-P fraction of TP was highest in Feedlot R, meaning that Feedlot R had the highest soluble phosphorus, whereas Feedlot C had the highest particulate-bound P, followed by Feedlot S.

Particulate-bound P may be reduced from runoff using vegetative filter strips or by a settling basin, but minimizing the transport of soluble nutrients is difficult. A combination of treatments may be needed to reduce ortho-P from runoff. Allowable ortho-P in lakes and reservoirs in North Dakota is 0.02 mg/L. Runoff from feedlot pen surfaces potentially may increase the phosphorus concentration in downstream water.

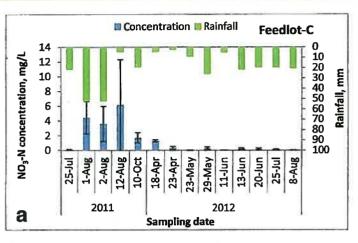


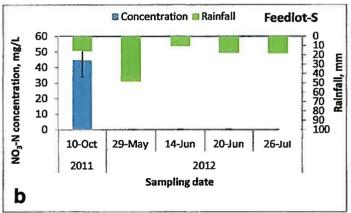




Figures 4a, b and c show the average NH₄-N concentrations during different sampling dates at Feedlot C, Feedlot S and Feedlot R, respectively. Concentrations of NH₄-N in runoff at Feedlot C were lower in 2011 than in 2012 (Figure 4a). The same trend also was noticed for Feedlot S. NH₄-N concentrations at Feedlot C. Feedlot S and Feedlot R ranged from 0.78 to 64.6, 1.21 to 29.83 and 1.10 to 47.93 mg/L, respectively.

Figure 4. Total ammonium-N (NH₄-N) concentrations in runoff from different feedlot pen surfaces during different sampling events. The error bar represents the standard deviation.





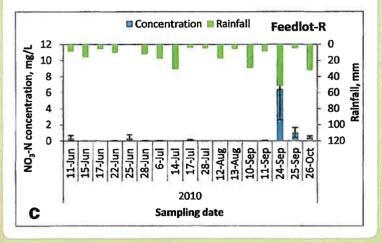
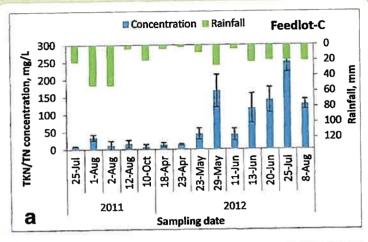


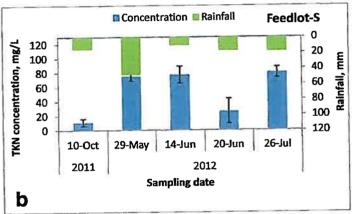
Figure 5. Total nitrate-N (NO_3 -N) concentrations in runoff from different feedlot pen surfaces during different sampling events. The error bar represents the standard deviation.

Figures 5a, b and c show the NO₃-N trends during different sampling dates at Feedlot C, Feedlot S and Feedlot R, respectively. Comparatively, overall lower NO₃-N concentration was observed at Feedlot C and Feedlot R versus Feedlot S. The NO₃-N concentrations in runoff samples ranged from 0.04 to 6.16, 0 to 44.52 and 0 to 6.43 mg/L at Feedlot C, Feedlot S and Feedlot R, respectively.

Except at Feedlot S, NO₃-N concentrations always were below the EPA minimum allowable effluent discharge concentration level of 10 mg/L but higher than the maximum limit criteria for Class I streams in North Dakota (1.0 mg/L).

Similarly, these values are also higher than the allowable NO₃-N in lakes and reservoirs in North Dakota (0.25 mg/L). If runoff water reached downstream, it could impact aquatic species and recreational uses. Also, water may be a source of toxic levels of nitrate for livestock, but safe levels of potentially toxic nitrate concentration in water for livestock is very high (500 mg/L).





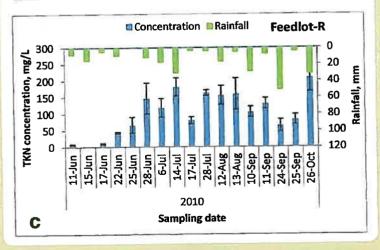
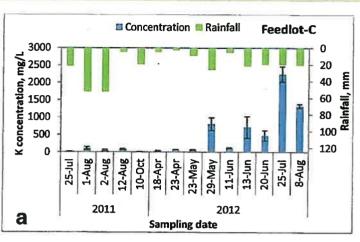


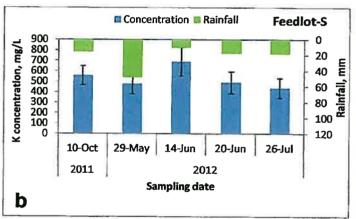
Figure 6. Total Kjeldahl nitrogen (TKN)/total nitrogen (TN) concentrations in runoff from different feedlot pen surfaces during different sampling events. The error bar represents the standard deviation. Total nitrogen was measured for samples collected in 2012.

Average concentrations of total Kjeldahl nitrogen (TKN) during sampling events from Feedlot C. Feedlot S and Feedlot R are presented in Figure 6, and pooled overall concentrations are presented in Table 1.

Overall, TKN/TN ranged from 6.58 to 251, 10.95 to 80.79 and 7.95 to 209 mg/L for Feedlot C. Feedlot S and Feedlot R, respectively. According to the EPA Ecoregions V (North Dakota), the maximum allowable TN concentration for rivers and streams is 0.88 mg/L, and according to the North Dakota Class I stream criteria, the maximum allowable TN concentration is 1.0 mg/L.

