



Government of Western Australia
Department of Aboriginal Affairs

ENQUIRIES : Megan McCorry - Ph 65518083

OUR REF: O117455/GR2.A290

YOUR REF: 14/0054

SHIRE OF YORK	
FILE	GR2.290
OFFICER	INITIALS
Ray	
2.7 FEB 2014	
1138353	
REFERRED TO COUNCIL	
DATE	INITIALS

Mr Ray Hooper
Chief Executive Officer
Shire of York
1 Joaquina Street
YORK WA 6302

Dear Mr Hooper

**DEVELOPMENT ASSESSMENT PANEL APPLICATION - PROPOSED CLASS II
LANDFILL AT ALLAWUNA FARM, 2948 GREAT SOUTHERN HIGHWAY, ST
RONANS**

Thank you for your letter dated 7 February 2014 regarding the above.

The Department of Aboriginal Affairs (DAA) has reviewed the information attached to your letter and can confirm that there are no sites under the Aboriginal Heritage Act 1972 (AHA) within the area as depicted. The DAA notes the information presented in section 8.10 of the Planning Report in relation to Aboriginal heritage. In terms of the AHA there are no impediments to the proposed development.

If you have any further queries regarding this matter contact Senior Advice and Approvals Officer Megan McCorry on 6551 8090 or at megan.mccorry@daa.wa.gov.au

Yours sincerely

Cesar Rodriguez
Manager Heritage Advice and Approvals

18 February 2014



Government of **Western Australia**
Department of **Health**

Your Ref: O117455 / GR2.A290
Our Ref: EHB-00019/03 EHB14/309
Contact: Vic Andrich
Phone: 9388 4978

Mr Ray Hooper
Chief Executive Officer
Shire of York
PO Box 22
YORK WA 6302

SHIRE OF YORK	
FILE	GR2. 290
OFFICER	INITIALS
JALY	
20 MAR 2014	
1139098	
REFERRED TO COUNCIL	
DATE	INITIALS

Attention: Jacky Jurmann, Manager of Planning Services

Dear Mr Hooper

PROPOSED CLASS II LANDFILL - ALLAWUNA FARM 2948 GREAT SOUTHERN HIGHWAY, ST RONANS

Thank you for your letter dated 7 February 2014 requesting comment from the Department of Health (DOH) on the above proposal.

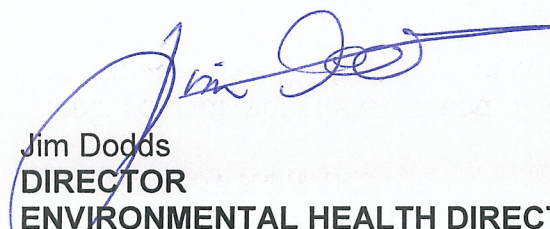
The Shire of York should ensure that the proposal is in accordance with Department of Environment Regulation Works Approval.

DOH has a concern that the topography of the site suggests that collected leachate and water captured by interdunal swales (underground water directed to hill side dams for stock watering) may discharge into the creek at the base of the landfill. The creek would in turn, find its way to the Avon River by tributary particularly during winter.

It is recommended that the Shire of York seek assurances that the concern is addressed.

Should you have queries or require further information please contact Vic Andrich on 9388 4978 or vic.andrich@health.wa.gov.au

Yours sincerely


Jim Dodds
DIRECTOR
ENVIRONMENTAL HEALTH DIRECTORATE

14 March 2014

Environmental Health Directorate
Grace Vaughan House 227 Stubbs Terrace SHENTON PARK Western Australia 6008
PO Box 8172 PERTH BUSINESS CENTRE WA 6849
Telephone (08) 9388 4999 Facsimile (08) 9388 4955
www.health.wa.gov.au



Government of **Western Australia**
Department of **Mines and Petroleum**

Your ref: O117455 / GR2.A290
Our ref: A0289/201401
Enquiries: Suzanne Simons - Ph 08 9222 3013
Email: suzanne.simons@doir.wa.gov.au

Ray Hooper
Chief Executive Officer
Shire of York
PO Box 22
YORK WA 6302

Dear Mr Hooper

DEVELOPMENT ASSESSMENT PANEL APPLICATION - PROPOSED CLASS II LANDFILL AT ALLAWUNA FARM, 2948 GREAT SOUTHERN HIGHWAY, ST RONANS

Thank you for your letter dated 7 February 2014 regarding the above proposal.

The Geological Survey of Western Australia (GSWA), on behalf of the Department of Mines and Petroleum (DMP), has reviewed the proposed Class II Landfill at Allawuna Farm, 2948 Great Southern Highway, St Ronans with respect to the access and development of minerals and petroleum resources, geothermal energy and basic raw materials, and has no comment to make in this regard.

If you have any queries, please contact Warren Ormsby on 08 9222 3571 or Warren.ormsby@dmp.wa.gov.au.

Yours sincerely




Rick Rogerson
Executive Director
GEOLOGICAL SURVEY OF WESTERN AUSTRALIA

10 March 2014

Records

From: Jacky Jurmann
Sent: Thursday, 27 March 2014 7:08 AM
To: Records
Subject: FW: Proposed SITA Landfill
Attachments: Allawuna_Annual horticulture.pdf; Allawuna_Dryland cropping.pdf; Allawuna_Grazing.pdf; Allawuna_Perennial horticulture.pdf; Allawuna_Vines capability.pdf; ATT00002..txt

SHIRE OF YORK	
FILE	GR2, 290
OFFICER	RA7
INITIALS	Jacky
27 MAR 2014	
1139273	
REFERRED TO COUNCIL	
DATE	INITIALS

Jacky Jurmann

Manager of Planning Services
 Shire of York
 PO Box 22
 YORK WA 6302

Ph: 9641 2233
 Email: planner@york.wa.gov.au

From: Doncon, Greg [<mailto:greg.doncon@agric.wa.gov.au>]
Sent: Wednesday, 26 March 2014 6:59 PM
To: Jacky Jurmann
Subject: RE: Proposed SITA Landfill

Hi Jacky,

Thank you for requesting information about the agricultural productivity of the proposed land fill site. I understand that the proposal is not a local shire run facility but for a large scale commercial facility dealing with a wide range of waste from the Metropolitan region.

I have prepared a number of maps using our regional scale soil-landscape mapping and interpreted land use capability assessments for the subject land and adjacent areas. I have attached the maps for your information. Please note that these maps are generated from regional scale data and provide a guide to land capability. Detailed paddock scale land capability assessments would be recommended before the area was developed for a new land use such as horticulture.

These regional scale maps show that the area proposed for the land fill has more than **70% high land capability** for **annual horticulture**, **perennial horticulture** and **vines**. The maps indicates that **more than 70% of the land with moderate to high capability** for **cropping** and **grazing**. Currently the land is used for cropping and grazing.

The maps were created using NRM Info (<http://spatial.agric.wa.gov.au/slip/framesetup.asp>), it is a website that you should have access to. It may be a little slow from outside of DAFWA, but it will show the data you are seeking. If you need higher quality maps, please advise and I will see what I can do. If you need assistance to use the website, please advise and I will talk you through the process. I will not be in the office tomorrow, but can assist on Friday.

DAFWA currently has a project identifying high quality agricultural land in the coastal areas between Gingin and Geraldton. We have developed a new methodology which

3/27/2014

considered both irrigated and dryland agricultural uses. You can find out more about at:
http://archive.agric.wa.gov.au/PC_95674.html

High quality agricultural land is defined as "areas of land identified from a combination of soil, land capability, water resource and rainfall data as the most productive and versatile for either irrigated or broadacre agriculture"

In the current SPP2.5, **Priority Agricultural Land** is defined as land considered to be of State, regional or local significance for food production purposes, due to its collaborative advantage in terms of soils, climate, water (rain or irrigation) and access to services. **Priority agricultural land is derived from High Quality Agricultural Land data** that has been subject to consultation and refinement, and has removed land required for existing and future urban/development areas, public use areas and land required for environmental purpose

While the subject land appears to have moderate to high land capability for all agricultural land uses, it is unclear whether the irrigated uses are possible as they require access to good quality water for irrigation. I am unable to comment on this but you may wish to contact the Department of Water.

The relevant WAPC policies which relate to the protection of priority agricultural land are SPP2.5 and DC 3.4 as well as the rural planning guidelines (see <http://www.planning.wa.gov.au/6906.asp>)

I hope this additional information on land capability assists you in finalising your report to the Wheatbelt Development Assessment Panel.

Regards

Greg Doncon | Research Officer
 Department of Agriculture and Food, Western Australia
 PO Box 432, Merredin WA 6415
 t +61 (0)8 9081 3117 | f +61 (0)8 9041 1138
 w agric.wa.gov.au



A progressive, innovative and profitable agrifood sector that benefits Western Australia

From: Jacky Jurmann [<mailto:planner@york.wa.gov.au>]
Sent: Wednesday, 26 March 2014 7:49 AM
To: Doncon, Greg
Subject: FW: Proposed SITA Landfill

Greg,

Does DAFWA realise that this is not a Shire run waste facility but a large-scale private facility to cater for Perth's waste? I was hoping that the comments would be provided on the use of productive agricultural land for non-rural uses. To me it appears that the use is inconsistent with State Policy that emphasises the importance of protecting productive farmland. Are there any Policy statements to this effect that you could guide me to?

Regards,

Jacky Jurmann

Manager of Planning Services
 Shire of York

3/27/2014

PO Box 22
YORK WA 6302

Ph: 9641 2233
Email: planner@york.wa.gov.au

From: Doncon, Greg [<mailto:greg.doncon@agric.wa.gov.au>]
Sent: Tuesday, 25 March 2014 1:43 PM
To: Jacky Jurmann
Subject: RE: Proposed SITA Landfill

Hi Jacky

A letter has been sent (attached is a copy), although I understand it was only sent today, apologies for the delay. It was initially delayed as I needed to determine the distance between a soil conservation notice on the property and the waste site. The SCN does not impact on the waste site.

The letter is quite brief and does not convey the debates that occurred within DAFWA. This is a matter that has been discussed at length. In the end, the discussions came back to the notion that all shires run waste facilities and then there are some poorly kept waste facilities on farming properties (the farmer very own site where they dump their own waste). DAFWA does not impose conditions on any of those sites beyond the need for a vegetative buffer and adequate fencing to keep livestock out. There is an argument for greater monitoring by the waste industry of their impact on the surrounding rural environment (grazing animals and cropping), but this would need to occur across the state and the cost would then be imposed on the waste site managers and we are not sure that the shires want this level of monitoring imposed upon their facilities.

The potential contamination of the food supply chain from the Allawuna site is expected to be insignificant compared to the poorly managed farmer tips. There is a monitoring within the abattoirs and if any issues are detected arise DAFWA will investigate. I understand that DAFWA biosecurity staff do visit Shire run waste facilities mainly looking for declared weed species and I assume that Allawuna will fall into this same category. DAFWA has investigated farms and their waste sites when problems have been detected at abattoirs. From DAFWA perspective, a level of monitoring is carried out as part of regulating and protecting the agricultural sector.

If I can be of any further assistance please let me know and if I can locate any specific policy documents I will send them through.

Regards

Greg Doncon | Research Officer
Department of Agriculture and Food, Western Australia
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w agric.wa.gov.au



A progressive, innovative and profitable agrifood sector that benefits Western Australia

From: Jacky Jurmann [<mailto:planner@york.wa.gov.au>]
Sent: Tuesday, 25 March 2014 7:48 AM
To: Doncon, Greg
Subject: Proposed SITA Landfill

Hi Greg,

3/27/2014

I am currently finalising my report for the Wheatbelt Development Assessment Panel on the proposal SITA landfill at Allawuna Farm. A large number of the submissions received from the community raised concerns about the use of agricultural land for landfilling, threats to bio-security and threats to general and organic farming activities.

I didn't receive a response to my referral from the Department of Agriculture, but was wondering if you had any comments or if there are any policy documents that would assist me.

Thanks,

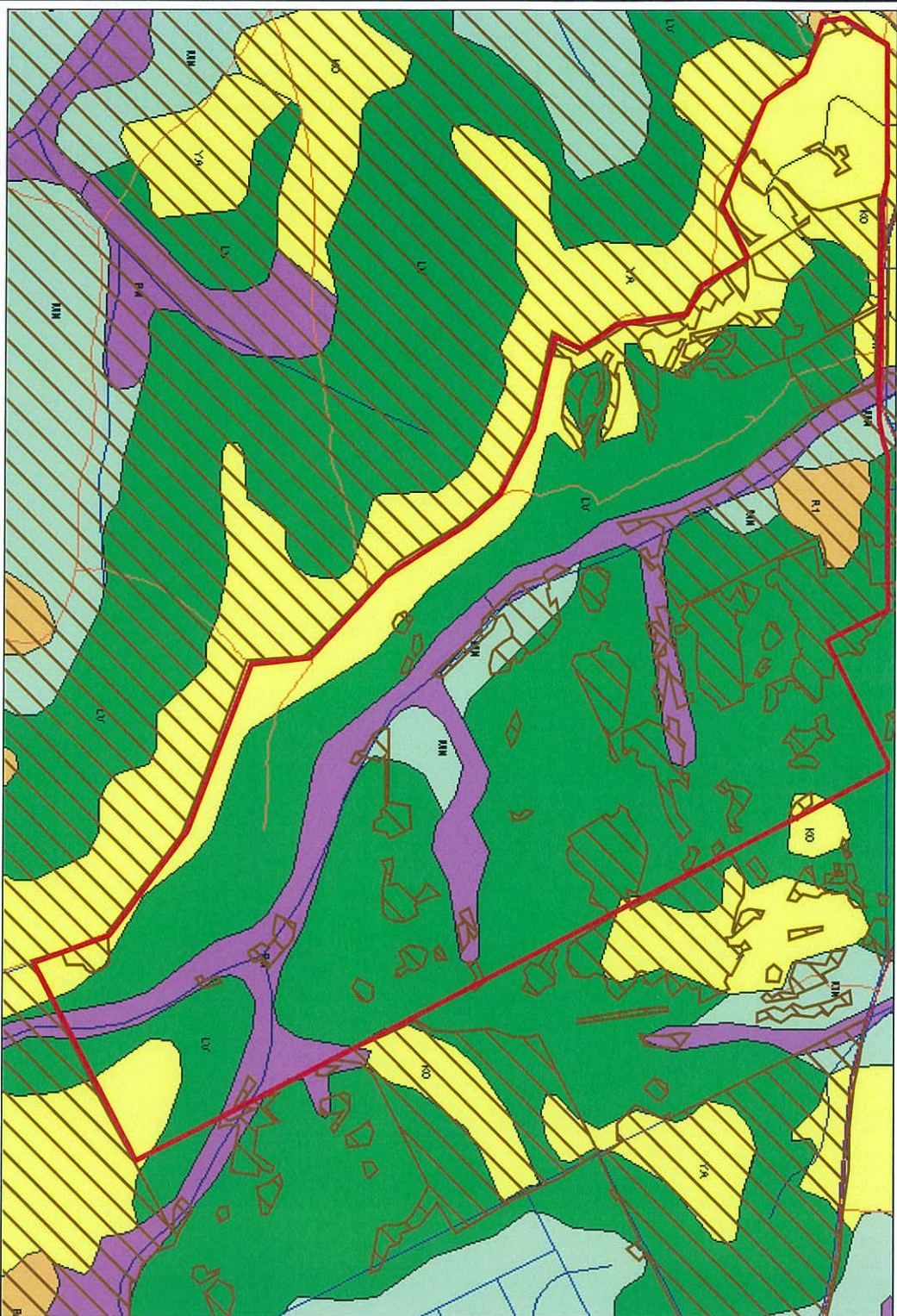
Jacky Jurmann

Manager of Planning Services
Shire of York
PO Box 22
YORK WA 6302

Ph: 9641 2233

Email: planner@york.wa.gov.au

Annual Horticulture



LEGEND

- Cities and Towns**
 - A Major town names
 - A Towns names
 - All cities and towns
- Hydrology**
 - Hydrology
 - Roads - Detailed
- Roads**
 - Freeway
 - Highway
 - Primary
 - Secondary
 - Minor
 - Track
 - Connector
 - Proposed
- Vegetation**
 - Remnant vegetation
 - Properties Boundary
 - Subsystems
 - A Subsystem/phase label
 - Subsystem/phase label arrow
 - Subsystem/phase boundary
- Land Capability**
 - >70% of Land has high capability
 - 50-70% of Land has high capability
 - 50-70% of Land has moderate to high capability
 - 50-70% of Land has low capability
 - >70% of Land has low capability
 - Insufficient information

