

Wyndham City Council Refuse Disposal Facility Works Approval Application

EPA 20B Community Conference Report

PCB Consulting

March 2017

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Introduction

EPA received a Works Approval application for the Wests Road Refuse Disposal Facility (RDF) operated by the Wyndham City Council (WCC). The Wests Road Refuse Disposal Facility (RDF) has been operating as a landfill since 1976, covers 240 ha and is located 8km west of the Werribee central business district. The site has been developed as a series of cells which are used for landfill once quarrying of the area is complete.

WCC proposes to construct four new large landfill cell areas (each made up of multiple cells) and raise the height of existing cells 1A, 2 and 3. Under this proposal, all cells will be filled to 44 m (AHD, essentially above sea level), which is the maximum height allowed under the planning scheme (44m AHD is about 22 m above ground level). The existing cells are currently filled to between 30 and 33 m AHD.

The proposal is for disposal of putrescible waste, solid inert waste, and fill material (the same waste stream as for the existing cells). The site receives waste from across the Melbourne metropolitan area.

The draft application was officially received by EPA on 23rd of June, 2016. Further information was requested by EPA and WCC resubmitted the application with the further information as requested by EPA on 30th November, 2016. Public comment submissions opened on the 14th of December, 2016 and closed on 7th of February, 2017.

The Works Approval application was available for download on the EPA website. The EPA received over 170 submissions. A summary of the issues and concerns raised in all the submissions is included in Appendix 2.

To enable EPA to gain further understanding of the issues that have been raised through submissions, EPA invited all interested parties to attend a public conference held pursuant to section 20B of the *Environment Protection Act 1970*. The public conference was held on the 14th March 2017 at the Mansion Hotel at Werribee Park.

Under Section 20B of the *Environment Protection Act*,

"The Authority shall take into consideration the discussions and resolutions of any conference under this section and the recommendations of any person presiding at that conference."

This report outlines the discussion and key issues identified at the conference and includes recommendations for EPA to consider as part of the assessment of the works approval application. The report has been prepared by the independent conference chair, Cath Botta (PCB Consulting Pty Ltd).

Conference Process

The conference was held on Tuesday 14th March, 2017. Approximately 60 people attended the conference including key EPA representatives, representatives from the Metropolitan Waste and Resource Recovery Group, Sustainability Victoria and Wyndham City Council representatives also attended.

The conference was chaired by Cath Botta, from PCB Consulting Pty Ltd. The process for the conference was designed in consultation with EPA staff and incorporated feedback from the community. The process was designed to ensure all participants had the opportunity to put their perspectives forward, ask questions, and raise issues and concerns with the application.

The conference agenda is included in Appendix 1 of this report.

The conference was opened by the chair and then EPA, represented by Tim Faragher (Manager of Development Assessments Unit), gave a short presentation on the assessment process and a summary of the issues raised in the submissions received.

Wyndham City Council (WCC), represented by Simon Clay (Manager Waste Management & Disposal City Operations, Wyndham City Council) then briefly outlined the proposal, gave an overview of activities at the site, and Wyndham City Council's responses to the main themes in the concerns and issues raised in the submissions including, environmental monitoring, operational issues, odour, landfill gas, fires and buffers.

Two community representatives, were given the opportunity to present further detail on community issues and concerns with the application:

- Connie Menegazzo
- Harry Van Moorst

All participants were then given the opportunity of asking questions or raising further issues or concerns that had not already been identified in the submissions. Harry Van Moorst, representing submitters, was given the opportunity to make closing comments on the key issues and concerns before the conference closed.

Issues, Concerns and Questions

Issues, Concerns and Questions raised by participants at the conference, and any responses given by EPA and Wyndham City Council (WCC) representatives at the conference are summarised in Table 1. The chair's recommendation for follow up actions are also included in the table.