If runoff from these feedlots (Feedlot C and Feedlot S) reached downstream, TN concentration might exceed the EPA Ecoregions V recommendation for the North Dakota maximum limit criteria of Class I streams. To reduce TKN/TN in runoff water, a vegetative filter strip or settling basin might be the best option because vegetative filters are effective in reducing TS, and TKN/TN is correlated with TS.





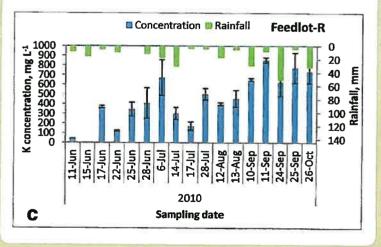


Figure 7. Total potassium (K) concentrations in runoff from different feedlot pen surfaces during different sampling events. The error bar represents the standard deviation.

Concentrations of K at different sampling events from Feedlot C, Feedlot S and Feedlot R are shown in Figures 7a, b and c, respectively. Potassium concentration in runoff at Feedlot C was very low in 2011 but was found very high in 2012 (Figure 7a). The large number of animals produced per feedlot increased the amount of manure, leading to a greater amount of nutrients available for transport by runoff, which may result in greater K value in Feedlot C.

Potassium concentration ranged from 12 to 2,246, 437 to 689 and 43 to 854 mg/L from Feedlot C, Feedlot-S and Feedlot R, respectively. Potassium transportation may increase with rainfall intensity and feedlot slope. The major concern using feedlot runoff for land application is the high concentrations of K, which may increase salinity in soil.

Summary

Open cattle feedlots may contribute significant amounts of nutrients in runoff. If runoff from feedlots reaches downstream, it might exceed existing nutrient criteria for Class I streams and the surface water numeric standard in North Dakota. This may lower water quality and cause pollution issues.

Producers, engineers, Extension agents and policymakers may use this runoff quality information to design and implement acceptable technologies or management practice to control target nutrients from open beef cattle feedlot runoff.

Acknowledgement

This project was funded by the North Dakota Department of Health and EPA-ND section 319 (h). The authors also acknowledge the beef cattle feedlot owners for providing access to their facilities.

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GLEN INNES STYFRN COUNCIL The General Janager. FOR ACTION Year Dis ON Tadan This cattle feed lot should mot be allowed to go a lead.

We hived, worked an a feed lot for a few years, the worst job we live hed. the cattle were only able to feed from they become biogged, as the feeder had to be moved all the time. I had terrible headarches from the smell of usine of the roise wasn't now 9 hen but all the time from their hellows I noise from the machine Plus de cattle feed shouldn't be ao close to our water catchement, I ad close to town, plus not fair to the other farmers. that line close his No we cant support, I do not want this feed lot around Glendines Regards

Sent:

Tuesday, 24 November 2020 9:16 AM

To:

Council Email

Subject:

Proposed DA for a feedlot at Stonehenge

It has come to my attention through social media that a new DA for the Stonehenge Feedlot has been submitted. As the Feedlot is to be in the Glen Innes water catchment area the town water supply could be compromised. I'm sure the residents would not be happy with a Council who would approve such a DA, particularly when they previously had been through years of drought and water restrictions. Water is a precious commodity as I'm sure you are aware.

My family have been frequent visitors to Glen Innes and loved the pristine environment. I'm afraid we would really not want to frequent a town with a chance of contaminated water. We would regretfully find another place to holiday as would a lot of other tourists which would undoubtedly hurt the town's tourism dollar. I really feel for the residents in the vicinity of Stonehenge who would have to live with the odour of a Feedlot, let alone the very likely chance of contracting Q Fever.

this DA is approved Glen Innes Severn Council should be ashamed of themselves.

Sent from my iPhone

Sent:

Monday, 23 November 2020 4:11 PM

To:

Council Email

Subject:

Development Application Number: 25/20-21

The General Manager,
Glen Innes Severn Council.

I wish to make objection to the above proposed development on the following grounds:

Unacceptable Biohazard Risk: The high volume of effluent emanating from this proposed facility poses great potential for contamination in the Beardy Waters catchment which is the primary source of water supply to residents and businesses in Glen Innes. Property owners from outside the urban area also rely upon town supply in times of drought. Proper management of this volume of waste would be a complex procedure requiring constant ersight from all relevant authorities, including Council, with no guarantee that contamination would not still occur due to unforeseen weather conditions, equipment failures, planning deficiencies or simple human error.

Pollution: Placing 1000 head of cattle into a feedlot environment will result in excessive noise and odour ermanently affecting nearby residents. Strong winds will spread this pollution further afield, impacting property owners over a wider area.

Heavy Vehicle Access: Operators of heavy vehicles going to the proposed site have the option of using Glen Legh Road as an alternative to the New England Highway which has no slip lane necessary for large, slow trucks safely entering and leaving Stonehenge Road. Sections of the Glen Legh Road are already in very poor condition and any increase in heavy vehicle traffic will require expensive remedial work.

Contradictory Planning Controls: It is unconscionable for Council to approve developments of small rural lifestyle blocks obviously intended for residential rather than full time agricultural use and then permit a high impact feedlot in the immediate vicinity. Affected property owners would have expected normal grazing and cropping activities around them but they could not have anticipated that such a development would be proposed, let alone approved. Potential residents and investors in the district will lose interest when they see properties drastically devalued by an ad hoc planning process.

Precedent: In the event that this proposal is approved then it is logical to assume that more agricultural producers "Il embark upon similar projects, affecting other localities within Councils control. Once a precedent has been established it will be that much more difficult for neighbours to argue against further feedlots regardless of their lack of suitability.

