



City of Greater Dandenong

Submission to the Victorian Government's
*Statewide Waste and Resource Recovery
Implementation Plan*

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Introduction

The City of Greater Dandenong welcomes the opportunity to provide a submission in response to the Victorian Government's *Statewide Waste and Resource Recovery Implementation Plan (Plan)*.

This submission outlines the City of Greater Dandenong's response to the *Plan* and provides recommendations for the Victorian Government in relation to future land use planning for the appropriate disposal of prescribed industrial waste (PIW).

With Victoria's population projected to reach over 10 million by 2051,¹ a comprehensive statewide waste management system is a vital component for maintaining the social cohesion of our community. The strategy is of direct importance to both community and business stakeholders who are dependent on the service of waste removal, and of particular importance to those communities who are directly impacted by the presence of waste management facilities.

The City of Greater Dandenong has a long history in hosting the landfill facilities upon which previous waste disposal strategies were predicated. Much of the landfill activity in this region will cease within the lifespan of the Victorian Government's *Statewide Waste and Resource Recovery Implementation Plan*.

Of particular concern to the City of Greater Dandenong in this regard, are strategies to address PIW that are currently managed at the Lyndhurst facility located on Taylors Road.

As the *Plan* makes clear, managing any waste facility requires a thorough consideration of the land use planning surrounding the facility. In the case of a PIW facility, this need is even more acute.

Unfortunately, in the case of PIW, the *Plan* indicates there is no current strategy in place, or in the process of being developed, by the Victorian Government around future land use planning for a facility to deal with such waste beyond the existing facility at Lyndhurst.

The City of Greater Dandenong believe this is a policy area the Victorian Government needs to address.

Failure to do so will perpetuate the substandard outcomes achieved by previous governments in addressing this issue:

"We should have determined exactly what we wanted to do and the reasons why we had to do it, then tied down the details. As it now stands, toxic waste continues to be stored at Lyndhurst, one of Melbourne's outer suburbs, which is a far-from-satisfactory outcome."

- Steve Bracks, *A Premier's State*.²

¹ *Victoria in Future 2015*, pg 1, Source < http://www.delwp.vic.gov.au/__data/assets/pdf_file/0018/308511/Victoria-in-Future-2015-WEB.pdf>

² Bracks, S, 2012, *A Premier's State*, pg 165, Melbourne University Press.

Background

Located within the City of Greater Dandenong, in the suburb of Lyndhurst is the Taylors Road Landfill, which processes solid putrescible and non-putrescible waste, including domestic, commercial and industrial and construction and demolition waste, and PIW.

The Lyndhurst facility is the only site in Victoria with a permit to process PIW.

The facility began operating as municipal landfill in 1990. The site was previously a sand quarry.

In the same year it began operating, the then Shire of Cranbourne accepted an application for the facility to accept PIW. In granting the application, the council included provisions prohibiting the facility to accept hazardous waste. However, under the Environment Protection Authority (EPA) licence, the facility was permitted to accept hazardous waste.

In 1994, the City of Greater Dandenong (coming into existence after the Victorian Government amalgamated councils across the State) became the responsible authority for planning permits of the facility.

In 2007, a VCAT ruling determined that the EPA was in the best position to regulate various types of waste through its licencing powers and that a planning permit should not be doing the same.

Following the outcome of the VCAT hearing, the then Victorian Government announced the facility would be the only one in Victoria to accept PIW and that it would be acquiring control of the facility.

In 2011, the then Planning Minister the Hon Matthew Guy MP approved amendment C125 to the City of Greater Dandenong Planning Scheme, thus re-zoning the site from a Farming zone to an Industry 1 zone.

Community Concern

The community of Greater Dandenong, especially the residential community in close proximity to the site, have actively advocated for and sought the earliest possible closure of the facility and the prohibition of it receiving PIW and contaminated soils.

Active residents groups, such as RATWISE and the Hampton Park Progress Association are members of the Taylors Road Landfill Community Reference Group. This Community Reference Group (of which Council has observer status membership) meets under the auspices of SITA (operators of the Lyndhurst facility) to engage with it on these matters.

RATWISE as a group, and many of its members in their individual capacity, together with many individuals within the broader community, have over the years maintained a strong community pressure on Council seeking a satisfactory outcome in these matters.

Council remains committed to supporting its community in achieving those outcomes.

Demand for PIW Treatment and Disposal

Following the Global Financial Crisis (GFC), the volume of PIW deposited at the Lyndhurst facility had fallen by 50 per cent to about 35 000 tonnes per annum. This was in part due to alternatives such as the onsite treatment of contaminated soils to a standard which allows reuse or depositing elsewhere.

Onsite containment has also reduced the quantity of these soils being brought to the Lyndhurst facility and new facilities, also potentially reducing the quantity going to landfill.

Economic activity is also thought to be a factor in the quantity of PIW received.

While a period of slower economic growth may have suppressed the volumes of PIW in Victoria, Government policies all now recognise a sustained period of economic growth and activity which may increase the volumes PIW requiring treatment or disposal throughout the life of the *Plan*.

Conclusion

The below refers to specific sections of the *Statewide Waste and Resources Recovery Implementation Plan* and the City of Greater Dandenong's response.

1. Section 3.2 (pg 21) of the *Plan* acknowledges the importance the metropolitan region plays in managing commercial and industrial waste, which includes PIW and much of which has to be landfilled and also, Section 5.6.1 (pg 48) notes the current status of the Lyndhurst facility and outlines this facility is the only landfill in Victoria with a licence to accept PIW, however this type of waste is not recognised when analysis of future needs are discussed later on within the *Plan*.
2. Section 7 (pg 56) of the *Plan* acknowledges that good land use planning, "*achieve(s) an overall community benefit by developing land in a fair, orderly economic and sustainable way.*" The section goes on to state, "*Land use planning and environmental approvals now require ongoing community engagement as part of the conditions of planning permits and licence approvals.*" Furthermore, the section indicates, "*To support the long term future of waste facilities and landfills it is essential that there is a match between the type of facility, risk and the surrounding land uses.*" Section 7 (pg 56) also notes, "*As with other essential services and infrastructure, it is important that sufficient land is available in suitable locations*" and "*To support the long term future of waste facilities and landfills it is essential that there is a match between the type of facility, risk and the surrounding land uses.*"
3. The City of Greater Dandenong believes, that:
 - the Lyndhurst facility in its current location and context, cannot be seen as suitable under best practice tests in accordance with today's standards; and
 - neither Plan Melbourne nor any of the State Metropolitan Waste and Resource Recovery Plans have addressed sufficient PIW land in suitable locations.
4. **Therefore, the City of Greater Dandenong believe the final *Statewide Waste and Resources Recovery Implementation Plan* must:**
 - **recognise the need for future land use planning and commence a process to determine how this issue will be addressed, as there is a current gap in Government policy;**
 - **provide details why an expansion for the Lyndhurst facility to expand has been provided;**
 - **consider investing, in part, waste levies being collected in to planning for the identification of a suitable PIW site for Metropolitan Melbourne in the decades of expansion ahead; or ultimately**
 - **identify a new site to deposit PIW.**