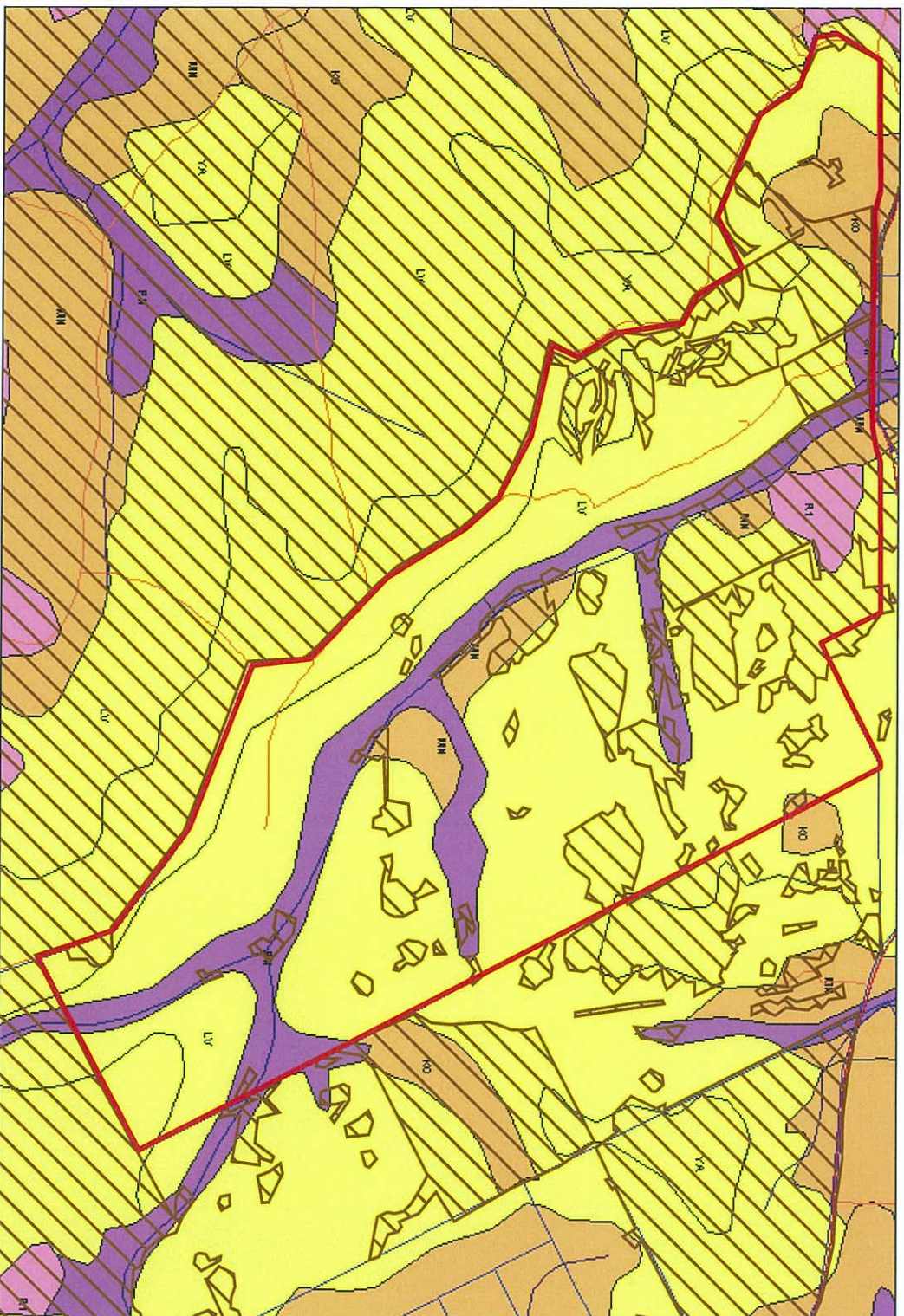
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Produced By: 159.207.60.128

Date Produced: 3/26/2014



Dryland cropping



LEGEND

- Cities and Towns**
 - A Major town names
 - A Towns names
 - A All cities and towns
- Hydrology**
 - Hydrology
 - Roads - Detailed
 - Freeway
 - Highway
 - Primary
 - Secondary
 - Minor
 - Track
 - Connector
 - Proposed
- Vegetation**
 - Remnant vegetation
 - Properties
 - Subsystems
 - A Subsystem/phase label
 - Subsystem/phase label arrow
 - Subsystem/phase boundary
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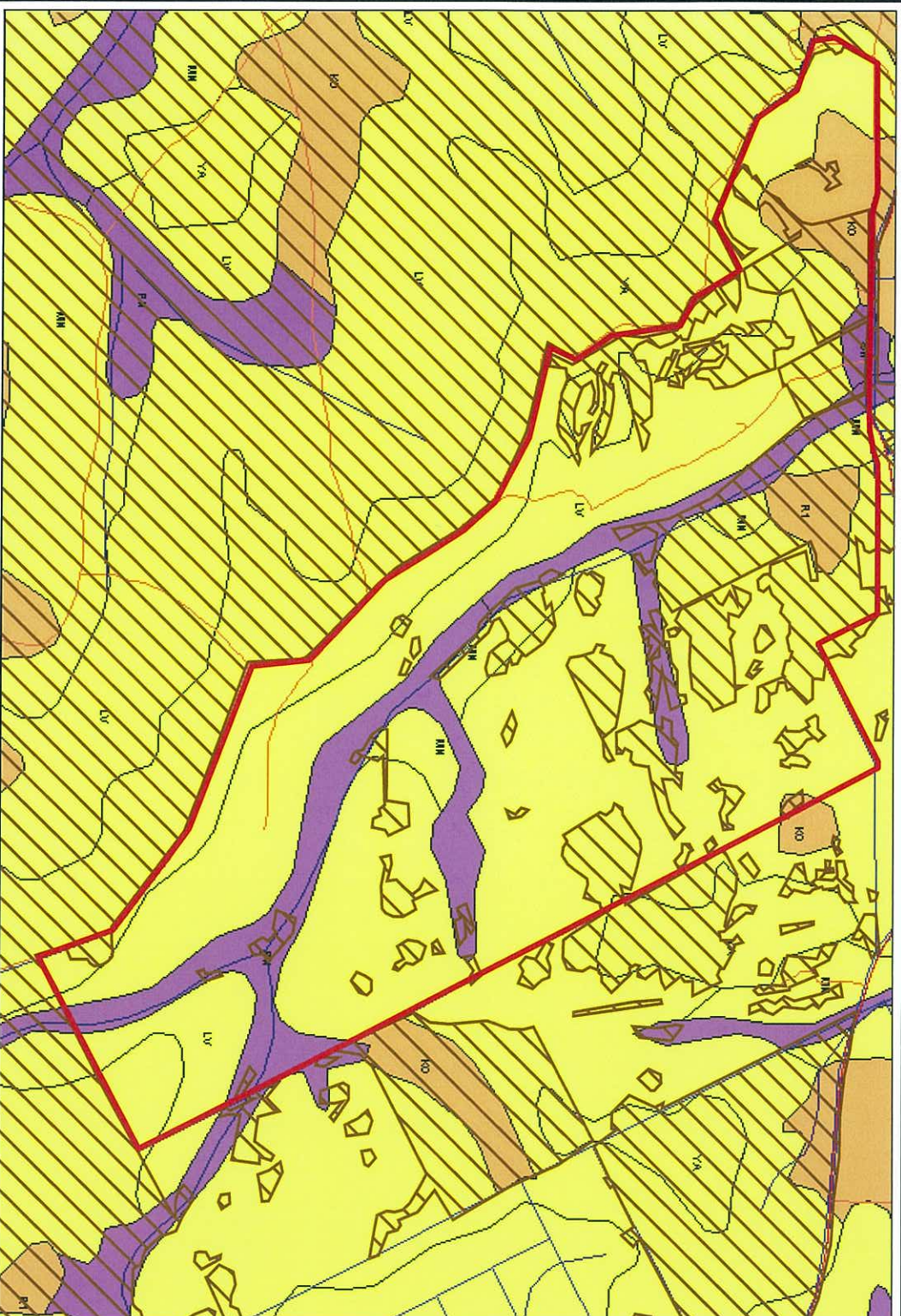
1 km

Produced By: 159.207.60.128

Date Produced: 3/26/2014



Grazing



LEGEND

- Cities and Towns**
 - A Major town names
 - A Towns names
 - All cities and towns
- Hydrology**
 - Hydrology
 - Roads - Detailed
 - Freeway
 - Highway
 - Primary
 - Secondary
 - Minor
 - Track
 - Connector
 - Proposed
- Vegetation**
 - Remnant vegetation
 - Properties
 - Subsystems
 - Subsystem/phase label
 - Subsystem/phase label arrow
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 - Insufficient information

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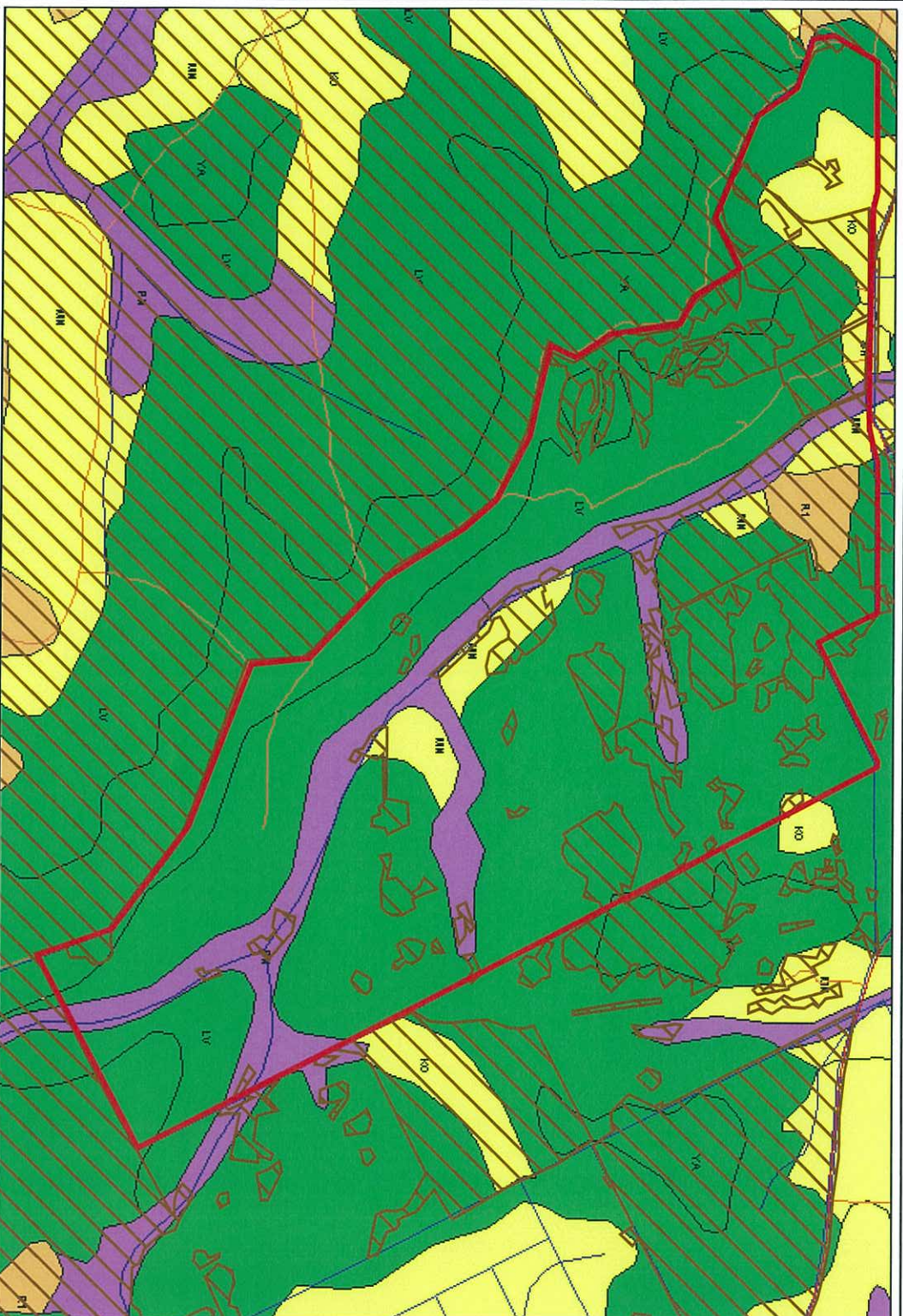
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Date Produced: 3/26/2014

