
From:
Sent: Wednesday, 20 May 2015 12:08 PM
To: Records
Subject: I147730 - Modified Allawuna Farm Landfill - Submission - printed
Attachments: Allawuna Farm Landfill Submission.pdf; pic00308.jpg; pic25300.jpg; pic26154.jpg

Dear Sir/Madam

Please find attached for your records copy of the submission lodged by SITA in respect of the modified Allawuna Farm Landfill proposal.

(See attached file: Allawuna Farm Landfill Submission.pdf)

Regards,

Dominique Joly
Office Administrator

(Embedded image moved to file: pic00308.jpg) — SITA Australia is changing brand to SUEZ environnement —
116 Kurnall Road
WELSHPOOL WA 6106 Australia

(Embedded image moved to file: pic25300.jpg) (Embedded image moved to file: pic26154.jpg)

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Recycling and waste recovery Australia

19 May 2015

Shire of York
PO BOX 22
YORK WA 6302

Dear Sir/Madam,

**RE : AMENDED APPLICATION FOR THE ALLAWUNA FARM LANDFILL
SUBMISSION BY SITA AUSTRALIA PTY LTD (SITA)**

SITA refers to the amended application for planning approval for the Allawuna Farm Landfill currently being advertised for public comment. SITA lodges the following submission in support of the proposed Landfill.

Summary:

This submission identifies:

1. the key modifications to the Landfill, which give even greater certainty on environmental safety;
2. the need for the Landfill;
3. the Landfill's consistency with State and Regional Planning Policies;
4. that the Landfill will allow the continuation and sustainability of broad-hectare agriculture in the district (relevant to clause 4.15.1(a) of the Shire of York Town Planning Scheme No 2 (TPS 2));
5. that the Landfill will be of benefit to the district (relevant to TPS 2 clause 4.15.1(b));
6. that the Landfill will not be detrimental to the natural resources or the environment (relevant to TPS 2 clause 4.15.1(b));
7. that the Landfill will not detrimentally impact the amenity, health and convenience of the district or its residents;
8. that fire risks will be appropriately managed; and
9. that the Shire will not have unusual nor unduly onerous obligations.

For these reasons, SITA seeks the support of the Shire of York to the amended application for Allawuna Farm Landfill to the Wheatbelt Joint Development Assessment Panel.



1. Key Landfill Modifications:

The modifications to the proposed Landfill are the consequence of further extensive site investigations by Golder Associates which have provided a more detailed understanding of sub-surface soil and groundwater conditions and even greater certainty on environmental safety.

The key modifications are:

- Revising the approach to the Landfill development sequence, to commence development at the top half of the paddock and develop from west to east. This will:
 - Reduce infiltration into the upper soil layers, by removing the upper more permeable layer;
 - Reduce stormwater diversion requirements;
 - Allow for the base of the landfill to be above the maximum estimated winter water levels;
 - Allow for expected maximum soil material excavation depth; and
 - Further reduce the risk of impact to water downstream of landfill.
- Raising of the floor of the Landfill to ensure a minimum clearance of at least 2m between the base of the Landfill and the maximum estimated winter groundwater level;
- Reduction in the Landfill footprint by approximately 31% from 52ha to 36ha;
- Reduction in the overall height and volume of waste placed by approximately half from 11.1 million cubic metres of waste (10.1 million tonnes) to 5.1 million cubic metres (4.6 million tonnes);
- Reduction in the nominal life of the Landfill from 37 years to approximately 20 years, based on forecast annual tonnages of between 150,000 and 250,000 tonnes of waste per annum;
- Reduce the height of the waste from 355m AHD to 350.5m AHD;
- Require, as a consequence of the reduction in material excavated from the raised Landfill, sequential development of three on-site borrow areas comprising a total of approximately 20ha commencing from approximately Year 10 onwards, which will be progressively rehabilitated to allow on going agricultural use; and
- Reduction in the size and extent of the leachate pond and stormwater dam required.

These modifications to the Landfill design will further minimise any potential risk to the local environment and groundwater. In this latter respect it is significant to note that the Department of Water in its March 2014 submission to the Shire noted that:

- The proposed landfill is not within the catchment of the Mundaring Public Drinking Water Source Area; and
- No paleochannel was mapped in its detailed *Helena River Salinity Statement* study (May 2007). Detailed geotechnical investigations by Golder Associates have also confirmed the absence of any paleochannel below the Landfill footprint.



2. Need for the Landfill:

The need for the Allawuna Farm Landfill is driven by the on going need for landfill to dispose of those wastes that cannot be recovered or recycled.

The 'Western Australian Waste Strategy – Creating the Right Environment' (2012) seeks to reduce Class II waste to landfill to 32% by 2020, from its current levels of around 60%. With this diversion target the Strategy still foreshadows that Metropolitan landfill needs to accommodate between 870,000 tonnes and 1,145,000 tonnes per annum by 2020. Should the Perth / Peel Region population reach 3.5 million people around 2050 as now projected, the landfill needs would increase to approximately 1.6 million tonnes for Class II waste at targeted diversion rates.

SITA's current landfill at South Cardup is nearing exhaustion and it is estimated that the remaining existing Metropolitan Class II landfills could be exhausted circa 2032 or sooner.

There are three new near-Metropolitan landfills approved or in the latter stages of approval. Assuming all three proceed to full operation, it is estimated that these planned landfills will be exhausted by circa 2045 at the above tonnages.

While SITA fully supports resource recovery and recycles in excess of 100,000 tonnes per annum of material that would otherwise be sent to landfill, it is evident that the demand for landfill will not decline, even if the Waste Strategy diversion targets are met.

Further, there is not enough current and planned landfill capacity to meet the future demand and regulatory and economic factors dictate that future landfill development must concentrate on the development of options to the near east of the Darling Scarp.

There is clearly a need for additional landfill sites to be developed on an on going basis to ensure an adequate supply of landfill airspace to provide for long term waste disposal needs.

3. Consistency with State and Regional Planning Policies:

Both State and Regional Planning Policies have long recognised not only the need for land use flexibility in Rural areas / zones, but also frequently the need for rural areas to accommodate for future landfill requirements as summarised below:

- **Draft State Planning Strategy (WAPC 2012):** identifies waste disposal, treatment and recycling facilities as an essential infrastructure item related to Western Australia's growth. The Strategy identifies that a network of strategically located waste management facilities and infrastructure sites are required to cater for this growth. The Draft SPS also notes that:

'The siting, design, operation, and on going funding and management of waste management facilities is often complex. Planning for waste facilities will need to secure strategic sites and major corridors from the source to the waste facility.'

Sites will need to be suitable in terms of buffers, transport access, relationship to existing waste facilities and producers, and the degree of risk of air, soil, groundwater, and surface water pollution.

Buffer areas surrounding some existing waste disposal facilities are also becoming inadequate as volumes of waste increase and sensitive land uses encroach on previously isolated facilities.'

The Allawuna Farm Landfill satisfies the identified issues.

- **Draft Wheatbelt Regional Planning and Infrastructure Framework – March 2014:** provides an overview of regional planning issues and a basis for on going planning and development within the Wheatbelt. The Framework notes under the Objective of a Vibrant Economy:

'In addition to servicing their own community needs, there is potential for Wheatbelt local governments to establish facilities that accept and manage waste from the Metropolitan area or to develop specialist waste treatment operations that service a much wider geographic area. The Class II landfill and gas collection plant planned for in the Shire of Gingin is an example of such an enterprise There are also current proposals for landfill facilities in the Shires of York [ie the Allawuna Farm Landfill] and Toodyay.'

The Framework also states that the WAPC in its decision making will aim to:

'Promote rural-zoned land as highly flexible areas that can accommodate a wide variety of enterprise'.

It is significant also that the Wheatbelt Development Commission acknowledges that the Wheatbelt will become the focus for Perth's waste management needs.

- **Avon Arc Sub-Regional Strategy (2001):** provides a regional framework for long- term land use within the Avon Arc that forms part of the western portion of the Wheatbelt region, including York. The Strategy identifies as an Implementation Priority the need to develop an integrated local and regional waste management strategy for the disposal and re-use of waste materials generated "...both within and outside the region."

Further, while the Strategy preferences broadacre farming, it does not preclude other appropriate uses and notes that various public uses and installations of regional or State importance, such as water treatment plants, waste disposal, prisons, airfields and utility corridors may need to be located in rural areas.

- **State Sustainability Strategy (2003):** establishes a sustainability framework containing principles, visions, and goals. It seeks to ensure that sustainability is considered and incorporated into decisions and actions for the future of Western Australia at all levels.

The Landfill is acceptable against the principles of sustainable development, the precautionary principle and intergenerational equity. The Landfill will not have any adverse impacts that will detrimentally affect future generations. The Landfill does not pose a threat of serious or irreversible environmental damage and there is no scientific uncertainty as to the environmental damage.

The detailed studies undertaken by SITA and considered by the Minister for Environment, the Environmental Protection Authority (EPA) and other specialist government agencies and Departments (including the Department of Water and Department of Agriculture and Food) quantify the potential environmental impacts and preventative actions have been planned accordingly. Based on these sufficiently known potential impacts, the Minister for Environment and the EPA consider that the potential environmental impacts can be appropriately regulated and managed by the Department of Environment Regulation (DER).

The Landfill will be subject to a rigorous environmental assessment by the DER for the issue of a works approval under Part V of the *Environmental Protection Act*. The DER will only grant a works approval, and hence the Landfill can only proceed, if the DER considers the environmental risks can be appropriately managed. The DER will then comprehensively regulate and monitor the operation of the Landfill under an environmental licence.

- **SPP 1 – State Planning Framework Policy:** sets out the general principles for land use planning and development in the State and aims to provide a framework to provide for the sustainable use and development of land. The Framework is supported by five principles, which are:
 - Environment: To protect and enhance the key natural and cultural assets of the State and deliver to all West Australians a high quality of life which is based on environmentally sustainable principles.
 - Community: To respond to social changes and facilitate the creation of vibrant, safe and self-reliant communities.
 - Economy: To assist in the creation of regional wealth, support the development of new industries and encourage economic activity in accordance with sustainable development principles.
 - Infrastructure: To facilitate strategic development by making provision for efficient and equitable transport and public utilities.
 - Regional Development: To assist the development of regional Western Australia by taking account of the special assets and accommodating the individual requirements of each region.

Allawuna Farm Landfill satisfies the principles:

- Environment: The Minister for Environment and the EPA (including on advice from other specialist government agencies and Departments) consider that the potential environmental impacts can be appropriately regulated and managed by DER. As noted above the Landfill is acceptable against the principles of sustainable development, the precautionary principle and intergenerational equity.
- Community: The potential employment and economic benefits of the Allawuna Farm Landfill to the York region will serve to broaden and further support and strengthen the economic base of the region, facilitating greater opportunities for self-reliance and elevating the vibrancy of the town site.
- Economy: The potential employment and economic benefits are significant, as discussed further in this submission.
- Infrastructure: waste provides an essential public service. The need for the Allawuna Farm Landfill is discussed previously.



- Regional Development: the potential direct and in-direct economic effects of the Landfill of additional local employment and the supply of materials and services by local businesses and contractors will facilitate strengthening of the local economy, support demand for existing and new state and regional services and facilitate development of new community infrastructure.
- **SPP 2.5 – Land Use in Rural Areas:** is a general Policy on the planning of rural areas that ‘...aims to support both rural and rural living land uses to cater for both anticipated and unexpected future needs.’ and is applicable where ‘...there is no Western Australian Planning Commission (WAPC) endorsed strategic or statutory planning instrument in place to guide decision making...’

The Policy further notes that the WAPC ‘...will continue to promote rural zones in schemes as highly flexible zones that cater for a wide range of rural land uses.’ and that ‘...beyond its principle function for primary production, rural land is also required for public purposes.’
- **WAPC’s Rural Planning Guidelines (2014):** are best described as a ‘Practice Manual’ for the preparation and amendment of rural planning schemes and policies; the pre-eminent guidance being provided by strategic or statutory planning instruments of the WAPC.

The Guidelines note that:

‘With growth pressures on major population centres such as Perth, Mandurah and Bunbury, rural areas may come under increased pressure to accommodate ‘regional’ facilities that require large land areas and/or separation distances. This could include land uses such as waste management...’

The Guidelines further note that the possible amenity impacts of regional facilities can be avoided ‘... by applying separation distances. Guidance for separation distances may be obtained from EPA Guidance Statement No. 3 Separation Distances between Industrial and Sensitive Land Uses.’ This is the case for the Allawuna Farm Landfill.

4. Continuation and Sustainability of Broad-hectare Agriculture in the District (TPS 2 cl 4.15.1(b)):

While an objective of the General Agriculture Zone of the Shire of York TPS 2 is “to ensure the continuation of broad-hectare agriculture as the principal land use in the district ...” it is clear that the Scheme does not preclude the use of land with General Agriculture Zone for purposes other than broad-hectare agriculture, as permitted by TPS 2 clause 4.15.1(b) and as considered further in the next two sections in respect of the Landfill being of benefit to the district and not detrimental to the natural resources or the environment.

Consistent with State policies that emphasise the need for flexibility in rural areas / zones, the Scheme makes provision for a broad range of other uses within the zone, both rural related and non-rural related. Some of these other uses have the potential to remove larger areas of agricultural land from production for considerably longer periods than that proposed by the Allawuna Farm Landfill, for example, “Industry – Noxious” which includes chemical and pesticide manufacturing plants, brick and tile manufacturing, refineries and chemical plants as well as abattoirs, paper and particle board production, tanneries and wool scouring.



The land comprising the Allawuna Landfill site has no unique characteristics or capabilities. Land capability data from the Department of Food and Agriculture WA (DAF) shows the land comprising the landfill as having comparable soil types and agricultural capability (Class 3 – Fair for Dryland Cropping) as much of the balance of the Allawuna Farm and, for that matter, the vast majority of the cleared agricultural land within the Shire of York.

Neither can it be said that the higher value cropping lands of the Shire are under “pressure” as DAF data for the 2014 season shows that barely half of the land within the Shire having a Fair or higher capability for cropping was put to seed (54,000 ha of a potential 101,000ha) for a gross crop yield estimated at 164,000 tonnes.

The land comprising the Landfill and borrow pits will be rehabilitated to agricultural use, including the ability to be cropped, on completion. In the interim, the balance of the Farm will continue to be leased by SITA to the current lessee who in 2013 planted 1,000ha of barley with a gross yield of 3,000 tonnes for an average yield of 3 tonnes per ha.

It is evident that the Allawuna Landfill will have little or no impact on the “... *the continuation of broad-hectare agriculture as the principal land use in the district.*” as the land temporarily lost to agricultural production represents less than 0.1% of cropable land within the Shire and, on completion, will be rehabilitated for agricultural use.

Furthermore, the Allawuna Landfill will have little or no impact on the “..*expansion of agricultural activities.*” as:

- Only half of the land having a Fair or better capability of being planted to crop within the Shire of York is actually utilised for cropping; and
- Clearing restrictions on remnant vegetation on private land – of which there is some 21,000ha within the Shire – is a far greater restraint on expansion of agricultural activities within the district as it is on Allawuna Farm itself.

Additionally, the Landfill will not impact the sustainability of agriculture in the district. In this respect it is significant to note that the DAF in its submission to the Shire in March 2014 noted that “*the potential for contamination of the food chain from the Allawuna site is expected to be insignificant compared to poorly managed farm tips*”. The Wheatbelt Natural Resource Management held a similar view in its submission to the Shire.

The DAF also noted that all Shires run waste facilities, that DAF biosecurity staff visit Shire run waste facilities, mainly looking for weed species, and it is assumed that Allawuna would be subject to similar inspections.

5. Benefit to the District (TPS 2 cl 4.15.1(b)):

Under TPS 2 clause 4.15.1(b), non-rural uses are to be considered in the general agricultural zone where they can be shown to:

- be of benefit to the district; and
- not be detrimental to the natural resources or the environment – considered in the next section.

The construction and operation of the Landfill will have clear benefits for the district.



SITA's commitment to ensuring as far as reasonably practical that labour, plant and materials are sourced from the broader York region is clearly manifest in the Heads of Agreement it has entered into with Avon Waste, a locally-based waste management contractor, for the provision of on-site landfill management services. The contract, when finalised, will be for an initial term of five years.

