

17 December 2015

Metropolitan Waste and Resource Recovery Group  
Level 4, Tower 4, World Trade Centre  
18-38 Siddeley Street  
MELBOURNE VIC 3005

*By email: [participate.metro@mwrrg.vic.gov.au](mailto:participate.metro@mwrrg.vic.gov.au)*

Dear Sir/Madam,

**RE: MOUNT ATKINSON HOLDINGS PTY LTD**

Mount Atkinson Holdings Pty Ltd (MAH) controls approximately 700 hectares of land in the area bounded by Greigs Road, Hopkins Road and Middle Road.

The land was acquired by MAH in 2013 on the basis that it had been identified for urban use and development in the West Growth Corridor Plan and subsequent rezoning and inclusion in the Precinct Structure Plan program would enable more detailed planning and coordination of reticulated infrastructure and public transport to facilitate development.

MAH plans commencement of a substantial investment on its land to deliver a mixed use development comprising significant employment, retail and residential components during 2016, following the approval of the Mt. Atkinson and Tarneit Plains PSP.

MAH acknowledges that growth area planning nominates the Boral Quarry in Deer Park as a component of a state significant industrial precinct and more recently the SWRRIP indicates that the Boral site is a candidate waste and resource recovery hub.

MAH appreciates the opportunity to review the (Consultation) Draft Metropolitan Waste and Resource Recovery Implementation Plan (Draft Plan) in the context of growth area planning decisions made by the State Government in 2012 to include land west of Hopkins Road within the UGB, nominating its use for a mix of employment / residential and industrial purposes supported by an activity centre.

We also note that Hopkins Road is identified in a number of key strategic documents as an important arterial road that will carry significant volumes of traffic in the future and contribute to the economic prosperity of the western region.

## **GENERAL OBSERVATIONS CONCERNING THE DRAFT PLAN**

MAH notes that the Draft Plan is for consultation purposes and observes that it confirms that there is sufficient currently approved landfill airspace to meet the needs of the metropolitan area for the next 10 years.

The matter of waste management is important and decisions concerning future opportunities for an improved response to consumer, industry and waste industries behaviour and the development of technology and infrastructure to better process, recover and dispose of waste, should not be made hastily.

Waste management and resource recovery strategies require a whole of government approach on the assumption that there are no quick fixes and potentially a requirement for government to invest capital in waste management infrastructure and develop new systems and advanced technology.

Planning for waste management must be balanced taking into account net community benefit and the rapidly changing urban areas of metropolitan Melbourne which deliver significant economic benefits and social infrastructure, leading to improved lifestyle for those living in growth areas. New or expanded waste management facilities must not compromise the potential of growth areas

MAH considers that the Draft Plan is not an 'Implementation Plan' as it does little more than identify specific actions which perpetuate reliance on land fill airspace as the primary means of waste management.

Rather, the Draft Plan is descriptive of issues and current arrangements and foreshadows a review process being undertaken which is perhaps an initial step in a program to initiate industry and community engagement to review a longer term and environmentally sustainable waste management and resource recovery in the metropolitan area.

The Draft Plan appears also to rely too greatly on aspects of the 'State Infrastructure Plan' (SWRRIP) which has not been the subject of objective review by the wider community or reviewed by an independent expert body.

To this extent, both the Draft Plan and SWRRIP are fundamentally vulnerable to criticism.

The Draft Plan makes various references to 'consultation' which has been undertaken by MWRRG and its own 'research and analysis'. There is no formal reference to the sources of information, what form the consultation has taken and with which organisations, or the

nature of research and analysis (whether specific or general). This information is essential to understand and validate any of the approaches suggested in the Draft Plan.

MAH supports the general theme and 'priority focus' expressed in the Draft Plan to divert organics away from landfill, and optimise recovery of resources to reduce reliance on landfill.

### **SPECIFIC COMMENTS CONCERNING THE DRAFT PLAN**

#### **1. The draft plan has erroneously calculated the potential landfill disposal capacity of candidate sites relying on 'potential' entire void space.**

This assumption is fundamentally flawed and is at odds with landfill site selection criteria in EPA Waste Management Policy (siting design and selection of landfills).