1 km



Perennial Horticulture



LEGEND

- Cities and Towns**
 - A Major town names
 - A Towns names
 - All cities and towns
- Hydrology**
 - Hydrology
 - Roads - Detailed
 - Freeway
 - Highway
 - Primary
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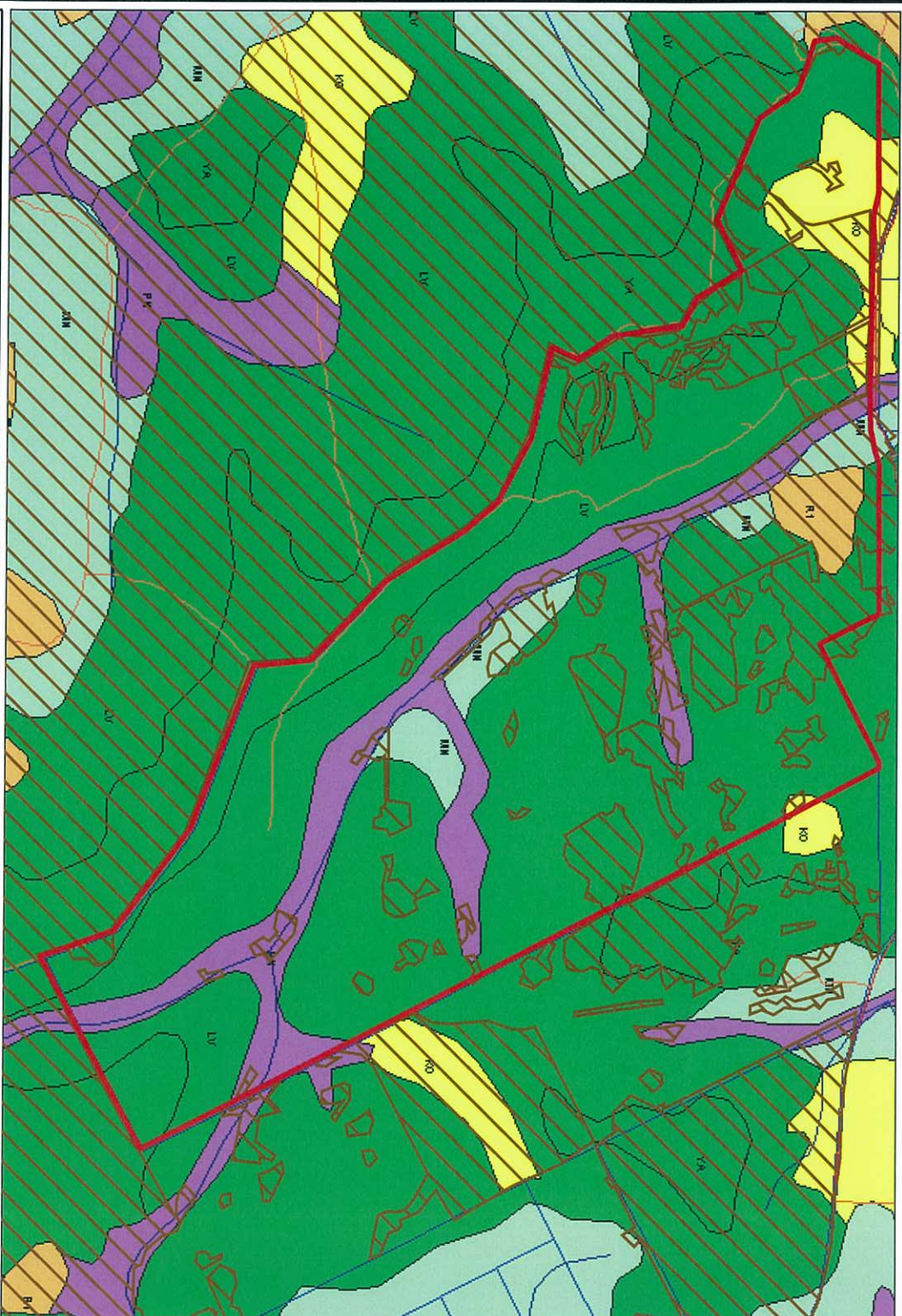
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Date Produced: 3/26/2014

1 km



Vines



LEGEND

- Cities and Towns**
 - A Major town names
 - A Towns names
 - All cities and towns
- Hydrology**
 - Hydrology
 - Roads - Detailed
 - Freeway
 - Highway
 - Primary
 - Secondary
 - Minor
 - Track
 - Connector
 - Proposed
- Vegetation**
 - Remnant vegetation
 - Properties
 - Subsystems
 - Subsystem/phase label
 - Subsystem/phase label arrow
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Produced By: 159.207.60.128

Date Produced: 3/26/2014





SHIRE OF YORK	
FILE	GR2.290
OFFICER	INITIALS
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06 MAR 2014	
I138578	
REFERRED TO COUNCIL	
DATE	INITIALS

Your ref: O117455 / GR2.A290

Our ref: RF11246

Enquiries: James Mackintosh, 6250 8043

Chief Executive Officer
Shire of York
PO Box 22
YORK, WA 6302

Dear Mr Hooper

DEVELOPMENT ASSESSMENT PANEL APPLICATION – PROPOSED CLASS II LANDFILL AT ALLAWUNA FARM, 2948 GREAT SOUTHERN HIGHWAY, ST RONANS

Thank you for the above referral dated 7 February 2014. The Department of Water (DoW) has assessed the proposal and would like to provide the following advice:

The subject site is located within the Avon River Management Area under the Waterways Conservation Act, 1976 and within a proclaimed surface water area under the Rights in Water and Irrigation Act, 1914. This site is also located in proximity to a minor river known as Thirteen Mile Brook.

Public Drinking Water Source Protection

The Mundaring catchment Public Drinking Water Source Area (PDWSA) surface watershed is about 1000 m to the west of the Allawuna Farm landfill site. It is considered that the divide hydraulically separates the PDWSA from the Thirteen Mile Brook catchment. The low permeability clayey substrate should effectively limit the volume and restrict movement of potential groundwater contamination from the Allawuna Farm Landfill, based on the information provided by the proponent.

Local Hydrogeology

Overall, the upper catchment location and design of the proposed Allawuna Landfill site should have a low impact on groundwater and surface water resources over its 37 year active life and beyond. The low permeability clays underlying the site effectively separate the surface and groundwater systems, in this area. The landfill site is proposed to be constructed on low permeability clayey material with the base of the landfill designed to maintain a minimum distance of 3m to groundwater, which is proposed to be confirmed by bore drilling as part of future detailed designs.

Potential Leachate Transport

The proponent calculates that the total liner leakage under various scenarios is estimated to be 8.43 L/ha/day, assuming that appropriate monitoring and leachate sump emptying limits the leachate head to no more than 300mm above the liner. Any leachate leakage would be further decreased by the low permeability in situ clayey material forming the landfill subgrade. If sandy gravelly material is encountered under the landfill subgrade then it will need to be replaced by low permeability clayey material to maintain a 3m deep low permeability clayey barrier under the landfill liner system.

Information from the proponent (Table 6) provides the rate of percolation under various static heads of surface water through 3m of low permeability clay that will be maintained under the landfill liner system. Whilst the infiltration rates (m/yr) appear to be correctly calculated the time to reach groundwater (years) needs to be divided by the estimated clay effective porosity (Θ_e) of about 0.01 to determine the travel time from the seepage velocity. This reduces the travel time from the range of 432 to 110 years to the range of 4.3 and 1.1 years.

Field studies undertaken by the proponent indicate that low permeability clayey substrate will provide an adequate buffer distance from the leachate dams and landfill to Thirteen Mile Brook. It has been interpreted from geological bore logs that a clayey confining layer several metres thick overlies a confined aquifer with hydraulic conductivity (k) of up to 0.6 m/d. Calculations in the report indicate that the very low volumes of leachate entering the confined aquifer will take well over 100 years to reach Thirteen Mile Brook. However, if the seepage velocity (v) is calculated from formula ki/Θ_e where the hydraulic gradient (i) is 10/640 and the effective porosity (Θ_e) is 0.05 then the seepage velocity is about 0.19 m/d and the time taken to travel the 640m to the Thirteen Mile Brook is about 9 years. This is still a long time period for any low volume of leachate to reach the sediments under Thirteen Mile Brook.

Palaeochannels

A palaeochannel was not mapped in the detailed *Helena River Salinity Statement, Department of Water (May 2007)*. Thirteen Mile Brook is a small headwater catchment that would be unlikely to generate 30 metres depth of alluvial fill from top of the catchment along only a 15 km stretch of V-shaped Thirteen Mile Creek. Topographic contours show the flatter valley floor is only about 100 m wide.

The *Helena River Salinity Statement*, Figure 5 shows Manyuring Spring to be associated with an outcrop of weathered basement at an elevation of between 275 and 280 mAHD. There is no evidence for a palaeochannel in the Mundaring Catchment downstream of Manyuring Spring. No palaeochannel is indicated from the bore logs in the works approval submission. In addition, the salinity of the groundwater in some of the recently drilled SITA bores are of high salinity whereas the downstream Manyuring Spring is fresh indicating that groundwater is not flowing through from Thirteen Mile Brook.

Indications are that Manyuring Spring is a locally fed spring with groundwater derived from west of the catchment divide and not from alluvium within Thirteen Mile Brook. The spring is a surface expression of groundwater, possibly caused by a less permeable weathered bedrock damming groundwater causing it to rise to the surface and flow westward downstream. All the evidence suggests that groundwater within Thirteen Mile Brook alluvium flows northward towards the distant Avon River.

The above clearly indicates that as far as the geomorphology and hydrogeology is concerned there is a low risk of Manyuring Spring feeding contaminated groundwater into the protected Mundaring Catchment PDWSA from the 8km distance to the proposed Allawuna Farm Landfill site.

Leachate Storage Dam

Leachate will be collected in drains under the landfill and diverted to leachate dams. Leachate generation has been estimated under a 1 in 20 year, 24 hour duration storm event and 1 in 100 year extreme storm event, to enable leachate dams to be designed to prevent overtopping. The modelling of dam capacity is considered conservative as it does not include leachate storage capacity in the unsaturated waste mass, or enhanced

evaporation from the leachate dams back to the landfill for trickle irrigation and evaporation on active landfill cells.

Conclusions and Recommendations

- There are no significant concerns with regards to the protection of water resources, in particular the Priority 1 (P1) Public Drinking Water Source Area (PDWSA) of the Mundaring Catchment;
- An assessment should be made of the maximum extent and height of any leachate mounding under the landfill site;
- The calculations of groundwater travel times in sections 4.11.2 and 4.11.3 of the works approval need to be reviewed and verified by SITA;
- If sandy gravelly material is encountered under the landfill subgrade then it will need to be replaced by low permeability clayey material to maintain a 3m deep low permeability clayey barrier under the landfill liner system;
- An Allawuna Farm Landfill operating strategy, that includes groundwater and surface water monitoring, should be forwarded to DoW for review;
- An acceptable monitoring bore network needs to be installed and monitoring should occur between the landfill, the leachate dams and 13 Mile Brook;
- Additional pre-development groundwater levels and groundwater and surface water quality monitoring should be undertaken to ensure a substantial baseline data set. In addition, comprehensive geotechnical investigation across the entire site of the landfill footprint should also be undertaken; and
- Rehabilitation and revegetation of the Thirteen Mile Brook should be considered as an additional, final resort minor treatment system and general best management practice for development adjacent to degraded waterways.

Should you wish to discuss this advice further please contact me on 6250 8043 or by email at james.mackintosh@water.wa.gov.au.

Yours sincerely



James Mackintosh
Program Manager
Land Use Planning
Swan Avon Region

4 March 2014



Government of Western Australia
Department of Parks and Wildlife
Perth Hills District

Your ref: GR2.A290
Our ref: 2010/008643; 35939
Enquiries: Rebecca Ong
Phone: 9290 6108
Email: rebecca.ong@dpaw.wa.gov.au

Ray Hooper
Chief Executive Officer
Shire of York
1 Joaquina Street
YORK WA 6302

SHIRE OF YORK	
FILE	GR2.A290
OFFICER	Saay
INITIALS	
12 MAR 2014	
1138730	
REFERRED TO COUNCIL	
DATE	INITIALS

Attn: Jacky Jurmann

Development Assessment Panel Application – Proposed Class II Landfill at Allawuna Farm, 2948 Great Southern Highway, St.Ronans

I refer to your letter of 15 January 2014 requesting comments on the landfill proposal affecting the lot mentioned above. The Department of Parks and Wildlife requests the following conditions be placed on the proposed development, should it be approved;

Conditions

- 1) Prior to the commencement of development works an environmental management plan for black cockatoos is to be prepared and approved to ensure the protection and management of the sites environmental assets with satisfactory arrangements being made for the implementation of the approved plan.
- 2) Measures being taken to ensure the identification and protection of any vegetation on the site worthy of retention that is not impacted by development works, prior to commencement of development works.

The request for these conditions is in line with *State Planning Policy 2.2, section 5.5(i)d*, where it states that decision-making should consider mechanisms to protect areas of high biodiversity and/or conservation value, including land containing Threatened flora or Threatened Ecological Communities or that which is habitat to Threatened Fauna. The above conditions are requested to ensure the identification and protection of any habitat trees located within the impacted areas of the subject lots. The vegetation associations found within the lot include medium woodland of wandoo and marri, which are species of trees known to provide essential habitat to the three species of threatened black cockatoos – Baudin's black-cockatoo (*Calyptrornychus baudinii*), Carnaby's black-cockatoo (*Calyptrornychus latirostris*) and the forest red-tailed black-cockatoo (*Calyptrornychus banksii naso*).

Carnaby's Black Cockatoo is classified as Endangered under the Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act 1999), and both Baudin's cockatoo and forest red-tailed black cockatoo are classified as Vulnerable. Proposals likely to have a significant impact on black cockatoo habitat are required to be referred to the Commonwealth Department of Sustainability, Environment, Water, Populations and Communities. –

If it is likely that the proposed subdivision will involve;

- clearing of any known nesting tree,
- clearing of any part or degradation of breeding habitat,

- clearing of more than 1 hectare of quality foraging habitat, or
 - clearing or degradation (including pruning the top canopy) of a known roosting site,
- then the proposal should be referred to the Commonwealth.