Table 1: Issues, Concerns and Questions raised at the Conference

Key Issues	Issues, Concerns and Questions raised	Summary of Responses given by EPA and WCC	Recommended Follow up Action
<p>Odour and Noise</p>	<ul style="list-style-type: none"> • What is the likely predicted vs actual impact of odour in existing and future (if approved) residential areas? • 500m buffer is inadequate – you can smell from Watton Street • Odour can be smelt from freeway • Noise due to operating hours – next to a growth corridor with residential encroachment- early hours of the morning and increasing the height will mean more noise • Odour modelling – has the sampling and monitoring been adequate? How frequently is this checked over a year? Is the modelling affected by the biases of the consultant employed by council? • What is the likely impact on odour of going higher (tip mountain)? Increased surface area could mean more odour. 	<p>WCC stated that some changes have been made already on site such as extra soil cover, particularly at the end of each day to reduce odour issues.</p> <p>WCC stated that odour complaints are taken seriously and WCC do encourage residents to notify the site manager of any potential odour issues.</p>	<p>EPA need to consider the concerns raised regarding the odour modelling particularly in relation to the proposed height and piggybacking arrangement proposed.</p> <p>WCC need to consider options for how residents and the community can easily raise odour and noise issues with WCC and how these options can be promoted to the community.</p>
<p>Height and Visual Amenity</p>	<ul style="list-style-type: none"> • The landfill detracts from amenity of the area (is an eye sore) and detracts from the view of the rural landscape (You Yangs and rural setting) • Height and visual amenity of the mounded landfill • Concern about the tip mountain impacts on how people feel • Precedent of height approval at 44 m AHD – will this lead to more mounded landfills? • When did council put profits in front of community amenity/liveability? • Land value impacts 	<p>Impact on amenity value is not grounds for EPA to refuse the proposal.</p> <p>Impact on property values is not grounds for EPA to refuse the proposal.</p>	<p>EPA and WCC need to consider a lower height option for the site.</p> <p>EPA needs to clarify and assess the technical feasibility of the proposed height of 44m AHD including the impact on the associated risk profile of the site.</p>

<p>Recycling and transitioning to new technology</p>	<ul style="list-style-type: none"> • Why wait until 2021 for renewable contracts – why not test the market now? • How do we make money from rubbish? Recycle – we have too much to send it all to Land fill • Look at packaging form shops – including plastic bags • Can’t keep going the same way – we need to reduce waste • What is the landfill closure timeline • Waste to energy project – happening at Dandenong – what is the viability for this site? • Reduced incentive for other waste recovery options if 30 years in approved • How does/is council managing the conformity/compliance of incoming loads? • What procedures and practices are used to prevent recyclable material entering the landfill eg batteries, which can cause fires? • What do council do to educate community and how much \$ are spent to do this? • Metropolitan waste and resource recovery group – why are you not raising the bar to ensure that Victoria is not below world standard waste disposal entity. The 30 year plan should ensure phasing in of world’s best practice over next 10 years and not allowing landfill to increase • Why are councils pushing for landfill when community does not support it? • How does council explain the credibility gap between opening up landfill vs encouraging alternatives for next 50 years – the 2 are not compatible – council has a vested interest in not adopting new technology • How do they square up this with the legislation around waste hierarchy and disposal at bottom • When are councillors going to start telling the truth at election times so we know who is supporting this? 	<p>WCC stated that their vision for the RDF was for transformation from a landfill to a resource recovery operation where only residual waste goes to landfill.</p> <p>WCC stated that this works application will secure the sites future and will then enable the Council to explore alternative waste technology with the confidence to invest in alternative technology in the future at the site.</p> <p>WCC stated a whole of site application does not lock in landfilling for the next 30 years.</p> <p>WCC stated that any “profit” from the RDF goes back to the community, currently through additional funding to Council’s capital works program.</p>	<p>WCC need to clarify what waste to energy options have been considered by council to date, Councils assessment of the viability of these options at the site, and Councils plans and timelines for transitioning the site to the use of alternative waste technology.</p> <p>MWRRG and SV need to clarify the future plans for Landfill sites and the timelines for phasing in new technology for waste management at current sites such as Werribee.</p>
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Key Issues	Issues, Concerns and Questions raised	Summary of Responses given by EPA and WCC	Recommended Follow up Action
	<ul style="list-style-type: none"> • This Works approval is not encouraging an industry into transition – this holds back any notion of transition • Andrews Government is putting \$2million towards alternatives – why do council want to lock in landfilling for 30 years instead of considering alternatives? • There is no environmental justice for the people of the west as we carry the burden for the rest of the state. We need alternative methods for waste treatment not just landfill • Concerned that we just keep using old technology 		
<p>Planning and Buffer Zones</p>	<ul style="list-style-type: none"> • What is the buffer for future development – people don't always know what it is • Staging of the landfill site– first into the NE corner then to SW corner – residential community being developed close to this – why staging it this way? • Buffer Zone – neighbouring land owners should not provide the buffer for the landfill – the buffer should be internal to the landfill or the neighbouring land owned by council 	<p>EPA stated that buffer zones are managed through the planning functions within Councils.</p> <p>WCC stated that Council is currently looking at amendments to the buffer distance around the facility.</p>	<p>WCC need to develop some "plain English" information about the facility including associated planning issues such as the buffer zone areas surrounding the site.</p> <p>EPA and WCC need to clarify adequate buffer zones for gas, odour, and noise issues and how those distances are determined on this site.</p>

Key Issues	Issues, Concerns and Questions raised	Summary of Responses given by EPA and WCC	Recommended Follow up Action
<p>Rehabilitation and landscaping of the site</p>	<ul style="list-style-type: none"> • What does rehabilitation look like? Will it have plastic bags in it? • Remediation – who looks after remediation? who will hold the financial assurance and costs, especially if the council boundaries change, the landfill is sold or the larger size goes across 2 council areas • There have been promises of rehabilitation and landscaping works but no visible action – when will this work start on the ground? • Visual impact – when will this change? What are the timeframes on making it more visually acceptable 	<p>EPA stated that costs for Remediation are covered by Council. The Financial assurance covers the remediation costs of the site if it is abandoned or manager goes bankrupt.</p> <p>WCC stated that council has requested \$8.5 million be provided in the budget for this year for rehabilitation works on the site.</p>	<p>WCC need to develop some "plain English" information about the facility including the longer term vision and plans for the site, and a clear timeline for landscaping works.</p>

Key Issues	Issues, Concerns and Questions raised	Summary of Responses given by EPA and WCC	Recommended Follow up Action
<p>Community engagement, consultation and the CRG</p>	<ul style="list-style-type: none"> • What is the current status of CRG? No minutes available online – appears to have been restructured after last election • Approval of Long time frames removes opportunity for community consultation • Further clarification on what notice was given and how and when? Council should give notice on the 20B conference • How much notice of 20 B conference – only 1 day notice was received • Consultation audience for the 20 B wider than just submitters - more wide distribution needed. Some people don't get the local paper • Council and EPA did acknowledge that there will be no opportunity for further consultation if the works application is approved but did not address what is their response to this? What are the options? • The numbers attending the conference do not reflect the level of concern in the community 	<p>EPA stated that all submitters were notified by email and by hard copy where email was not provided on 1/3/2017 of the conference. There was also a media release that was picked up by the local paper (Star Weekly) and reported on 1/3/2017. Details on the Conference were placed on the EPA website</p> <p>Invite sent to CRG independent chair for circulation to the membership of the CRG 1/3/2017. A reminder email was sent to submitters on 8/3/2017.</p> <p>WCC stated that the CRG is still in place and still operating with an independent chair. The minutes are available on the council website and the outstanding minutes should be posted within the next 4 weeks.</p>	<p>WCC need to ensure the CRG is adequately resourced, this may include consideration of an independent minute taker for the group. The TOR and minutes for the group need to be up to date and available online.</p> <p>EPA needs to review their internal processes for organising community conference processes</p> <p>WCC need to consider developing and resourcing a community engagement plan and communications plan for this facility.</p> <p>EPA to consider the possibility of setting approval conditions that require a community consultation and engagement plan for the facility.</p>

Key Issues	Issues, Concerns and Questions raised	Summary of Responses given by EPA and WCC	Recommended Follow up Action
<p>Compliance standards, Track record, and Monitoring</p>	<ul style="list-style-type: none"> ▪ How can council have a 30 year approval given their current poor track record? ▪ Would council be more able to comply with EPA regulation if the landfill was in ground (ie landfill vs land mounding) ▪ There are no current standards covering the proposed piggy backing arrangement of waste on to previous cells. 	<p>EPA do spot checks on compliance to operation licences as part of the EPA Compliance and Enforcement Plan.</p> <p>EPA does consider the compliance history when assessing the application.</p> <p>WCC stated that they continue to work towards compliance with licence conditions at the site and are open and transparent about compliance issues.</p> <p>WCC stated that an independent auditor and EPA will review and approve the design for each new cell.</p> <p>WCC stated that each new landfill cell will be constructed to comply or better the standard of the day as specified in EPA's Best Practice Guidelines for Landfills</p>	<p>EPA need to consider the concerns raised about the track record of the applicant including breaches to compliance standards.</p> <p>EPA also need to consider more frequent targeted compliance inspections at this site, particularly in relation to the proposed piggy backing arrangements.</p> <p>WCC need to provide a clear outline of the system of independent auditing, monitoring and reporting at the site.</p>