The obvious limitations of the assumptions regarding future landfill airspace are ultimately acknowledged on Page 52 of the Draft Plan, however the extent to which modelling may need to be re-calculated and the likely implications of this are not particularised.

This is a fundamental flaw in the Draft Plan.

#### **2. The Draft Plan attempts to describe 'What do we want to achieve?'**

In MAH's view, the reader is unable to match the 'priority actions' with any clear plan of action to achieve the priority outcomes.

In Chapter 2 of the Draft Plan there is confusion created by a mismatch of descriptions dealing with waste and resource recovery facilities (where nine (9) different descriptions are used) compared to the 'Glossary' and definitions section of the plan which define 'hub' and 'landfill'.

In a document purporting to be a 'regional waste management plan' which will be referenced in planning decisions through Clause 19.03-5 of all planning schemes, it is essential that terminology is a clear and unambiguous.

We observe that a 'hub' is not necessarily a 'landfill', and 'resource recovery infrastructure' does not necessarily include or involve a landfill component, and as there is more than one type of landfill possible, different external amenity impact considerations will apply. These are important distinctions.

**3. The description of the 'Deer Park Precinct' in Table 13 and depiction graphically on Page 98 are inaccurate both in terms of the extent of the Boral Deer Park WA area and the extent of land approved for landfill.**

The description in Table 13 and the diagram on Page 98 are misleading in the context of the intent and scope of the Draft Plan and the desire for genuine consultation with existing communities currently affected, and potentially affected in the future, by landfill and waste management activities.

The Draft Plan should be amended to accurately reflect the current approval of landfill and waste processing and accurately reflect the area which has approval to be quarried by Boral in the future.

Please refer to the attached diagram which was prepared by Boral depicting the existing conditions at Deer Park.

The map on Page 98 of the Draft Plan also requires amendment to show existing prisons which are to the east of the Boral site, the proposed Caroline Springs Station and the urban growth areas which are to the west and north west of the Boral site.

**4. The outcomes of the ten (10) priority actions will not be measured by performance indicators.**

It is curious that an implementation / action plan has no specified performance indicators, which makes any review in the future more subjective and less able to be measured.

This is a major shortcoming of the Draft Plan.

**5. Table 13 Analysis of hubs.**

There appears to have been no proper analysis of the function of the so-called 'hubs' nominated in the Draft Plan, with some principally being an existing landfill site with ancillary resource recovery facilities and others involving only legitimate purpose built waste recycling / processing facilities.

There is no evidence of proper analysis of whether a hub has the real capacity to host an expanded landfill or establish new resource recovery infrastructure.

In the case of expanded landfills proposed in Table 13, there is no evidence that the landfill site selection criteria and considerations nominated in BEPM and Waste Management Policy (Siting and Design of landfills) at Section 13(1) have been applied.

It is simply not satisfactory to assume that because there may be more land or future quarry airspace to fill with waste beyond the present approval, such is either justified or appropriate when assessed in a balanced manner.

**6. The Draft Plan acknowledges that there is sufficient landfill capacity for 10 years in the metropolitan region but actively promotes new landfill airspace.**

It is the responsibility of waste management groups to 'minimise the development and use of landfills', (Section 10(5) Waste Management Policy (Siting and Design of landfills)), not unilaterally advance expansion of existing landfills without adequate assessment in accordance with State Policy. Expansion of a landfill requires the same assessment criteria as a new landfill.

The Draft Plan makes a misconceived reference to the Deer Park Precinct by confusing the Boral Quarry with a much smaller landfill operated by TPI. We note that the quarry site is not an approved waste management hub or resource recovery facility. We also highlight that a large majority of the quarry site is yet to be quarried, making any assumption of future airspace premature.

The Draft Plan appears to offer a disproportionate level of detail and advocacy for future theoretical expansion of the TPI / Boral landfill with or without resource recovery operations, with no proper analysis of its feasibility or compatibility with the surrounding area.