The opportunity also exists for one or more local contractors in the York region, including Avon Waste, to provide waste haulage functions to SITA. It is significant in this respect to note that proposals from local haulage contractors have also been received by SITA and are being evaluated.

Expressions of interest for the provision of other services and materials for the construction and operation of the landfill have also been received and will be evaluated at the appropriate time.

Landfill management and waste haulage are expected to generate 23.5 new FTE positions comprising 22 full-time and 3 part-time (half-time) jobs, most of which SITA will seek to fill locally if there are appropriately skilled applicants.

It is estimated that these positions will generate some \$1.5 million in new wages into the region supporting local shops, businesses and services.

The employment opportunities generated by Allawuna in the York region, both directly and indirectly, together with the flow-on effects from the construction and operation of the proposed facility, will provide a significant impetus to the local and regional economy and strengthen and broaden the economic base of the Town and the district.

Not Detrimental to the Natural Resources or the Environment (TPS 2 cl 4.15.1(b)):

Under TPS 2 clause 4.15.1(b), non-rural uses are to be considered in the general agricultural zone where they can be shown to:

- not be detrimental to the natural resources or the environment; and
- be of benefit to the district – considered in the previous section.

The Landfill will not be detrimental to the natural resources or the environment.

The Allawuna Farm Landfill is a fully lined, engineered landfill which will maintain a minimum separation of 2m to the winter groundwater level.

The site was selected following multi-criteria assessment of 19 sites across four local authorities, primarily as it presented the least risk to the environment. A comprehensive geotechnical and environmental assessment has been undertaken, with consideration given to impacts on flora, fauna, surface water, ground water, odour and noise amongst other matters.

The EPA has considered flora and vegetation, terrestrial fauna (including Black Cockatoos), hydrological processes, inland waters environmental quality (for 13 Mile Brook), Aboriginal and European heritage, amenity-odour, traffic, agriculture and earthquakes.

The Minister for Environment and the EPA have concluded; including on advice from other specialist government agencies and Departments, including the DER, DoW and DAF; that the potential environmental impacts can be appropriately regulated and managed by DER under the Works Approval and Licence processes.



The modifications to the proposed Landfill are the consequence of further extensive site investigations by Golder Associates which have provided a more detailed understanding of sub-surface soil and groundwater conditions and even greater certainty on environmental safety.

The Landfill will be subject to a rigorous environmental assessment by the DER for the issue of a works approval under Part V of the *Environmental Protection Act*. The DER will only grant a works approval, and hence the Landfill can only proceed, if the DER considers the environmental risks can be appropriately managed. The DER will then comprehensively regulate and monitor the operation of the Landfill under an environmental licence.

6. Amenity, Health and Convenience of the District and Residents:

The proposed Landfill will not impact the amenity, health and convenience of the York district or its residents as a consequence of the positioning of the Landfill and the substantial buffers achieved. The design of the Landfill, the waste received and the procedures for the placement and management of that waste are discussed below:

- **Visual & Landscape:** Allawuna Farm is situated on the south side of Great Southern Highway, 20km west of the York Townsite. The landfill site is well removed from and fully screened from the Great Southern Highway by the intervening landform and vegetation.

Mt Observation, a tourist and picnic destination lies approximately 4.6km to the north west of the landfill site, adjoining the northern most paddock of Allawuna Farm. The landfill site is well removed from and fully screened from this location by the intervening landform and vegetation.

- **Tourism:** The landfill is unlikely to impact on tourism in the area as:
 - The site is well removed from and fully screened from Great Southern Highway by the intervening landform and vegetation;
 - The site is well removed from and fully screened from Mt Observation and related picnic / public areas by the intervening landform and vegetation;
 - Landfill and waste haulage trucks accessing the site will be fully covered and sealed, the trailers will be unmarked and truck and trailers cleaned regularly; and
 - There will be no signage at the entry to the Allawuna Farm property indicating the presence of the Landfill.

It is unlikely that visitors to the York region would become aware of the presence of the Landfill.

- **Traffic:** The Allawuna Landfill will generate pocket road train vehicle movements between SITA's waste transfer stations at Kurnall Road, Welshpool and Atwell Street, Lansdale and the landfill site. Pocket road trains will not travel through the York Townsite.

A fleet of eight pocket road trains will be required and will be parked overnight on-site. The trailers will be unmarked and fully sealed.

The intersection of the site access road and Great Southern Highway will be upgraded to the requirements of Main Roads WA to provide a passing lane on the north side for through traffic as well as an acceleration lane on the south side for road trains exiting the site.

A detailed traffic impact assessment was undertaken by Shawmac Traffic Engineers to assess the impact the additional pocket road trains will have on Great Southern Highway which carries 1,357 vehicles per day at the site location.

Existing crash data from the MRWA shows a total of 47 accidents in the five years to 2012 for the Highway of which only seven accidents involved two or more vehicles; the balance being vehicles hitting animals, other objects or unknown causes.

The report concluded that the increase in traffic arising from the Allawuna Farm Landfill would:

- not alter the Level of Service along the Highway (Level of Service B - reasonable free flow) as a consequence of the small increase in heavy vehicles and the number of passing lanes / opportunities; and
 - result in only a very small increase in the risk of vehicle to vehicle fatalities. The increase in level of risk is significantly below the probability of death by common causes such as 1:130 for unintentional poisoning, 1:1,123 for accidental drowning and 1:84,079 for lightning strike.
- **Buffer:** DER Guidelines recommend a buffer of 150m to a single rural dwelling. Allawuna achieves a 600m buffer within the site boundaries. The closest single dwelling to the landfill footprint is 1.9km. The buffer distances achieved are well in excess of DER recommendation for a Class II landfill and will minimise the impacts of the landfill on surrounding residents.
 - **Flora & Fauna:** The landfill has been specifically located to avoid clearing of any remnant bushland on the site. The scattered isolated Marri and Wandoo trees on the area have been carefully assessed and show no evidence of Black Cockatoo roosting or breeding. The Federal Department of Sustainability, Environment, Water, Population and Communities (DSEWPaC) decided in August 2013 that the proposed clearing did not constitute a Controlled Action under the EPBC Act and did not require assessment.
 - **Groundwater & Surface Quality:** The design and operational measures proposed will minimise the potential for unacceptable impacts on groundwater and surface water.

Clean surface runoff from rainfall events is diverted around the fully lined Landfill to either the stormwater dam or the existing 13 Mile Brook watercourse.

The groundwater on the site is protected by a clay layer and the landfill lining system.

Leachate generated by the decomposing waste is the most mobile form of pollution that may be generated by landfilling activities. Leachate generated within the Landfill is managed through a hierarchy of minimising generation, extraction and storage and evaporation. If the leachate dams are filling close to the design operational freeboard, leachate will be transported off site in a tanker for disposal by an appropriately licensed contractor.

The Department of Water has advised the EPA that the proposal should have a low impact on groundwater and surface water resources over its operational life and beyond.

- **Dust & Particulates:** The site is within a valley and is 1.9km from the nearest dwelling to the north-east. In order to limit the potential for dust generation at the site, various measures will be adopted including covering of all vehicles, use of water for dust suppression on unsealed roads or exposed stockpiles when necessary.



- **Odour:** The Landfill site is located 1.9km from the nearest dwelling. The EPA has concluded that a well-managed landfill is unlikely to cause odour impacts at the buffer distance achieved at Allawuna and detailed modelling has confirmed that all threshold odour levels are contained well within the property boundary.
- **Noise:** The *Environmental Protection (Noise) Regulations 1997* stipulate the allowable noise levels that can be received at any noise sensitive premises as a result of activities occurring on another premise. A comprehensive noise assessment was performed for both the construction and operational phases and found that predicted noise levels at the nearest sensitive receivers were within the guideline limits for times of day during both the construction and operational phases of the landfill development.
- **Landfill Gas Emissions:** Landfill gas will be collected and flared to convert the methane into the less harmful carbon dioxide. When a sufficient quantity and quality of landfill gas is being produced the gas may be used as fuel for electricity generation.
- **Litter:** The landfill will be designed and operated to minimise the potential for litter and particularly lightweight, windblown litter (paper, plastic bags, etc.) including by use of enclosed and sealed trailers to transport waste, construction of a 1.8m high fencing around the site perimeter and regular litter patrols around the active cell fence and site fence to collect any windblown litter.
- **Fire:** A comprehensive Fire Management Plan has been developed in consultation with the Department of Fire and Emergency Services (DFES) and is discussed further later in this submission.
- **Fuel & Chemical Management:** Chemicals and fuels used for landfill operations will be stored appropriately to minimise the risk of impact on the environment. The storage and handling of chemicals and fuels will be in accordance with the *Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007* and Australian Standard AS 1940 *The storage and handling of flammable and combustible liquids*.
- **Dieback & Weed Management:** A Dieback and Weed Management Strategy will be developed and implemented at the site.
- **Public Health:** The four potential routes for infection are:
 - Contaminated Surface Water: The risk of 13 Mile Brook being contaminated by leachate is low given the stormwater and leachate management systems proposed. Further, the Brook is seasonally dry, not used for drinking supplies and unlikely to be used for swimming.
 - Contaminated Groundwater: The risk of groundwater contamination is low given the clayey material below the landfill footprint and the composite landfill liner system. Additionally, the groundwater is limited and mostly saline and not used for human consumption and unlikely to be used for stock watering.
 - Airborne Emissions: The Landfill maintains a significant buffer within the site of 600m, considerably in excess of DER requirements and the nearest residence is 1.9km to the north-east.



- Pests – Insect or Animal: Management measures will be implemented to deny denying pests food and shelter including covering waste at the end of every day, highly odorous or decayed waste will be buried promptly and bird control measures such as anti-perch strips on buildings, acoustic bird scaring devices and other techniques will be implemented as required.

Fire Management:

A Fire Management Plan has been prepared in consultation with the Department of Fire and Emergency Services (DFES). The Shire of York was also approached for input to the Plan but referred SITA to DFES.

The Plan optimises the prevention of fire in the first instance and addresses fire response for public safety and minimisation of related damage to the facility.

The Plan identifies measures to be put in place to prevent a fire in the Landfill, site fire fighting infrastructure, fire response procedures, fire fighting equipment, storage of flammable materials and maintenance of fire breaks.

The Plan includes a dedicated 150KL water tank for fire fighting purposes only supplied by rainwater, stormwater from the dam or, if needs be, water will be carted in to the site.

Fire fighting equipment retained on-site will be available to the assist with local fire management when not required on-site.

7. Shire Responsibility:

The obligations of the Shire of York during the construction and operations phases of the Landfill will not be unusual or unduly onerous as the Landfill will be regulated and monitored primarily by the DER through the Works Approval and Environmental Licence processes.

The Shire's operational oversight will be limited to:

- = Oversight of planning approval conditions;
- Assessment and issue of building licences for any buildings erected on site; and
- = Periodic inspection of the site to ensure it complies with the Local Government Act firebreak order.

Should the Shire require any further information then please do not hesitate to contact me.

Yours sincerely,

Nial Stock

State General Manager – Western Australia

From: Mark Duperouzel
Sent: Wednesday, 20 May 2015 3:12 PM
To: Records
Subject: 1147732 - FW: Land Fill - Allawuna - PRINTED

2

Dear Commissioner and Chief Executive Officer,

I am writing this letter to give you the reasons for my support for the proposed project to go ahead at Allawuna.

After reading the documents when the first situation was apparent , as long as it was managed correctly I couldn't see any serious issues with it.

Since then as you know the foot print has been reduced and moved further from the seasonal creek, it is now an even better more easily managed situation.

I've done much homework which now puts some true facts in the spot light, which haven't seemed to have been aired yet , they are;

1. The York Rubbish Tip that was located south of the existing Transfer station was there in operation for an estimated 70 years (this also was the sewerage dump) up until the transfer station opened ,and is located on the bank of the Avon River – no mention probably because there was never an issue??
2. The Sewerage waste water treatment plant located adjacent to the Avon River just south of York, which has an abundance of Saline Water which has already contaminated the town dam – no mention?
3. The Sewerage waste water treatment plant located **on** the Avon River in Beverley – No mention
4. During the period of the past 8 weeks after speaking to the operators of Beverley Transport, York Earthmoving -York, GT Humphrey Transport-York, Irvine Transport in Shackleton, Emin Bulk Transport- York , have all agreed that an accumulation of the tonnages of Lime that has been carted up the Great Southern Highway ,to and through the town of York, has very well exceeded 120-140,000 tonnes which is approx. 2400-2800 road train movements **1 way only** , these trucks have to return !!! Total Est **5000!**. This tonnage has been spread throughout the towns that the Great Southern Highway is the pathway to for e.g.; Bruce Rock, Quairading, Beverley, South Cunderdin, Mt Walker, Narrembeen, Kulin, Corrigin, York- funny that – not 1 person has said anything about it – This is for the last 8 weeks only!!!! Unbelievable!
5. CBH is carting by road train 102.000t of grain into the Shire of York and it is either going to Northam or The Metropolitan area . This is approx. 2040 movements one way and these trucks also have to return . This has happened over the last 12 months. Seriously - No mention?? So don't tell me that 3 trucks per hour coming **half way** to York is going to be a problem.
6. The Rubbish tip in Northam(which is **unlined**) has been there for 20 years + is monitored and has never recorded a problem in very close proximity to the Avon River- No mention??
7. If the York Town waste can be delivered to the site with no fee attached for storage, the considerable amount of savings will be in excess of \$2m over the life of the footprint for the Shire of York – this has to be a benefit especially with dwindling Govt funds to get projects done - No mention??
8. Landfill is not illegal.
9. Selling your farm after working it for the past 50 years is not illegal.
10. The Farmer that is leasing the remainder of the property around the proposed Landfill footprint doesn't have an issue with the waste being in close proximity of his cereal crops-No Mention?
11. The Site in Geraldton which owned by Toxfree (A company that has to abide by the same rules as SITA) also has cells 26m high and is adjacent to the Airport and all these people that come into the airport have to

drive straight past it , it is an entry statement to the City with Tarcoola Heights overlooking it! – not an issue for Geraldton! This is not an issue because the site is known to be managed very well, as no doubt with the EPA standards this will be also. There will be minimal risk to the environment – how can there be when it'll be managed correctly? Look at the Forrestfield rubbish tip(Dawson Avenue Tip), was there as a full tip for 15 years and now it's a sports playing field , can't be that bad hey!

12. The proposal has pencilled in a local company to manage the site with maybe the likes of 23 people required to carry out the operation- **massive** employment opportunity , possibly the biggest business in York apart from the School and Hospital.
13. Almost forgot ,during harvest, CBH YORK took in 278,720 tonnes of grain in 2014 and 264,083 tonnes in 2015 now that's if every truck was a road train (and they weren't) that is approx 5600 truck movement **1 way only** and these trucks have to return!! **11000 + in total!!**(info is from CBH directly). These are phenomenal figures !!!! not including all trucks that pull from there and ship to Perth and Northam. No one has mentioned it??
14. With Global companies like this, there is no doubt –like all other mega companies, they have a community grants scheme . Our own sporting clubs and organizations should benefit greatly with financial sponsorship- it can't not happen!! This company would be **crazy** not to help out.
15. Finally ,what about the former Claremont Rubbish Tip in Brockway Rd which is set amongst multi-million dollar homes, adjacent to one of the largest Co-Ed private schools in W.A. which now produces Methane Gas to heat the world class Superdome and the Recycling facility in South Fremantle which adjoins the SFSHS. There has never been any problems with this set up.

With that info I personally can't see why us as a community should have to miss out on a tremendous opportunity for now and into the future. York keep up with the times , accept change because we have to look after ourselves!

There is 213300 hectares in the Shire of York and they want to use 50 of them , this is the size of the head of a Pin on the map , let's be **realistic**.

Kind Regards,

Mark Duperouzel

Ps ; could I please have acknowledgment that you have received this email.

This email and any attachment(s) to it are confidential and may contain privileged and/or copyrighted information. If you are not the intended recipient, please notify the sender immediately by return email and permanently delete this email and any attachments. Do not copy, use or disclose it or its contents. Unauthorised use of this email is not permitted.

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Shire of York
PO Box 22
YORK WA 6302

SHIRE OF YORK	
FILE	PS. GEN-PP0-3-1
OFFICER	INITIALS
KIRO	
20 MAY 2015	
1147721	
REFERRED TO COUNCIL	
DATE	INITIALS

3

COPY SENT TO:	
1.	JAMES BEST
2.	
3.	

