

Submission to the Draft Metropolitan Waste and Resource Recovery Implementation Plan

December 2015

Brimbank City Council Submission to the Draft Metropolitan Waste and Resource Recovery Implementation Plan



1. Introduction

Brimbank City Council appreciates the importance of managing waste and welcomes the opportunity to provide comment on the Draft Metropolitan Waste and Recovery Implementation Plan (Draft Implementation Plan).

Strategically located at the centre of Melbourne's West – Australia's fastest growing region, Brimbank is the interface between the inner areas and major urban growth areas of Melbourne. Covering 123 km², the City of Brimbank is a culturally diverse community with an estimated 197,701 residents, 74,159 local jobs and 12,188 businesses. With a Gross Regional Product estimated at \$6.7 billion, Brimbank's key industry sectors include Manufacturing, Wholesale Trade, Logistics, Health Care and Social Assistance and Education. *Plan Melbourne* recognises Brimbank will be a major development and employment hub for Melbourne's West.

Council supports the general thrust of the Draft Implementation Plan, its strategic directions and 10 priority actions, however, highlights the following key issues which are further expanded in the following submission:

- Concern about the reliance on landfills in Melbourne's north and west to meet the disposal requirements of the metropolitan region over the long term, and the need for significant investment to support access and movement, mitigate amenity impacts and address a range of other matters
- The need for stronger planning controls to guide appropriate development of waste and resource recovery infrastructure, ensure protection from encroachment of incompatible land uses, establish existing operators to undertake environmental impact assessments to support expansion, and greater transparency for ongoing monitoring of existing operations, as well as protect surrounding uses including safeguarding environmental assets
- Use of the landfill levy to support local government to rehabilitate closed landfills, provide appropriate infrastructure to support the development of state significance waste and resource recovery hubs, incentivise innovation and technological upgrades to improve existing operations and reduce amenity impact
- Clarification of the term 'best practice' including how it can be encouraged and measured across a range of operations
- The importance of consultation and engagement with the community and stakeholders in waste and resource recovering decision making is supported, including information about existing landfill operations to community liaison groups.

2. Amenity issues relating to existing waste and resource recovery operations and landfills

The City of Brimbank has a number of waste and resource recovery operations, and operational and closed landfills, both in and near the municipality. These include facilities in the Brooklyn Industrial Precinct and Deer Park (in the City of Melton) which are recognised as being hubs of state significance, and other facilities in Kealba, Keilor and elsewhere.

Over time, there have been a range of issues associated with the operation of these facilities including off site amenity impacts relating to dust, odour and over-burden, inappropriate buffer distances to established residential properties, and the height of stockpiles and bund walls.

Some landfills are proximate to areas of ecological importance including the Kororoit Creek in Brooklyn, the Maribyrnong River and its environs and Jones Creek. Council proposes that the Draft Implementation Plan further recognise the importance of environmental features that surround facilities and recommends robust planning measures (as opposed to subordinate legislation) that can meaningfully protect environmental assets, including appropriate buffer distances and landscape planting.

Council recently lodged an objection to the expansion of Boral Deer Park Quarry, highlighting that while Brimbank supports the construction of the new facility and installation of modern dust monitoring equipment, it seeks to ensure:

- Facilities are located a sufficient distance from residential uses in the City of Brimbank, having regard to the prevailing wind direction and local climatic conditions
- Requirements to undertake an environmental impact assessment as part of expansion plan (taking into consideration the cumulative impact of all on-site operations, including truck movements and road treatment), to be prepared by an independent environmental auditor, and that any recommendations be included in the design and operation of the facility and associated infrastructure
- Ongoing monitoring of operations and regular updates by an independent environmental auditor and communication to established community liaison committee.

Council seeks stronger provisions to ensure there is an emphasis on operators undertaking environmental impact assessments to support expanded operations, and greater transparency in relation to the ongoing monitoring of operations to measure and minimise existing off-site amenity impacts.

3. Reliance on landfills in Melbourne's north west to meet all of the disposal requirements of the metropolitan region in the long term

Council supports the overarching principle to reduce materials being disposed at landfills through measures which include provision of alternative resource recovery facilities such as transfer stations.

Council acknowledges the importance of the north west landfill cluster in servicing councils, industry and residents however is concerned that the Draft Implementation Plan proposes total reliance on the north west landfill cluster for the entire disposal requirements of the metropolitan region when the south east landfill cluster reaches capacity in 15 years.