Liability: If this development proceeds, affected property owners are likely to seek legal redress from Council leading to an expensive, divisive and drawn out process. Staffing and financial resources required to defend any class actions would result in a curtailment of existing programs to the detriment of rate payers.

I would therefore, urge Councillors to reject this proposal as it is grossly unsuitable on all counts for this area.

Glen Innes NSW 2370



22 lovember 2020

GLEN INNES SEVERN COUNCIL Received by Records

23 NOV 2020

FOR ACTION:

FOR INFORMATION MRPS/TP

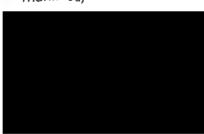
To: The General Manager

Gleninnes Severn Council

Submission about Development Application 25/20-21 Jardana Feedlot

I am strongly against the Jardana Feedlot. I do not want any risk of contamination to our water catchment area from a feedlot. I have been near feedlots and the smell of feedlots can be unbearably not beallowed so close to residential subdivisions.

Thank You,



Political Donations and Gifts Disclosure Statement

Political Donations and Gifts Disclosure to Council

If you are required under section 147(4) or (5) of the Environmental Planning and Assessment Act 1979 to disclose any political donations or gifts (see page 1 for details), please fill in this form and sign below. (see page 1 for details), please fill in this form and sign below. (See page 1 for details), please fill in this form and sign below. (See page 1 for details), please fill in this form and sign below. (See page 1 for details), please fill in this form and sign below. (See page 1 for details), please fill in this form and sign below. (See page 1 for details), please fill in this form and sign below. (See page 1 for details), please fill in this form and sign below. (See page 1 for details), please fill in this form and sign below. (See page 1 for details), please fill in this form and sign below. (See page 2 for details), please fill in this form and sign below. (See page 2 for details), please fill in this form and sign below. (See page 1 for details), please fill in this form and sign below. (See page 2 for details), please fill in this form and sign below. (See page 2 for details), please fill in this form and sign below. (See page 2 for details), please fill in this form and sign below. (See page 2 for details), please fill in this form and sign below. (See page 2 for details), please fill in this form and sign below. (See page 2 for details), please fill in this form and sign below. (See page 3 for details), please fill in this form and sign below. (See page 4 for details), please fill in this form and sign below. (See page 4 for details), please fill in this form and sign below. (See page 4 for details), please fill in this for details and sign below. (See page 4 for details), please fill in this for details and sign below. (See page 4 for details), please fill in this for details and sign below. (See page 4 for details), please fill in this fill in this for details and sign below. (See page 4 for details), please fill in this fill in this fill in this fill in this fill	SUBMISSION IN RELATION TO AN APPLICATION?	 state below any reportable political donations or gifts made by person making this declaration or by other relevant persons state below any reportable political donations or gifts you have made over the 'relevant period' (see glossary on page 2). If the donation or gift was made by any persons with a financial interest in the livoude Australian Business Number (ABN). floud a Australian Business Number (ABN). floud a papilicant of a planning application state below any reportable political donations or gifts that you know, or ought reasonably to know, were made by an associate. If you are a person making a submission in relation to an application, state below any reportable political donations or gifts that you know, or ought reasonably to know, were made by an associate. 	Name of donor (or ABN if an Donor's residential address or entity's registered Name of party or person who address or other official office of the donor; address of the donation was made, or person to whom address or other official office of the gift or entity's address the gift or entity's address.
If you are required under section (see page 1 for details), please sclosure Sfatement Details	ircle relevant option)	eportable political donations o State below any reportable p include Australian Business If you are the application, OR If you are a person making	Jonation Name of donor (or AE string) or gift? entity); or name of pers made the gift

By signing below, I/we hereby declare that all information contained within this statement is accurate at the time of signing.

Please list all reportable political donations and gifts—additional space is provided overleaf if required

Date Received:		<customer name<="" th=""></customer>
Application No: Date F	Activity Type: Development/Applications/Political Donation Declaration	Document Name: <application identifier=""> Political Donation Declaration <customer name:<="" th=""></customer></application>
Office Use Only:	Activity Type: Developme	Document Name: <applic< td=""></applic<>

Sent:

Monday, 23 November 2020 12:41 PM

To:

Council Email

Subject:

Objection to Cattle Feedlot at Stonehenge.

General Manager,

Regarding the DA for the Cattle Feedlot at Stonehenge I hereby advise that I Strongly Object to GISC approving this DA and my reasons are listed below.

This Feedlot negatively affects many local residents. It is located in the Glen Innes water catchment area. It is too close to the Glen Innes township.

el the location of this Feedlot is not in the best interest of Glen Innes and it's residents.

Your sincerely

ELENTINHES SEVERN COUNCIL
Received by Records

2: 100 2020

FOR ACTION TSO
FOR INFORMATION MR PS/TP

Glen Innes 23.11.2020

Dear sir,

As a rate payer in Emmaville for your

I had to put up with feed lot stink, every time

the wind blew from the south east.

As a rate payer in Glen Innes, I do not

look forward to the smell blowing over town,

not to mention pollyting the water table.

I have never made a donation to any political garty

Please do not allow this feed lot near Glen Innes.

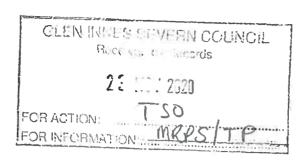
Unless you want to spend money advertising Glen

as the town to more to only if you are a heavy smoker

Yours faithfully

GLEN INNES 2370

19th November 2020



TO WHOM IT MAY CONCERN

Re: DA No 25/20-21

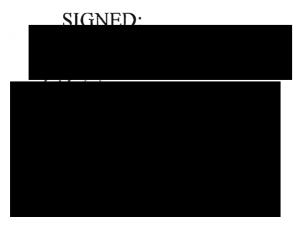
We oppose the Jardana Pty Ltd Cattle Feedlot at Stonehenge.