The Department of Parks and Wildlife suggests that the proponent refer to the "*Environment Protection and Biodiversity Conservation Act 1999* draft referral guidelines for three threatened black cockatoo species: Carnaby's cockatoo (endangered) *Calyptohynchus latirostris*, Baudin's cockatoo (vulnerable) *Calyptohynchus baudinii*, forest red-tailed black cockatoo (vulnerable) *Calyptorhynchus banksii naso*" (Commonwealth of Australia 2011) for further information.

Please contact Rebecca Ong (Ph: 9290 6108) if you require further advice

Yours sincerely



Benson Todd
DISTRICT MANAGER

4 March 2014



Government of **Western Australia**
Department of **Planning**

Your ref: O117455 – GR2.A290
Our ref: DP/10/02057
Enquiries: Jaime Bishopp
Telephone: (08) 6551 9094

Ms Jacky Jurmann
Planning Officer
Shire of York
PO Box 22
YORK WA 6302

Dear Ms Jurmann

**RE: DEVELOPMENT ASSESSMENT PANEL APPLICATION – PROPOSED
CLASS II LANDFILL AT ALLAWUNA FARM**

Thank you for your correspondence on 7 February 2014 and referring the above mentioned application to Policy Development and Review for comment on the tourism planning aspects of the proposal.

The application is for the use of Allawuna Farm located at Lots 4869, 5931, 9926 and 26932 Great Southern Highway, Saint Ronans for the purposes of a Class II landfill and construction of associated infrastructure and facilities.

No surrounding land is specifically zoned for tourism however Wandoo National Park abuts the site and Wambyn Nature Reserve is within the vicinity of the site. The National Park and Nature Reserve may be used for recreation/tourism. A requirement of landfill sites is to manage noise, dust and odour therefore these impacts are unlikely to pose an issue from a tourism planning perspective. It is recommended that the site be considered from any major vantage points (such as tourist lookouts) that may be in the area, including its visibility from the Great Southern Highway.

Please note that this is a response from the Policy Development and Review branch on **tourism planning issues only** and does not reflect comments of other branches of the Department of Planning or a formal position of the Western Australian Planning Commission, which may need to be consulted on this proposal.

I trust this information will assist you, however should you require any additional information, please do not hesitate to call Jaime Bishopp on 6551 9094.

Yours sincerely

Lisa Bell
Planning Manager Policy Development and Review

14/03/2014



26 February 2014

Mr Ray Hooper
Chief Executive Officer
Shire of York
PO Box 22
York WA 6302

SHIRE OF YORK	
FILE	GR2.290
OFFICER	INITIALS
RAY	
JACKY	
05 FEB 2014	
1138533	
REFERRED TO COUNCIL	
DATE	INITIALS

Dear Ray

Re : Allawuna Farm Landfill Project

"Thank you for providing the Department of Fire and Emergency Services (DFES) the opportunity to comment on the Allawuna Farm Landfill project. DFES has some significant concerns over the proposed landfill project as described in the submission.

The principal concern is that there is no explicit emergency management plan for consideration by DFES prior to the project being developed.

The project is being developed within 4km of the nearest registered earthquake location of a magnitude 2.5. The site will have leachate facilities that will cover the physical and biological decomposition of the waste. The leachate dam will consist of two 3,000m² leachate retention. What is the process for dams that are damaged and losing their leachates? What are the occupational health and safety requirements for the responders when dealing with leachate spillage?

The landfill gas will be composed of a variety of gases (section 9.11) including methane, carbon dioxide, oxygen, hydrogen and water vapour. The initial phase of operation there may be a flaring facility (section 10.6), which conversely means that there may not be a flaring facility and any gases may subsequently only be released into the atmosphere. Additionally the option to generate electricity may be used once the site has a sufficient quality and quantity of energy recovery. It may therefore not produce energy. What are the safety issues for responders to deal with gas emissions of this type?

The comprehensive Fire Management Plan (section 10.9) should be developed immediately and prior to the works plans being finalised. The area is serviced by volunteers and may require specialist training and equipment to deal with fires and other emergencies that may occur in landfill site. The emissions from a fire in the 2 metre deep waste (section 9.4) may prove to be carcinogenic or damaging to the health of fire fighters unless using breathing apparatus. There is likely to be between 150,000 and 250,000 tonnes of waste per annum (section 9.1). What are the processes for dealing with these fires and other emissions and also fire potentially entering the site?



With this volume of waste and it being carted by pocket road train vehicles (section 11.1) will increase the vehicle traffic and potential for vehicle accidents, particularly east of the BGC Quarry and prior to the road works being undertaken to upgrade Great Southern Highway. Has there been an analysis of the capacity of local emergency service crews to deal with any potential change to the requirements to respond to traffic accidents, and do the responders have the equipment to deal with the types of vehicles that may be involved?

DFES is sure that many of these issues of concern can be overcome, but we believe that DFES need to be actively participating during the development and implementing of the plans to ensure that community protection is not compromised."

Yours sincerely

Robert Fraser
AO Lower Wheatbelt
Goldfields/Midlands



Government of **Western Australia**
Office of the **Environmental Protection Authority**
Strategic Policy and Planning Division

SHIRE OF YORK	
FILE	GR2.290
OFFICER	INITIALS
RAY	
SHEEHAN	
20 FEB 2014	
1138318	
REFERRED TO COUNCIL	
DATE	INITIALS

Mr Ray Hooper
Chief Executive Officer
Shire Of York
Po Box 22
YORK WA 6302

Your Ref: O117455/GR2.A290
Our Ref: ER05-2013-0008
Enquiries: Anthony Sheehan, 6145 0844
Email: anthony.sheehan@epa.wa.gov.au

Dear Mr Hooper

**DEVELOPMENT ASSESSMENT PANEL APPLICATION PROPOSED CLASS II
LANDFILL AT ALLAWUNA FARM, 2948 GREAT SOUTHERN HIGHWAY,
ST RONANS**

Thank you for your letter to the Environmental Protection Authority (EPA) dated 7 February 2014 regarding the Development Assessment Panel Application for the proposed landfill at Allawuna Farm.

The proposal was formally referred to the EPA in 2012 under section 38 of the *Environmental Protection Act 1986* (EP Act). After considering advice from relevant regulatory agencies, the EPA determined that the proposal did not require environmental impact assessment under Part IV of the EP Act as it could be adequately regulated under Part V of the EP Act. The EPA published its determination on the EPA website in July 2013.

The full reasons for the EPA's decision are set out in the enclosed Statement of Reasons for your reference.

Yours sincerely

Darren Foster
DIRECTOR

14 February 2014

Encl.

The Atrium Level 8, 168 St Georges Terrace, Perth, Western Australia 6000.
Postal Address: Locked Bag 10, East Perth, Western Australia 6892.

Telephone: (08) 6145 0800.
Facsimile: (08) 6145 0845.
Website: www.epa.wa.gov.au

ALLAWUNA LANDFILL
STATEMENT OF REASONS
JUNE 2013

THE PROPOSAL

The EPA has received a third party referral for the development and operation of a Class II or III Putrescible Landfill on a property known as Allawuna, within the Shire of York. The proponent has advised the EPA that only Class II waste will be accepted. The proposal is located on Lots 9926, 26934, 4869 and 5831 Great Southern Highway, Saint Ronans. The proposal has a nominal life expectancy of 37 years and will accept between 150,000 and 250,000 tonnes of waste each year.

The total area of the Allawuna property is approximately 1,500 hectares (ha). Of this, 25 per cent is uncleared remnant bushland with the remainder being cleared land used for either sheep grazing or broad acre cereal cropping.

The proposed ground disturbance area is approximately 70 ha, including waste placement, roads and supporting infrastructure. The proposed ground disturbance area has been extensively cleared and contains scattered Marri and Wandoo trees as well as a small number of Flooded Gum and *Allocasuarina fraseriana* (Sheoak). The understory is composed of introduced grazing and cropping species.

The proponent has advised the EPA that the landfill will be constructed as a series of cells, with each cell sized to fill in two to three years. Each cell will be shaped to facilitate free draining of the floor for leachate collection from a sump area. The base of the cells will be double lined with a layer of low permeability clay or Geosynthetic Clay Liner under a 2 millimetre thick high density polyethylene (HDPE) liner.

A stormwater dam will be constructed of low permeability clay and located on the south eastern corner of the landfill. Two leachate evaporation dams will be located to the west of the landfill. These will also be lined with low permeability clay and HDPE. Other minor infrastructure such as sheds, offices, workshops, laydown areas and stormwater drainage will also be constructed as part of the proposal.

EPA Guidance Statement No. 3 Separation Distances between Industrial and Sensitive Land Uses recommends a buffer distance of 150 metres between a Class II or III landfill and a single residence. The distance between the proposal and the nearest single residence is 1,900 metres. The Guidance Statement also

orchid diversity. The proponent has confirmed that the proposal does not include dewatering.

Terrestrial Fauna

The site contains two habitat types: 'cropland with scattered Marri and Wandoo' and 'minor creek line lined with Wandoo and Flooded Gum'. A survey of the proposed ground disturbance area determined that both these habitat types are severely degraded, contain low fauna habitat value and are well represented in the local vicinity.

Thirty five species were recorded during the survey, comprising two mammal species, five reptile species and 22 bird species. A total of 227 species have been recorded previously within the vicinity of the site. The survey report notes that the survey was not exhaustive as trapping was not undertaken nor were surveys conducted at night. The survey report states that the expected fauna assemblage consists of species that are generally common and widespread throughout the region and are not dependent on the habitat found within the study area.

Terrestrial Fauna – Black Cockatoo

The Forest Red-tailed Black Cockatoo, Carnaby's Cockatoo and Baudin's Cockatoo are protected under the *Wildlife Conservation Act 1950* and are known to exist in the region. Therefore, Black Cockatoo foraging, roosting and breeding assessments were undertaken by the proponent.

Vegetation on the proposed ground disturbance area includes isolated trees or small stands of mature Marri and Wandoo which are both known foraging resources for Black Cockatoos. The area has approximately 4 hectares of foraging habitat. Foraging evidence of the Carnaby's Black Cockatoo and/or Baudin's Black Cockatoo were recorded during the assessment.

Tall trees with dense canopies are present within the proposed ground disturbance area and provide potential roosting habitat for Black Cockatoos. However, no evidence of roosting (droppings or feathers) was recorded during the assessment.

The site has 144 trees potentially suitable for breeding. Of these, 13 contain suitable breeding hollows. All trees with suitable hollows were examined during the survey, but there was no evidence that the hollows were used as nests.

Hydrological Processes

The Department of Water has advised the EPA that the proposal will be constructed on low permeability clayey material. The base of the landfill will be designed to maintain a minimum distance of 3 metres to groundwater, which will

OTHER ISSUES

Traffic

The proposal will generate new road train vehicle movements between the Kurnall Road, Welshpool waste transfer station and the Allawuna site. Road trains will depart the Welshpool industrial area via Orrong Road (eastbound) and Roe Highway (northbound) before turning east into Great Eastern Highway. At the lakes intersection road trains will turn east onto Great Southern Highway and continue to the Allawuna site. When the proposal is operating at full capacity, it is expected that road trains will depart the waste transfer station at regular twenty minute intervals.

Main Roads WA has advised the EPA that the traffic studies commissioned by the proponent satisfy its requirements and that the overall increase in traffic for the Great Eastern Highway will be between 0.1% and 0.6%. The overall increase in heavy traffic will be between 2% and 3%. Main Roads WA has also advised the EPA that the proposal will have a negligible traffic impact on Great Eastern Highway and does not warrant any safety or capacity improvements.

Agriculture

Many of the public comments also raised concerns that the proposal may impact neighbouring farming activities. The Department of Agriculture and Food (DAF) advised the EPA that should the proposal be approved, the DAF supported the continuation of mixed commercial farming around the facility conditional on monitoring to manage biosecurity risks. The DAF noted that a cereal cropping program and a breeding sheep flock will provide opportunities for ongoing biological sampling to identify any effect of the facility on the surrounding environment.

Earthquake

An issue raised during public comment concerned the potential for contaminant leakage as a result of earthquake. This is a matter that can be dealt with through detailed design and the works approval and licensing process.

LEVEL OF ASSESSMENT

Part IV Division 1 of the *Environmental Protection Act 1986* (the EP Act) provides for the referral and assessment of significant proposals. The EP Act defines a significant proposal as a proposal likely, if implemented, to have a significant effect on the environment.

Part IV of the EP Act is therefore not required for this proposal to achieve appropriate community consultation or assessment of the environmental issues.

The former Department of Environment and Conservation (now Department of Environment Regulation) advised the EPA that subject to the requirements of obtaining a works approval and licence, the Department is able to manage issues associated with emissions and discharges from the proposal under Part V of the EP Act.

The EPA is of the view that the Department of Environment Regulation will conduct a comprehensive assessment of the proposal including that a licence will not be granted unless it can be demonstrated that the impacts to the environment are acceptable.

A clearing permit, under Part V of the *Environmental Protection Act 1986*, to clear the native vegetation will also be required to implement the proposal. The Department of Environment Regulation will undertake an assessment of the impacts against the clearing principles in the Act before making a decision on whether or not to grant approval to clear the native vegetation.

In summary, although the proposal raises a number of environmental issues, the EPA considers that the potential environmental impacts are not so significant as to warrant formal environmental impact assessment and the subsequent setting of formal conditions by the Minister for Environment under the *Environmental Protection Act 1986* (EP Act). This is because the potential environmental impacts of the proposal can be regulated and managed effectively under Part V of the EP Act.

PUBLIC ADVICE

In providing advice to the EPA to inform its decision on whether or not to assess the proposal, the Department of Agriculture and Food, Department of Water and the former Department of Environment and Conservation's Air Quality Branch all recommended further investigations that should be undertaken as part of detailed design and arrangements for monitoring should the proposal be approved. The EPA recommends that the proponent consult these Departments during detailed design and preparation of its works approval and licence applications to ensure that their requirements are met.