Council questions the sustainability and viability of transporting waste across metropolitan Melbourne. This option requires landfill waste to be transported long distances and will contribute to increased freight further exacerbating traffic and congestion issues.

Freight movement in Melbourne's west is anticipated to increase significantly and there will need to be substantive improvements made to road infrastructure to support access and movement.

Furthermore, there will need to be additional resources provided to VicRoads to enable adequate compliance and enforcement of vehicles to cover loads and prevent any material spillage.

The Draft Implementation Plan identifies that the reliance on the north west catchment requires that some landfills would be required to operate at significant higher capacity.

Council is concerned about the expansion of landfill sites and the amenity impacts on surrounding land uses particularly residential uses. It notes that this is also inconsistent with the State Government Waste Management Policy which aims to minimise development and use of landfills. Council highlights the opportunity to investigate other options for waste disposal.

The expansion of landfill sites may also compromise other commercial development in the wider area due to the need to increase buffer distances from an expanded landfill for some incompatible uses.

Council highlights that any increases would require substantive and appropriate investment to address the negative impacts of expanded landfills in Melbourne's north west, including improved road infrastructure, appropriate and substantive landscaping to address and mitigate the negative image associated with landfills, and addressing long term legacy issues associated with landfills including their use post remediation.

Council proposes that further investigation into localised solutions to address landfill waste should be pursued to achieve a balanced and equitable outcome for metropolitan Melbourne.

4. Planning controls to facilitate resource recovery and ensure protection from encroachment of incompatible land uses

Council supports planning controls to effectively manage waste and resource recovery. Centralising all waste infrastructure and services standards in one location within the planning scheme, and providing clear waste and recovery objectives linked to appropriate standards will improve decision making.

Policy development to ensure effective and efficient waste management and resource recovery in multi-unit and mixed use developments is also supported, including mandatory waste management plans for all multi-unit, high-rise and mixed use development for larger developments.

Protection of buffer separation distances from new and closed waste management facilities is required, and highlights that closed landfills and associated landfill infrastructure can fail due to age and degradation i.e. cell failure. This can be supported through the identification of resource recovery hubs and required buffers within the state section of planning schemes. Similarly a Landfill and Infrastructure Overlay could be introduced to the Victorian Planning Provisions to provide a planning tool to regulate both use and development of the land within a separation distance surrounding a waste management facility.

Council has developed internal policy to identify separation buffer distances from closed landfills consistent with the Environment Protection Authorities (EPA) Best Practice Environmental Management (Siting, Design, Operation and Rehabilitation of Landfills) 2010 (BPEM). The policy has been successfully implemented and upheld with supporting decisions at the Victorian Civil and Administrative Tribunal. On this basis Council would be keen to participate in pilot projects carried out by the Metropolitan Waste and Resource Recovery Group for establishment of state wide planning controls.

Council is of the view that there should be consideration to make 'stockpiling' a permit required use and development in the planning scheme. Threshold dimensions could be set, and the works tied to different land uses, in order to set triggers for a planning permit being required. The aim of such a change would be to enable an assessment of the location and management of large stockpiles and for issues of dust, odour, landscape impact and slippage risk to be assessed.

5. Use of the landfill levy to provide financial support to rehabilitate closed landfills, and provide appropriate infrastructure to support the development of state significant hubs

The Draft Implementation Plan highlights the EPA's requirements for closed landfills to be progressively rehabilitated in accordance with BPEM. The EPA issues pollution abatement notices (PANs) to develop rehabilitation and aftercare plans, and environmental and auditing is required to identify and manage environmental impacts and risks at all metropolitan landfills. Across Victoria the responsibility for rehabilitation falls predominantly with local councils, and Council has been issued PANs for two closed landfills within its municipality. The significant cost of rehabilitation and compliance imposed on local government for closed landfills is considered unsustainable and requires further consideration and support.

Equally, the success of state significant resource and recovery hubs also requires investment to provide appropriate infrastructure to support their operation and potential expansion, and minimise community environment and public health impacts. Council recently constructed sealed roads in the Brooklyn Industrial Precinct. The \$2.6 million project included a contribution of \$750,000 from Council with the State Government providing the remainder of the funds.

Council recognises the economic importance of Brooklyn Industrial Precinct to Melbourne's west, and more specifically its important role as a resource recovery hub of state significance. Council works proactively with businesses to improve the operation and appearance of the precinct so that it can support further growth and development. Council has been working with businesses and residents to address infrastructure and environmental concerns associated with the Brooklyn Industrial Precinct through Council's Brooklyn Evolution program. Council anticipates that the sealing of Jones and Bunting roads will help address some of the dust and air quality concerns residents have which stem from the constant flow of heavy traffic in and out of the Precinct. Further improvements to address dust and air quality can be achieved through investment in best practise operational processes.

Council highlights the importance of establishing funding streams to support ongoing investment to improve the operation of waste and recovery hubs. Currently landfill levies introduced into the Environment Protection Act are not only used to fund activities of the EPA, Sustainability Victoria, the State and Regional Management Groups (held in an environmental protection fund), but can be directed to fund waste and recovery initiatives. Substantial reserves have built up in this fund and it is proposed that it could in part be used to assist local government to mitigate the financial impact of rehabilitation of closed landfills and support development of hubs of state significance.

Council submits that the proceeds from the landfill levy must be directed at incentivising operational improvements of existing waste and resource recovery operations, particularly to upgrade or retrofit old technology, which is expensive, and will result in significant reductions to off-site amenity impacts.

Further, if as proposed, the north and west of Melbourne is going to be required to take a greater proportion and increasing volumes of metropolitan waste, a significant amount from the fund must be directed to investing in new technology and best practice in Melbourne's north and west.

6. Local recycling facilities for dry recyclables including metals, rubbers and tyres

The Draft Implementation Plan highlights that there is a shortage of processing facilities in the metropolitan area for dry recyclables including metals, rubbers and tyres.

While it is anticipated that these will continue to be recycled off shore, there appears scope to explore the potential for localised recycling options. The case for localised recycling is environmentally more sustainable and responsible, and would potentially offset the impact of international market conditions that has created a situation where these products are being stockpiled in Australia, creating compliance issues for councils, and amenity impacts on surrounding sites and land use.

Council understand that a number of organisations are contracted to accept materials on site regardless of whether these can then be processed or 'moved on', and this contributes to stockpiling.

It is proposed that the Draft Implementation Plan give consideration to adequate recycling facilities for dry recyclables in the long term to better manage current and projected demand.

7. Defining 'Best Practice'

The Draft Implementation Plan highlights that the need for all facilities to meet best practice. However, in reality there is little information provided on what constitutes best practice. Council's experience is that companies have internal policies that define their interpretation of 'best practice', and that this varies from organisation to organisation, e.g. stock pile management.

While the principle of best practice has been around for many years, compliance issues still remain including dust and odour emissions and stockpiling.

Council proposes that it would be useful to provide clarity on what constitutes 'best practice' across a range of operations, and review the parameters for this to be achieved, and clearly demonstrated. This could include the establishment of mandatory provisions, guidelines, penalties, and funding to support compliance. An emphasis on monitoring over the long term is also required to ensure that best practice evolves with industry and technology development.

Council submits that the proceeds from the landfill levy could also be directed to incentivise the uptake of best practise processes through the establishment of industry 'best practice' programs.

8. Increased education, industry programs and initiatives to minimise and recycle waste including resource recovery hubs

Council recognises the importance of educating both industry and the community about the benefits of waste minimisation and recycling. Council currently delivers a range of education programs including Brimbank Recycling GEMS.

Council supports a regional approach to waste and resource recovery services, and recently participated in a group procurement of recycling services that was awarded to SKM Recycling at Coolaroo and Laverton.

A greater emphasis and funding support could be directed toward supporting innovation in the waste and resource recovery sector, establishment of a centralised industry knowledge base, and information sharing through increased networking opportunities.

Council is currently hosting the Western Alliance for Greenhouse Action for a three year period, and will be pursuing further opportunities to work more closely with industry to educate and identify opportunities to reduce waste and improve their environmental credentials.

Brimbank is home to 12,188 businesses with key industry sectors including Manufacturing, Wholesale Trade, Logistics, Health Care and Social Assistance and Education. Plan Melbourne recognises Brimbank will be a major development and employment hub for Melbourne's West. Brimbank has a significant food manufacturing sector with established and successful businesses like Presha Food, Cavalier Brewing, Eiffel Tower, La Tortilleria, Asahi, Schweppes Ferguson Plarre and JBS, as well as a large number of food operators across Brimbank.

With 42% of food and green waste still going to landfill across metropolitan Melbourne there is significant need find innovative and efficient processes to support industry development and potentially commercialisation.

Council would welcome greater resourcing to examine the potential to work with industry and develop opportunities to recycle food and waste. This requires initial investment to fund identify appropriate programs, or even research and development to support innovation, and Council highlights the landfill levy as a potential funding source to support this work.

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