It is far too close to the town's water supply and to Glen Innes and it has close neighbours. Have you ever smelt the foul odour coming from a feedlot?

How could this have been passed by council without written notification been given to the ratepayers asking for objections?

We are very displeased with the way this council passes SUBDIVISIONS

AND THE PURCHASING OF PROPERTIES without written notification to and a chance to object from the neighbours. This has never happened with previous councils.



From: Sent: To: Subject:	Monday, 23 November 2020 9:10 AM Council Email Jardana Feedlot
Dear Mr Bennett,	
RE: Development Application 25/ 'Jardana Feedlot' 34 Pedlows Roa	
The towns water supply is a concept washed into our tanks. Are we has had cancer with chemotof others in the area. It will be in the area. It will be in the area. We are extremely concerned that easterly winds which are commonal one the Stonehenge area has havindows and doors!!! If will be in the area. We are extremely concerned that easterly winds which are commonal one the Stonehenge area has havindows and doors!!! If will be in the area will area will away to live with, we are well away.	therapy in the last months & we are extremely concerned for our health & that e will see this feedlot everyday as we drive to work as it his highly visible from our
stepped out of our car and smelt was a feedlot less than 2 kms awa Glen Innes won't be immune to t	the feedlot we would be jumping right back in, but in saying that if we knew there ay we wouldn't even look in the area. he smells either as the southerly winds blow !! nis beautiful area around farms not thinking that we would have to deal with a
We have nothing against Mr Pedl that are not situated close to hor	low but we're sure there is a more suitable position on one of his many properties mes and water catchments.
Thank you for your time & we ho	pe the council consider the ratepayers views this time
Kind Regards	

Sent from my iPad

glen Inner Lovern Council Water catalment Protection GLEN INNES SEVERN COUNCIL Received by Records Location incompatiblety 23 NOV 2020 adverse Health and Lafety Social ampact Biohazad Explogically Sustamable Devalorents & DD Native that I habitet impact Culturage Histoge impact There is my concerns of. Feel but so. Slone Herge.

0

Sent:

Sunday, 22 November 2020 7:30 PM

To:

Council Email

Subject:

Stonehenge Feedlot

To the General Manager

I have recently learned, through social media, that a new proposal for the Stonehenge Feedlot has raised its "ugly head". I was so relieved when the former proposal was withdrawn. To say that I'm disappointed about this new proposal would be a very large understatement.

Having previously enjoyed this picturesque, idyllic setting many times over the years, it saddens me to think that it could all be marred by a feedlot. I will certainly not be frequenting Stonehenge should said feedlot be approved. Having previously resided near a feedlot, I have no desire to experience the stench, dust and cattle trucks again. It is certainly not my idea of an ideal setting I'm afraid. I will also not be jeopardising my health or that of my children and grandchildren by subjecting them to tainted drinking water and the threat of Q fever.

Whilst I am not a vegetarian as such, I consider the conditions which cattle are kept under in feedlots to be absolutely barbaric.

Thank you for your time and I can only hope that you realise how detrimental this proposed feedlot would be to the community of Stonehenge and surrounding areas.

Yours sincerely

Sent:

Sunday, 22 November 2020 8:22 PM

To:

Council Email

Subject:

Attention General Manager

Development Application 25/20-21 Jardana Feedlot

Dear Sir,

I wish to lodge my objection to the proposed feedlot at Stonehenge.

As a beef producer I am not anti feedlots but I am apposed to the location.

Over the last thirty to forty years council has allowed farm land, along the New England Highway from the Stonehenge recreation ground to Glen Innes to be split up for lifestyle blocks. It is now not appropriate for a evelopment of this kind to go ahead next to what council has allowed to become a semi-rural area and this close to town.

I also feel that the proposal has the potential to create animosity between towns people and the wider grazing community.

The applicant should be encouraged to build the feedlot in a more appropriate location away from lifestyle blocks and preferably not in the Glen Innes water catchment.

I hope council, considers carefully this application and is mindful of the effect it could have on the wider community.

Glencoe NSW 2365.

Sent:

Thursday, 19 November 2020 5:53 PM

To:

Council Email

Subject:

PROPOSED INTENSIVE FEEDLOT AT STONEHENGE

I am extremely disappointed to learn that this proposal is being considered again after the residents expressed their concerns about the location of this facility.

If a feedlot is to be developed it should be far outside the Glen Innes water catchment area and nowhere near the head of the Beardy Waters and the Glen Innes water supply.

Where is the environmental impact study which provides Council with information that this proposed feedlot will not affect our water supply, our air quality from smells, noise and dust and that this development will not affect the surrounding residents. These residents have bought and established their home in a fresh air, rural environment and no doubt will be feeling betrayed by this Council if this is approved. Council should take into consideration the fect on these people.

Is it possible to consider a public meeting now that Covid restrictions are easing.

Dear Sir
MY OBJECTIONS TO DEVELOP MENT. PLANS OF FEED LOT. AT. 34 PEDLOWS RD.
D CONTAMINATION OF WATER SUPPLY 2) SMELLS OF FEED LOT. FO. MEANBY, NABOURS AND. JONN.
3) IMPACT. TO FISH AND WIDLIFE 4) VALUES OF PROPERTY. Will DECLINE
57 COUNCIES OBJECTIVITY. NOT. IN BEST INTEREST. OF RATE PAYERS
THANK U.
PLEASE WAITE BACK, TO ME.