Through the public comment process, the South West Aboriginal Land and Sea Council (SWALSC) advised the EPA that the area surrounding the proposal site is a place of ceremonial and mythological significance to the local Noongar People. SWALSC also reported that the Helena River is a registered Aboriginal heritage

Records

From: Jacky Jurmann
Sent: Wednesday, 26 March 2014 10:29 AM
To: Records
Subject: FW: Proposed Landfill - Allawuna Farm, York, Western Australia [SEC=UNCLASSIFIED]
Attachments: Allawuna Landfill - Shire of York response.docx

SHIRE OF YORK	
FILE	GR2.290
OFFICER	INITIALS
JACKY	
26 MAR 2014	
1139253	
REFERRED TO COUNCIL	
DATE	INITIALS

Jacky Jurmann

Manager of Planning Services
 Shire of York
 PO Box 22
 YORK WA 6302

Ph: 9641 2233
 Email: planner@york.wa.gov.au

From: Spiro.Spiliopoulos@ga.gov.au [mailto:Spiro.Spiliopoulos@ga.gov.au]
Sent: Tuesday, 25 March 2014 2:56 PM
To: Jacky Jurmann
Subject: Proposed Landfill - Allawuna Farm, York, Western Australia [SEC=UNCLASSIFIED]

Dear Jacky,

In response to our telephone conversation I have attached a brief comment on the seismic hazard at the proposed site of the Allawuna Landfill. Please contact me if you require additional information.

We have provided a more specific comment on the seismic hazard analysis conducted as part of the license application for this landfill and forwarded this to the Department of Environmental Regulation.

Regards
 Spiro

Spiro Spiliopoulos
 Earth Monitoring and Hazards
 Minerals and Natural Hazards Division | **GEOSCIENCE AUSTRALIA**

Phone: +61 2 6249 9494 Fax: +61 2 6249 9999 Mob: +61 478 883 862
 Email: Spiro.Spiliopoulos@ga.gov.au Web: www.ga.gov.au
 Cnr Jerrabomberra Avenue and Hindmarsh Drive Symonston ACT
 GPO Box 378 Canberra ACT 2601 Australia
 Applying geoscience to Australia's most important challenges

From: Johnston Gary
Sent: Thursday, 20 March 2014 8:41 PM
To: Spiliopoulos Spiro
Subject: Fw: Proposed Landfill - Allawuna Farm, York, Western Australia SEC=UNCLASSIFIED

Classification: SEC=UNCLASSIFIED

Hi spiro

3/26/2014

Could you arrange for one of your team to answer this query.

Thanks

Gary

This email has been sent from a BlackBerry device provided by Geoscience Australia.

From: Jacky Jurmann [<mailto:planner@york.wa.gov.au>]
Sent: Thursday, March 20, 2014 05:33 PM AUS Eastern Standard Time
To: Johnston Gary
Subject: Proposed Landfill - Allawuna Farm, York, Western Australia

Hi Gary,

I am currently assessing a development application for the construction of a landfill facility at Allawuna Farm, 2948 Great Southern Highway, St Ronans, York (WA, 6302).

We have received quite a number of submissions from the community raising concerns regarding that the liner system will fail during an earthquake result in pollution. From the earthquake mapping we have for assessment of domestic buildings, it appears that the area is located in a low risk area and that it would require a significant event for the suggested scenario to occur.

Do you provide comment on development applications? Or do you have any research that may assist me in responding to these concerns.

Thank you for your assistance.

Regards,

Jacky Jurmann

Manager of Planning Services
Shire of York
PO Box 22
YORK WA 6302

Ph: 9641 2233
Email: planner@york.wa.gov.au

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3/26/2014

Seismic Hazard at the Proposed Allawuna Farm Landfill Site

Background

Geoscience Australia (GA) received an email on 20 March, 2014 from the Manager of Planning Services, Shire of York seeking comment on the seismic hazard at the site of a proposed landfill at Allawuna Farm. The location of the proposed site was taken from information submitted to GA from the Department of Environmental Regulation.

Local Seismicity

The seismicity of Australia is typically low on a world scale, e.g. GSHAP (Giardini, 1999), though some regions of the country have elevated seismicity that would be classified as at the low end of moderate seismicity. Parts of Western Australia also have elevated seismicity which include the wheat belt region inland of Perth around Meckering. Several faults have also been mapped in this region; the nearest to the proposed site is the inferred Dumbleyung Fault (Myers and Hocking, 1998) which is within 12km. It is noted, however, that current levels of seismicity in Australia are poorly correlated to the proximity of mapped faults. This contrasts with countries located on tectonic plate boundaries where seismic events typically occur on identified fault structures. Figure 1 shows the location of earthquakes with magnitude 3.5 and above, detected in the last 50 years, in the vicinity of the proposed site.

Seismic Hazard and Implications for Design

Seismic hazard is defined in the Australian building standard AS 1170.4-2007 (Standards Australia, 2007) for design and is based on seismic hazard research undertaken in the late 1980s. The 500 year return period (RP) bedrock level hazard defined in the standard for the Allawuna site is presented in Table 1 for peak ground acceleration (PGA) and the spectral periods of 0.3s and 1.0s. More recently the seismic hazard of this region has been reassessed by GA as part of a national assessment of seismic hazard (Leonard et al., 2013). The results of this research for the Allawuna site are listed in Table 1. The seismic hazard gives a measure of the severity of acceleration that will be experienced by buildings at the site for a given return period and on bedrock. It can be noted that the new assessment of local hazard is significantly lower than previously understood.

The seismicity of the proposed landfill site is at the threshold of moderate. In terms of engineering design, the application of current design and construction standards along with appropriate analysis and detailing will ensure a safe facility. For building related structures the provisions of the Building Code of Australia (BCA) make the current design standard, AS 1170.4 mandatory along with its higher specified local hazard. For non-building structures the latest assessment of hazard could be used.

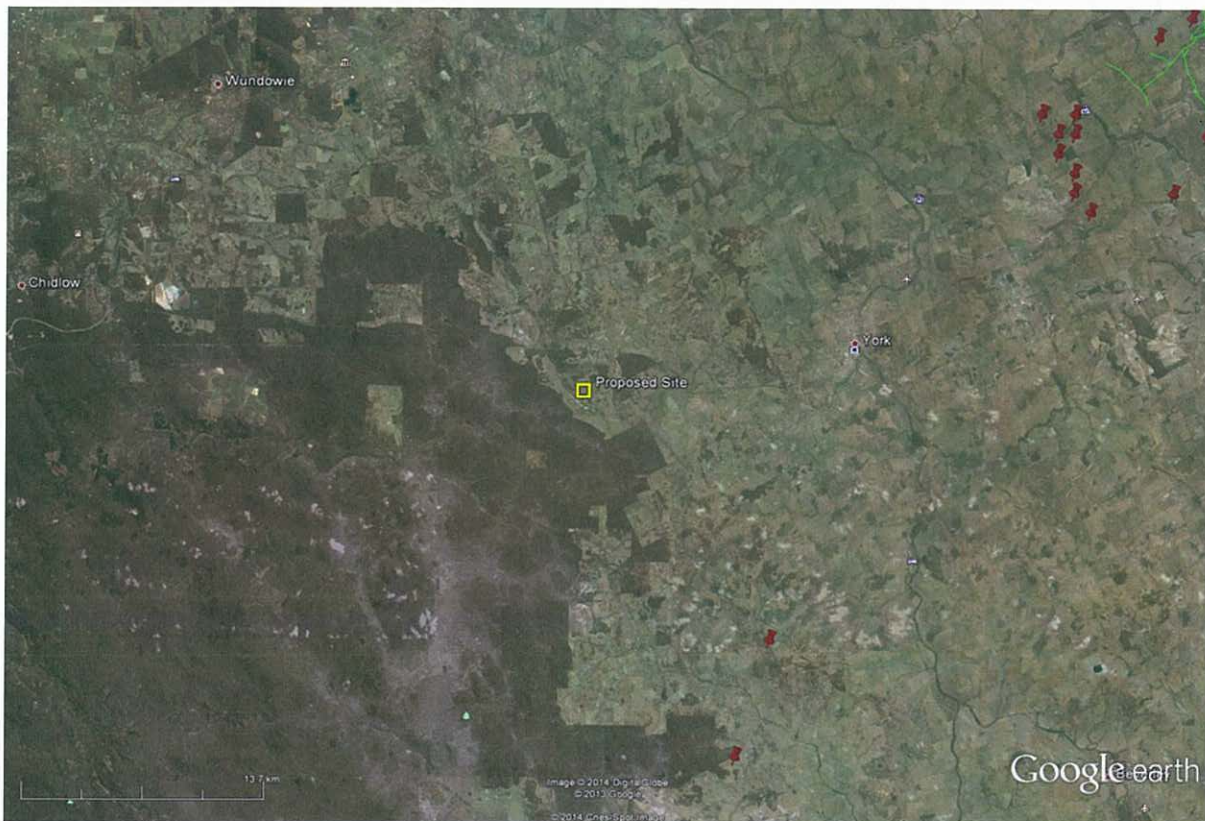


Figure 1 Location of the proposed landfill site and earthquakes with magnitude greater than 3.5 from the GA database. The fault scarp from the Meckering earthquake (M6.5 1968) can be seen in green in the upper right quadrant.

Table 1 Earthquake hazard assessment at the proposed site. Comparison between AS 1170.4 and Geoscience Australia Earthquake Hazard Atlas

Period (seconds)	Hazard from standard AS1170.4 – 2007: bedrock PGA (g)	Hazard from new GA Hazard Map: bedrock PGA (g)
0.0	0.13	0.072
0.3	0.38	0.099
1.0	0.11	0.027

Figure 2. Hazard curves for bedrock at the proposed site of the Allawuna Farm Landfill. Curves relate to different building natural periods as noted.

References

Giardini, D. (1999). The Global Seismic Hazard Assessment Program (GSHAP) 1992–1999, *Anal. Geofis. Spec. Ed.*, 42, folded map in pocket. BCA

Leonard, M., Burbidge, D. & Edwards, M., 2013. *Atlas of Seismic Hazard Maps of Australia*. Record 2013/041. Geoscience Australia. (http://www.ga.gov.au/metadata-gateway/metadata/record/gcat_e4cf3e90-414d-42b9-e044-00144fdd4fa6/Atlas+of+Seismic+Hazard+Maps+of+Australia)

Myers, J. S. and Hocking, R. M., 1998. Geological map of Western Australia, 1:2 500 000 (13th edition): Western Australian Geological Survey.

Standards Australia. 2007. AS1170.4-2007 Structural design actions Part 4: Earthquake actions in Australia (2nd edition). Standards Australia (Standards Association of Australia), Homebush, NSW

Working on behalf of the Heritage Council to recognise, conserve, adapt and celebrate our State's unique cultural heritage

19 February 2014

Chief Executive Officer
Shire of York
PO Box 22
YORK WA 6302

Attention: Ms Jacky Jurmann

SHIRE OF YORK	
FILE	OFFICER
104	Jacky
INITIALS	240
21 FEB 2014	1138348
REFERRED TO COUNCIL	DATE
INITIALS	

YOUR REF
OUR REF
ENQUIRIES
O117455/GR2.A290
P4183/31404
Susan Barratt
(08) 6552 4000

Dear Sir

St Ronan's Well, York
LGA Application No. O117455/GR2.A290

Under the provisions of Section 11 of the *Heritage of Western Australia Act 1990*, the proposed development has been referred to the Heritage Council for its advice due to its proximity to the State Registered Place known as *St Ronan's Well, York*.

We received the following information:

Site plan
Landfill cell layout plan

The referral for the proposed development has been considered in the context of the identified cultural significance of *St Ronan's Well, York* and the following advice is given:

Findings

- A landfill development is proposed at Alawuna Farm, 2848 Great Southern Highway, St Ronan's.
- The closest registered place to the proposed development is *St Ronan's Well, York*. However, the proposed landfill is located at some distance south of the registered curtilage of this place.
- The proposed development does not appear to impact upon any place of State cultural heritage significance.

Advice

The proposed development does not significantly impact on the identified cultural significance of *St Ronan's Well, York*, or any other place of State cultural heritage significance.

This advice is given from a heritage perspective to assist the Shire of York in its determination of this proposed development. There has been no assessment on the merits or otherwise of the development, which is required to be determined by the decision-making authority.

www.stateheritage.wa.gov.au
info@stateheritage.wa.gov.au

Should you have any queries regarding this advice, please contact Susan Barratt at susan.barratt@stateheritage.wa.gov.au or on 6552 4000.

Yours sincerely,

A handwritten signature in blue ink, reading 'Callum Crofton'. The signature is written in a cursive style with a large initial 'C'.

Callum Crofton
AMMANAGER DEVELOPMENT AND INCENTIVES



Enquiries: Melinda Marshall on 9622 4713
Our Ref: 13/2013
Your Ref: O117455/GR2.A290

SHIRE OF YORK	
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04 MAR 2014	
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DATE	INITIALS



ABN: 50 860 676 021

27 February 2014

Shire of York
PO Box 22
YORK WA 6302

ATTENTION: JACKY JURMANN

**CHIDLOW YORK ROAD (M010) SLK 25 – 26.3
PROPOSED CLASS II LANDFILL FACILITY - LOT 4869 (25560) GREAT SOUTHERN
HIGHWAY, ST RONANS**

Further to your correspondence of the 7 February 2014 with attachments, Main Roads WA (MRWA) provides the following comments.

MRWA has been liaising with the proponent regarding the impact of the proposal on the MRWA road network and has previously reviewed and approved the Traffic Impact Statement dated 15/10/13, and have given support for the proposed new access design concept dated 20/12/13. Please find attached copies of our most recent correspondence with the proponent's traffic consultant and the new access design concept drawings.

If you require any further information please contact Melinda Marshall on 9622 4713.