In this sense the Draft Plan is at best ill-conceived and at worst advocating additional landfills contrary to other statements made, and contrary to the State 'waste hierarchy' and order of preference, which cites 'disposal' as the last resort.

**7. Organic Waste.**

If the criteria to identify potential resource recovery infrastructure sites (Figure 17 of the Draft Plan) is adopted for the Boral Deer Park 'hub', buffers of at least 1000 metres are cited for non-organic infrastructure and buffers of 2000 metres are required for organics and 500 metres for putrescible landfill, to sensitive receptors.

These considerations have significant implications for surrounding land and must be taken into account prior to the approval of any Implementation Plan which nominates candidate hubs. The plan should prescribe likely limitations on the breadth of waste management activities which might be possible and the internalisation of buffers within the 'hub'.

#### **MT. ATKINSON AND TARNEIT PLAINS PSP**

We observe that the MPA has produced a draft PSP and Future Urban Structure for key agency comment prior to the preparation of a Planning Scheme Amendment and has had a Concept Plan in circulation since September 2014.

In preparing the draft PSP, the MPA has consulted extensively with relevant waste management agencies and stakeholders including Sustainability Victoria, EPA, Department of Economic Development, Metro Waste Management Group and Boral / TPI.

The consultation has informed the Future Urban Structure proposed for the PSP area and takes account of the existing quarry and potential waste resource and recovery activities.

#### **SUMMARY COMMENT ON THE DRAFT PLAN**

- a) The plan relies too heavily on landfill as a key to future waste management and appears to conclude that the bulk of waste for the metro area should be accommodated in the west of Melbourne.
- b) The Metropolitan Waste and Resource Recovery Group has not previously made submissions to the growth corridor plan or Plan Melbourne to comment on planning for waste management infrastructure.

The Draft Plan attempts to influence growth area planning well after key growth area planning principles have been confirmed (2012) by the State Government.

- c) In relation to the Boral Deer Park site and any future operation of a landfill and waste processing infrastructure, the Draft Plan needs to acknowledge that the Mt. Atkinson / Tarneit Plains PSP is well advanced and has government support to deliver land for employment, amenity and significant investment in the west of Melbourne.
- d) State Government Policy expressed prior to and confirmed since the last election is for any future landfill proposal on part of the Boral Deer Park site to be 'called in' by the Planning Minister as part of a detailed assessment process. There is also no guarantee of any particular outcome for the Boral site in relation to waste hub infrastructure which is yet to be proposed and the subject of a detailed environmental performance and planning assessment.

MAH is a landowner of growth area land and is vitally interested in waste management planning for Melbourne.

In its view the current Draft Plan for waste management is largely deficient in identifying actions to progress anything other than expanding a number of existing landfills.