GLEN INNES SEVERN COUNCIL Received by Robords

23 NOV 2020

FOR ACTION: TSO

FOR INFORMATION: MC

Sent:

Monday, 23 November 2020 11:18 AM

To:

Council Email

Subject:

Feedlot DA Objection

General Manager,

Regarding the DA for the 1000 head Intensive Cattle Feedlot at Stonehenge I hereby advise that I STRONGLY OBJECT to GISC approving this DA for a multitude of reasons including the below.

- 1. Its location in the Glen Innes water catchment area.
- 2. Its close location to a large number of residential homes.
- 3 Its close location to the town of Glen Innes.
- 4. Its highly visible and offensive by-products including odour, noise, huge increase in vehicular and large truck traffic near established residences, biohazard to other farming activities in the area, reduction in adjoining land values and the negative visual impact on the picturesque valley.

The fact that this DA negatively affects many local residents, GISC must put their interests ahead of the DA's one persons interest, and REJECT this DA.

Thanking you,



Lawn Plannes.

application on the property 34 Pedlow Road Stonehange My objections are

The proposed development is in close proseinity to residential homes tourist attractions id will be seen from homes , highway and is located in the water latchment. This will decrease the value of any homes farms also development housing potential for the future People have bought homes or farms to netine in later life to live a clean healthy life style but it well cause - noisi, dust, odour, disease personal fublic social reconomici.

I believe council has to take into consideration

the potential hassaids it can cause.

("he town water catchment (Beardy waters) is virtually adjacent too proposed rite which supplies are town water, with significant rain fall in winter months could potentially course mismanagment events the lower water security could be compromised, not to say the impact this could have on our indangered species eg murray est a turles.

Traffic will be descripted at Stone hange - Ren Englan High way due to large heavy whiches turning off highway cousing significant noise to nearly residents. In conclusion I feel these has been no

consideration been made to this proposesi alle development. It could be neould further from

town, the measiby residents a surrounding froperture & Beardy Water catchment too prevent the potential knower floods that well have segrepeant over flow of water into our catchment system. This will mean low waferation rate for the eattle pens, open effluent drains, manuse slockpiles,

EMBRACING CHANGE, BUILDING ON HISTORY

Our Ref:KT:NW:ECM579521

10 November 2020



Stonehenge NSW 2370

Dear Sir & Madam.

RE: DEVELOPMENT APPLICATION NUMBER: 25/20-21 PROPERTY: 34 Pediows Road, Stonehenge.

Lot 125 DP659979, Lot 1 DP308507, Lot 126 DP753311, Lot 22

DP753311, Lot 23 DP753311, Lot 2 DP1115100, Lot 3 DP1115100, Lot 1 DP1115100, Lot 1 DP180562, Lot 1 DP114064, Lot 13 DP114034, Lot 4 DP114034, Lot 12 DP114034, Lot 5 DP7243, Lot 2 DP7243, Lot 1 DP7243, Lot 4 DP7243 And Lot 3 DP7243.

Council is in receipt of an application for 1,000 Head Cattle Feedlot at the above property.

Stone henge w.sn.



STONEHEN GE N.S.W.

ES WE ARE OBJECTING TO
THIS FEED LOT

GLEN WATER TO THE COUNCIL

Records by Records

231.1.2320

FOR ACTION: MR.PS

: council@gisc.ri. site: www.gisc.nsw.gov.au . 81 365 002 718 ئاد.





Stonehenge NSW 2370

18 November 2020

The General Manager Glen Innes Severn Council P O Box 61 GLEN INNES NSW 2370

Dear Sir,

RE: Public Submission on Development Application No: 25/20-21 Jardana Feedlot, 34 Pedlows Road, Stonehenge, NSW 2370

I have concerns regarding the above submission and its impact on the Beardy Waters Catchment.

The Beardy Waters is a finite resource in dry times and in times of flood there may be unavoidable runoff from the feedlot.



The General Manager

PO Box 61

Glen Innes NSW 2370

GLEN INNES STAFFIN COUNCIL

Harman, av Herords

2 0 110V 2020

FOR ACTION

TSO

FOR INFORMATION:..

11 November 2020

Dear Sir

I am writing in objection to the Development Application no:25/20-21

Property: 34 Pedlows Road

Stonehenge

I have previously objected a Development of a Cattle Feedlot application for the above property and again wish to strongly express my objection.

As this development is quite close to my property, I feel it will seriously de value my property and harm my family's welfare as to the smell and noise a Cattle feedlot close by can cause. There is also an environmental impact that would certainly be a problem to surrounding properties and Waterways ,as I'm sure were previously stated on studies done on the previous application as well.

In closing I have driven past other feedlots in the past and the smell and noise to the immediate areas surrounding these feedlots can be unbearable. A Feedlot close to our property would certainly ruin what we now know as a beautiful quiet area of small farm lots.

Thank you for your consideration

Yours faithfully



Stonehenge NSW 2370

Sent:

Monday, 23 November 2020 9:20 AM

To:

Council Email

Subject:

Development Application Number 25/20-21 Jardana Feedlot

Attachments:

gisc DA rejection letter.pdf

Please find attached my letter regarding the referenced D.A.

Regards

The General Manager
Glen Innes Severn Council.

Reference: Development Application
Number 25/20-21 Jardana Feedlot.

I believe the Glen Innes

Water Supply should be protected
from any risk of pollution or
contamination, for the present
and into the future, and feel
strongly that the referenced
Development Application should
be rejected.

