



14th October 2009

General Manager
Shoalhaven City Council
PO Box 42
Nowra, NSW 2541

Dear Mr Pigg

RE: Development Application 09/2077

The Basin Villages Forum objects to the proposed non-putrescible waste facility at Tomerong for the reasons set out in the following.

There is no economic or social benefit to the community. This is one company that stands to benefit substantially from this proposal and leave a toxic legacy for future generations to manage. There is no indication of who will be responsible for the future management and cost of this facility once the company has completed filling the void.

No strategic planning document has ever mentioned this type of development. In fact their opposition to this type of proposal is indicated by statements such as "to protect the natural and cultural values of Jervis Bay" (JBREP); "to maintain and enhance the marine, estuarine and natural resources by providing living opportunities which are environmentally, socially and economically sustainable" (Jervis Bay Settlement Strategy); and the vision in the South Coast Regional Strategy is for a "sustainable, attractive and liveable future for the South Coast". To transport waste hundreds of kilometres on overburdened roads into a prime coastal asset makes no sense and lacks any indication that forward planning has been considered in this application.

St Georges Basin is already at risk from the cumulative impacts of the urban development on its shores. This view is supported by the Coastal Lakes Inquiry 2002 and the study conducted by GeoScience Australia. This waste disposal facility will receive long lasting toxins with the intent of holding them in the catchment of this water body. Tomerong Creek runs through the site and into St Georges Basin. This places the future health of St Georges Basin at even greater risk during construction phase and in the ongoing management that will be required for several hundred years. The hydrological study is based on assumptions and is of questionable accuracy. There is no indication of how stormwater, a rising water table and seepage will be managed in the long term.

It is proposed to mound the waste above the natural contour. Best practice mining returns the land surface to the original contour. A mound of this type is inconsistent with best practice, is subject to future erosion and is likely to raise the water table and become unstable.

The concept of trapping the waste effectively in clay and or plastic liners is not proven. There is no evidence that the concept will work. In fact evidence suggests that in the long term these are certain to fail and toxic leachates will infiltrate nearby waterways.

The traffic generated by the waste facility and quarry will escalate to over 30,000 truck movements per year. This impacts on the whole of the Shoalhaven where we have several major traffic issues already. It will have a significant impact on the Princes Highway–Island Point Rd intersection, which is already dangerous, and where there can often be a build-up of traffic between the roundabouts. It is unacceptable to subject residents to this volume of traffic in a rural residential zone. It is ludicrous to suggest that Gumden Lane has the capacity to take 30,000. Neither Island Point Rd nor Gumden Lane has safe egress for either pedestrians or bike riders who currently use this passage. The proposed volume of trucks will make it unusable for local residents. The volume of heavy vehicles will also have a significant impact on road maintenance throughout the Shoalhaven which the ratepayers will have to foot the bill for.

The noise data in the EIS uses averaging to conveniently bring the noise impact to just below the level where noise attenuation would be required. This ignores the peak noise levels which is what will affect local residents most. There is no independence in the assessment and it is the residents who will pay the price in loss of amenity. It speaks loudly about the character of the proponents that they are unwilling to take responsibility for noise reduction yet they ask us to trust them to deal responsibly with toxic wastes.

Tourism is a major employer in the area and a waste disposal centre of this nature is quite likely to diminish the appeal of the area as a tourist destination. This would seriously affect the tourism industry and local employment. The proposal will generate a mere 4 to 5 jobs. How many will it jeopardise?

This type of development will have a negative impact on surrounding land values. The coastal strip of NSW is seen as an area of increased population density. There is no logic in trying to accommodate a toxic waste disposal area and an increase in population density. These are competing interests not compatible ones.

The EIS concludes that the cumulative negative environmental impact will be relatively low. However as a community we would argue that it will impact on our natural assets, our water quality, our roads, our air quality, and our local amenity with increased traffic and noise. There is no discussion about the long-term impact. There is brief mention of Ecologically Sustainable Development (ESD) and the Precautionary Principle. Surely if these principles were responsibly applied, this DA could not be supported by either Shoalhaven City Council or the Southern Regional Planning Panel,

Yours faithfully



President, Basin Villages Forum