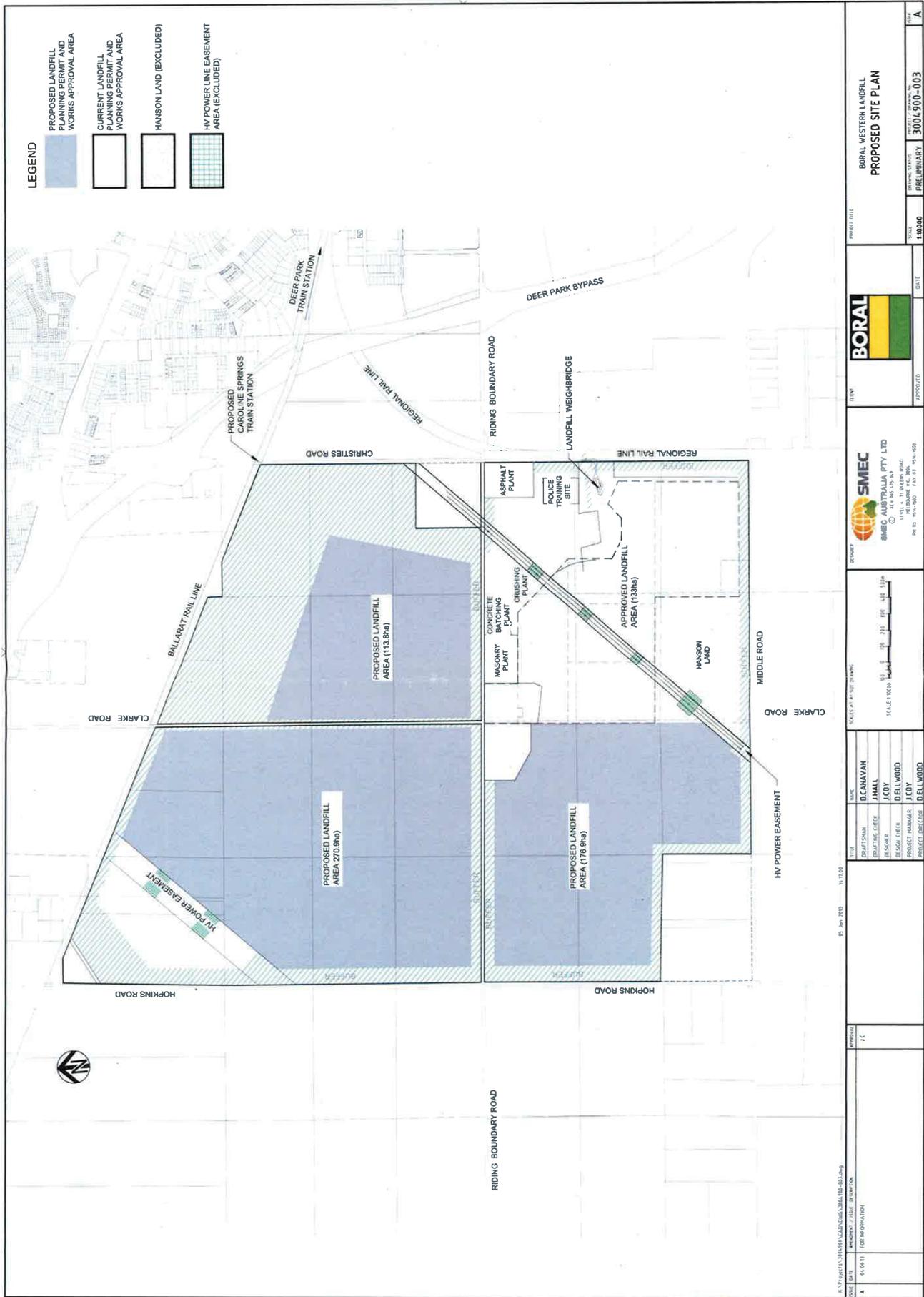
Insufficient analysis of the implications of expanded landfills and possible waste hubs renders the Draft Plan ineffective and justifies a significant review and redraft by the Metropolitan Waste and Resource Recovery Group.

Yours sincerely,



David Scalzo  
Director

Attachment x 1



**LEGEND**

	PROPOSED LANDFILL PLANNING PERMIT AND WORKS APPROVAL AREA
	CURRENT LANDFILL PLANNING PERMIT AND WORKS APPROVAL AREA
	HANSON LAND (EXCLUDED)
	HV POWER LINE EASEMENT AREA (EXCLUDED)

		<b>BORAL WESTERN LANDFILL</b> <b>PROPOSED SITE PLAN</b>	
		PROJECT TITLE: BORAL WESTERN LANDFILL SCALE: 1:10,000 PROJECT NUMBER: 3004-900-003	
DATE: 15/06/2015 SCALE: 1:10,000 SCALE: 1:10,000		PROJECT MANAGER: J. COOY PROJECT DIRECTOR: D. BELLWOOD	
NAME: D. CANAVAN DESIGN CHECK: J. HALL REVISIONS: J. COOY REVISIONS: D. BELLWOOD		APPROVED: J. C. DATE: 15/06/2015	

Figure 3 – Site Plan (SMC)