Beauths

Rate payer and long Herm resident

Sent:

Saturday, 21 November 2020 2:33 PM

To:

Council Email

Subject:

ATT: General Manager

Attachments:

action group flyer feedlot.pdf

att: Craig Bennett

General Manager

G.I.S.C.

TO WHOM IT MAY CONCERN

It has come to my attention that a 1000 head of cattle feedlot is being proposed for development within this local council's purview This letter is by way of OBJECTION to this new redevelopment. I am happy to outline my reasons in person . However I understand that this may NOT be possible. So I will briefly outline them for you here.

<u>Firstly: This project appears to benefit a few at the DETRIMENT to the many</u>

I am led to believe that the current council and a previous council that sat circa 2012 have not been vigilant in exercising their elected responsibility regarding rezoning demarcation as well environmental impact (pertaining in particular to the proposed reedlot development) As well it is uncertain that council have in fact even considered the local community at all .I refer to in particular the housing development that has already been acted upon (and as well I might add; all with in an apparent council zoning that possibly allows for a rural /agricutural type industry but NOT a residential environment?) I must admit that the questions raised above are not with my own range of expertise I wonder if the NSW Ombudsman could give some clarity for me. Food for thought in any event.

As I am not in contact with the action group that seems to be doing a remarkable job of raising public awareness; I am uncertain as to whether they have in fact, alerted the

N.S.W. Ombudsman as yet . So it may be a moot point. None the less I was happy to see that 2 councillors left to room citing pecuniary interests regarding the feedlot proposal and thus completing their legal duty. It is to be noted that these 2 councillors have in fact sat on council during the same time the afore mention "suburban" re developement within a agricultural / rural zone setting took place I wonder IF they left the room then?

It may be somewhat obvious by now that I am not born and bred in this region I have .however been here long enough to know that simply leaving a room when one has a conflict of interest and in particular of a pecuniary nature merely "covers" one against perceived criminal activity . But as I said: I have been here long enough to

realise that their 'influence 'still remains in the room ..'old school tie'and or fear of social reprisal etc. Makes me ponder!

In the interest of full disclosure I will be putting this matter to the attention of my Party MP hoping that they will be able to clarify my concerns I am also considering contacting the NSW Ombudsman for my own piece of mind as well.

The above is but one of my concerns I have others regarding this project see attached letter.

Please don't hesitate to contact me in writing by phone or by way of personal interview

Respectfully





Semit:

Sunday, 22 November 2020 8:06 PM

To=

Council Email

Subject:

Objection to Development Application 25/20 - Jardana Feedlot

Attachments:

Development Objection - Political Donations and Gifts Disclosure

Statement.pdf

Goodday

Re: Objection to Development Application Number: 25/20-21 - Jardana Feedlot

I wish to lodge my objection to the above development.

I ha ve attached a document "Development Objection – Les Chard.pdf" covering the details, together with my Political Donations and Gifts Disclosure Statement.

vill also submit a hard copy of my objection.

Thankyou Kind regards



The General Manager Glen Innes Severn Council PO Box 61 Glen Innes NSW 2370

Re: Development Application Number: 25/20-21 - Jardana Feedlot

Good day

I wish to lodge my objection once again to the above development.

My number one concern is that this development is in the catchment area of the Glen Innes Water Supply. Under the Environmental Planning and Assessment Act, this alone should have stopped the application before now. No matter how diligent people are, mistakes will be made over the coming years if this development is allowed. This will put our water supply at risk. All Glen Innes residents have a right to safeguard their water supply. It is also Council's responsibility to safeguard our drinking water supply.

My second concern is for all the nearby residents, especially those who have moved into the nearby subdivision and could now find their situation changed and their land values decreased.

Also, there are the other problems such as traffic, noise, dust and odour.

I trust Council will see these dangers and act accordingly.

Yours sincerely



22/11/2020

Sent:

Thursday, 19 November 2020 9:01 PM

To:

Council Email

Subject:

'Intensive Cattle Feedlot' at Stonehenge.

is my name. I wish to give notice of my objection to the proposed cattle feedlot at Stonehenge.

If approved by Council as the consent authority, this intensive feedlot will pose significant risks and impacts including cumulative impacts to the community, the local Beardy Waters Catchment, groundwater, Public health and safety implications, vulnerable and threatened biodiversity and ecosystems and grificant animal welfare considerations.

Sent:

Thursday, 19 November 2020 5:43 PM

To:

Council Email

Subject:

PROPOSED INTENSIVE CATTLE FEEDLOT AT STONEHENGE

To our elected representatives and our Council officers.

I was very disappointed to learn that this proposed feedlot is now back on the table.

I have written to Council, signed petitions against this proposal and have spoken to many Glen Innes residents who are completely against this proposal.

I have travelled extensively in NSW and Queensland and have seen the effect of these *small* intensive feedlots. I have smelt them from kilometres away from their site and have seen the dust raised.

"'hy pollute our waterways, inflict smell, attract flies and vermin to our pristine part of the world. We have a lourishing tourist industry which we are encouraging people to visit.

Please listen to your residents and act on their behalf.

If there is a huge amount of support for this proposal, let me know as I have not spoken to anyone who supports this proposal at the current site.

Sent:

Thursday, 19 November 2020 5:23 PM

То:

Council Email

Subject:

feedlot

Why do we need another feedlot so close to our water and so close to people in general, dosent make sence.

Sent from Mail for Windows 10

Sent:

Thursday, 19 November 2020 10:31 AM

To:

Council Email

Subject:

feedlot

Hi,

I am lodging my show of disapproval for the apposed feedlot. I do not agree with the feedlot being set up so close to town.

Yours faithfully

Sent: Wednesday, 18 November 2020 6:10 AM

To:

Council Email

Subject:

Re Proposed Feedlot Stonehenge

TO WHOM IT MAY CONCERN

I am hereby putting my objection forward to the proposed feedlot at Stonehenge. I can't believe this has surfaced again.

We live quite close to the area in question and definetely will NOT tolerate this so close to our home and to other family homes and so close to our towns water supply. I am hereby asking you to put this ridiculous, money grabbing scheme to bed once and for all.

Sent from my iPhone

Sent:

Wednesday, 18 November 2020 10:50 AM

To: Council Email

Subject:

Attn General manager

I object to the feedlot application for 34 pedlows road. Start putting interest into the people of the town. Our water is terrible as it is! Put the people before your profit!

Get Outlook for Android

Sent:

Wednesday, 18 November 2020 2:35 PM

To:

Council Email

Subject:

Development Application: Number 25/20-21-

Feedlot..

To.

GENERAL MANAGER

This is my submission to your attempt at putting a feedlot at Stonehenge.. This would be a CATASTROPHY for our town (Glen Innes...just to clarify) It would be seen from the highway...it would be stinking to high heaven. As is the one at Rangers Valley on a hot day with breezes blowing. Both the look and the smell would be visible from the highway... People on holidays(tourists) really don't want to be reminded of where their steak is coming from and how cruel it is .I can hear it now "geeze don't go there, bloody place stinks"

. is also in the town water catchment..

Feedlots really need to be out of sight and out of mind.

It is insulting to the citizens and ratepayers of Glen Innes to continually attempt to slip this development thru.

Shut it down once and for all .Tell them to go find another plot of ground. Council MUST stop this NOW.

Glen Inness RATE PAYER.

Sent from Mail for Windows 10

Sent:

To:

Cc:

Subject: Attachmen Tuesday, 17 November 2020 10:26 AM

Council Email

Carol Sparks; Dianne Newman; Glenn Frendon; Andrew Parsons; Colin Price; Jeffrey

Smith; Steve Toms

Objection to Jardana feedlot DA 25/20-21

16th Nov objection to feedlo

latest.rtf

16th November 2020

Mr Craig Bennett
General Manager
Glen Innes Severn Council
136 Church Street
Glen Innes NSW 2370

Dear Mr Bennett,

RE - DEVELOPMENT APPLICATION 25/20-21. "JARDANA FEEDLOT" 34 PEDLOWS RD, STONEHENGE.

Once again we strongly OBJECT to this proposed feedlot development and would like to register our OBJECTIONS as we are directly impacted by it.

Our reasons are as follows:

1. BEARDY WATERS & SURROUNDING WATERCOURSES

The town's water security is a worrying issue not only for Stonehenge but also the Glen Innes township as well. The proposed feedlot is still approximately 1 km uphill from the Beardy [which is the town's major water supply]. The feedlot with its stated storm water drains, effluent drains, sediment basin, composted animal pile, burial site & manure stockpile is still too close to the river. Even if the applicant spreads all this over his entire property [i.e. -all his DP's] it will still find its way downward to the lower water source. Run-off downhill of manure, urine, faeces & chemicals will travel along the ground surface as well as leech below the ground. In times of heavy rains all the water courses running over his whole property will ultimately flow into the Beardy as its natural catchment area.

When the Beardy floods & water levels rise, peak periods of wet weather will make containing the effluent more difficult resulting in more contamination. As well as polluting our major water source the odours will be awful too as the pads will take much longer to dry.

This year alone Stonehenge has received over 900mls of rain to date.

In times when it is dry the smells, dust & odour will still be blown for miles around especially in winds from the E & S.E. Winds that are common to this area.

Also how much water will be taken from underground aquafers & the Beardy to supply this feedlot? Despite the stated dams & bores 1,000 head of cattle require thousands of litres of water per day especially in hot summers.

Can the threat of polluting our major water supply be risked?

2. PROPOSED FEEDLOT POSTION & AMENITY OF THE STONEHENGE AREA

The area of Stonehenge is made up of many small landholders, larger farms & homes - all very close to this proposed development. Over the last thirty years Council has agreed to the sub-division of land in this area for our smaller holdings but now appear to disregard objections from them for this Feedlot. The distance from the feedlot to neighbouring properties is 1 km - 3 kms taking into account Surrey Park, East & West Pandora Roads, Glen Legh Road & Lambs Valley as well as those on the NE Highway, all of which surround this valley & proposed development site. The natural amenity of this beautiful area is being compromised by the proposed development by one man against the dozens of residents living here. Remember we are all rate payers & voters in this Council area & deserve a right to be heard and counted.

3. TRAFFIC ISSUES

Grain needs to be delivered to silos & cattle need to be transported both to the feedlot and then transported away from it at weight maturity. This will increase traffic flow both to & from Stonehenge Rd merging onto the NE Highway with its 100 km speed limit, making it extremely dangerous with large trucks & B -Doubles merging. This is dangerous!!!

To conclude we support farmers & their right to produce & profit but not at the expense, or impact against, their immediate neighbours, surrounding communities & the Glen Innes township.

Yours Sincerely

Sent:

Tuesday, 17 November 2020 1:00 PM

To:

Council Email

Subject:

cattle feed lot gleninnes area

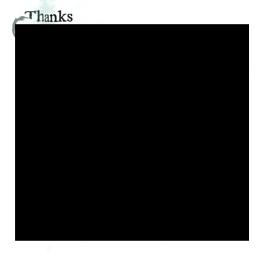
OF GLEN INNES ARE
OPPOSED TO THE FEED LOT TO BE STARTED HERE IN THE SHIRE OF GLEN INNES, IN REALITY WE ARE NOT OPPOSED
TO THE IDEA OF A FEED LOT IT SELF BUT THE FLY, WATER AND AIR POLUTION, IT WILL ATTRACT TO OUR BUSINESS
OPPERATIONS HERE AT OUR WE ALL READY HAVE CATTLE HERE AROUND US, AND THE FLY
POLUTION CAN BE UNBEARABLE WITH THE JUST FEW HUNDRED HEAD IN AND AROUND US HERE IN SUMMER ALL
READY, MENTIONED BY OUR CUSTOM WHEN RESIDEING HERE ON HOLIDAYS ON A POWERED CARAVAN SITE. OR
NON POWERED SITE, CAN THIS FEEDLOT BE MOVED FURTHER AWAY FROM THE TOWN AND OTHERS, AS
GEOGRAPICLY, IT WILL BRING ABOUT ISSUES WE HAVE STATED, THAT WAY IT'S A WIN, WIN,...FOR EVERYBODY FOR
THE AREA. KIND REGARDS,...ROSS AND BRIGITTE WILSON.

Sent:
Sent:
Solution:
Subject:
Subject:
Description:
Subject:
Description:
Descript

Attn: Town Planner

Good moning Kathleen

Please seattached for a objection letter to DA 25-20-21 Pedlows proposed feedlot - November 2020. We will also drop the original letter of objection in to the Town Hall office.



Stonehenge NSW 2370

The General Manager Glen Innes Severn Council PO Box 61 Glen Innes NSW 2370

Applicant:

Jardana Pty Ltd

Development:

Intensive livestock agriculture: 1000 head cattle feedlot

Application Number:

Development Application No.25/20-21

Property:

34 Pedlows Road, Stonehenge.

Lot 125 DP659979, Lot 1 DP308507, Lot 126 DP753311, Lot 22 DP753311, Lot 23 DP753311, Lot 2 DP1115100, Lot 3 DP1115100, Lot 1 DP1115100, Lot 1 DP114064, Lot 13 DP114034, Lot 4 DP114034, Lot 12 DP114034, Lot 5 DP7243, Lot 2

DP7243, Lot 1 DP7243, Lot 4 DP7243 And Lot 3 DP7243.

Dear Sir/Madam

Objection to the Development of the Intensive livestock agriculture: 1000 head cattle feedlot at 34 Pedlow Road, Stonehenge NSW 2370.

We wish to strongly object to this proposal on the following grounds:

The proposed site for this feedlot is in close proximity to our residential address. The proposed site is upwind of our home and the smell, dust and noise would most certainly impact on our quality of life if the proposed feedlot proceeds.

Wind corridor:

This proposed site for the "Jardana" feedlot lies in a high wind corridor starting around the Stonehenge Recreation Area and going through to the Grafton Rd Beardy Waters Bridge following the Beardy Waters system. This valley is highly populated with numerous subdivisions so we would not be the only residents adversely affected by this proposal.

Smell:

The waste generated by feedlots has a by-product that is very pungent, to say the least, particularly after rain. Concentrated waste managed at its best still gives off a strong odour.

The prevailing winds of this location (the proposed feedlot) are easterly, south-easterly southerly, south-westerly, and westerly, with occasional north westerly winds during the storm seasons. This proposed feedlot is at the top of the **wind tunnel** of this highly populated valley going towards the town of Glen Innes.

Water:

As most residences along this wind tunnel path rely on rainwater as the only water supply to service our everyday requirements, including drinking water. We feel that our water quality will be compromised due to the increased dust levels and the airborne virus and bacterial fallout to our roof catchment.

Noise:

You can hear traffic noise generated from the location adjacent to the proposed feedlot site at Stonehenge all the way to the Grafton Road, Beardy Waters Bridge demonstrating that this valley is affected by the prevailing winds. This noise will increase with the proposed new industry.

Property Valuation:

I would also ask you to consider the drop in valuation in every property along this corridor due to location of this proposed development as people do not want to live anywhere near a feedlot for the above-mentioned reasons. Similarly, the adverse effect that the proposed development will have on people considering relocating to the area.

Water catchment land for the Glen Innes town water supply:

The lay of the land still falls towards the catchment area of the Beardy River.

With the climate extremes of drought, and the then near after floods Mr Pedlow cannot guarantee the containment of feedlot wastes and the potential contamination of the Glen Innes town water supply.

Tourist attraction:

Tourism prospects will also be affected as the main tourist parking bay and rest area on the way into town from the South along the New England Highway promotes the area of Glen Innes. This parking bay rest area overlooks the proposed feedlot. This parking area is always in high demand as a rest area and is used by travellers from all directions coming and going from Glen Innes. We feel that if the proposed feedlot is approved the smell and sight of the feedlot from the rest area will have a significant impact on the tourism prospects for Glen Innes.

Mr Owen Pedlow has obviously spent a considerable amount of money on this application as this is the third attempt with gaining approval.

We have read the STATEMENT OF ENVIRONMENTAL EFFECTS Stonehenge Feedlot Jardana Pty Ltd but real-life experiences do not always conform.

Are our realistic concerns not relevant?

Both are not opposed to feedlots but believe this site is far too close to so many residential homes (that the Glen Innes Council has given approval to prior to this feedlot application) and lie in the prevailing path of the proposed feedlot at 34 Pedlow's Rd.

As we are genuinely concerned rate payers for the town of Glen Innes and its tourism prospects, so we must take this opportunity to do our part and **not give our approval** for this feedlot **on the grounds of location.**

Name:	Signature:	
Name:	Signature:	