Yours faithfully

Michael Hayward
NETWORK MANAGER

Enquiries: Melinda Marshall on 9622 4713
Our Ref: 13/2013
Your Ref: 20/12/13

4 February 2014

Shawmac
PO Box 937
SOUTH PERTH WA 6937

ATTENTION: PETER GEORGY

**CHIDLOW YORK ROAD (M010) SLK 25 – 26.3
PROPOSED NEW ACCESS DESIGN - LOT 4869 (25560) GREAT SOUTHERN
HIGHWAY, ST RONANS**

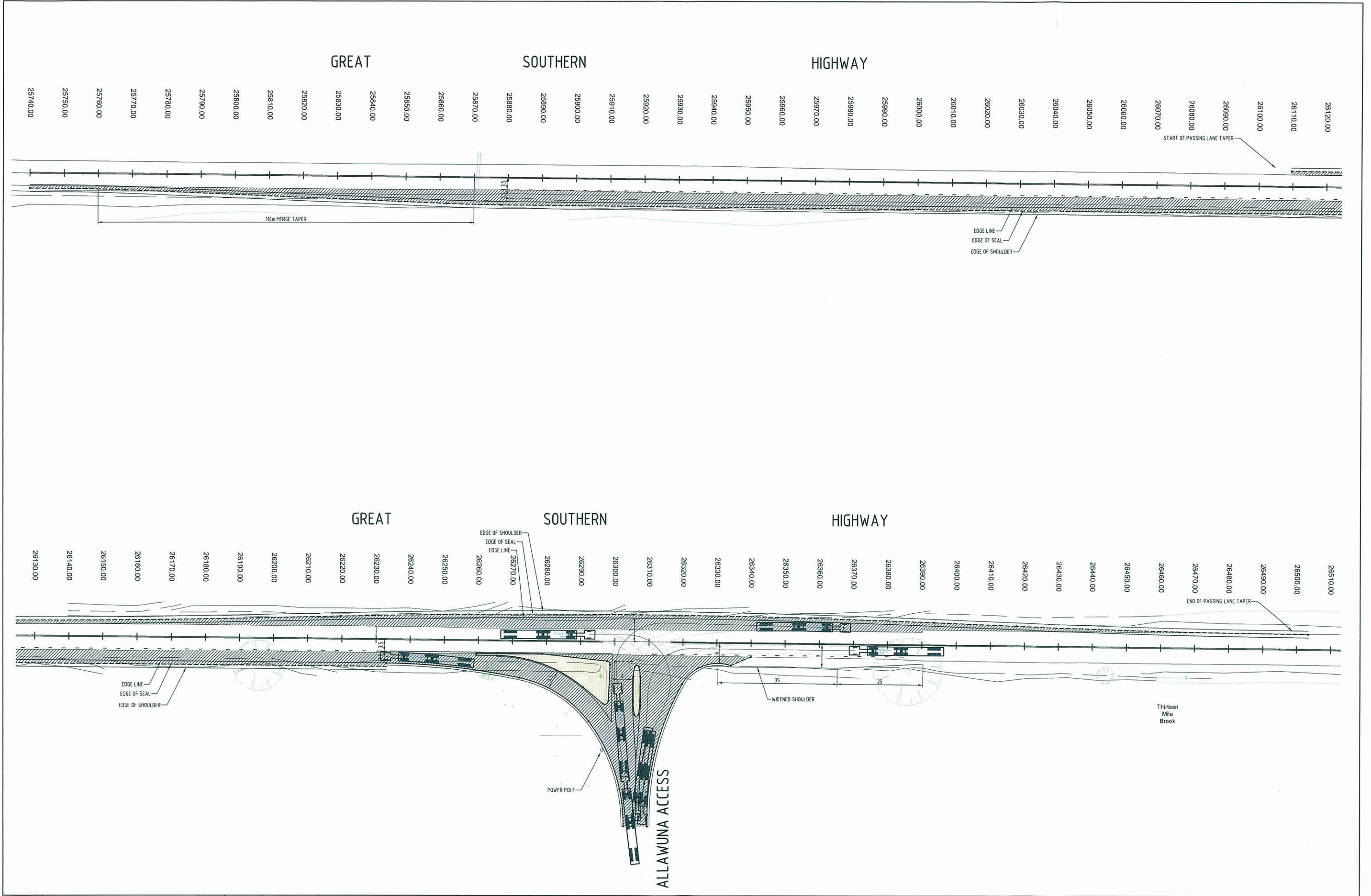
Further to your email correspondence of the 23 January 2014 with attachments, Main Roads WA (MRWA) provides the following comments.

1. MRWA supports the proposed new access design concept as depicted in the drawings dated 20/1/14. Please proceed to preparation of construction drawings on MRWA title blocks. Please contact Vaughan Wares on vaughan.wares@mainroads.wa.gov.au to obtain the required drawing numbers. Please forward the completed drawings to MRWA for review, approval and signature.
2. Please note that the Sign and Pavement Marking Drawings will need to include the following notes:
 - "All redundant signs and pavement markings to be removed by the Contractor, prior to new markings being installed".
 - "All regulatory signs and pavement markings are notational only and must be Assessed and approved by Main Roads Western Australia prior to any installation".
3. The proponent will be responsible for the cost of vegetation clearing, any service relocation and all associated approvals for the proposed works within the Chidlow-York Road reserve.

If you require any further information please contact Melinda Marshall on 9622 4713.

Yours faithfully

Michael Hayward
NETWORK MANAGER



				CLIENT		LOCAL GOVERNMENT AUTHORITY		A1 - SCALE:				<div><div><div>1ST FLOOR 908 ALBANY HIGHWAY EAST VICTORIA PARK WA 6101 P 9355 1300 E admin@shawmac.com.au</div><div>SHAWMAC</div><div>CONSULTING CIVIL AND TRAFFIC ENGINEERS</div></div></div>		DATE:		20-12-2013		ALLAWUNA LANDFILL GREAT SOUTHERN HIGHWAY SITE ACCESS ARRANGEMENTS PLAN							
				BOWMAN & ASSOCIATES PTY LTD		SHIRE OF YORK		HORIZ: 1:500		VERT: N/A				DESIGNED:		S.ROGERS									
								DATUM		CHECKED:				B.HARTLEY											
								HORIZONTAL: MGA84 ZONE 50		DIRECTOR:				T.SHAW		DRAWN:		S.ROGERS		DRAWING NUMBER:		00000-000		REV.	
								VERTICAL: AHD																	
No. DATE DESCRIPTION APPROVED																									
REVISION																									
FILE REF: M:\Users\JLR Civil Consulting\Documents\SR\Shawmac\Allawuna\Allawuna Entrance Design1																									
LAST SAVED BY: JLR Civil Consulting DATE: 20 December 2013 4:59 PM																									

Our ref: 20140206 / TM

Mr Matthew Reid
President
Shire of York
PO Box 22
YORK WA 6302

SHIRE OF YORK	
FILE	GR2-290
OFFICER	INITIALS
RAY	
JACKY	
I138382	
24 FEB 2014	
REFERRED TO COUNCIL	
DATE	INITIALS

CC: MATTHEW

Dear Mr Reid

Matthew

PROPOSED SITA LANDFILL AT ALLAWUNA FARM NEAR YORK

Given the amount of community concern and interest that I am aware of in relation to this proposal I want to let the Shire know of the action I have undertaken to date in response to representations from my electorate.

In September last year I wrote formally to the Ministers for Environment, Planning and Transport. Please find attached copies of my correspondence and the responses received for your information and consideration by the Shire.

The potential impact on the road remains my primary concern and the project proponents are well aware of my reservations.

I realise that this is an extremely contentious issue for the Shire and I have urged my parliamentary colleagues to progress the development of a state-wide waste management to ensure that local government and communities can have greater confidence in dealing with issues such as this in the future.

Please don't hesitate to contact me if you would like to discuss this matter further.

Yours sincerely

Mia Davies

HON MIA DAVIES MLA
Member for Central Wheatbelt

Encl.

19 FEB 2014

MERREDIN OFFICE

Mitchell St, Merredin WA 6415

Ph: (08) 9041 1702

Fax: (08) 9041 2554

NORTHAM OFFICE

Northam Boulevard, Fitzgerald St, Northam WA 6401

Ph: (08) 9622 2871

Fax: (08) 9622 1668



From: Davies, Mia
Sent: Tuesday, 24 September 2013 11:47 PM
To: 'minister.jacob@dpc.wa.gov.au'
Subject: SITA landfill proposal in York

Hon Albert Jacob MLA
Minister for Environment; Heritage
12th Floor, Dumas House
2 Havelock Street
West Perth WA 6005

Via email: minister.jacob@dpc.wa.gov.au

Dear Minister

SITA LANDFILL PROPOSAL IN YORK

I write in relation to the proposed waste dump on Allawuna Farm, located 18 km west of the township of York.

There has been significant community concern expressed in relation to this project; primarily with regards to the environmental impact of the facility but also in relation to the impact on the existing heritage, tourism, agricultural lifestyle and amenity of the Avon Valley.

You will be aware that the Environmental Protection Authority decided not to assess the project – a decision that has further deepened the community's concern in relation to the potential environmental risks, especially ground and surface water.

In addition, should the project proceed there will be a significant increase in heavy road traffic on the Great Southern Highway. This section of road between the Great Eastern Highway and the entrance to Allawuna Farm is winding and narrow with limited overtaking opportunities. SITA advises there will be six traffic movements per hour (during the day), not an insignificant number when you consider the road conditions and the current volume of traffic.

While I genuinely welcome the prospect of new industry to create employment in the region, in this particular case I believe the negative impacts of the project will outweigh the benefits. I have met with the proponent, SITA, on a number of occasions to express my concerns - they are aware of my reservations in relation to this matter.

I do not support the project proposal and urge you to consider the concerns of the community prior to the granting of any license to the proponent.

Could you advise if consideration is being given to introducing a coordinated State Waste Management Strategy. Communities on the fringe of the Perth metropolitan area will likely be faced with this scenario again and it is a divisive and unacceptable situation for both the

project proponents and these communities. Your advice on this and the other issues raised would be most appreciated.

Yours sincerely

MIA DAVIES MLA

Member for Central Wheatbelt
Parliamentary Secretary to Minister for Regional Development; Lands

THE NATIONALS *for Regional WA*

Merredin P 08 9041 1702 | F 08 9041 2554 | The Old Town Hall, Mitchell Street
Northam P 08 9622 2871 | F 08 9622 1668 | Northam Boulevard, Fitzgerald Street
E mia.davies@mp.wa.gov.au | W www.miadavies.com.au
All correspondence to PO Box 92 Northam WA 6401



Hon Albert Jacob MLA
Minister for Environment; Heritage

Our Ref: 50-00820/13

RECEIVED
17 OCT 2013

Ms Mia Davies MLA
Member for Central Wheatbelt
PO Box 92
NORTHAM WA 6401

Dear Ms Davies

Thank you for your email dated 24 September 2013 regarding the SITA landfill proposal on Allawuna Farm in York.

As the proposal is currently in the appeals process, I am not in a position to comment on its merits at this time.

With respect to strategic planning for waste management, I am pleased to advise that there is a considerable amount of work being conducted through the Waste Authority, which has established a Strategic Waste Infrastructure Planning Working Group to develop a Waste and Recycling Infrastructure Plan (WRIP) for the Perth and Peel regions.

The aim of the WRIP is to provide recommendations to Government on infrastructure required to meet the future waste management needs of the Perth and Peel regions. Details on this project are available on the Waste Authority's website (www.wasteauthority.wa.gov.au) and I encourage you and your constituents to review this information and provide input.

I trust this information is of assistance.

Yours sincerely

Albert Jacob MLA
MINISTER FOR ENVIRONMENT; HERITAGE

15 OCT 2013

From: Davies, Mia
Sent: Wednesday, 25 September 2013 12:11 AM
To: minister.buswell@dpc.wa.gov.au
Subject: SITA landfill proposal in York

Hon Troy Buswell MLA
Minister for Transport
13th Floor, Dumas House
2 Havelock Street
West Perth WA 6005

Via email: minister.buswell@dpc.wa.gov.au

Dear Minister

SITA LANDFILL PROPOSAL IN YORK

I write to raise my objections to the proposed waste dump on Allawuna Farm, located 18 km west of the township of York.

There has been significant community concern expressed in relation to this project; primarily with regards to the environmental impact of the facility but also in relation to the impact on the existing heritage, tourism, agricultural lifestyle and amenity of the Avon Valley.

There is also concern in relation to traffic movements on Great Southern Highway. Should the project proceed there will be a significant increase in heavy road traffic on the Great Southern Highway. This section of road between the Great Eastern Highway and the entrance to Allawuna Farm is winding and narrow with limited overtaking opportunities. SITA advises there will be six traffic movements per hour (during the day), not an insignificant number when you consider the road conditions and the current volume of traffic. In view of this, I question the validity of the statement "*an independent traffic impact statement found the landfill would have a negligible impact on both the local road network and the Great Southern Highway*" and seek your feedback on the assessment made by MainRoads in relation to the project.

While I genuinely welcome the prospect of new industry to create employment in the region, in this particular case I believe the negative impacts of the project will outweigh the benefits. I have met with the proponent, SITA, on a number of occasions to express my concerns - they are aware of my reservations in relation to this matter.

Communities on the fringe of the Perth metropolitan area will likely be faced with this scenario again and it is a divisive and unacceptable situation for them and the project proponents. A coordinated State Waste Management Strategy would assist both industry and the community to avoid these conflicts in future.

I'd welcome your advice in relation to the impact of the proposed project, particularly on the local road network and the Great Southern Highway.

Yours sincerely

MIA DAVIES MLA

Member for Central Wheatbelt

Parliamentary Secretary to Minister for Regional Development; Lands

INATIONALS *for Regional WA*

Merredin P 08 9041 1702 | F 08 9041 2554 | The Old Town Hall, Mitchell Street

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All correspondence to PO Box 92 Northam WA 6401



Treasurer; Minister for Transport; Fisheries

Our Ref. 30-41947

Ms M Davies MLA
Member for Central Wheatbelt
Mia.davies@mp.wa.gov.au

Dear Ms Davies *Mia,*

Thank you for your email of 25 September 2013 concerning a proposal by SITA Australia Pty Ltd to establish a landfill site in the Shire of York and the impact on the Great Southern Highway (Chidlow-York Road).

While the Shire of York is the responsible authority for approving the SITA landfill proposal, SITA has provided a Traffic Impact Statement (TIS) to Main Roads which indicates that the landfill proposal will generate an additional 48 road train movements and 30-40 light vehicle movements per day on the Chidlow-York Road. The TIS also proposes an upgrade of the existing access to a channelized intersection at this location

The traffic associated with the proposal represents an overall increase of 2.8-5.7% over existing traffic volumes on the Chidlow-York Road. The variation in the predicted growth is dependent on whether most of the site workers travel from York in the east or from the west. This predicted growth equates to one to two years' normal traffic growth

In view of the above, Main Roads considers that the Chidlow-York Road has sufficient capacity to easily accommodate the proposed increase in traffic.

Yours sincerely

Hon Troy Buswell, MLA
MINISTER FOR TRANSPORT

22 OCT 2013

From: Davies, Mia
Sent: Wednesday, 25 September 2013 12:27 AM
To: minister.day@dpc.wa.gov.au
Subject: SITA landfill proposal in York

Hon John Day MLA
Minister for Planning
11th Floor, Dumas House
2 Havelock Street
West Perth WA 6005

Via email: minister.day@dpc.wa.gov.au

Dear Minister

SITA LANDFILL PROPOSAL IN YORK

I write to raise my objections to the proposed waste dump on Allawuna Farm, located 18 km west of the township of York.

There has been significant community concern expressed in relation to this project; primarily with regards to the environmental impact of the facility but also in relation to the impact on the existing heritage, tourism, agricultural lifestyle and amenity of the Avon Valley.

There is also concern in relation to traffic movements on Great Southern Highway. Should the project proceed there will be a significant increase in heavy road traffic on the Great Southern Highway. This section of road between the Great Eastern Highway and the entrance to Allawuna Farm is winding and narrow with limited overtaking opportunities. SITA advises there will be six traffic movements per hour (during the day), not an insignificant number when you consider the road conditions and the current volume of traffic. In view of this, I question the validity of the statement *"an independent traffic impact statement found the landfill would have a negligible impact on both the local road network and the Great Southern Highway"*.

While I genuinely welcome the prospect of new industry to create employment in the region, in this particular case I believe the negative impacts of the project will outweigh the benefits. I have met with the proponent, SITA, on a number of occasions to express my concerns - they are aware of my reservations in relation to this matter.

Communities on the fringe of the Perth metropolitan area will likely be faced with this scenario again and it is a divisive and unacceptable situation for them and the project proponents. A coordinated State Waste Management Strategy would assist both industry and the community to avoid these conflicts in future.

I'd welcome your advice, specifically in relation to the role of Planning as the project progresses through approvals. Your comments on the broader issue of a coordinated State Waste Management Strategy would also be appreciated.

Yours sincerely

MIA DAVIES MLA

Member for Central Wheatbelt
Parliamentary Secretary to Minister for Regional Development; Lands

INATIONALS *for Regional WA*

Merredin P 08 9041 1702 | F 08 9041 2554 | The Old Town Hall, Mitchell Street
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All correspondence to PO Box 92 Northam WA 6401



Minister for Planning; Culture & the Arts
Government of Western Australia

RECEIVED
15 NOV 2013

Our Ref: 33-22845

Ms Mia Davies MLA
Member for Central Wheatbelt
PO Box 92
NORTHAM WA 6401

Dear Ms ~~Davies~~ *Mia*

PROPOSED SITA LANDFILL SITE AT ALLAWUNA IN YORK

Thank you for your email of 25 September 2013 regarding the proposed Allawuna landfill site at 2556 Great Southern Highway, York. I am aware of community concern regarding the proposal and have responded to a number of queries on this matter.

At this point, no planning application has been made for the landfill site. However, I am currently considering Amendment 50 to the Shire of York's scheme, which could assist decision making should an application be lodged, as this may introduce definitions for waste management sites, as well as other application requirements. The Shire's scheme is currently silent on the matter of landfills which could complicate decision-making if an application were lodged prior to the scheme being amended.

Due to the construction cost of the landfill site, it is likely to meet the threshold that would require determination by the Wheatbelt's Development Assessment Panel (DAP). As Minister for Planning, I have no decision-making role in DAP processes.

As you may be aware, there are also 35 pending appeals made against the level of environmental assessment set by the Environmental Protection Authority (EPA). No formal assessment was set, and the Office of the Appeals Convenor is currently investigating appeals lodged on this basis. The Appeals Convenor will make a recommendation to the Minister for Environment on this matter.

I share your views regarding greater co-ordination of landfill sites, and I understand the Department of Environmental Regulation is progressing work regarding site selection criteria on behalf of the WA Waste Authority.

As a planning response, the Western Australian Planning Commission has recently endorsed a Wheatbelt Regional Planning and Infrastructure Framework (the Framework) for public comment, which I expect to present to Cabinet shortly.

The Framework recommends that waste management sites be determined by scheme amendment processes, which require early referral to the EPA and public advertising. Subject to environmental and land use suitability, landfill sites should be adjacent to the region's major transport routes - the Great Eastern, Great Northern and Brand Highways. The Great Southern Highway, though technically a main road, may not be configured to handle the type of vehicles proposed, nor be an ideal entry point to WA's first inland town of York.

This approach acknowledges that identification of proposed landfill sites that are linked to metropolitan transfer and recycling stations meet a range of operational, logistic and business considerations. Until the WA Waste Authority has established site selection criteria, planning instruments such as the Wheatbelt Regional Planning and Infrastructure Framework can set broad parameters for sites, with a decision-making framework reflective of community expectation.

I hope this provides an update to the Allawuna proposal and my office would be happy to provide briefings as it progresses.

Yours sincerely

A handwritten signature in black ink, appearing to read 'John Day'.

**JOHN DAY
MINISTER FOR PLANNING;
CULTURE AND THE ARTS**

13 NOV 2013

SHIRE OF YORK	
FILE	GR2. 290
OFFICER	INITIALS
SAEKY	
13 MAR 2014	
1138760	
REFERRED TO COUNCIL	
DATE	INITIALS



Our Ref: SMP:mt ID 259884
File Code: PS.DEV 12

10 March 2014

Mr Ray Hooper
Chief Executive Officer
Shire of York
PO Box 22
YORK WA 6302

Dear Sir

REQUEST FOR COMMENT ON PROPOSED CLASS II LANDFILL AT ALLAWUNA FARM, 2948 GREAT SOUTHERN HIGHWAY, ST RONANS

Thank you for the opportunity to write a submission in response to the proposed class II landfill at Allawuna Farm.

The State Government's Best Practice Environmental Management document – Siting, Design, Operation and Rehabilitation of Landfills, issued by the DEC in July 2006, in the section Best Practice Siting Considerations (Section 4) provides a hierarchy of aspects to be considered when screening for potential sites. At the top of the hierarchy is community needs and, in Section 4.1.1, it states 'Generally, local government is responsible for providing a framework for the orderly development of waste management facilities for both the public and private sectors, and ensuring that a reliable system of waste management, including landfill airspace, is maintained within a region.'

The Shire of York does not have a community need for a major landfill capable of receiving, on an annual basis for over 40 years, over 50 times the volume of waste likely to be created within the Shire of York and is therefore an unnecessary additional requirement.

The Shire of Mundaring, in combining with other local governments in the Eastern Region has fulfilled that responsibility and to have additional heavy traffic travelling through its suburbs carting waste from the Perth metropolitan area to the Shire of York is also of detriment.

Though the South Cardup landfill operated by SITA is scheduled for closure in 2015/2016 there is substantial long term airspace capacity at the Henderson landfill, Millar Road landfill and the Red Hill landfill within the Perth metropolitan area in addition to a new landfill in North Bannister that has recently been approved and two approved landfills at Dardanup.

The State Government, in its Western Australian Waste Strategy has indicated the Strategy's success will be measured in increasing the proportion of material recovered from the waste stream and reducing the proportion of waste destined for

Mr R Hooper, Chief Executive Officer
Shire of York

Re: Proposed Class II Landfill at Allawuna Farm, St Ronans

10 March 2014
Page 2

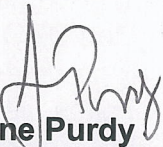
landfill. In allowing the construction of a landfill in York without requiring SITA to demonstrate that there is insufficient airspace capacity within the metropolitan area or requiring SITA to invest in resource recovery facilities that would reduce the need for it to construct an additional landfill is contrary to the State's policy.

Approval of SITA's application for solely a landfill facility is also likely to reduce the viability of proposed resource recovery projects.

For the reasons stated above it is recommended the application be refused.

Should you require any further information please contact the undersigned on 9290-6637.

Yours sincerely



Shane Purdy
DIRECTOR INFRASTRUCTURE SERVICES

T:\Administration\Restricted\Corr\2014\03-Mar 10 York.docx

Records

From: Jacky Jurmann
Sent: Tuesday, 18 February 2014 10:27 AM
To: Records
Subject: FW: Proposed Landfill Site - Allawuna YR O177455/GR2.A290

SHIRE OF YORK	
FILE	GR2. 290
OFFICER	RAY
DATE	18 FEB 2014
REFERRED TO COUNCIL	
DATE	INITIALS

18 FEB 2014
1838276

Jacky Jurmann

Manager of Planning Services
 Shire of York
 PO Box 22
 YORK WA 6302

Ph: 9641 2233
 Email: planner@york.wa.gov.au

From: Brindal, Shelley [<mailto:Shelley.Brindal@pta.wa.gov.au>]
Sent: Tuesday, 18 February 2014 10:18 AM
To: Jacky Jurmann
Subject: Proposed Landfill Site - Allawuna YR O177455/GR2.A290

Dear Jacky

*Thankyou for your letter dated 7th February regarding a proposed landfill site at 2948 Great Southern Highway, St Ronans.
 The PTA has no comment to make in this regard*

regards

Shelley Brindal | CORRIDOR & HERITAGE COORDINATOR
 Infrastructure Planning & Land Services Branch
 Public Transport Authority WA | PO Box 8125, Perth Business Centre, 6849
 ☎ 9326 2510 ✉ shelley.brindal@pta.wa.gov.au
OUT OF OFFICE: Wednesdays.

PTA ref 534/14

SHIRE OF YORK	
FILE	GR2.290
OFFICER	INITIALS
RAY	
28 FEB 2014	
1138485	
REFERRED TO COUNCIL	
DATE	INITIALS



YOUR REF: 0117455 / GR2.A290
 OUR FILE REF: 2013/0226-6
 OUR REF: 626-00574

Locked Bag 33
 Cloisters Square, Perth WA 6850
 Tel: 08 6467 5325
 info@wasteauthority.wa.gov.au
 www.wasteauthority.wa.gov.au

Ray Hooper
 Chief Executive Officer
 Shire of York
 1 Joaquina St
 YORK WA 6302

Dear Mr Hooper

DEVELOPMENT ASSESSMENT PANEL APPLICATION – PROPOSED CLASS II LANDFILL AT ALLAWUNA FARM, 2948 GREAT SOUTHERN HIGHWAY, ST RONANS

Thank you for the opportunity to comment on the application for a proposed class II landfill at Allawuna Farm, 2948 Great Southern Highway, St Ronans.

The *Western Australian Waste Strategy: Creating the right environment* contains landfill diversion targets, endorsed by Government. As well, the WA Government supported, with qualifications, the 1995 recommendation of the Select Committee on Recycling and Waste Management that 'No new landfill sites should be established on the coastal sand plain because of the potential to pollute ground water'. The Waste Authority also supports this position.

While the Select Committee's recommendations only referenced the coastal sand plain, the Waste Authority does not believe it is useful to distinguish between the swan coastal plain and other areas where there is a potential to pollute groundwater. On that basis new putrescible landfills should only be established when their potential to pollute groundwater has been properly assessed and is considered acceptable.

Modelling indicates the Perth and Peel region's current putrescible landfill capacity is likely to last until about 2024, based on current diversion rates. If diversion rates increase consistent with the targets in the Waste Strategy—that is, 65 per cent by 2020—current Perth and Peel putrescible landfill capacity is likely to last until about 2030.

Consistent with its *Communication on the Waste Hierarchy*, the Waste Authority confirms its view that landfills are an option of last resort for managing wastes.

The Waste Authority aims to reduce the dependency on landfill over time but recognises that over the medium term, putrescible landfills are still required as:

1. landfill diversion targets are progressively reached through a greater proportion of waste being reused, recycled, reprocessed or recovered through energy capture;
2. a contingency measure to manage peaks in waste generation that can occur with greater reliance on processing technologies such as waste to energy and

mechanical/biological treatment facilities through natural disasters or technology failures/fires; and

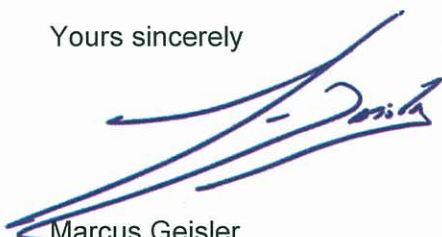
3. a mechanism to manage genuine residual putrescible waste which is unlikely to be reduced in the long term below 5% to 10% (circa 75,000 to 150,000 tonnes per annum) even following the application of all available technologies and techniques.

The Waste Authority will continue to develop policies that support the delivery of the Waste Strategy's targets, including policies that support the development of landfill supply (availability of landfill airspace) to only that amount necessary to manage waste which cannot be recovered through other means and to cater for contingency purposes.

The Waste Authority supports managing waste as close as possible to the point of generation to avoid associated transport impacts and to reduce the transfer of impacts associated with the landfilling of waste from one community to another.

The Waste Authority will be providing the Minister for Environment with a Waste and Recycling Infrastructure Plan investigation report for the Perth Metropolitan and Peel Region in the first half of 2014 that will include a waste infrastructure framework which will assist future landfill demand planning and siting considerations, in and adjacent to, the Perth and Peel regions.

Yours sincerely



Marcus Geisler
CHAIRMAN

25 February 2014

Our Ref:

14 February 2014

SHIRE OF YORK	
FILE	CR 2. 290
OFFICER	Ray
INITIALS	
21 FEB 2014	
1138349	
REFERRED TO COUNCIL	
DATE	INITIALS

Chief Executive
Shire of York
Po Box 22
YORK WA 66302

RE: Development Assessment Panel Application – Proposed Class II Landfill at Allawuna Farm, 2948 Great southern highway, St Ronans.

Thank you for taking the time to provide us with this information.

The planning advice you have provided has been noted in our planning database in advance of our next review of network capacity requirements. During this time, one of our planning officers may contact you to clarify development details.

A key planning consideration is to determine whether forecast demand for network capacity, which is comprised mainly of firm network connection applications, is in line with long-term trends or represents a significant change to trend. Relatively large changes in forecast demand will receive close attention.

Western Power strives to continually improve the accuracy and timeliness of its planning information. Toward this objective, Western Power presents its plans via the Annual Planning Report (APR) and the Network Capacity Mapping Tool (NCMT)

In addition Western Power supplies its NCMT data to the Department of Planning for integration into cross-agency publications and planning tools.

I invite you to review the information provided via the APR and the NCMT for your area. Once again, thank you for assisting us in delivering quality information to our customers and the broader community.

Yours sincerely

Grant Coble-Neal
System Forecasting Manager
Network Planning and Development

Connecting people with electricity

363 Wellington Street Perth WA 6000
GPO Box L921 Perth WA 6842
enquiry@westernpower.com.au

T 13 10 87 | F (08) 9225 2660
TTY 1800 13 13 51 | TIS 13 14 50
westernpower.com.au

Electricity Networks Corporation
ABN 18 540 492 861

Records

From: Jacky Jurmann
Sent: Monday, 17 March 2014 5:22 PM
To: Records
Subject: FW: DEVELOPMENT ASSESSMENT PANEL APPLICATION - ALLAWUNA FARM - LANDFILL
Attachments: WDCPP05 WDC position on waste management - Endorsed December 2013 - Version 1.docx

SHIRE OF YORK	
FILE	GR2.290
OFFICER	Jacky
17 MAR 2014	
1139031	
REFERRED TO COUNCIL	
DATE	INITIALS

Jacky Jurmann

Manager of Planning Services
 Shire of York
 PO Box 22
 YORK WA 6302

Ph: 9641 2233
 Email: planner@york.wa.gov.au

From: Grant Arthur [<mailto:Grant.Arthur@wheatbelt.wa.gov.au>]
Sent: Monday, 17 March 2014 3:18 PM
To: Jacky Jurmann
Cc: Wendy Newman
Subject: DEVELOPMENT ASSESSMENT PANEL APPLICATION - ALLAWUNA FARM - LANDFILL

Hi

Further to our phone conversation this morning, please see attached the WDC's position paper on waste management. This is fairly generic, but does discuss our views on planning for situations when companies wish to use the Wheatbelt to dispose of waste from Perth.

The WDC understands that Perth will not be able to provide for all its waste management needs, including landfill, into the future. Given that the Wheatbelt surrounds Perth on two out of four sides (with the ocean on one side and Serpentine/Jarrahdale on another) it is inevitable that this area will become a focus for Perth's waste management. We also understand that Perth Local Governments and the private sector will want the cheapest option.

The following is an extract from the attached position paper:

"These proposals may offer economic benefits to the region in terms of employment and investment contribution, however they are potentially in conflict with the lifestyle amenity of these peri-urban areas and therefore should be carefully considered.

Given the region's proximity to Perth and low population density it is inevitable that waste management companies will continue to look to the Wheatbelt for landfill development opportunities. A proactive approach to identify suitable sites for this type of development could provide more palatable options for this development.

Concluded by the position:

(The WDC) Supports the development of private enterprise waste management services where these can demonstrate economic benefit to local communities and where there is no detrimental effect to the environment and potential conflict with the lifestyle amenity of the region is mitigated. "

3/18/2014

In summary, the WDC supports the concept of the Wheatbelt playing a role in assisting the State with waste management issues. The WDC is supportive of the Avon identifying a site (or sites) for this activity and a planning process to support this. This site selection should be related to the best place to put waste based on infrastructure (such as road and rail transport), environmental impact, local government and community support, and lifestyle amenity considerations. Whilst costs must always be considered, the most cost effective option for Perth communities and the private companies undertaking their waste management should not be the main deciding factor.

Hope this helps. Please call if you require any further information.

TA

GA

Grant Arthur | Director - Regional Services
Wheatbelt Development Commission | Avon
L1, 298 Fitzgerald Street | PO Box 250 | Northam WA 6401
P: 08 9622 7222 | F: 08 9622 7406 | M: 0407 385 732
E: grant.arthur@wheatbelt.wa.gov.au



Wheatbelt
Development
Commission



Wheatbelt
Development
Commission

WDC PPO5 - WDC POSITION ON WASTE MANAGEMENT

1. INTRODUCTION

There are three broad issues for consideration relating to waste management services in the Wheatbelt. These are:

- The continued utilisation of landfill as the predominant model of waste management used by local governments and the ongoing financial viability and environmental impact of this model;
- The potential for waste management services to be provided across shire boundaries by groups of local government and/or private enterprise; and
- Increasing interest from private waste management companies in treating metropolitan waste in the Wheatbelt and the acceptability of this to local residents.

2. BACKGROUND

Traditionally, waste management in the Wheatbelt has been for the purposes of treating locally generated waste. Local government has, and will continue to play an integral role in the delivery of waste and recycling services to local communities.

In recent times, waste management services have been subject to increasing government scrutiny and regulation, increasing the cost to local government to provide these services.

As a result of the increasing cost burden and a number of state government initiatives, multi-shire solutions are increasingly being considered. While the State Government and the WDC encourage regional collaboration as a 'best practice' approach to waste management, it is recognised that low population densities and distances reduce the ability to develop effective models that produce economies of scale in the Wheatbelt.

The development and long term viability of multi-shire waste processing facilities is often constrained by significant infrastructure investment requirements, low volumes of waste produced and processed (due to low population bases) and distance between communities. For these reasons landfill and farm and community rubbish tips continue to be utilised as the predominant form of waste management in the Wheatbelt.

Local Government and private enterprise are looking towards the development of recycling and resource recovery capabilities via waste transfer stations, to reduce the quantity of waste sent to landfills. These transfer stations require the pooling of local resources and partnership building between local governments to service a broader geographic area. A number of regional projects of similar nature have been investigated. These include:

- Avon Regional Organisation of Councils – Regional Waste Strategy;
- Dryandra Voluntary Regional Organisation Of Councils – Strategic Waste Management Plan 2012 Review and subsequent regional waste site development and transfer stations development projects;
- Brookton Pingelly Regional Transition Group’s Transfer Stations; and
- Roe Regional Organisation of Council’s Regional Rubbish Tip project.

To offset the cost of construction and maintenance of additional landfills across the region, facilities are strategically placed in areas that receive high volumes of waste as per a calculation of population density. A well run, well-resourced regional facility could offer long term benefits including increased operating efficiencies, reduced capital costs, reduction of environmental impacts and less conflict with neighbouring land uses.

Local Governments have limited revenue raising capacity and currently waste management is not covered by the Federal Assistance Grants, presenting challenges to further development of multi-shire waste management services.

Waste management companies are increasingly viewing the Wheatbelt as a potential location for development, due to its proximity to Perth, availability of land and the Department of Environment and Conservation’s 2006 policy prohibiting new inert landfill sites on the Swan Coastal Plain.

Recent waste management proposals include the Shires of Gingin (Veolia Pty Ltd - Fernview Farm), Toodyay (Opal Vale Pty Ltd – Chitty Road) and York (SITA – Allawuna Farm), these are at different stages of the environmental approvals process.

These proposals may offer economic benefits to the region in terms of employment and investment contribution, however they are potentially in conflict with the lifestyle amenity of these peri-urban areas and therefore should be carefully considered.

Given the region’s proximity to Perth and low population density it is inevitable that waste management companies will continue to look to the Wheatbelt for landfill development opportunities. A proactive approach to identify suitable sites for this type of development could provide more palatable options for this development.

3. WDC POSITION

In consideration of the above, the Wheatbelt Development Commission:

1. Recognises the increasing cost burden of local waste management service delivery to local government;
2. Supports the development of multi-shire models of waste management where these can demonstrate economic benefits to local communities and where there is no detrimental effect on the environment.
3. Supports the development of private enterprise waste management services where these can demonstrate economic benefit to local communities and where there is no detrimental effect to the environment and potential conflict with the lifestyle amenity of the region is mitigated.

Endorsed Date: 12 December 2013



wheatbelt
natural resource
management

**Wheatbelt Natural Resource
Management (Incorporated)**

ABN: 61 661518 664

P: 08 9690 2250

F: 08 9690 2255

E: info@wheatbeltnrm.org.au

W: www.wheatbeltnrm.org.au

14 March 2014

Ray Hooper
Chief Executive Officer
Shire of York
1 Joaquina Street
York, WA 6302
TOWN STATE Post Code

Dear Mr Hooper

RE: Development assessment Panel Application – Proposed Class II Landfill at Allawuna Farm. 2948
Great Southern HWY, St Ronans

I write in response to your request to comment on planning approval regarding the above application. Wheatbelt NRM Inc. has a politically neutral position on the application for use of Allawuna Farm for use as landfill. However, after careful review of the application for planning approval for the site as a class II landfill and construction of supporting infrastructure would like to make the following recommendations.

This response has been written on the assumption that best environmental management practice in accordance with relevant acts and regulatory standards will be adhered to throughout the entirety of the project life until final approval for closure by DER. These comments will only be relevant for the current proposal as a Class II sanitary landfill site; a change in class or size would require a new list of recommendations.

1. Ground and Surface Water

Given the results of the hydrological surveys and subsequent assessment by the EPA and DOW, that the proposed site should have low Impact on groundwater and surface water, we are of the opinion that there should be no adverse impacts on the surrounding environment. To mitigate any potential emerging threat careful site design, environmental monitoring and reporting to relevant authorities must happen regularly.

There is, however, the potential for poisoning of wildlife as a result of contact with Leachate. Appropriate management strategies will need to be implemented to reduce this impact. There should be a range of tactics used to deter wildlife from toxic leachate to avoid acclimatisation leading to reduced effectiveness of deterrents. Some possible deterrents include:

- Audio to create a sense of primal fear
- Visual deterrents

- Use of Birds of Prey
- Minimising availability of potential food sources

The effectiveness of management options will need to be monitored closely and a contingency plan put in place to address issues immediately as they arise. We recommend an adaptive management approach in line with changing conditions.

2. Impacts on Agriculture

Provided the site is well managed there are no, foreseeable, major negative impacts on agricultural activities. However, it is noted that under certain climatic conditions (eg. temperature inversion or strong winds) both sound and odour will travel further than predicted potentially making the environment unpleasant for those working on neighbouring properties. The potential for this impact should be investigated further and preventative strategies implemented to minimise impacts. Some of the strategies include:

- Buffer Plantings with fast growing native species.
- Monitoring of noise and odour on neighbouring properties under a range of climatic conditions. This could be extended to visitor areas including Mt observation.
- Minimise the size of the working face in the landfill and cover more regularly under certain climatic conditions
- Continued regular contact and feedback from surrounding landholders and visitors with respect to noise and odour should be maintained and reviewed regularly

Weeds and plant pathogens pose a threat to farming enterprise if organic matter is not dealt with in an appropriate manner. Management options will be discussed in the next section.

3. Impacts on Biodiversity

Although SITA's landfill proposal states that the "landfill will have a minimal impact on flora and fauna within the region". There is a real potential for damage to flora and fauna in the adjacent bushland remnant, if the threats are not managed appropriately. Application of the precautionary principle should be applied in the decision making process to reduce negative impacts on biodiversity.

"Where there are threats of serious or irreversible damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. In the application of the precautionary principle, decisions should be guided by

(a) careful evaluation to avoid, where practicable, serious or irreversible damage to the environment; and

(b) an assessment of the risk-weighted consequences of various options. Environmental Protection Act 1986, S4A(1) "

A Nature Map inquiry of flora and Fauna species occurring within a 5km, 10km, 20km radius of the landfill site, showed the presence of several nationally important species (see table 1.) all of which could be impacted if potential threats are not considered and managed appropriately.

Table 1. Flora and Fauna species

Conservation Status	No. of Species		
	5km	10km	20km
Rare or likely to become extinct	3	7	18
Protected under international agreement	1	2	2
Other specially protected fauna	2	2	3
Priority 1	0	0	4
Priority 2	0	2	11
Priority 3	4	7	19
Priority 4	10	13	21
Non-conservation taxon	509	718	1471
TOTAL	529	751	1549

Flora

Potential impact on adjacent remnant vegetation should be investigated and strategies put in place to minimise impacts. Surrounding vegetation can be negatively impacted by weeds, pathogens and fire. Many urban gardens contain plants sourced from nurseries infected by various species of phytophthora and other plant diseases. Most green waste contains environmental weeds (this can include native species) and some of these may be declared at a local, state or national level. If not managed there is the potential for spread into native bushland. Weeds and plant pathogens can be spread by wind, water, vehicles and animals.

Some strategies may include

- Hygiene of all plant and machinery
- Greenwaste composted and treated off site
- Personnel maintaining the landfill should be able to identify the various types of declared weeds which may exist in the region so that they can monitor for their presence at the facility and undertake appropriate treatment and destructive action (as any land manager is required to do)
- Site regularly tested for pathogens
- Prevention of birds and animals feeding on organic waste
- Revegetation to Buffer neighbouring reserve from weeds
- Weed management including identification, monitoring and control
- Covering of waste more regularly on particularly windy days

- Composting and treatment of organic waste offsite

Fauna

There is potential poisoning of fauna as a result of contact with leachate, and refuse and subsequent secondary poisoning of native fauna. Edge sensitive species may be impacted by increased noise and vehicle movement in the area forcing them to retreat further in to remnant vegetation potentially limiting their capacity for dispersal and ability to forage for food.

Birds

Bird can be attracted to landfill sites in large numbers for water, food, nesting or roosting. The birds may transfer pathogens to drinking water collection or storage areas, as well as depositing seed laden excreta and food scraps in bushland.

There is also potential for a population increase of the more aggressive species (Galah, Corella, Australian Raven) that have a reputation for taking over habitat and nesting sites of more sensitive species including the Carnabys Black cockatoo. Large flocks will damage native vegetation on agricultural crops. Scavenger species and waterbird population increases may exceed the carrying capacity of the surrounding environment and will require management and monitoring.

Possible Bird control measures

- Minimise size of uncovered working face
- Use of Birds of prey
- A range of Visual, audio deterrents that used in a random pattern to minimise potential of birds becoming accustomed to the measures
- Culling
- monitoring for effectiveness of management measures should be carried out regularly

Feral Animals

Fox, cat and rodent populations will increase in response to increased food availability. This increase in numbers will have a devastating impact on Wildlife in the area if not managed. They have the ability to climb and dig. Daily covering on its own is unlikely to act as a sufficient deterrent, so a combination of measures will need to be implemented

Some feral animal management options include:

- Covering waste deep enough to reduce the attraction of animals to waste
- monitoring covered area for signs of feral animals
- trapping
- baiting (care need to be taken to avoid secondary poisoning of native species)
- shooting

4. Recommendations

- That an appropriately qualified and diverse advisory group be established to guide environmental risk mitigation for the site

- That planning approval be subject to a comprehensive environmental management plan addressing the impacts discussed above
- An effective monitoring regime be put in place and reviewed regularly to understand efficacy of risk mitigation
- A biosecurity plan be developed to mitigate the risk of incursions through landfill activities – so that there is a predetermined framework for responding to biosecurity incursions

Wheatbelt NRM Inc. may be able to assist in the development and implementation of the above recommendations. Further there are potential opportunities for the above recommendations to contribute, in a meaningful way, to localised conservation initiatives in the area. Wheatbelt NRM Inc. would be happy to provide context for any such activity. Please don't hesitate to contact me if you require further clarification or have any questions.

Yours faithfully

A handwritten signature in dark ink, appearing to read 'Natarsha Woods', followed by a period.

Natarsha Woods

Chief Executive Officer