R and A Chester

19 May 2015

Dear Sir/Madam

RE: SITA Planning Application for Landfill at Allawuna Farm

The property "Allawuna" has four titles in free hold or fee simple with a total area of 3740 acres and, as such, we are entitled to rationalise or subdivide and sell the same as four separate blocks. Due to the topography of the terrain and total area, no new block would be viable for agriculture. Problems of water, roads and fencing would arise and be heartache for the new owners who would have to supplement their income with off-site monies, production would fall.

A landfill proposal has been put to my wife and me. This requires an area of about 150 acres out of a total of 3740, not the whole 3740 acres as envisaged by some people. The site is in approximately the centre of the farm and is shielded from the main road and neighbours by hills, valleys and timber. The nearest neighbour resides 1.9 km away in a north easterly direction. Buffers greater than 600 metres are wholly on the property. The agricultural land not required would be farmed as such and a considerable number of jobs would be created.

Allawuna is drained by the 13 Mile Brook which flows in a northerly direction. No Allawuna drainage flows into the Mundaring water catchment, which is contrary to what a few people say who in my knowledge have never been on Allawuna. I direct your attention to a letter from the Department of Waters to the CEO of the Shire of York dated 4 March 2014, copy enclosed. Previous council chose to ignore this information which was totally self-explanatory. Subsequent exploratory works (drilling) have not revealed channels feeding Mundaring water catchment.

We have been prevented from developing Allawuna to its full potential by spurious clearing laws. A covenant exists saying further clearing would create on site and off site salinity.

We look forward to the landfill project. Allawuna will be preserved as a productive farm. Many other jobs will be created on and off site.

Both my wife and I are in our eighties and look forward to retirement at no cost to the government.

Yours sincerely,



Mr R Chester



Mrs A Chester

OVER COUNTER
20/5/15



Government of Western Australia
Department of Water



looking after all our water needs

Your ref: O117455 / GR2.A290

Our ref: RF11246

Enquiries:

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.

Swan Avon Region

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 Manyuering 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 Manyuering 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 Manyuering Spring is fresh indicating that groundwater is not flowing through from Thirteen Mile Brook.

Indications are that Manyuering 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 Manyuering 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 or
email at 

by

Yours sincerely



James Mackintosh
Program Manager
Land Use Planning
Swan Avon Region

4 March 2014

Records

From: les {
Sent: Friday, 24 April 2015 1:54 PM
To: Records
Subject: Allawuna Landfill

4

SHIRE OF YORK	
PS. Gen. PPO. 3.1	
OFFICER	INITIALS
KIRA	OX
24 APR 2015	
JI47169	
REFERRED TO COUNCIL	
DATE	INITIALS

May I submit my objection to the proposed landfill site as follows:

- There is nothing of a financial or logistical benefit to York.
- The town is making great efforts to improve the tourism prospects of the town and a local landfill site will nullify these efforts and keep people away.
- My main concern is the road from York to the Lakes turn-off which now is barely adequate and with the sheer volume of landfill traffic it will become nothing short of dangerous.
- The image of York as a clean, green town would be destroyed.
- The landfill would cause the quality of life of its residents to deteriorate and deter young families from relocating here.

Regards,
 William L. Durbin

York 6302

Records

From: Jean Durbin
Sent: Friday, 24 April 2015 7:39 PM
To: Records
Subject: Submission re waste dump site at Allewuna

5

YORK Western Australia 6302

24th April 2015

SHIRE OF YORK	
FILE	PS. Gen PPO.3
OFFICER	INITIALS
KIRG	
28 APR 2015	
I147180	
REFERRED TO COUNCIL	
DATE	INITIALS

Dear Sir/Madam

I am forwarding this submission as my objection to the proposed waste disposal site at Allawuna Farm situated 18 kms from York.

- 1 * We came to live in York for the rural lifestyle and farming ambience of the region and placing a waste disposal site on prime agricultural land completely nullifies this aspect and also places in jeopardy the livelihood of the adjacent organic farms on the boundaries of Allawuna. SITA has chosen this site as the cheapest possible option as it is close to the Welshpool transfer station and an access road is already in place. Waste disposal sites should be placed on land that is degraded beyond recall but of course that would entail considerable expense and this company is clearly not prepared to go to the expense of such a development elsewhere.
- 2 *The site at Allawuna is in the water catchment area and should never be placed at risk. With the best will in the world SITA cannot guarantee the safety of the water resource. Leakages will always happen therefore a waste disposal site should always be in places where if leakages of toxic material occurs, the damage is minimal and the expense of clean up is also reduced.
- 3 *The site at Allawuna is in an area where seismic disturbance occurs on a regular basis. Surely that should ring warning bells and indicate that the risk of any earth movement is going to create a situation where any toxic materials can escape into the groundwater.
- 4 *We travel the road from York to Midland every week. This road is in a state of disrepair at the moment and is dangerous in parts due to the high number of grain trucks and other traffic. The proposed addition of double bogie trucks carrying waste to and from Perth every 20 minutes is a recipe for disaster. SITA will not go to the expense of maintaining this road and certainly from public forums the company seems quite unconcerned about the potential of death and injury from all the truck traffic. With SITA's proposed truck timetable, there will be a constant line of moving trucks on two thirds of this road. Do local residents have to wait for an horrific accident caused by one of these trucks before common sense prevails ?

5 *York is a pretty town and a great drawcard for tourists. The town relies on the extra income generated by tourists but visitors will not want to battle the road buffeted by waste trucks travelling to Allawuna and consequently will stay away and go somewhere else that is more amenable to access. SITA has now started to dangle a carrot saying that York will benefit from a few more jobs and that some businesses may obtain some input in the construction phase. In our view this will not overcome the negative impact this proposed waste disposal site has on York town site residents and people in the surrounding area. The major benefit will be for the State Government as an easy way to dispose of Perth's mounting waste burden. Why should the residents of York and district have this facility placed in their pristine environment to the detriment of humans, animals and plants? Once in place this waste dump will continue to grow, place more stress on its surroundings, more traffic than proposed on the road. Invest in the future by reducing metropolitan waste, advise companies like SITA to be proactive and develop waste disposal sites on degraded land even though it will cost more.

Yours sincerely

Jean Durbin (Mrs)

Records

From: frank parker
Sent: Wednesday, 29 April 2015 11:07 AM
To: Records
Subject: Aallawuna landfill
Attachments: ALLAWUNA LANDFILL PROPOSAL.docx

SHIRE OF YORK	
FILE	PS. Gen. PRO. 3
OFFICER	KIRA
INITIALS	<i>[Signature]</i>
29 APR 2015	
I147241	
REFERRED TO COUNCIL	
DATE	INITIALS

3.

Please find attached a letter regarding the proposed submission from Frank & Elizabeth Parker.

6

Elizabeth Parker

SUBMISSION TO YORK SHIRE COUNCIL CONCERNING OBJECTIONS TO THE PROPOSED LANDFILL AT ALLAWUNA

We, Frank Parker and Elizabeth Parker of [redacted] object to the application – Proposed Landfill at Allawuna Farm, 2948 Great Southern Highway, St Ronans, on the following grounds:

1. The social impact of the landfill proposal being approved:
 - There is no doubt that at least 95% of the Shire's population is not in favour of the landfill proposed at Allawuna. This is evidenced by the unanimous disapproval expressed by the people at the meetings at the York Town Hall being clearly representative of the total opposition to the adoption to the proposed landfill.
 - Each meeting at the Town Hall has shown people being increasingly anxious and concerned. The consequence of the approval of the landfill proposal by SITA will unquestionably result in the York Community feeling powerless in managing their environment, lifestyle and severely damaging the pride that residents have regarding historical York and the approach to the Avon Valley.
 - The consequence the effect the approval of the landfill proposal will have on the relationship between the residents of the York Shire and the York Shire Council and local government will be quite dysfunctional. The relationship has always been quite tenuous and often quite hostile. This may or may not be the Shire Council's fault but the evident reluctance by the Shire Council to release requested documents regarding the tip proposal, even under freedom of information formal requests, leaves an unexplained cloud hanging over the Shire Councillors and particularly the Shire Council administration.
 - My own observations of the York Community as a professionally qualified sociologist of some 45 years' experience leave me in no doubt of the detrimental effect of the approval of the landfill proposal on the community morale and pride of ownership of the people of York. The ethics of not recognizing the rights of at least 95% of the community against those of a foreign-owned entrepreneurial establishment are unquestionably wrong.

2. Traffic problems.
 - The information supplied by Main Roads Department sent to Mia Davies by Troy Buswell (I have a copy of this correspondence forwarded to me by Mia Davies' office), states that the traffic increase resulting from the approval of the tip will be an insignificant 6%.
 - What is not taken into account is the **type** of vehicles that will form this increase.
 - The type of vehicles SITA will use are road trains and it is quite impossible to overtake such vehicles safely on most of the narrow one-lane road.
 - My experience has been that I am terrified when such vehicles decide to overtake my own vehicle. Similarly, the extra long vehicles bank up behind one another making overtaking impossible. On the few passing lanes it is not uncommon to have road trains overtaking one another and using up the whole of the length of the overtaking lanes.

3. Land values.

The proposed establishment of a landfill at Allawuna will and has caused a fall in land values on nearby farming properties which are not compensated for in any way. Further. The value of properties in the town of York has decreased as a result of the proposed landfill. We approached a real estate agent (Elders Real Estate) recently regarding sub-dividing our rural residential property and were told at this time it was not advisable as values have fallen as a result of the land fill proposal. We contend that it is grossly unfair to penalise landholders financially if the landfill proposal is approved.

Frank Parker, B. App. Sc., Dip Soc. Stud., Dip. Gemm

Frank Parker

Elizabeth Parker, ALAA

Elizabeth Parker

29th April, 2015

Page 2 of 2

SHIRE OF YORK	
FILE PS. Gen. PFO. 3.1	
OFFICER	INITIALS
KIRA	
30 APR 2015	
I147250	
REFERRED TO COUNCIL	
DATE	INITIALS

4.

Shire of York
 Box 22 York
 WA 6302

7 York WA
 6302
 26-4-2015

Dear Councilers,

And all who rely on water from the Mundaring water catchment, which is major percentage of the south west of W.A. We have to stop these people from dumping thousands of ^{tons of} rubbish in the said area or any place near a water catchment for any purpose. The entire population of York (bar 1) and the Shire Council of York are against the proposal. We have all said NO to it, and that is exactly what we mean, all the amendments are not going to stop toxic and poisonous liquids finding a way to water that thousands of people, animals, and vegetation rely on. Has any one done a costing on replacing the water east of York when it has been poisoned from this scheme. I just hope people will realise this is a ridiculous idea from the start.

Yours sincerely

F. L. Davies
 Frank Davies.

Christine Goward

York

April 29, 2015

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

Dear Sir

Re: Landfill Proposal by SITA on Allawuna Farm - Lots 9926, 4869, 5931 and 26934 Gt Southern Hwy, St Ronan's, York

I am writing to object strongly to the above mentioned proposal.

I have resided in York for 25 years, raising my two children here and enjoying living in this beautiful rural area.

My reasons for objecting to this proposal are many and I have listed some of these below.


Allawuna is on the Gt Southern Hwy, which is one of the main Roads to Perth. Since the closure of the three tier rail this Highway has already become extremely dangerous. There would be a huge extra amount of heavy vehicles using this already extremely dangerous substandard Road. The Wheatbelt road fatality rate is six times the state average according to the RAC. Almost two in every three fatalities in the Wheatbelt occur during daylight hours according to the RAC. I strongly object to the extra amount of traffic this landfill would cause, making an already hazardous highway many times more dangerous and inevitably causing more fatalities in our area..

Because Allawuna is situated on the Gt Southern Hwy we will have a dramatic decrease in the number of tourists visiting York. This will cause a decrease to our hospitality and tourism industries resulting in less money for the town and higher unemployment rates.

Allawuna is situated next to Mundaring water catchment area and if contamination occurs from Leachate it will affect drinking water and waterways in the area.

Groundwater aquifers exist in the area and there have been no comprehensive groundwater studies performed to date for the whole region.

This area is seeing an increased frequency and intensity of storm events and flooding. The Avon Valley is part of the South West Seismic Zone and therefore if Landfill is placed on a seismic fault line it could result in catastrophic results if HDPE liners should tear due to an earthquake.

SHIRE OF YORK	
FILE	P3. Gen. PFO. 3.
OFFICER	INITIALS
Kira	
01 May 2015	
1147267	
REFERRED TO COUNCIL	
DATE	INITIALS



Leachate leaking into our waterways and farm land will contaminate water and clean food.

The inclusion of three borrow pits in the landfill site would cause environmental destruction and loss of farm land.

Given these reasons I urge you on behalf of the residents of York to reject the proposal from SITA for the Allawuna Landfill in our area

Yours sincerely

A handwritten signature in black ink, appearing to read 'Christine Goward', written in a cursive style.

Christine Goward

KEVIN KEATH

YORK WA 6302

9

SHIRE OF YORK	
FILE	PS. Gen. PPO. 3.1
OFFICER	KIRA
DATE	4 MAY 2015
I147316	
REFERRED TO COUNCIL	
DATE	INITIALS

Commissioner James Best
Shire of York
PO Box 22
YORK WA 6302

Dear Commissioner

RE: SITA ALLAWUNA LANDFILL PROPOSAL

Lots 9926, 4869, 5931 and 26934 Great Southern Highway, St Ronan's YORK

I wish to object to the landfill at Allawuna, proposed by SITA Australia

The primary grounds for my objection are:

Heavy traffic increase

- * Heavy vehicle delivery of refuse will exacerbate an already congested highway, especially from The Lakes to York. For every delivery a return trip to the metropolitan area is made, which is often ignored in discussions.
- * Wheatbelt road fatalities are the highest in the State and such road traffic from early morning to dusk, if not a greater time span will increase risk of crashes on this road.
- * The maintenance of this road, which will deteriorate at an increasing rate, was sidestepped by SITA representatives at the first public meeting in York, at which I was present, as "main roads' problem", ie road maintenance on a stretch of highway which requires major upgrade to a three-lane for its entirety, with alternate passing lanes every 5km or so [in my opinion], will be another fight precipitated on York residents.
- * Damage to York as a tourist destination will occur as this road is comprehended as a dangerous drive.

Pollution of water catchment area

The Allawuna site is adjacent to a water catchment area: where currently dogs are not even permitted
The can be NO GUARANTEES that leaching from the deteriorating refuse will be contained from polluting this catchment area with contaminants far worse than dog excreta!

This region's potential for earthquake/tremor damage

This area is a designated Seismic risk area - the South West Seismic Zone: a trauma waiting to happen.
The height of the land disturbance on the Meckering earthquake line demonstrates what catastrophic upheavals have already happened in the York environs, with potential to spew toxic materials from any landfill site.

**I could go on..but this will suffice as a framework for all the intertwining PERMANENT problems
I see as direct results from this venture.**

Yours sincerely



Kevin Keath

YORK WA 6302

10

SHIRE OF YORK	
FILE	PS Gen. PPO. 3.1
OFFICER	INITIALS
KIRG	
4 MAY 2015	
1147317	
REFERRED TO COUNCIL	
DATE	INITIALS

Commissioner James Best
 Shire of York
 PO Box 22
 YORK WA 6302

Dear Commissioner

RE: SITA ALLAWUNA LANDFILL PROPOSAL

Lots 9926, 4869, 5931 and 26934 Great Southern Highway, St Ronan's YORK

I wish to object to the landfill at Allawuna, proposed by SITA Australia

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I could go on..but this will suffice as a framework for all the intertwining PERMANENT problems I see as direct results from this venture.

Yours sincerely

Kerrie Keath

Records

From: Roma Paton
Sent: Monday, 4 May 2015 1:01 PM
To: Records
Cc: James Best
Subject: Public Submission/Amended Development Application/SITA
Attachments: Public Submission Shire of York Amended SITAdated 4th May 2015 .pdf

11

PS. Gen. PFO. 3.1	
James KIRA	B
5 MAY 2015	
I147322	
RECEIVED TO COUNCIL	
DATE	INITIALS

Planning Officer,
Kira Strange,
Shire of York,
Joaquina Street,
York.

Public Submission -Amended Development Application /Class 11 or 111 putrescible landfill site :
SITA Australia Pty Ltd (Allawuna Farm Landfill) Great Southern Hlghway, St Ronans (W5581/2014/1)*6}

Dear Kira,

Please find my 19 page submission PDF attached below.

Would you please confirm you are able to open this file and if you require a hard copy to be provided.

Kind regards,

Roma Paton

York 6302

SUBMISSION
ALLAWUNA LANDFILL FACILITY -

Lots 4869, 5931, 9926 & 26934 Great Southern Highway St Ronans, Shire of
York

Amended Development Application /Class 11 or 111 putrescible landfill site : SITA
Australia Pty Ltd (Allawuna Farm Landfill) Great Southern Highway, St Ronans
(W5581/2014/1)[*6}

Public Comment: Dated 4th May, 2015
Without Prejudice.

Roma Paton

York

I wish to object to the proposal and subsequent amendments advertised 22 nd April, 2015 for the SITA landfill site (on the property known as Allawuna, 18 km West of York in the Avon Valley).

I (and my Family) live East of the proposed Landfill in the Town of York. We chose to live in York for health and life style reasons, both of which, I believe, will be jeopardised if this Landfill proposal is approved.

Regardless of the alleged amended cosmetic changes SITA have made, I believe the same risks exist with this proposal for residents health, environmental damage and risk to ground water.

Golder Associates Document (Appendix W - Limitations) in SITA's amended application. This document is, I believe, **a disclaimer against information provided to SITA supporting their application and states:**

It **did not perform a complete assessment** of all possible conditions or circumstances that may exist at the site'.

Conditions may exist which were undetectable given the limited nature of the enquiry Golder was retained to undertake with respect to the site. Variations in conditions may occur between investigatory locations, and there may be special conditions pertaining to the site which have not been revealed by the investigation and which have not therefore been taken into account in the Document. **Accordingly, additional studies and actions may be required.**

Where data supplied by the client or other external sources, including previous site investigation data, have been used, it has been assumed that the information is correct unless otherwise stated. No responsibility is accepted by Golder for incomplete or inaccurate data supplied by others.

Given the limitation document provided by Golder Associates, it is reasonable to believe insufficient credible research has been carried out to permit the amended application to proceed.

BORROW PITS: The addition of Borrow Pits increase the footprint of the Landfill site and reduces even further the viable productive farming land on this property. These Borrow Pits will in fact be an extractive industry secondary to the Landfill proposal and no extractive industry licence has been applied for.

With the ever decreasing viable farm land in W.A. eastern wheatbelt due to drought and salt, it is inconceivable why any approval or consideration would be given by any Government Regulator that would risk farmland in the western high rainfall areas of our States food bowl, namely the property known as Allawuna.

I submit the following researched information for the Shire of Yorks Planner and JDAP to consider.

In areas where I have researched information, I will provide you with reference information together with map and photographic attachments.

This proposal does not fit York's Town Planning Scheme. The Town planning scheme does not include "waste Management" therefore this application should be rejected.

Question to Planner and DAP Panel Members:

IF the Liner SITA plan to use is SAFE with NO risk of compromise or breaches from earthquakes and the contamination of leachate and dust pose No risk to people and there will be no No risk to ground water contamination - **Why is the WA Government so anxious to get landfill out of the sand plane of the metro area?**

This proposal does not fit York's Town Planning Scheme. The Town planning scheme does not include "waste Management" therefore this application should be rejected. In fact it goes directly against all the rules the Shire of York force other people to comply with.

Shire of York Town Planning Scheme No 2

4.15 General Agriculture Zone

4.15.1 Objectives

To ensure the continuation of broad-hectare agriculture as the principal land use in the district encouraging where appropriate the retention and expansion of agricultural activities . **(Landfill is not an agricultural activity)**

- a) To ensure the continuation of broad-hectare agriculture as the principal land use in the district encouraging where appropriate the retention and expansion of agricultural activities . **(Landfill is not an agricultural activity)**
- b) To consider non-rural activities where they can be shown to be of benefit to the district and not detrimental to the natural resources or the environment **(how is this proposal going to benefit York, SITA has not even used out Local Paper to put their adverts in - they used Northams paper instead. landfill is detrimental to the environment)**To allow for facilities for tourist and travellers, and for recreation uses. **(This proposal is not providing facilities for tourist and travellers or any recreation uses and I believe this proposal will have a detrimental effect on tourists and travellers to York due to the extra large trucks on the already over burdened road)**
- c) To have regard to residential use of adjoin land at the interface of the General Agriculture zone with other zones to avoid adverse effects on local amenities **(this proposal has**

already adversely effected the adjoining landowners as well as many of the residents of York they are not happy with the proposal)

This proposal is not consistent with the objectives of Yorks Community Strategic Plan which states under:

Environment – Preserving and Sustaining Our Natural Environment

Our Vision – “ Our environment will be preserved for future generations, protecting viable rural land, whilst our town grows and develops”.

One of the **objectives** includes “**Protect and Enhance Our Rural Land and Spaces**”

And one of the **priorities** under this objective is “**Establish land use strategy to ensure rural and farming land is protected**”

Economic Development –

One of the **objectives** includes “Facilitate Sustainable and Managed Development”

And one of the **priorities** under this objective is “**Protect Primary Agricultural Areas through effective Land Use management**”

The proposal is not consistent with the local planning strategy which includes “**protection of sustainably agriculture and; preserve and enhance the environment and natural resources**” - this proposal is not in keeping with this strategy!

Shire of York Local Planning Strategy

1) Vision

2) Objectives, strategies & actions

General Objectives

Economic

1. Encourage the development and diversification of businesses that will strengthen and broaden the economic base of the Shire and provide employment opportunities for the community
2. Encourage Tourism that is complimentary to the character of the Shire and is compatible with the lifestyle and aspirations of the community
3. Protect broad acre agricultural areas from inappropriate development and intrusion by urban and semi-rural uses

Environmental

4. Protect and enhance the Shires key environmental values that support the continuation of biodiversity, the lifestyle of the community and the viability of eco system dependent businesses
5. Promote natural resource management as a cooperative mechanism to protect and enhance the Shire’s key environment values

State Planning Policy 2.5 – Land Use Planning in Rural Areas – as published in the Government Gazette on 27th November 2013.

Part 4. Objectives of this Policy

- a) To protect rural land from incompatible uses by –
 - I. Requiring comprehensive planning for rural areas
 - II. Make land use decisions for rural land that support existing and future primary production and protection of priority agricultural lands, particularly for the production of food; and
 - III. Providing investment security for the existing and future primary production sector
- b) To promote regional development through provision of ongoing economic opportunities on rural land
- c) To promote sustainable settlement in, and adjacent to, existing urban areas
- d) To protect and improve environmental and landscape assets
- e) To minimise use conflicts.

INCORRECT INFORMATION PROVIDED BY SITA:

1. Mr Stock indicated that SITA would like to generate electricity from the landfill, bringing power for up to 3000 homes by burning methane gas. He indicated during the meeting that

this would benefit YORK when infact the power to Alluwuna does NOT go through York but comes from Northam through the Muresk line.

2. SITA states that the average annual rainfall recorded at York is 381mm. The Shire of York website states that the average rainfall recorded at York is 450mm. Local Farmers records show an average rainfall in the area of 500mm.

If SITA can't get the smallest and easiest figures correct how can the community believe anything that SITA state in their proposal?

3. Clearly SITA failed to research this sufficiently. Quote from SITA application page 18 8.3 seismology "The area around Northam, from the Darling Scarp to Merredin is an area of notable seismic activity in Western Australia. The location of the landfill is to the south western edge of this zone of activity." **This statement by SITA is incorrect! see map Ref: attachment 1 The reference map shows clearly the western edge of the seismic zone is in fact well after Great Southern Highway joins Grt Eastern Highway and incorporates the eastern area of Mundaring. The Meckering earthquake was responsible for the sever damage and ultimate demolition of the historic Royal Hotel on the cr. of Avon Terrace and South street in York.**

4. **Allawuna farm land is not degraded farmland as claimed by SITA**

Evidence : Ref. Attachment 1. the site planned for the Landfill. Crop harvest and Wandoo trees Attachment 1.



RISK TO 13 MILE CREEK AND GROUND WATER

Evidence:

The west oct 2008

Updated Wed 29 Oct 2008, 12:53pm AEDT



PHOTO: Storm and lightning over the Wheatbelt.

MAP: York 6302

The Shire of York in the West Australian Wheatbelt is assessing damage from heavy rain overnight.

Some areas of the shire recorded **65 millimetres of rain in two hours.**

York Storm - Jan 29 2009 -

The York Shire President Pat Hooper says crews have been out cleaning up after flash flooding washed away parts of some roads. He says parts of the farming community have also taken a hit.

"At this stage it's hard to ascertain all the damage but I have got reports of stock losses, at least one dam has burst its banks, we've got (damaged) fences and obviously hay and grain that's about to be harvested could have also taken a fair bit of damage," he said. "It just sort of rolled in and then this noise came, that was probably the most frightening thing, and then this howling wind came through."

Tropical Cyclone *Dominic*, 22 - 27 January 2009

A low moved off the Kimberley coast during 24 January. This system moved steadily west and intensified into Tropical Cyclone *Dominic* by 0900 WDT 26 January. *Dominic* turned southwest and reached category 2 intensity before crossing the west Pilbara coast near Onslow at 0600 WDT 27 January. Wind gusts to 133 km/h (72 knots) were recorded at Onslow Airport and there was some minor structural damage and power lines brought down. *Dominic* weakened quickly over land although the remains of the system caused heavy rainfall and flooding in many parts of southern Western Australia. The Gascoyne River inundated many parts of Carnarvon. A train was derailed east of Kalgoorlie on 30 January apparently because of flowing water. **Flash flooding was also reported in the wheatbelt including York.**

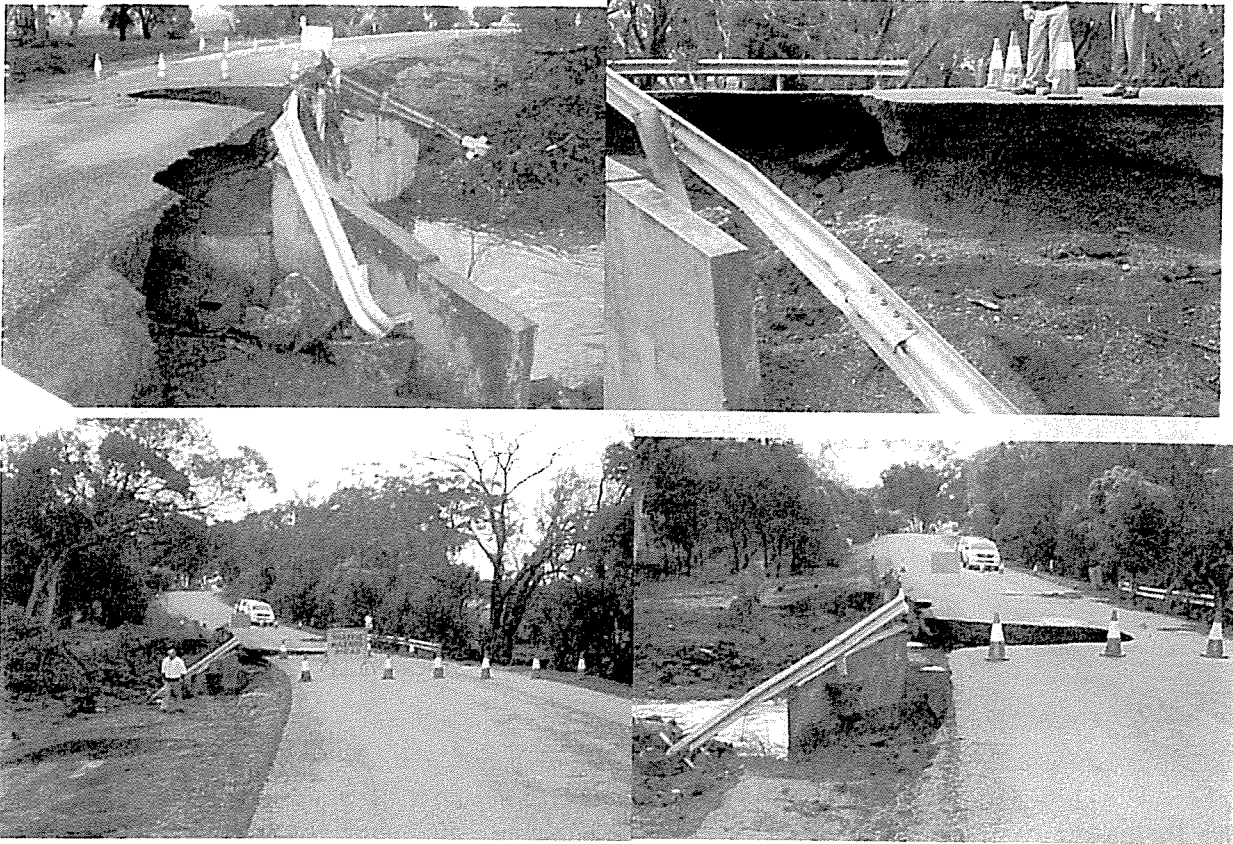
Locals from all walks of life chipped in to help when rain and flash flooding washed out roads and swept away bridges in the Wheatbelt town of York overnight.

"There has been damage to about four bridges and some road surfaces have been washed away and there is a lot of debris on the roads," Sergeant Grahame Tysoe of York Police said.

<http://www.watoday.com.au/wa-news/storms-wash-out-york-bridges-20081029-5b2d.html#ixzz2ufJTfprC>

Shire of York CEO Ray Hooper was called out about 8.15pm to attend to flooding when the bridge on Mokine Road to the west of York was washed out.





"At about 10.30pm and you could see that the foundations were gone and you had to backtrack about 20km to get back into town," Mr Hooper said. "The road was completely cut and impassable."

At one stage, the four roads surrounding Mr Hooper as he tried to redirect traffic were cut - and his small team was stranded until the water subsided.

The bridge closure has cut the main school bus run, with farmers having to deliver their children to a designated pickup point this morning.

"You are looking at a 16km longer trip," Mr Hooper said.

He urged motorists to avoid the bridge area and travel from York to Mokine via Northam instead.

The flash floods also caused the Great Southern Highway to be closed last night between The Lakes turnoff and York. The highway was reopened later this morning.

Main Roads has changed the speed limit of the road to 60kmh and has warned motorists to use caution.

Weatherzone.com.au meteorologist Thomas Saunders said the band of storms that caused the flash flooding was concentrated to the west of York.

FLASH FLOOD `13 MILE CREEK - Jan 6 2013



Air Pollution:

I am concerned our air quality will be impacted both by odour and dust pollution from both the Landfill site and the Leachate pond dust. The ponds are as I understand it, designed to allow the moisture to dry out leaving remnant 'toxic heavy metal dust'. SITA State manager explained that this 'dust' is to be dug out and transported by front end loader to the nearby landfill site to be covered. SITA have no comprehension how strong the summer winds are here in York. The Toxic dust will become airborne as soon as it is disturbed by the front end loader and will be carried for miles by the wind.

York is seriously impacted regularly by smoke from south west burn offs. These burn offs are over a hundred kms away and York still gets the smoke, we can guarantee we will be impacted directly by dust and odour from the Landfill site which is only 18 km west of York.

I am very concerned the water in water tanks will be contaminated by toxic dust from the dump both during excavation and daily heavy machinery activities.

Who will take responsibility if my water is contaminated and my health is impacted by the toxins from the site? The risk for York and its families cannot be ignored.



EVIDENCE YORK STORM JANUARY 29 2011

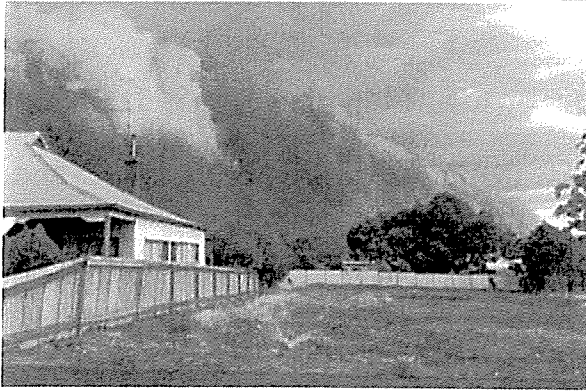


Photo below:
YORK -Dust/Wind Storm seconds before it hit
York Photo taken look NE Mt. Bakewell
29/1/2011

below: Dust/Wind storm looking west of York 29/1/2011
Photo

Evidence of how airborne toxic dust can impact on the health of nearby residents:
Esperance Port authority failed to contain lead dust which resulted in contamination of rain water tanks throughout Esperance, impacting on the health and well being of children and families in the area.

Reference: [Department of Environment and ...www.dec.wa.gov.au/news/.../esperance-lead-and-nickel-update.html](http://www.dec.wa.gov.au/news/.../esperance-lead-and-nickel-update.html)

Sep 5, 2012 – The **Esperance Port Authority** was subsequently convicted on five charges relating to **lead contamination** and one charge of emitting a nickel ...Record \$525,000 fine for **Esperance** Port over **lead** dust | Perth Now www.perthnow.com.au/...esperance...lead.../story-e6frg143-1225792...

Oct 30, 2009 – **BIG FINES: Esperance Port Authority** is facing heavy fines today after admitting six charges in relation to the 2007 **lead contamination**

Risk Management of pollution:

Given the history of SITA in Australia. (Ref. Attach. 3) Evidence proves SITA's clean/green/safety track record is not so clean/green or safe.

It is too easy for multi national companies to step aside, change their name, sell their business or declare bankruptcy to avoid their legal obligation for damage to the environment and peoples health. We in Western Australia have seen this happen too many times - **James Hardie/Wittenoom is a prime example - this environmental disaster cost my family members lives.**

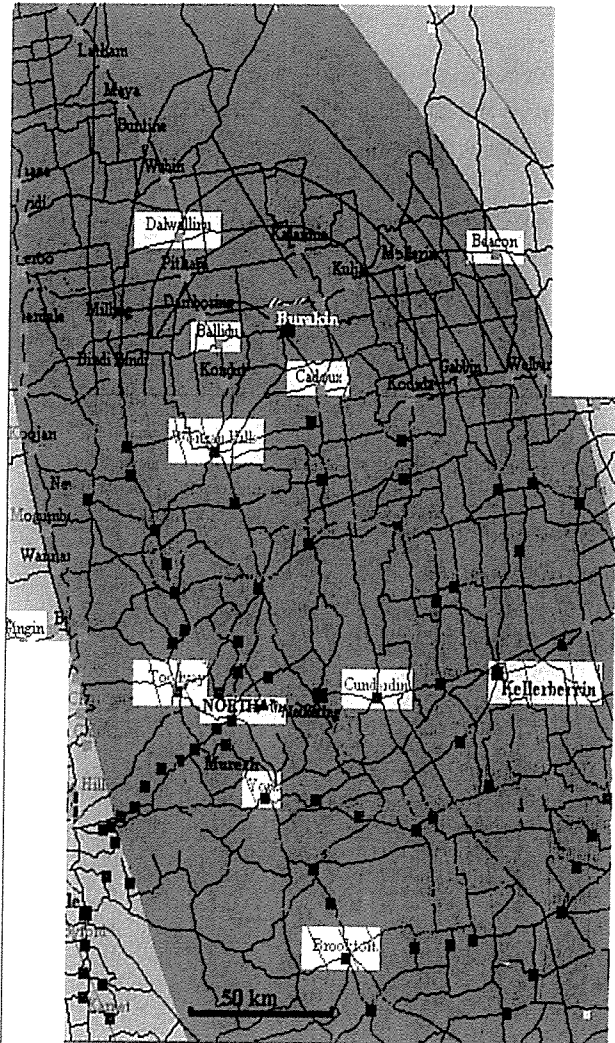
Earthquake Risk

Zone: SWSZ

York is now listed as one of the top four high risk areas for Earthquakes on the Seismic

web site. This can and would see a catastrophic environmental disaster if the clay base is breached by an earthquake of similar magnitude (6.9) to the Meckering Earthquake in 1968 - the clay base and plastic liner proposed by SITA as the source of protection cannot be guaranteed. HDPE liners tear during earthquakes with a magnitude >5.

http://www.seismicity.see.uwa.edu.au/welcome/seismicity_of_western_australia#SW



YORK Nov 1994 - Jan 1995 REF: http://www.seismicity.see.uwa.edu.au/welcome/seismicity_of_western_australia/earthquake_swarms

(A swarm of earthquake events occurred about 10 km SE of York, beginning on 26 Nov 1994, and continuing into Jan 1995. The largest event was magnitude 2.6, and occurred on 29 Nov. 27 events were located during the swarm, although there were many other events, too small to be accurately located. Portable instruments were deployed in the area to accurately locate some of the events.

Evidence: www.seismicity.see.uwa.edu.au/welcome/seismicity_of_western_australia/wa_historical/meckering

The Meckering earth quake caused the Mundaring to Kalgoorlie water supply pipe line to snap, it forced the steel pipe inside itself for well over a meter, such was the force of this quake. This fractured pipe section is on public display in a park within the Town site of Meckering.

- Meckering earth quake caused Mundaring/Kalgoorlie pipe to break forcing it inside itself

Below: The surface faulting in Meckering was up to 3 metres high, and almost 40 km long



If

York

Meckering (WA) Earthquake - 14th October 1994
Photo courtesy of Alice Snooker



experience an earthquake (6.9) similar to the Meckering quake with a drop of 3 meters in the land, the liners will not survive. Landfill cells will also slip down the hill.

Source <http://www.westaustrianvista.com/meckering-earthquake.html>

If 1/2" thick steel pipe can rupture, then it is reasonable to conclude a plastic liner will also rupture.

- SW York - Magnitude: 2.4 (ML) 09 September 2011

The map below: all known earthquakes in the region of magnitude 5.0 or more. Source: http://www.seismicity.see.uwa.edu.au/welcome/seismicity_of_western_australia/wa_historical?p=44594

In order to compute earthquake risk in Australia, using a technique known as the Cornell-McGuire method, Brian Gaull and Marion Leiba (1990) divided Australia into a number of earthquake source zones (see map below). 13 of these source zones are in Western Australia. While ideas on seismicity have evolved since then, this map gives an idea of the major sources of seismicity in Western Australia and Australia in general. Notable is the low seismicity attributed to the Northern Territory. Earthquakes in this region since 1987 have dramatically changed the level of seismic risk attributed to this region of Australia. Source: http://www.seismicity.see.uwa.edu.au/welcome/seismicity_of_western_australia/wa_historical?p=44594

1968 - Western Australia - Meckering

Although the magnitude 6.9 Meckering earthquake of October 1968 was not the largest in Western Australia's history, it was certainly the most significant in terms of damage done and cultural upheaval. **It caused ground rupturing almost 40km long, some of which can still be seen.** In Meckering, a bank, hotel, shire hall, three churches and 60 of about 75 houses were wrecked. Where the fault crossed the highway, **the road had an approximately 1.5 m high step in it.** Railway lines were buckled, and a water main was folded in upon itself.

Interesting fact: There are on average 80 earthquakes of magnitude 3.0 or more in Australia each year. Earthquakes above magnitude 5.5, such as the 5.6 magnitude event in Newcastle in 1989, occur on average every two years. **About every five years there is a potentially disastrous earthquake of magnitude 6.0 or more.**

Earthquakes of magnitude 4.0 or more are relatively common in Western Australia with one occurring approximately every five years in the Meckering region.

WA has been identified as the nation's earthquake capital with the release of a series of new maps pinpointing quake hotspots around the country.

Maps published by government seismologists at Geoscience Australia identify four earthquake "hot zones" across the State - areas scientists believe could be the most dangerous because of seismic activity.

The National Earthquake Hazard Map of Australia ranks danger zones according to estimates of ground shaking that might occur in a particular area.

The earthquake hazard maps can be viewed at www.ga.gov.au/darwin-view/hazards.xhtml.

Geoscience <http://www.ga.gov.au/hazards/earthquakes/earthquake->

Evidence of seismic activity in York:

The Meckering earthquake was responsible for the sever damage and ultimate demolition of the historic Royal Hotel on the cr. of Avon Terrace and South street in York.

SW of York, WA.

Magnitude: 2.4 (ML)

Depth: 0 km

Tsunamigenic: Not available

Date and Time

UTC: 09 September 2011 @ 23:12:33

Sydney Time: 10 September 2011 @ 09:12:33 (AEST)

Location

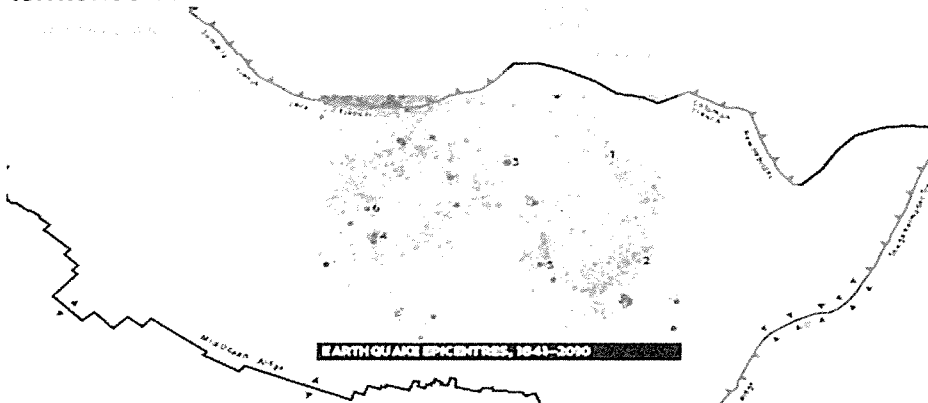
Coordinates: -31.973, 116.718

Geo Science has predicted York is one of the top 4 hot spots in Australia that will experience an earthquake and predict a magnitude of 7.1. Earthquakes change surface and underground water courses and tear landfill liners at magnitude 5.

Geo Science has predicted **York is one of the top 4 hot spots** in Australia **that will experience an earthquake and predict a magnitude of 7.1.** Earthquakes change surface and underground water courses and tear landfill liners at magnitude 5.

Ref: <http://www.australiangeographic.com.au/topics/science-environment/2011/10/earthquakes-in-australia/>

Western Australia is a quake hotspot, with more quakes than all the other states and territories combined.



MOE in Victoria, York and Kirwan in Western Australia and Tenant Creek in the Northern Territory are the regions in Australia with the highest potential for earthquakes, according to a new Earthquake Hazard Map of Australia.

SOME West Australian EARTHQUAKE SWARMS -

YORK Nov 1994 - Jan 1995 REF: http://www.seismicity.see.uwa.edu.au/welcome/seismicity_of_western_australia/earthquake_swarms

A swarm of events occurred about 10 km SE of York, beginning on 26 Nov 1994, and continuing into Jan 1995. The largest event was magnitude 2.6, and occurred on 29 Nov. 27 events were located during the swarm, although there were many other events, too small to be accurately located. Portable instruments were deployed in the area to accurately locate some of the events.

YORK	Nov 1994 - Jan 1995	2.6	27 events located
------	---------------------	-----	-------------------

Ref: Attach. 3 Seismic Map - Ref: http://www.seismicity.see.uwa.edu.au/welcome/seismicity_of_western_australia#SW

February 26, 2014, 8:34 am



- 1.
1. [The Guardian](#)

3.

4. **Earthquake rocks WA's Goldfields**

5. The Australian-2 hours ago

6. A MAGNITUDE 4.6 **earthquake** has rocked **Western Australia's** ...occurred in the Coolgardie, **Kalgoorlie** and Boulder area at 8am (WST)**today**.

Geoscience Australia seismologist Eddie Leask said it was the equal second largest earthquake recorded in the area, behind a magnitude five that struck close to Kalgoorlie in April 2010 and tying with another 4.6 centred further away to the town's east in April 1977.

Phase arrivals, or seismic waves associated with the earthquake, were recorded in areas including Kambalda, some 100km away, **Mundaring in Perth's Hills region, some 500km from the epicentre, and Forrest, 657km away.**

Natural water course: SITA plan to insert storm water pipes to divert the water which naturally runs through the valley when it rains.

It is a breach of the Rights in Water and Irrigation Act 1914 to divert any watercourse or diminish the flow of it.

Section 11 (1) - (a) to do anything, or install any works or object, that causes obstruction of or interference to a watercourse or wetland or its bed or banks, unless the person holds a permit granted by the Minister authorising the person to do so. There is nothing in the application to indicate SITA has obtained permission - therefore it can be assumed they have not.

Section 17 . Obstruction etc. of watercourse etc. without authority, offence and Minister's powers as to

(1) Where, whether before or after the coming into operation of this Act, land was or is granted, transferred in fee simple, or demised by the Crown, a person shall not, except as authorised by a permit or by any other Act, obstruct, destroy, or interfere with any watercourse, race, or drain flowing through or over the land, or any dam or reservoir, or the bed of any disused watercourse, race, or drain, that is on the land.

Leachate ponds - Risk of pollution:

I noted during the conducted tour that the ponds would be directly adjacent to the 13 mile creek - though I believe this may have been changed to another site further up the hill. How the leachate will travel up hill I do not know. When State Manager of SITA Nial Stock was asked if he was aware York has, over recent years, experienced extensive and frightening night flash flooding. He claimed he was not aware of this problem, however he stated any night flooding would be noticed by the "night watchman" who would phone the head office for trucks to be driven from Perth to pump out the leach gate ponds. The toxins held in the Leach gate ponds would already be washed into the 13 Mile creek and well on its way to the Avon and Swan Rivers before any truck could drive the 2 hours to York from Perth to pump out the toxins.

Western Power have no plans to extend the grid to the area and neighbouring farmers confirm Mobile phone connections are unreliable in the area which means the 'night watchman' will not be able to call for assistance if flash flooding occurs.

National Toxics Network secretary Lee Bell reported the Cardup **facility is located in the worse possible location for a landfill - on the Darling Scarp, above a rain catchment area with natural creek lines.** This comment also applies to Allawuna Farm proposed site it is also adjacent to natural creek lines and water catchment.

100,000 litres of leachate sludge was released into Cardup Reserve and Brook in 2012 by SITA

Evidence of leachate breaches by SITA: <http://au.news.yahoo.com/thewest/a/-/news/7388792/investigation-into-toxic-spill-in-creek/>

The Department of Environment and Conservation is investigating how more than 100,000 litres of toxic waste spewed out of containment tanks at the South Cardup landfill site, south of Perth, yesterday contaminating a local creek.

Leachate tanks at the landfill site overflowed on Thursday night sending the waste flowing more than one kilometre through bushland and into Cardup Brook. The spill was not detected until yesterday morning.

The black-coloured leachate is understood to contain a toxic cocktail of heavy metals, pesticides and other poisons. - these would go into the 13 Mile creek.

"Work is currently underway to determine the extent of soil that may have been affected and a suitable remediation strategy to protect the environment and nearby land use."

The landfill site is licensed to take household, commercial and industrial waste and has been used to dump some of the State's most noxious chemical waste. - is this what we can expect?

National Toxics Network secretary Lee Bell said the incident highlighted failures at the Cardup landfill facility and it was time it was closed down. So why move the problem to York?

"This facility is located in the worse possible location for a landfill - on the Darling Scarp, above a rain catchment area with natural creek lines. It was a terrible place to put a landfill and now a lot of the problems are becoming evident," Mr Bell said. York site will be the same!

Serpentine Jarrahdale Ratepayers Association president Alan Clarkson said the toxic slick had run through a Bush Forever nature reserve and across South Western Highway.

"The worst fears of the community have been realised," Mr Clarkson said.

"We urge the Government to close this facility."

If SITA's State Manager is unaware that York experience torrential flash flooding, particularly in the area they plan to use for Landfill, then clearly they are ill prepared to handle the consequences of these catastrophic environmental flash floods can cause.

Toxic heavy metal dust - Summer winds:

The Leachgate ponds are designed to allow the moisture to dry out leaving remnant 'toxic heavy metal dust'. This 'dust' is to be dug out and taken to the nearby landfill site to be and covered. Again SITA have no comprehension how strong the summer winds here in York. That Toxic dust will be airborne, carried for miles polluting grain crops, cattle and sheep fodder, drinking troughs and the air we in York breathe. Our water tanks will be contaminated.

Previous SITA prosecutions.

It is well documented on the WWW SITA breach environmental rules and regulations. SITA have already breached environmental regulations/laws here in W.A., why are they permitted to continue operating? See attachment 3.

Risk to Flora, fauna and revegetated water ways:

I together with those who live and visit this area, value the flora and fauna.

I have spent many hours as a community volunteer planting trees and revegetating the 13 mile creek. A creek which is now showing signs of being alive again.

If the Landfill application is granted - the risk to this beautiful revegetated and tenuously fragile environment will be desimated. The risk is far too great.

York wheat, meat, eggs, Olive Oil and organic produce:

The area surroundi the proposed Landfill Site is a high food production area The wheatbelt farms are the food basket for ALL West Australians. To risk ANY contamination to surrounding crops, fruit trees, stock fodder and water would be inconscionable.

Attachement 3.

SITA odour prosecutions/ Australia

No. 1 www.epa.vic.gov.au/about-us/news-centre/media-releases/media/2009/june/25/sita-to-face-court-on-pollution-charges

SITA PENALISED FOR SMELLY SITE - POLLUTION CHARGES SITA

Australia Pty Ltd will be required to front the Sunshine Magistrates' Court on three charges relating to the environment

NO. 2 [http://www.epa.vic.gov.au/about-us/news-centre/media-releases/media/2010/july/07/sita-penalised- For-smelly-site](http://www.epa.vic.gov.au/about-us/news-centre/media-releases/media/2010/july/07/sita-penalised-For-smelly-site)

SITA PENALISED FOR SMELLY SITE - A Brooklyn company responsible for composting green waste was convicted in the Sunshine Magistrates' Court SITA Australia Pty Ltd pleaded guilty to the charge and was fined \$35,000.

NO. 3 [www.epa.vic.gov.au/about-us/news-centre/media-releases/media/2010/february/01/guilty-verdict-for- sita-s-brooklyn-site](http://www.epa.vic.gov.au/about-us/news-centre/media-releases/media/2010/february/01/guilty-verdict-for-sita-s-brooklyn-site)

GUILTY VERDICT FOR SITA'S BROOKLYN SITE - SITA Australia Pty Ltd pleaded guilty in the Sunshine Magistrates' Court to breaching its EPA licence by allowing odours offensive to humans to be discharged beyond the boundary of its Brooklyn premises.

NO. 4 <http://www.epa.vic.gov.au/our-work/publications/publication/2012/september/1503>

Hallam Road Landfill - Final Enforceable Undertaking – Community Information

EPA has negotiated an Enforceable Undertaking with SITA Australia following odour offences at its Hallam Road landfill site. Through the EU, SITA is obliged to invest heavily in best practice management for future cells and community engagement projects.

Hallam Road Landfill Enforceable Undertaking - Community Information

NO. 5 <http://www.wwww.epa.vic.gov.au/our-work/publications/publication/2012/july/1489>

Several times last year EPA Victoria confirmed that odour travelled beyond SITA Australia's Hallam Rd landfill boundary, in breach of its EPA licence.

NO. 6 <http://www.wwww.epa.vic.gov.au/about-us/news-centre/news-and-updates/news/2012/april/11/hallam-road-landfill-update>

Hallam Road landfill update

Odour from Hallam Road has been a longstanding issue for EPA and the community. The landfill's operator, SITA Australia Pty Ltd, has informed EPA that 'cell 8' - **the major source of odour** - will be closed by June

NO. 7 www.wwww.epa.vic.gov.au/about-us/news-centre/media-releases/media/2012/september/24/large-scale-works-required-in-enforceable-undertaking

Large scale works required in enforceable undertaking

EPA Victoria has negotiated an enforceable undertaking with **SITA Australia following odour offences** at its Hallam Rd landfill site.

NO. 8 www.wwww.epa.vic.gov.au/about-us/news-centre/media-releases/media/2010/october/21/hallam-road-landfill-fined-for-july-odour-incident

HALLAM ROAD LANDFILL FINED FOR JULY ODOUR INCIDENT

SITA Australia Pty Ltd has been fined almost \$6,000 by EPA Victoria following an odour incident in July this year. EPA received 15 odour complaints from residents living around the Hallam Road landfill in Hampton Park

Records

From: Roma Paton
Sent: Sunday, 24 May 2015 7:24 PM
To: Records
Subject: Public submission/amended development application/SITA/Addendum

Planning Officer,
Kira Strange,
Shire of York,
Joaquina Street,
York.

SHIRE OF YORK	
FILE	PS-GEN-170.3-1
OFFICER	INITIALS
KIRA	
25 MAY 2015	
1147838	
REFERRED TO COUNCIL	
DATE	INITIALS

Addendum to - Public Submission -Amended Development Application /Class 11 or 111 putrescible landfill site : SITA Australia Pty Ltd (Allawuna Farm Landfill) Great Southern Hliighway, St Ronans (W5581/2014/1){*6}

Dear Kira,

Further to my 19 page submission lodged on the 4th May, 2015, I wish to address some of the issues on the SITA pamphlet which arrived after I had lodged my submission with the Shire of York.

1. The update sheet was not provided to every resident who will be impacted by the proposed Landfill dump - this is remiss of SITA and unfair on those who missed out.
2. The Landfill is 13km as the crow flies from York. It is misleading to use the road measurement of 20km because the odour, smell and rubbish is not going to travel by road, it will come across the farms to York, which is 13km!
3. Mundaring Public drinking water is sourced from the Perth supply (Serpentine dam), not the Mundaring catchment area. The statement by SITA is, I believe, incorrect and misleading.
4. The proposed landfill tip IS within the Mundaring water catchment area. There is a Water Corporation "WATER CATCHMENT" sign on the York side (East) of the Allawuna farm on Great Southern Highway. Water from this catchment is piped to Kalgoorlie/Goldfields and all Towns in between, as well as York, Beverley and south the Narrogin.
5. It is incorrect to claim minimal impact on traffic flows - the York/Lakes road is an extremely busy and dangerous road. Increasing the traffic with double bogie rubbish trucks will have an impact and increase the danger for those who use this road regularly. It is not minimal as claimed by SITA.
6. There is no time frame provided for the so called 22 full time jobs. Statement by SITA is, I believe, designed to give false hope and mislead the public.
7. SITA has not spelt out where the \$1.5 million in new wages will be made up from - obviously it is not in York or they would have stated that. Therefore we must presume there will be no benefit for York residents.

Would you please acknowledge you have received this addendum.

Kind regards

Roma Paton

SHIRE OF YO	
FILE	PS-GEN-PRO. 3.1
OFFICER	INITIALS
KIRA	[Signature]
6 MAY 2015	
114739	
REFERRED TO COUNCIL	
DATE	INITIALS

12

York, May 5, 2015

To: Shire of York

Submission
Allawuna Landfill proposal
F & B Schreuder

York, WA 6302

Dear Sir,

We like again to express our deep concern about the proposal by SITA to construct and operate a landfill facility on land known as Alluwuna Farm.

Since in the State Administrative Tribunal summary of reasons for the decision on the 10th April to approve the amendment, Senior Member Peter McNab states: *“And, of course the proposed use does not change.” and also: that the essence of the proposal remains unchanged.”*

we consider that nothing has substantially changed that would require me to amend my original submission against the proposal. I believe that my original submission is still valid and to this end I am re-submitting my original document along with this statement, signed and dated to reflect my objection to the amended proposal.

First and foremost we do not think that good agriculture land should be used for the purpose of landfill. Land use in a fairly stable rainfall area should be used for food production, not being poisoned for the rest of the life of our Earth.

Secondly: The impact of such a facility is bad for the environment in the direct vicinity and in the worst scenario could be devastating for large parts of the countryside effecting all aspects of life.

In case of an Earthquake the liner of the landfill pit might well rip and leachate will percolate through the porous kaolin clay, on which this project will be based, and pollute the groundwater which is part of the Mundaring water catchment

Heavy storms can dump colossal amounts of water in a short time which will make the leachate ponds flow over and contaminate the 13 Mile Creek and therefore the Avon and Swan River systems.

During the hot summer the aforementioned ponds will dry up and dust from it can easily be picked up by the wind and contaminate the surrounding farmland poisoning the food for life stock and drinking water collected from the roofs on outlaying farms. A dust storm like the one we suffered in February 2011 may carry the poison over long distances.

Page 1 of 2

Submission regarding Allawuna Landfill proposal
F & B Schreuder

York, WA 6302

Thirdly: The extra 60 or so extra movement of Double Bogie trucks between Midland and the proposed site will badly affect the traffic. They will slow traffic down when they go up the escarpment at Greenmount, then hit a bottleneck at Mundaring and another one at Sayers Valley. And then turning off at The Lakes enter a much too narrow road with countless bends which already has seen too many fatal crashes.

Fourthly: The positive economic impact on the Town of York will be minimal as a big multi-national company will source there material and labor from Perth.

The negative economic impact could be a real risk. Because of the additional heavy traffic on the narrow road and no real alternative route to York it might well slow the flow of tourist to our town. It is no fun driving three quarters of the trip wedged between two trucks.

The solution to Metropolitan waste can no longer be handled by local government and has become a State problem.

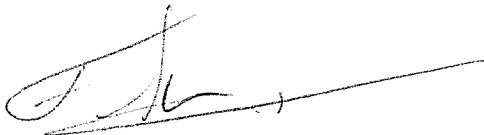
In the modern world we have progressed from leaving our bodily waste running into the gutter to well organized draining systems with more or less effective recycling plants to keep our environment clean. The cleanliness of our environment is a key condition for the continuation of the human specie. Digging holes to get rid of our household and industrial waste is a long standing practice which, we think, has run it course. We cannot keep digging holes for ever and ever. You might consider the following:

- The landfill site should be in a low rainfall area.
- It should be on land already cleared.
- It should be away from any populated are.
- Choice of a site should take into account local seismic activity.
- Metropolitan waste should be transported to the site exclusively by rail

We hope that you will consider our concerns.

Sincerely yours,

Frits Schreuder



Brigit Schreuder



Shire of York
P O Box 22
York WA 6302
records@york.wa.gov.au

13

SHIRE OF YORK	
FILE	PS-GEN-PP-3.1
OFFICER	INITIALS
KIRA	
7 MAY 2015	
1147429	
REFERRED TO COUNCIL	
DATE	INITIALS

To The Commissioner James Best and the Shire of York,

RE: The SITA Allawuna Landfill Proposal Lots 9926, 4869, 5931 and 26934 Great Southern Highway, St. Ronan's, York.

I object to the proposed landfill at Allawuna by SITA Australia and believe that the proposal should not be permitted.

The proposal is against the principals of the Shire of York's Town Planning Scheme, which states under general agriculture zone "to ensure the continuation of broad acre agriculture as the principal land use in the district encouraging where appropriate the retention and expansion of agricultural activities." Landfill is not an agricultural activity and will only destroy valuable agricultural land.

The proposed landfill is not acceptable with the Shire of York's Local Planning Strategy, which states "protection of sustainable agriculture and preserve and enhance the environment and natural resources." The proposal does not meet the objectives of York's Community Strategic Plan which states, "Protect and Enhance our rural land and spaces" and has a priority to "Establish land use strategy to ensure rural and farming land is protected." Landfill does not enhance nor preserve and should not be placed in our agricultural areas, especially near important water sources.

The landfill will not benefit York in anyway, but has the potential to destroy our agriculture industry, our tourism and hospitality industries and valuable employment that these industries bring to York. I therefore ask that this proposal be rejected.

As I don't live in York my
customers are safety of interest on the
road and what harm it will do to
the farm on which it is going to take
to

Yours sincerely
NAME
ADDRESS
DATE
SIGNATURE

P. Widen
Peter Widen
6/5/2015
P. Widen

Due 25th May 2015

1147429

14

Shire of York
P O Box 22
York WA 6302
records@york.wa.gov.au

To The Commissioner James Best and the Shire of York,

RE: The SITA Allawuna Landfill Proposal Lots 9926, 4869, 5931 and 26934 Great Southern Highway, St. Ronan's, York.

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The landfill will not benefit York in anyway, but has the potential to destroy our agriculture industry, our tourism and hospitality industries and valuable employment that these industries bring to York. I therefore ask that this proposal be rejected.

I visit York regularly & This would deter visitors to York, with the trucks & dust. Water catchment area would be contaminated.

Yours sincerely

NAME *BARUL KULLACK*
ADDRESS *NORTHAM*
DATE *07.05.15*
SIGNATURE *Barul Kullack*

Due 25th May 2015

I147797

To: SHIRE OF YORK,
P.O. BOX 22,
YORK, W.A., 6302

15

DATE 2.5.2015

RE: SITA ALLAWUNA FARM LANDFILL

NAME..... Heles & Neville Giles
ADDRESS..... York WA

Dear Sir,

The amended application from Sita Allawuna Farm Landfill proposed use does not change, the proposal is still the same as original, therefore the previous submissions to the Shire of York against the original application are still valid. The Shire of York's Planning Officer's report is therefore still valid. The JDAP's reasons for upholding the Shire of York's Council's decision and refusing the Sita Allawuna Farm Landfill, are still valid.

As a resident of York I object to this proposed Landfill at Allawuna Farm. This is going on good and productive farmland. The local access road from Perth, the Great Southern Highway, is substandard for the amount of extra traffic and heavy haulage roadtrains this proposal will bring. Rubbish dumps catch fire frequently, and are difficult to extinguish, especially in our hot dry summers. There are no fire services out in this area. The mobile telephone connection is erratic, the mainline connections often not working. There is no potable water out on this farm. The area is subject to flooding. The proposed area will be sited on a paleo water channel, adjacent to Mundaring Weir water Catchment. The area is situated adjacent to other farms, our foodbowl.

York is a historic town, the gateway to the eastern Avon Valley and Wheatbelt. York is a tourist destination, with retirees and young families.

This proposed Landfill will not benefit York. I ask that the proposal not be accepted.

Very worried about the Trucks on the road

Yours sincerely,

SIGNATURE.

H Giles

Shire of York
P O Box 22
York WA 6302
records@york.wa.gov.au

16

To The Commissioner James Best and the Shire of York,

RE: The SITA Allawuna Landfill Proposal Lots 9926, 4869, 5931 and 26934 Great Southern Highway, St. Ronan's, York.

I object to the proposed landfill at Allawuna by SITA Australia and believe that the proposal should not be permitted.

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The proposed landfill is not acceptable with the Shire of York's Local Planning Strategy, which states "protection of sustainable agriculture and preserve and enhance the environment and natural resources." The proposal does not meet the objectives of York's Community Strategic Plan which states, "Protect and Enhance our rural land and spaces" and has a priority to "Establish land use strategy to ensure rural and farming land is protected." Landfill does not enhance nor preserve and should not be placed in our agricultural areas, especially near important water sources.

The landfill will not benefit York in anyway, but has the potential to destroy our agriculture industry, our tourism and hospitality industries and valuable employment that these industries bring to York. I therefore ask that this proposal be rejected.

*Worried about Trucks n Road
Plus water quality*

Yours sincerely
NAME
ADDRESS
DATE
SIGNATURE

H Giles

Yok. WA 6302
H Giles
7-5-2015

Due 25th May 2015

1147429

Shire of York
P O Box 22
York WA 6302
records@york.wa.gov.au

To The Commissioner James Best and the Shire of York,

RE: The SITA Allawuna Landfill Proposal Lots 9926, 4869, 5931 and 26934 Great Southern Highway, St. Ronan's, York.

I object to the proposed landfill at Allawuna by SITA Australia and believe that the proposal should not be permitted.

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The landfill will not benefit York in anyway, but has the potential to destroy our agriculture industry, our tourism and hospitality industries and valuable employment that these industries bring to York. I therefore ask that this proposal be rejected.

HEAVY TRUCK TRAFFIC ON ROAD
POLLUTION FROM TRUCKS

Yours sincerely

NAME NEVILLE GEORGE GILES
ADDRESS YORK W.A.
DATE 7-5-09
SIGNATURE *Ng Giles*

2205

I147429

17

Shire of York
P O Box 22
York WA 6302
records@york.wa.gov.au

To The Commissioner James Best and the Shire of York,

RE: The SITA Allawuna Landfill Proposal Lots 9926, 4869, 5931 and 26934 Great Southern Highway, St. Ronan's, York.

I object to the proposed landfill at Allawuna by SITA Australia and believe that the proposal should not be permitted.

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The landfill will not benefit York in anyway, but has the potential to destroy our agriculture industry, our tourism and hospitality industries and valuable employment that these industries bring to York. I therefore ask that this proposal be rejected.

THERE IS PLENTY OF FOREST AREA AROUND THE LAKE:
OR BECC QUARRY HAS A BIG HOLE IN THE GROUND

Yours sincerely

NAME LEON CONWAY

ADDRESS

DATE 17-4-15

SIGNATURE 

Shire of York
 P O Box 22
 York WA 6302
records@york.wa.gov.au

18

To The Commissioner James Best and the Shire of York,

RE: The SITA Allawuna Landfill Proposal Lots 9926, 4869, 5931 and 26934 Great Southern Highway, St. Ronan's, York.

I object to the proposed landfill at Allawuna by SITA Australia and believe that the proposal should not be permitted.

The proposal is against the principals of the Shire of York's Town Planning Scheme, which states under general agriculture zone "to ensure the continuation of broad acre agriculture as the principal land use in the district encouraging where appropriate the retention and expansion of agricultural activities." Landfill is not an agricultural activity and will only destroy valuable agricultural land.

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The landfill will not benefit York in anyway, but has the potential to destroy our agriculture industry, our tourism and hospitality industries and valuable employment that these industries bring to York. I therefore ask that this proposal be rejected.

Negatives:

1. Impacts Tourism
2. Road Traffic with Trucks
3. Pollution and Smell.

Yours sincerely

NAME Maurice Buck

ADDRESS

DATE 7/MAY/2015

SIGNATURE

Maurice Buck

Shire of York
 P O Box 22
 York WA 6302
records@york.wa.gov.au

19

To The Commissioner James Best and the Shire of York,

RE: The SITA Allawuna Landfill Proposal Lots 9926, 4869, 5931 and 26934 Great Southern Highway, St. Ronan's, York.

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The landfill will not benefit York in anyway, but has the potential to destroy our agriculture industry, our tourism and hospitality industries and valuable employment that these industries bring to York. I therefore ask that this proposal be rejected.

I am concerned about Great Southern Highway which is already extremely dangerous.

The farm is near the catchment and will put toxins into our water ways and drinking water.

Yours sincerely

NAME

ANTONIA BIRCH

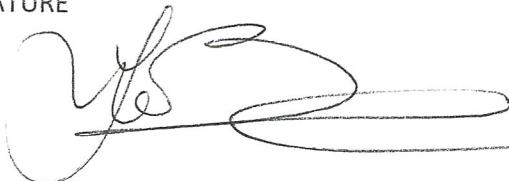
ADDRESS

YORK

DATE

7.5.15

SIGNATURE



I147429

Shire of York
P O Box 22
York WA 6302
records@york.wa.gov.au

20

To The Commissioner James Best and the Shire of York,

RE: The SITA Allawuna Landfill Proposal Lots 9926, 4869, 5931 and 26934 Great Southern Highway, St. Ronan's, York.

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TO MANY TRUCKS ON ROAD AS THE WILL BE
COMING UP FROM PERTH.

CONCERN THAT ~~IT~~ IT WILL CONTAMINATE THE WATER

Yours sincerely

NAME

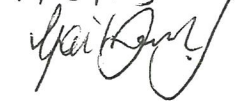
GAUL D'ARCY

ADDRESS

DATE

7/5/15

SIGNATURE



Shire of York
P O Box 22
York WA 6302
records@york.wa.gov.au

I147429

21

To The Commissioner James Best and the Shire of York,

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The landfill will not benefit York in anyway, but has the potential to destroy our agriculture industry, our tourism and hospitality industries and valuable employment that these industries bring to York. I therefore ask that this proposal be rejected.

Furthermore the SITA site is close to an important water catchment area.

The Great Southern Highway-York-Lakes is suffering from all the heavy transport. We now have numerous wheat trucks, this will increase when to have all the SITA trucks as well, the road is unable to cope with it. There have been ~~too~~ many accidents on the York Rd the last couple of years. This will increase with more large transport on the road.

Yours sincerely

NAME M. HERVEY

ADDRESS -

DATE

SIGNATURE 5/5/15



YORK

Due 25th May 2015

Records

From: C & M Chipper <
Sent: Thursday, 7 May 2015 8:05 AM
To: Records
Subject: Emailing: IMG
Attachments: IMG.pdf

SHIRE OF YORK	
FILE	INITIALS
PS-GEN-PP0.8.1	
KIRA	
7 MAY 2015	
1147396	
REFERRED TO COUNCIL	INITIALS

Hi,

Please find enclosed our objection to the LANDFILL RUBBISH TIP on Allawuna Farm York.
Can you please acknowledge this email.

regards

Chris Chipper

22

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Responded to w
confirmation of receipt
email 11/5/15



7 May 2015

York 6302 WA

To THE SHIRE OF YORK,

We are writing (again) to strongly object to the Proposed SITA Landfill Tip on Allawuna farm York WA.

Nothing substantial has changed in Sita's Proposal for a LAND FILL RUBBISH TIP in our beautiful Shire.

IT IS 2014 and SITA is trying to establish a LANDFILL PIT on prime Agricultural land, adjacent to a National Park and Water Catchment area.

And in Western Australia not some third world country.

Who is going to say that they are proud that this happened on their watch.

Ok its the cheapest option for SITA but really-.

Who is going to be responsible for:

- The noxious gases that will escape from the landfill rubbish tip into the atmosphere adding to Climate Change.
- The quality of the air we breath (people do live nearby)
- The wind that will blow contaminated dust into our drinking water (we have to catch our water on our roofs-no scheme water for us)
- The possible contamination of surrounding farm land by polluted dust and water. We are growing your food.
- The discharge of contaminates into the local water course. This tip site is on porous soil on a water course and right next to a major water catchment area.
- Damage to the pit liner and subsequent contaminate leakage. We live here and know how often there are Earth Tremors.
- The fact that the agricultural Zoning of Allawuna surely meant that this sort of activity could never happen.

We challenge you to swear that this TIP will be completely safe and there will be no pollution issues. Have you checked SITA's record.

Why dont we find an alternative way of dealing with our rubbish that sets an example to others and that we can be proud of!

Yours Sincerely

CHRIS CHAPPEL

Chris Chappell

Shire of York
P O Box 22
York WA 6302

I147429

23

To The Commissioner James Best and the Shire of York,

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The landfill will not benefit York in anyway, but has the potential to destroy our agriculture industry, our tourism and hospitality industries and valuable employment that these industries bring to York. I therefore ask that this proposal be rejected.

I also Object to Trucks that are going to be on the Highway. The road is not build for it.

Yours sincerely

NAME

ADDRESS

DATE

SIGNATURE

S. M. Davie

YORK also

01-5-2015

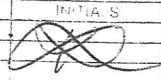
S. M. Davie

York
6302

Records

From: Danny Wallace
Sent: Thursday, 7 May 2015 9:08 PM
To: Records
Subject: SITA PROPOSAL

24

SHIRE OF YORK	
FILE	P5-GEN-100.3.1
OFFICER	KIAA
INITIALS	
- 8 MAY 2015	
1147432	
REFERRED TO COUNCIL	
DATE	INITIALS

To Whom it May Concern

I am writing this letter to express my concern over the proposal for a toxic waste dump at Allawuna. The environmental impact in regards to its location cannot be overlooked. I do not believe that any preventative measures undertaken by SITA could possibly stop the environmental impact of this site on both the soil which our food is grown in and the water which filters through to the Mundaring Catchment area.

My other concerns are the safe transportation of the waste along Great Southern Highway, which already needs upgrading. The wheat belt already has the highest road toll in the state. The site may decrease the number of tourists visiting our town, which would have a negative impact on our local tourism and hospitality industries.

I understand that waste has to go somewhere, however I urge you to consider the environmental impact, as well as the others I have mentioned in regards to this particular location.

Yours faithfully
Loretta Wallace

Records

From: C & M Chipper
Sent: Monday, 11 May 2015 10:21 AM
To: Records
Subject: Emailing: IMG attachment enclosed re objection to Allawuna Open Pit Rubbish Tip
Attachments: IMG.jpg

25

To the York Shire,
Please find enclosed my objection to the York (Perth) Open Pit Rubbish Tip on Allawuna Farm.
Please can you acknowledge this email or do I have to come into the office to check it has been received?
Thank you
regards
Melody Chipper

SHIRE OF YORK	
FILE	B. GEN No 3
OFFICER	KLP
INITIALS	[Signature]
11 MAY 2015	
1147481	
REFERRED TO COUNCIL	
DATE	INITIALS

Your message is ready to be sent with the following file or link attachments:
IMG

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

*Emailed 18/5
to acknowledge
email*
[Signature]

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- The quality of the air we breath (people do live nearby)
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- Damage to the pit liner and subsequent contaminate leakage. We live here and know how often there are Earth Tremors.
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We challenge you to swear that this TIP will be completely safe and there will be no pollution issues. Have you checked SITA's record.

Why dont we find an alternative way of dealing with our rubbish that sets an example to others and that we can be proud of!

Yours Sincerely

Melody Chipper

Mel Chipper

Records

From: sue preece <
Sent: Monday, 11 May 2015 1:52 PM
To: Records
Subject: Sita's Landfill application at Allawuna Farm
Attachments: Scan0018.jpg

26

Please find attachment being my submission re Landfill application at Allawuna farm York W.A.

SHIRE OF YORK	
FILE	PS-GEN-PP0. 3.1
OFFICER	INITIALS
K.R.A	[Signature]
11 MAY 2015	
1147484	
REFERRED TO COUNCIL	
DATE	INITIALS

York Council

Re Sita's revised application at Allawuna Farm York

I would like to give some reasons why I'm so against Sita's landfill proposal at Allawuna Farm in York.

1. The leachate seepage from a perforated liner due to York being a high risk earthquake zone would contaminate the water table.
2. When excess leachate occurs within the tip it's necessary to pump it in to storage ponds, when the excess leachate evaporates from these ponds due to our long, dry, hot summers the toxic residue will blow who knows how far & wide across the country side & contaminate drinking water from roof catchments.
3. Sita has spoken about recycling at the tip but there is no documentation to confirm this. If recycling doesn't happen it could prove to be very detrimental.
4. If a fire should occur within the landfill area it's a well known fact that it could burn & smoulder for weeks on end causing air pollution & affect the drinking water we enjoy today not to mention how many other things it would damage.
5. History has proven the landfill process will damage our environment.
6. It is a forgone conclusion that if this proposal goes ahead it will affect the health of the people, livestock, pets & bird life in a big way.

S Preece

Susan Preece

York 6320

9-5-2015

27

SHIRE OF YORK	
FILE	PS. GEN. PPO. 3-1
OFFICER	K. CA
INITIALS	[Signature]
11 MAY 2015	
1147478	
REFERRED TO COUNCIL	
DATE	INITIALS

1.

ALLAWUNA LANDFILL PROPOSAL

The amended proposal by SITA Australia Pty Limited to develop Allawuna Landfill, for Class 11 disposal of waste at Lots 9926, 26934, 4869 and 5931, Volume 285/78A Great Southern Highway, St Ronans, Shire of York,

In the State Administrative Tribunal 's summary of reasons for the decision on the 10th April 2015 to approve the amendment, Senior member Peter McNab states: "And of course the proposal use does not change," and also, "...the conclusion is that the essence of the proposal remains unchanged.

For these reasons I consider that nothing has substantially changed that would require me to amend my original submission against the proposal. I believe my original submission is still valid and to this end I am resubmitting my original submission as follows. I have signed and dated it to reflect my continuing objection to the proposal, amended or otherwise.

The proposal should be denied planning approval by the Shire of York. . It is our contention that it is inappropriate to allow a noxious industry of this type in an environmentally sensitive and fragile area. York is a Shire whose main pursuits are agriculture, tourism and recreation and this "development" is the antipathy of these pursuits.

Throughout this submission document, references will be made to

Victorian EPA's Best Practice Environmental Management (BEPM) – Siting, Design, Operation and Rehabilitation of Landfills (SDORL), September 2010 Version,

Best Practice Environmental Management, Department of Environment, WA, November 2005 (BPEM)

Wheatbelt Regional Plan 2010-13, 2012 Revision (WRP)

Shire of York Town Planning Scheme No 2 (TPS2)

Shire of York Local Planning Strategy (SoY LPS)

Environmental Protection Authority (EPA)

LANDFILL SITE

"The environment of the region [Wheatbelt] needs to be protected from incompatible land use to ensure the protection of extensive biodiversity assets." (p 31, WRP)

Proposed changes to land use should complement the natural and rural environment, not put it in jeopardy. Despite the mandatory buffer zones cited by SITA, the landfill will be very close to conservation reserves and sensitive receptors, such as the Swan-Avon and the Mundaring Catchments.

The *Wheatbelt Regional Plan 2010-13* (2012 Revision), an Australian Government Initiative, describes the Wheatbelt as a “valued natural amenity.” The report urges planning bodies to

- Lead the way in identifying opportunities to improve agricultural productivity consistent with changing environmental and climatic conditions
- Protect and manage the natural environment, particularly our water resources and biodiversity assets
- The protection of areas of high biodiversity in the region is essential and can be achieved through increased awareness and better land use planning and management (p 31)

The Shire of York states, “The local environment needs to be valued and sustained during growth to ensure the rural aspect and the farming economy are respected and maintained”. (p 5) “Our Shire will be a place of community, where lifestyle choices are important and where community matters”. (p 6) And one of the goals of the Shire is to “maintain and preserve the natural environment during growth, enhancing the ‘rural’ nature of York, and ensuring a sustainable environment for the future.” (p 6) SoY LPS). This proposal is not respecting and maintaining the rural nature of York and it has the potential to destroy the natural environment of adjoining conservation reserves. If a landfill is established on Allawuna farm, residents on adjoining properties will have been disadvantaged with regard to their health, their visible amenity through air and water pollution, odour and noise, and economically for the benefit of a few, and especially for the benefit of a multinational corporation.

“To ensure the continuation of broad-hectare agriculture as the principal land use in the district encouraging where appropriate the retention and expansion of agricultural pursuits.” (4.15.1 (a) TPS2). The site falls within a priority agricultural area worthy of protection based on strategic planning for the locality. This proposal is **not promoting the protection of sustainable agricultural production, farm diversification and the preservation and enhancement of the environment and natural resources.**

“To consider non-rural uses where they can be shown to be of benefit to the district and not detrimental to the natural resources or the environment (4.15.1 (b) TPS2). The landfill is to benefit the Perth Metropolitan area and the site has been chosen in response from a directive of the former Department of Environment and Conservation to locate all new landfill developments off the Swan coastal plain. It is obvious that York Shire will inherit the very same environmental problems that characterised the Swan coastal plain landfills. Any benefits to the district cited by SITA lack clear details. Figures that have been offered by SITA about employment are clearly over stated, including the sub-contractors driving rubbish trucks to the site. They will be located in Perth and not sourced from York.

MATTERS TO BE CONSIDERED BY LOCAL GOVERNMENT

We believe the Shire of York should refuse the planning application on the following grounds:

Part 4.15 GENERAL AGRICULTURAL ZONE:

4.15.1 a) b) c) d), 4.15.2, 4.15.4

In summary of this section, broad acre agriculture should be encouraged, non beneficial and detrimental non rural uses should not be considered, tourists, travellers and recreation should not be discouraged and the interface of Allawuna Landfill with adjoining land (Water Catchment, farming and residential) would bring adverse effects.

Part 5.7 Supply of potable water

Residents in this part of the Shire of York collect water for domestic use from their roofs. We are most concerned that our water will be polluted by micro emissions of a toxic nature. We are reminded of how easily children were contaminated with lead in Esperance through poor cartage and the unloading conditions of lead ore in Esperance Port.

Is it the intention of DER and the Shire of York to conduct baseline testing of our domestic water supplies, and subsequent retesting at regular intervals? Can the Shire of York demand such testing on the part of SITA? This is an issue of public health. How will the Shire of York guarantee our supply of potable water?

Although this section of the Scheme refers to the building code for a single dwelling, by implication, if an adjacent development will potentially contaminate the potable water collection of neighbours, it should be deemed unsuitable and the application refused.

Part 7.5 Matters to be considered by local Government

a) b) i) J) l) m) n) o) q) v) w) x) z) za) zb)

In summary, the Shire of York in considering this proposed noxious industry, should adhere to the aims and provisions of the Scheme, engage in orderly and proper planning, the compatibility of a landfill with its setting, the effect on the amenity of the area, the effect on the natural environment, its detrimental effects on adjoining properties, the amount of traffic to be generated, the landscaping of the land to which the application relates, the degradation and soil erosion to be caused, the loss of community benefit, and the impact of noise, dust and other pollutants on surrounding land uses.

Part 7.6 DETERMINATION OF APPLICATIONS

a) the council refuses to grant its approval.

Part 8.4 COMPENSATION

If the proposal is granted land and property in the area will be injuriously affected and residents on neighbouring properties will be able to seek compensation.

The proposal does not accord with the principles of orderly and proper planning. A consideration of amenity impacts can be demonstrated from the visual, odour, water pollution and traffic related concerns.

Discharge to Water and Land

“Valley fill landfills are to be avoided as they have inherent environmental problems such as unstable slopes, water infiltration and leachate seepage. Due to the open nature of these landfills and shallow placement of waste, they consume a greater amount of soil for cover and capping than an equivalent volume landfill in a disused quarry.” (BPEM) This proposed site is located on the side of the valley, approximately 100metres to the east of Thirteen Mile Brook. The landfill will sit astride one of the tributaries, and deviate the water from two others into dams. It is to be constructed with its western boundary, between four and six metres above the seasonally dry creek bed.

The landfill will be sited on the side of the valley below significant remnant bush on both Allawuna and on the adjacent property, owned by Ian and Jenni McColl. We know that the landfill site will have to pump out water to establish the cells and several of the tributaries will be cut off and realigned. One of those tributaries on Oringa Park, has a channel over 2 metres deep. Where, it enters Allawuna it disappears underground. Residents have witnessed huge volumes of water surging down that gully. SITA asserts that there will not be any dewatering. A large proportion of the landfill will be in the landfill and not the obligatory 3 metres above it as stated by SITA. How does the liner work if it is floating? A large portion of the landfill footprint will be in the water table, despite SITA’s assertions that it will be 3 metres above the water table. There is huge disquiet about the whole water issues on the site. The attachment with the bore logs reveals that Bore No 6 located at 283AHD has water at the head all through the year, including during dry summers. In typical weather conditions the landfill will have to manage large amounts of water and in atypical conditions it is inevitable that overflows will occur. These will carry toxic materials into Thirteen Mile Creek, and onto surrounding land.

The TPS2 (8.5 (i) addresses “the compatibility of a use or development with its setting”. Landfill sites are normally chosen where movements of all water is well known. Research completed for the Avon Valley Residents Association Inc and will be very close to paleo channel that feeds into the Mundaring- Helena Catchment. There are very serious inaccuracies in the hydrological calculations, including the rate of leachate permeation, not the 178 years outlined by SITA, but in fact 13 years, before it reaches the water table. (Refer to the submission from the Avon Valley Residents Assoc. Inc and to reports from *Landform Research* and *Rockwater*.)

Residents contend that the water feeding the remnant bush will be significantly altered. Studies of the wandoo have revealed their vulnerability to a lowered watertable and will place this bush in jeopardy. (Wills A. et al, *Crown Decline in Wandoo* 2001, DEC) The remnant bush in the buffer zones is also likely to be affected, thus affecting the visual amenity of the residents and vehicles on Great Southern Highway, Wambyn Road and Catchment Road.

SITA estimates that the landfill will be 30 metres higher than the surrounding natural landscape. Examination of topographical maps shows that the final height will be above 355 AHD metres, (Figure 4: Surface Water Catchments, *Allawuna Farm Landfill, Executive Summary*.) In the amended application adjusted to 350 AHD metres. Clearly, the landfill will be visible from adjoining properties and Catchment Road, Great Southern Highway and Wambyn Road. If the vegetation in the buffer zones alongside Great Southern Highway should become compromised (some has recently been cleared) our property including our residence, would also be able to view the site.

5.

We believe the location of the site to be completely unsuitable, but in event that this travesty should go ahead, very high bunds that are well vegetated should be demanded to counteract this visible pollution.

EARTHQUAKE

SITA has significantly downplayed the relevance of the earthquake warnings and over played their hand in the management of this situation.

If an earthquake of similar magnitude as Meckering, took place in York, any landfill site that relies on a high density polyethylene liner to separate the leachate from the water table, is bound to fail.

Information, mainly from the US indicates that this type of liner has failed, on a large number of occasions, under earthquake conditions. No information appears in any report from SITA on pseudo-static or pseudo-dynamic stress test on the liner material. If it did, it would in all likelihood indicate that the landfill structure would fail. Sukhmander Singh, delivered a paper, *Dynamic strength and stability of refuse landfills during earthquakes*, at the Earthquake Engineering Tenth World Conference in 1992 in Rotterdam. Some of his main points follow:

- In an earthquake there is failure of foundation soil and collapse of supported structures,
- The seismic response of medium plasticity clays...amplify the incoming seismic motion and their bearing capacity can be moderately decreased by continuous cyclic loading,
- Seismic loads are never simple
- The application of soil mechanics principles to refuse material strength and stability evaluation should be viewed with caution because of the incomparability of strains that produce a shear failure in soils and those that would produce shear failure in refuse.

The low permeability clay on the Allawuna site is medium plasticity.

Liquefaction, which can follow an earthquake, is also an issue not dealt with, and another potential cause of pit failure. (Geosynthetic Society of US;

http://www.geosyntheticssociety.org/resources/archive/gi/src/V5I1_2/GI-V5-N1&2_Paper9.pdf)

In summary, the following important points should be considered:

Seismicity:

- The Avon-arc lies within the South West Seismic Zone (SWSZ), one of three active seismic zones in Australia (the others being Tennant Creek and SE Australia).
- The SWSZ is the largest of the active zones and is known internationally as the most unpredictable.
- The centre of the SWSZ is now York (Geoscience, 2013) (previously Meckering, then the Burakin locality), it has consistently incorporated Toodyay and York.
- Since 1968 there have been constant movements with 9 shakes greater than Magnitude 5.

6.

- The Meckering earthquake (Magnitude 6.8) resulted in earth movements that altered the underlying hydrology as far west as Wundowie (55km) and Bindoon Agricultural College (80km).
- Local history from York landowners testify to changes in hydrology- springs disappeared, bores became dry, and water sources appeared in different places.
- This was evident by the emergence of fresh water springs at Wundowie Wetlands & Bindoon College, and altered hydrology in many farm bores.
- Earth movement opens and closes fissures in the underlying geology, as do piezometers, bores and tree roots to create connections between soil, clay and rock layers through which water will travel.
- Paleoliquefaction studies indicated numerous 'sand blows' (liquefaction) occurred following the Meckering earthquake.

LEACHATE

In the documentation from SITA, the leachate ponds are to be established to the north of the landfill and between it and Thirteen Mile Brook. This is the third proposed location of the ponds. Initially, they were to be located to the west of the landfill and close to Thirteen Mile Brook; secondly uphill and to the east of the landfill as described by the CEO on the consultative visits and now to the west of the landfill – how does one read these ad hoc changes? With scepticism and at least with a sense that the leachate is proving to be an issue. “As leachate contains high levels of nutrients and salts it requires treatment before it can be discharged to the environment.” (p27 EPA Vic) One of the management options for leachate is evaporation. SITA has indicated that this is the option to be used and considering the 2 metre evaporation rate per year in the York area, this seems reasonable.

However, the dried leachate material will be mechanically transported back to the landfill. This is material of high toxicity. The potential for contamination of adjoining property is high. The EPA Vic, also states, “Where leachate is to be evaporated, it should be within a closed system where no leachate is able to escape to the environment.” (p27) The accumulation and disposal of leachate is hugely problematic. Sita has indicated that the ponds will be open structures.

In June 2010, 100,000 litres of leachate from a **SITA** landfill site, spilled overnight into the South Cardup Creek and into a nature reserve. This is part of the Serpentine Catchment. After the accident **SITA ENVIRONMENTAL SOLUTIONS** was ordered to clean up the spill site and to test the soil daily. They were also to install a carbon filter. Since then tanks and tankers were introduced to remove leachate from the landfill site. The escaping leachate was described by residents as a black sludge, containing heavy metals, toxins and weedicide. But all this remediation occurred after the accident, as has been the case in all incidents cited from other states in Australia. All the leachate had already escaped.

On January 6th, 2013 the local area of the proposed Allawuna landfill had a rainfall event of around 40mm of rain in 30 minutes. Water accumulated in gullies and water courses to a depth of between 500mm and 1500mm. In fact, in one of the tributaries of Thirteen Mile Brook that flows from McColls's property the water was over two metres deep. Huge volumes of water swept down all the water courses, causing flooding, washaways and inundation of low lying areas of paddocks. The proposed landfill footprint is 500,000 sq metres, (p 30, SITA referral document).

7.

A 40mm rain event would produce 20.000 cubic metres of water, within that 30 minute period. If only a quarter of this quantity should reach the bottom of the landfill site (5000 cubic metres), this would result in the failure of any infrastructure and a consequent spillage. There are no figures in any reports indicating how this quantity of water would be managed or how high the bund at the bottom of the landfill is going to be. No pumps would be able to cope with these quantities, delivered in such a short time. If the liners, ponds or bunds should fail, the chances of recovering any of the spillage are slim. The hilly, gravely country, in which the landfill is planned, is recharge country. It is only in extreme rainfall events that have happened more and more each summer in the last decade, that substantial run off occurs.

Also, in recent years, a localised thunderstorm caused flooding. Two dams on properties adjacent to Allawuna were breached, fallen trees, rocks and sands and flooding of the Great Southern Highway occurred. Such an event would compromise the leachate ponds and flood the landfill.

It is predicted that such severe weather events will occur more frequently as Climate Change progresses. A landfill, despite the claims of advanced technology to be used, in such extreme weather events will undoubtedly cause significant environmental problems.

In the SITA proposal, acknowledgement is made that the liners will leak, 8.83 litres per hectare per day. Given the size of the landfill a significant volume will leak through the liner. SITA will rely on the low permeability clay to contain this leakage. In the SITA report (p 51) it is calculated that it will take 178 years for the leachate to travel 640 metres if the membrane should rupture. Passmore's calculations are that the leachate will take only 13 years to travel that distance. (p 2 Passmore R, *Comments on EPA Statement of Reason*, July 2013)

"I consider that the lack of adequate field-testing – to establish groundwater levels and substrata permeability is valid grounds for the EPA's decision to be appealed. This is reinforced by the calculation herein that the velocity of flow of groundwater beneath and beyond the landfill site is likely to be about fourteen times greater than that calculated by the proponent, raising the possibility of contamination of aquifer beneath Thirteen Mile Brook." (p 2)

Further, HDPE landfill liners are a relatively new concept (SITA points out that the liners can leak through inherent flaws, accidents and earth movements). The life of the liner is calculated on modelling, ie theory not practice. SITA hypothesises that the liner will last over a 100years. As these liners have only been in use for a short time, no one has the practical knowledge of how the liner will react to earthquake, the corrosive interaction with the waste, with saline and acidic soils. Further, an examination of the bore log, shows that the leachate ponds will also be in the water table.

It needs to be emphasised that the whole area has a complicated water system, which has not been properly addressed in the SITA proposal.

AIR EMISSIONS

Our research ascertains that the main sources of emission from this landfill are as follows:

- the waste materials as they are brought onto site,
- from the transport and any heavy plant used on site,
- waste blown by the wind as it is tipped or deposited at the landfill site,
- dust generated from the surface of the landfill when waste is tipped or unloaded,
- the waste materials previously deposited in the landfill,
- gas generated as the waste breaks down,
- and plant used to burn landfill gas, including gas flares or engines,
- leachate produced as waste breaks down,
- the discharges from any waste used to treat the leachate.

How will SITA control these emissions and contain them on site, in both **typical** and **atypical** conditions.

In recent years, York was subjected to a violent tornado type storm, accompanied by massive dust movement, which resulted in windows coated in mud. Severe damage was caused to buildings, fallen trees on roads (in fact the Great Southern Highway was cut off for many hours) and infrastructure, in general. If such an event, or similar were to occur again a large area of the Shire would be covered with toxic dust from the landfill.

During the spring and summer months the site will be exposed to many days of strong winds. For example, in February 2014, 7 days recorded winds of 20 or more kph, in January 2014 10 days recorded winds of 20 or more kph, in December 2013 7 days recorded winds of 20 or kph. This is typical of the wind patterns for the area. (Australian Bureau of Meterology, data from York weather station).

ODOUR EMISSIONS

Odour emissions from landfill are well documented. **Will this site have a robust on –site plan to manage and reduce odours and any emissions, especially considering the potential for gust, windy conditions.**

In 2000, SITA Organics established a bio-solids composting facility at the Kwinana Waste Water Treatment Plant in McLaughlin Road, Postans, in the Kwinana Shire. At that time the maximum waste was 50,000 tonnes per annum. The plant operated without complaint until 2003. In that year DEC issued an approval for the plant to increase the waste to 100,000 tonnes per annum. From this point odour complaints increased and the public expressed concern that the operation was a public nuisance and affected their amenity. The odour was particularly offensive in hot humid environmental conditions. It was resolved by DEC, Kwinana Council, SITA and Biowise, Water Corporation to carry out reviews and specialist odour modelling, with the support of the Department of Health Toxicology Department.

9.

Allawuna will rarely have the humid conditions, **but will** have the hot, windy conditions. The important issue associated with this site was that complaints came from outside the recommended 500m buffer zone (the same buffer zone that is proposed for the Allawuna site) including Medina, Orelia and Parmelia and the Kwinana townsite. Although the setbacks recommended by DEC were considered adequate, public concern escalated in line with the significant increase in the volumes of highly odorous wastes, such as grease trap waste, food wastes and bio-solids. Some minor improvements were made by SITA, but complaints continued. DEC imposed limits and targets. SITA chose to close the site. (*Agenda, Ordinary Council Meeting, City of Kwinana, February 2013.*)

The Kwinana experience shows that the 500metre buffer zone was inadequate, odour from decaying materials in a landfill is so offensive and health hazardous, that the regulatory process is unsatisfactory and that environmental health and social amenity issues are of secondary consideration in such ventures.

Similar complaints are currently being received for a composting plant at Oakford. With all due respect to DER (previously DEC) it appears that the company has violated the licensing codes and that the Government regulatory body has not monitored this site properly. Is the Shire of York prepared for the costly and time consuming role of close monitoring of the site, upon which the neighbours will demand.

Although the above examples were composting plants, landfill sites are notorious for violations associated with foul odour or stench.

In 2010, SITA Australia Pty Ltd was required to front the Sunshine Magistrates' Court in Victoria, on three charges relating to the environment. EPA Victoria brought three pollution charges against the company, relating to odours allegedly discharged from the company's Brooklyn composting facility in September 2010.

Similarly, odour from Hallam Road in Hampton Park, Victoria, has been a longstanding issue for the EPA and the community. The landfill's operator, SITA Australia Pty Ltd, informed EPA that 'cell 8' - the major source of odour - will be closed by June 2012. The cell is expected to be completely 'capped' by the end of September and should lead to an immediate reduction in odour. EPA has now finalised a brief of evidence against SITA paving the way for serious enforcement action.

Another important concern is the emission of methane from landfill.

In 2009 residents in Cranbourne (a suburb near a landfill site, which operated between 1996 and 2005), were advised to relocate their homes. The warnings were in response to the detection of methane gas found in concentrations deemed to be dangerous. In September 2008, residents in the area were forced to evacuate their homes, because of danger of explosions.

In South Australia, the EPA tabled a report in Parliament, which listed 20 landfill sites, identified as potentially posing a high risk to human health because of methane gas emissions. These sites were both closed and operational sites. In a region of high bushfire hazard, such as west York, the potential for methane gas fire is high.

10.

Ground Water

“Pollution of groundwater by leachate is very difficult to remediate, and accordingly, landfills should be sited in areas where impacts on beneficial uses of groundwater are minimised. In particular, landfills **should not** be located:

- in areas of potable groundwater, groundwater recharge areas or in areas identified by the
- DoE as a Groundwater Supply Area; or
- below the regional watertable.”

(Best Practice Environmental Management, