



Development Assessments Team
Environment Protection Authority Victoria
Submitted via Online Website

West's Road Refuse Disposal Facility

Works Approval Application – Extension of Operations

Thank you for the opportunity to make a submission in relation to the Wyndham City Council's Works Approval Application to extend the operation of the West's Road Refuse Disposal Facility.

Lend Lease are the developers of a major residential community named Harpley, which at its completion will accommodate approximately 18,000 new residents in approximately 4,000 new homes. Harpley is located to the north east of the existing refuse disposal facility and we are concerned that the further extension of operations on the facility will have an unreasonable impact on the growing Wyndham West community.

Attached is the latest Harpley master plan overlaid on an aerial photograph showing its location in relation to the West's Road Refuse Disposal Facility.

Background

Whilst it is understood that the West's Road Refuse Disposal Facility (RDF) has been in operation for some time the planning framework that applies to the surrounding land has changed significantly in recent times.

It is understood that in April 2014 Council received a planning permit to develop Cells 5 – 8 and alter Cells 1b, 2 and 3 to a height of 44 metres AHD however a works approval must be obtained before development can commence.

Although the planning permit process may have considered some land use matters, due to its timing it would not have considered the impact on the new Harpley community as residents had not yet moved in.

Since the planning permit was issued for the extension of the RDF 1109 lots have been sold and 259 new homes have been built/occupied and a further 134 homes are under construction. We believe that this changes the context in which the RDF operates and therefore further expansion of the facility's operations should be opposed.

Planning Review

The RDF is categorised as a Type 2 Landfill and specifies that a minimum 500 metre buffer should be maintained between the landfill and the nearest buildings.

Section 4.6 (Page 35) of the report prepared by GHD in support of the works approval application states that *'...residents are all located more than 500 metres, most over a kilometre, from areas where landfill activity will occur. The residential area of Werribee is located approximately 2.5 km northeast of the site'*.

As outlined above, the context in which the assessment has been undertaken has significantly underestimated the extent of development that will be in proximity to the RDF as the attached plan shows that residential development will be just outside the 500 metres buffer, not over 1 kilometre from the RDF.



Furthermore, with the staging of Harpley focussed on delivering Ison Road from north to south through the residential development to the railway line by the 30 June 2018 the likelihood of new homes being located just outside the 500-metre buffer in the near future (before the end of 2018) is very high.

Therefore, it is imperative that this works approval application properly considers the potential impact on these new homes that will be located inside the Black Forest Road South Precinct Structure Plan area.

Although it would seem from Figure 17 (Page 87) of the GHD report that the soon to be developed residential area is outside the 500-metre separation distance buffer and on the edge of the medium risk area we believe it is reasonable to conclude that there will be ongoing issues that occur that will no doubt impact the new residential community.

As such, we believe that the extent of Cells 5 and 6 should be reviewed to require that the 500-metre separation distance buffer be contained within the RDF site, rather than relying on private land. The reduction in the size of these cells will result in the medium risk assessment area being located further away from the edge of the new residential community and provide some protection against the nuisance events that currently occur at the RDF which are detailed in the complaints register within the GHD report.

The 2010 strategic planning decision to expand the Urban Growth Boundary to the west of the existing Werribee community and the approval of the Black Forest Road South Precinct Structure Plan in August 2013 have clearly directed that the area in close proximity to the RDF will accommodate a large new residential community. These metropolitan scale planning decisions should be considered as part of this process.

Request

For the strategic planning reasons outlined above we request that before further considering the works approval application the EPA requires the applicant to amend the plans so that the 500-metre separation distance buffer is contained within the subject land.

Lend Lease opposes the expansion of the land fill for the following reasons:

- The proposal would prejudice the orderly and proper planning of the Western Growth Corridor Plan, including the Black Forest Road PSP;
- The long and potentially unknown extended lifespan of the landfill will have a detrimental impact on the fulfilment of the urban outcomes sought in the surround area by the Black Forest Road Precinct Structure Plans;
- The proposed land use as a landfill will be incompatible with future urban development of the surrounding urban areas, resulting in the landfill operations causing an adverse impact on urban development being fully realised in the area; and
- The proposal will have an adverse visual impact on the future urban area, resulting in a detrimental impact on the amenity of the future urban areas.

We trust the contents of this submission are clear however we would value the opportunity to discuss this with you further. In the meantime please don't hesitate to contact me on 03 9643 0714 or 0438 987 915 if you have any queries.

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