Key Issues	Issues, Concerns and Questions raised	Summary of Responses given by EPA and WCC	Recommended Follow up Action
<p>Surface water, Leachate and potential for Ground water contamination</p>	<ul style="list-style-type: none"> ▪ Concern with hotspots breaking down landfill liner. How does this impact on the groundwater aquifer? ▪ Unknown implications for groundwater • Surface water – the creek diversion and the surface water management could lead to potential flooding impacts ▪ Breaches 100m buffer to surface water in BPEM. Relates to former creek route and redirected route. Inundation potential at the landfill as redirected creek is not sufficient for significant run off- related question as to how the original works approval allowed the landfill/surface water proximity. ▪ Concerns about the potential for more leachate with the proposed “piggy backing” of waste onto previous cells. 	<p>EPA stated that surface water management is now part of the EPA <i>The Landfill Best Practice Environmental Management</i> (BPEM) publication.</p>	<p>EPA need to consider the need for additional Hydrological assessments to address the surface water inundation concern and historic creek diversion issues.</p> <p>EPA need to consider the concerns raised about the risk assessment and risk management aspects of the proposal particularly in relation to the proposed “piggy backing” arrangement.</p>
<p>Risk Assessment and risk Management</p>	<ul style="list-style-type: none"> ▪ Fire – what procedures and practices are in place? ▪ Lack of risk assessment for the piggy back cells and the lack of assessment of the risk of delaying full rehabilitation of these cells 	<p>WCC state that there is a Fire Management Plan for the site. In addition the emergency management plan for the site is currently under review and input will be sought from the CFA on the firefighting capacity and on site requirements.</p>	<p>EPA need to consider the concerns raised about the risk assessment and risk management aspects of the proposal.</p>

Key Issues	Issues, Concerns and Questions raised	Summary of Responses given by EPA and WCC	Recommended Follow up Action
Perception of Stigma on the area	<ul style="list-style-type: none"> ▪ Environmental justice – how is this considered ‘just another blow for Werribee’ (youth prison, sewerage) ▪ Perception of Werribee due to landfill and the detention centre ▪ Why is Werribee continuing to be used as “waste mountain” the residents are getting sick of it. Why do we have to put up with taking all of Melbourne’s waste? ▪ Why has the EPA not got back to us on the 3rd party rights issue? We have got no real feedback – government policy is we have consultation? ▪ Why can other councils afford to pay to dump at Werribee when Wyndham Council appears to be starved of funds ▪ Cannot readily fix prior problems so don’t want to make the same problems new problems (3rd party appeal rights) ▪ 	WCC stated that the planning for waste for metropolitan Melbourne is undertaken by the Metropolitan Waste and Resource Recovery Group, and Sustainability Victoria.	<p>WCC need to consider starting the implementation of the landscaping plans for the site as soon as possible, including tree/vegetation planting along boundary fences to create a screen for amenity.</p> <p>MWRRG and SV need to clarify the sites role in landfill plans and arrangements and the degree of flexibility in these arrangements until 2020.</p>

Options for Resolving the issues and concerns

Participants at the conference were asked to record at their table any options that could be considered to resolve the issues and concerns. Responses to this question are documented in table 2 below.

Table 2: Ideas and Options raised at the Conference to resolve the issues and concerns

Key option	Ideas Raised	Recommended followup action
Reduce the Facility Height	<ul style="list-style-type: none"> • EPA should only ever approve tip height to ground level not above ground level • Approve the landfill extension to ground level only – the landfill apex to ground level to allow an appropriate profile • What is the risk to EPA saying ‘no’ to the works approval? 	EPA and WCC need to consider a lower height option

<p>Transition to alternative waste management strategies and greater promotion of waste minimisation strategies</p>	<ul style="list-style-type: none"> • Profit from landfill goes into alternative recovery options (waste to energy options) • Advocacy on the issue of producing less rubbish which ends up in landfill. • Stronger sorting protocols and processes • Incentives for facilities to transition to alternatives • Test alternative ways of waste disposal • Approving a 5 – 7 year landfill lifespan to ensure recovery options are considered • 	<p>WCC need to develop information for the community on waste minimisation strategies and resource recovery options currently available in the area.</p> <p>WCC need to clarify Councils plans and timelines for transitioning the site to the use of alternative waste technology.</p> <p>EPA and WCC need to consider the potential for a shorter approval time frame (7 – 10 years).</p> <p>MWRRG and SV need to consider and clarify the incentives and flexibility for landfill operators to transition to alternative options and technologies before 2020.</p>
<p>Improve Council planning Processes</p>	<ul style="list-style-type: none"> • Review staging of landfill and understand staging of residential development by lease and other land users • Council should own the land for the buffers – both landfill gas buffer and amenity buffer • The works approval application should be amended so that a buffer is provided wholly or at least substantially on the RDF site 	<p>EPA and WCC need to clarify adequate buffer zones for gas, odour, noise, and amenity issues that impact on private land.</p>
<p>Improve the operations at the site and begin landscaping actions</p>	<ul style="list-style-type: none"> • Start planting trees to screen the RDF. • Odour blocking technology or physical improvements – eg mounds of earth • Noise – no heavy machinery use from 00:00 to 06:00 	<p>EPA need to consider the concerns raised about the adequacy of rehabilitation plan for the site and the timelines for rehabilitation.</p> <p>WCC need to consider operational changes that can help to manage noise and odour levels at the site.</p> <p>WCC need to consider aspects of the landscaping plans for the site that can be started immediately eg tree/vegetation planting along boundary fences to create a screen for amenity.</p>

Recommendations

The conference provided an opportunity for the community to raise issues and concerns about the proposal with the EPA and the applicant, WCC. A range of issues and concerns were raised and have been documented in this report.

A number of issues were raised that are not within the scope of a EPA works approval application process such as planning issues, the proximity to residential areas, and concerns about impacts on the amenity value of the area or property values.

There were a number of key issues raised that will require follow up actions by EPA and the applicant WCC. These issues and suggested follow up actions form the basis of the Chairperson's Recommendations.

1. Facility Height - EPA and WCC need to consider a lower height option for this site. EPA needs to clarify and assess the technical feasibility of the proposed height of 44m AHD including the impact on the associated risk profile of the site.
2. Site Landscaping and rehabilitation - EPA need to assess the adequacy of the rehabilitation plan and landscape plan in the application. WCC need to consider aspects of the landscaping plans for the site that can be started immediately, for example tree/vegetation planting along boundary fences to create a screen for amenity.
3. Odour - EPA need to consider the concerns raised regarding the modelling and risk assessment work on odour included in the approvals application. In particular, the impact of the new proposed height and the piggybacking arrangement proposed for existing cells. WCC need to consider options for how residents and the community can easily raise odour and noise issues with WCC and how these options can be promoted to the community. The Community Reference group may be able to provide advice on how this could be done.
4. Communication and Engagement with the community - EPA needs to review their internal process for community engagement activities conducted by the EPA in association with Community Conferences. The review needs to include consideration of the invitation and RSVP process for the conference and identify potential improvements to the process. WCC need to consider developing and resourcing a community engagement and communication plan for this facility. The Community Reference group may be able provide advice how this could be done. WCC need to ensure the CRG is adequately resourced, this may include consideration of an independent minute taker for the group. The TOR and minutes for the group need to be up to date and available online. EPA need to consider the possibility of including licence conditions that require a proactive community consultation and engagement plan for the facility.
5. The Facility operation and risk management at the site - EPA need to consider the need for additional Hydrological assessments to address the surface water inundation concern and the impact of the historic creek diversion at the site. EPA need to consider the concerns raised about the risk assessment and risk management aspects of the proposal particularly in relation to the proposed "piggy backing" arrangement. WCC need to consider operational changes to better manage noise and odour levels at the site.
6. Compliance standards, Monitoring and Track record of the applicant - WCC need to provide a clear outline of the system of independent auditing, monitoring and reporting at the site. EPA need to consider the concerns raised about the track record of the applicant including breaches to compliance standards. EPA need to also consider more frequent targeted compliance inspections at this site.
7. Current and Future Waste Management Strategies for the area- WCC need to develop information for the community on waste minimisation strategies and resource recovery options currently available in the area. WCC need to clarify what waste to energy options have been considered by council to date, Councils assessment of the viability of these options at the site, and Councils plans and timelines for transitioning the site to the use of alternative waste technology. EPA need to request MWRRG and SV to consider and clarify the incentives and flexibility for landfill operators to transition to alternative options and technologies before 2020. EPA and WCC need to consider the potential for a shorter approval time frame (7 – 10 years) to provide certainty for planning but to also ensure future waste technologies are considered for the site, and adequate community consultation is undertaken.

8. Planning and Buffer Zones - WCC need to develop some "plain English" information about the facility including associated planning issues (such as the buffer zone areas surrounding the site in relation to current and future land developments in the area), as well as the longer term vision and plans for the site (including a clear timeline for landscaping works). EPA and WCC need to clarify adequate buffer zones for gas, odour, and noise issues and how those distances are determined on this site.
9. EPA are to make this report available to all attendees of the conference and to the independent chair of the Community Reference Group.

Appendix 1

EPA 20B Conference Agenda

6:00 pm	Arrive, tea and coffee	
6:15 pm	Welcome Background and Objectives of the Conference Agenda and Process	Cath Botta
6:25 pm	Brief outline of the Works Approval Process and key issues and concerns raised in the submissions received	EPA
6:35 pm	Brief Outline of the Works Proposed, Background information and outline of proposal	Wyndham City Council
6:50pm	Primary Objectors outline key issues, concerns and questions Responses from EPA and Council representatives	3 main community objectors present key concerns and questions – 25 min
7:25 pm	Questions of clarification and additional concerns and issues with the proposal Table groups to identify any additional questions of clarification to EPA representatives and Council representatives or to raise any additional concerns or issues with the proposal to what has already been received thru the submission process or from the Primary Objectors Responses from Council representatives (or EPA as appropriate) to question or issue raised by tables	Table group discussion – 20 min Questions, issues, concerns recorded Each table to report back –(20 min)additional issues or concerns or questions
8.05pm	Closing remarks from Objectors	
8:10 pm	What potential options for resolving the issues and concerns do you think should be considered?	Table group discussion recorded
8:20 pm	Closing Remarks and Next steps in the process	EPA
8.30pm	Thanks and Close	Cath Botta

Appendix 2

Issues raised in the individual submissions received by EPA

- Odour
- Visual amenity
- Landfilling an obsolete practice
- Human Health impacts
- Stigma
- Too close to future residential areas
- Council is driven by the dollar
- Poor track record
- Groundwater
- Surface water
- Approval period too long
- Airborne litter
- Landfill gas
- Land impacts
- Too close to current residential areas
- Dust
- Fires
- Negative impact on land values
- Quality of life
- Increased traffic

Issues raised in the common submission form letter received by EPA

- The negative impacts on me, my family and my community.
- Visual amenity: a 25m – 30m high mountain of unsightly rubbish;
- Odour - up to 3 km away
- Risk of contamination of air and ground water;
- risk to community health and well-being;
- Stigma - Western suburbs are the dumping ground for everyone else's waste;
- It will negatively impact the amenity and liveability of the new homes that will be built in the areas surrounding the landfill over the next few decades;
- It will set a precedent for other quarries in the region;
- It will encourage cheap waste dumping instead of recycling and resource recovery;
- It will send the wrong message to industry and the community - There are better, more sustainable Resource Recovery processes instead of landfill.
- Approval Period is too Long - a 40 – 50 year approval to continue with out-dated practices instead of the resource recovery alternatives that now form the basis of government policy and community expectations.

Review of issues raised in the submissions by organisations to the EPA

- proposals for the extension of or establishment of new landfills in Victoria need to be subject to a thorough and robust environmental impacts assessment similar to what has been completed for Melbourne Regional Landfill
- The piggy back cells - the lack of assessment of the risk of delaying full rehabilitation of these cells until the piggy back liner is constructed.
- Odour issues and the lack of odour modelling.
- Lack of noise modelling.
- Ground water levels at the base of cells.
- Land Fill Gas risks.
- Lack of detail regarding proposed cell construction design in the context of quarrying operations.
- further extension of operations on the facility will have an unreasonable impact on the land available for development to cater for a growing Wyndham West community
- Failure to provide a suitable internal buffer within the boundaries of the RDF site will have an impact on the land surrounding the site such that it may or may not be possible to construct buildings within the 500m buffer prescribed under the Landfill BPEM.
- a buffer should be provided wholly or at least substantially on the RDF site
- The buffers criteria is not adequately met at the site - the reliance on so much privately owned land for buffers is inequitable, and the proposed cell boundaries should be made smaller.
- The required buffer distances have been overestimated.
- Environmental Compliance
- Risks to Groundwater
- Surface Water impacts
- Litter and Amenity
- Proposed Best Practice Environmental Management (BPEM) for New Cells
- Landfill Siting
- Green Waste Processing Facility