

WORKING DRAFT SUBMISSION FROM MELTON CITY COUNCIL ON THE DRAFT METROPOLITAN WASTE AND RESOURCE RECOVERY IMPLEMENTATION PLAN

18th December 2015

This version is a working draft on behalf of the Melton City Council to the Draft Metropolitan Waste and Resource Recovery Implementation Plan (MWRRIP). A formal submission will be provided to the Metropolitan Waste and Resource Recovery Group following consideration of the submission by Council at its 8th February 2016 meeting.

General Comments

Council is generally supportive of the ten priority actions discussed in the MWRRIP. Comments on each of priority actions can be found within this submission.

Council strongly supports implementation of alternate waste technologies that will reduce our reliance on landfill. Our community does not wish for Melton, and in particular the Ravenhall hub to be turned into the primary disposal location for all of Melbourne's waste. We understand that there will be an ongoing need for well managed landfill operations, but we must move to a system where pre-sorting or alternate technologies are used first, with only residual inert waste requiring landfill. The draft MWRRIP supports this approach, we now want to see action. Council and its western colleagues attempted to take this step ten years ago through the implementation of the Western Region Wet MRF. Unfortunately government support was not forthcoming to ensure that the project could be implemented. Without reinvesting money derived from the Landfill Levy into the establishment of a number of these facilities across metropolitan Melbourne, the cost of establishing these facilities will be far too large for local government to absorb within a rate capping environment. To ensure the MWRRIP can be implemented the State must fund or subsidise waste infrastructure.

The MWRRIP reflects the State plan in identifying the west as playing a key role in future waste receipt and processing for metropolitan Melbourne. Although one of the priorities identifies a need for a new facility within the South East, a number of parts of the document identify the critical importance on the west. The reliance on the west and identification of Ravenhall as being one of the most important sites for Melbourne is a concern. The City of Melton is a growth area and whilst a comprehensive road network is being planned for, the timing on much of it is not yet known. Has this, and future traffic already proposed to be generated as part of growth within the municipality been considered and if so, what transport infrastructure network upgrades are required to support the transportation of waste from the east to the west? Who will fund these upgrades, in a timely manner?

Furthermore, there are significant impacts for the City of Melton if waste related traffic was to increase substantially in the future. Traffic, noise, odour, litter and risk are all key issues that will affect the local community. Council would be very interested to understand these impacts and would be concerned if a thorough and detailed analysis had not been prepared prior to planning for

the west to take a significant proportion of Melbourne's waste, or prior to a site being identified for development or significant expansion.

The following section of the submission looks at each priority action item and provides comment.

Priority Action Items

Priority 1: Minimise council's reliance on landfills through group procurement of residual waste collection and processing that progressively increases the resource recovery rate over the contract duration.

Council supports group procurement of residual waste processing facilities. This process will need to commence early in 2016 to allow the process to be completed prior to the conclusion of the Landfill Services contract. As part of this process, funding models should be considered and the State should be approached to subsidise or partially fund the capital investment required to deliver such infrastructure.

Council does not support the inclusion of collection services as part of this process. Local Government is well placed to tailor and deliver specific waste collection services to meet the needs of its local community.

Priority 2: Build the metropolitan organics processing network and maximise the network's productivity by accepting household and commercial food waste.

Council supports this priority item as an active participant in the North West Organics Facility User Group. Further facilities like Veolia Bulla will greatly enhance the waste processing capabilities of Melbourne.

Priority 3: Ensure hubs support industry while protecting communities and the environment through defining the role of the hub, promoting best practice, and acting on opportunities to co-locate with water utilities.

Please refer to section titled *Planning Related Matters* within this submission.

Priority 4: Develop planning policies and tools that facilitate resource recovery targeting; protection of buffer separation distances of waste and resource recovery facilities; provisions for recycling infrastructure in multi-unit developments.

Please refer to section titled *Planning Related Matters* within this submission.

Priority 5: Support and promote small on-site organic processing infrastructure.

Whilst this is a worthy consideration, we do not believe it should be included as a priority action item. We suggest that it could be included within a broader organics priority item that includes Priority 2 or Priority 7.

Priority 6: Develop a Transfer Station Growth Strategy to facilitate a network that can manage projected waste volumes while maximising resource recovery.

Council supports this initiative. The strategy should consider current facility capacities and capabilities along with gaps across the metropolitan footprint. This should occur in consultation with Councils, in particular the Transfer Station Local Government Network.

Priority 7: Establish relationships between commercial food waste generators and organic processors.

Whilst this is a worthy consideration, we do not believe it should be included as a priority action item. We suggest that it could be included within a broader organics priority item that includes Priority 2 or Priority 5.

Priority 8: Maximise recovery of priority materials (identified through Victorian Market Development Strategy) by establishing relationships between waste generators and the processing industry.

Council supports such an approach. A particular area of interest for Melton is recovery and processing of wood waste not suitable for organics processing along with soft plastics and EPS.

Priority 9: Community and stakeholders are engaged in waste and resource recovery decision making.

Whilst we strongly agree with this priority item, the contentious nature of waste management decision making makes this very difficult to achieve. The State needs to take a more active role, particularly in the area of critical and state significant infrastructure and cease relying on Local Government to make the decisions. Ministerial intervention should occur when Planning Scheme Amendments are proposed for any site listed in the Landfill Schedule. The State needs to take a leadership approach in the inclusion of provisions in the Planning Scheme.

Priority 10: Support residents and businesses to maximise recycling through local delivery of the Statewide Education Strategy.

It is disappointing that there is no mention of waste avoidance or reuse in the draft MWRRIP. Council cannot comment on the merits of the Statewide Education Strategy without having access to the strategy or involvement in its development. Council has strongly advocated for a consistent approach to waste education and was a supporter and advocate for the *Get it right on bin night* and *Back 2 Earth* initiatives. We look forward to continuing our strong relationship with MWRRG in future education campaigns.

Planning Related Matters

Changes to Planning Policy and Permit Applications

Any requirement that relates to Planning Permit applications must be carefully considered. Placing extra requirements for permit applications can only occur when there are triggers and mechanisms within the scheme. For example, planning schemes refer to land uses, they can't guide behaviour hence '*planning policies and tools that facilitate resource recovery targeting and provisions*' may not be possible.

It is important to note that any Planning Scheme Amendments for either implementing the above policies and tools, or for changing planning controls (such as the creation of buffers) should be prepared by the State. Councils shouldn't be relied upon to implement State Policy and buffer requirements to protect State Significant Infrastructure. Particularly if detailed modelling is not prepared to show what the actual impact of a facility will be, and a blanket control is applied instead.

There is a significant flaw with the modelling within the report in relation to the assessment of a site's future capacity based on the void of quarrying, rather than actual modelling and consideration of buffers. This also affects the Metropolitan Needs Analysis. This conflicts with the Local Buffer Support Action Group discussions which identified that there needs to be real data for sites (and associated operations) rather than arbitrary distances applied. This real data is needed to ensure the true impacts of an application for use on a site, or for an existing operation are understood and these impacts are mitigated or at least controlled.

There is an inherent assumption within the document that landfills can be placed on sites. This is not necessarily the case with sites having to apply for both planning permit applications and works approvals. The document needs to be clearer on this and should consider how to better deal with this risk.

There are a number of impacts for proposing facilities within areas such as Green Wedges or rural areas. This includes cost to the consumer, it has also been identified through Council's strategic planning that Green Wedges are often looked upon to support Melbourne, whether it be quarrying, waste, utilities or uses which are not considered 'appropriate' for Melbourne. Given these areas have been specified in State Planning Policy as key for agriculture, the environment and landscapes, these shouldn't just be relied upon to house Melbourne's facilities. In addition to the impacts on rates there are a number of negative impacts for uses within these areas.

Collocating with water utilities needs to be carefully investigated also. These facilities already have buffers which may need to be added to, this also affects surrounding landowners and road infrastructure (which may not have been designed to carry a large amount of traffic). Furthermore

the impacts of contamination are extremely important, particularly given these sites recycle water and distribute this for other uses.

Onus on Operators

Further to the above, it shouldn't just be the planning system and land surrounding facilities that are required to ensure ongoing protection of sites. Operators should be even more accountable, particularly in terms of Standards of Operation and BPEM. This Plan should recognise this, and require operators to work smarter and cleaner. This will only happen with amendments to Australian Standards, Operating Guidelines and Works Approval requirements. It is noted that on p.63 MWRRG considers that a best practice approach to the design and facilities in a hub should be adopted. How and who will ensure that this in fact occurs?

Growth Area Impact

Throughout the draft MWRRIP there is little consideration of the Precinct Structure Planning processes that are already occurring around some of the significant facilities in Melbourne. It is not appropriate to rely upon planning controls to protect facilities when the mechanism for protection of facilities (ie. managing land uses) has already been prepared.

Hub 3 – Deer Park Precinct

The draft MWRRIP refers to the “Deer Park Precinct” (such as Page 65). We believe using the name Deer Park is not representative of the location and we request that “Deer Park” is replaced with the correct suburb name “Ravenhall”.

Use of business names. Will the plan become redundant when businesses change names? Consider removing business names.

The plan identifies PineGro – given they are no longer operating from this site this reference should be removed.

The EPA does not progress planning, only works approval – please amend.

Identification of 500m landfill buffer not according with previous part of document and information provided as part of PSP preparation (1km plus).

Needs to identify State Significant Industrial land to the south, not just industrial.

Facilities missed in the MWRRIP

The following material recycling facilities within the City of Melton are missing from the draft:

- North Altona Rock Blasting, 852 – 944 Plumpton Road, Plumpton. Melway Reference 353 G7. Refuse transfer station and materials recycling

- 2-50 Meskos Road, Rockbank. Melway Reference 357 H2. Temporary Permit – Rock crushing facility ‘Mobile Crushing Plant’ to cease in 2017
- 2–50 Meskos Road, Rockbank. Melway Reference 357 H2. Temporary Permit 10 years plus – materials recycling facility (not yet constructed)
- City Circle, Treeleaf Lane, Melton South. Melway Reference 343 G1. Rock crushing and material recycling.

Minor Errors within MWRRIP

Page 92 – Closed Landfill List

The PC PAN Duty Holder of the former City of Melton landfill is Harness Racing Victoria.

Replace reference to *Shire of Melton* with *City of Melton*.

Minor Errors within MWRRIP – typographical errors

P 32 *resource recovery* s/b *resource recovery*

P45 missing a facility category

P53 penultimate paragraph: *were* s/b *where*

P55 & p75 (Table 17): inconsistency in spelling of licence as a noun (as per p56, 61): *license* s/b *licence*

P56 *resource ecovery* s/b *resource recovery*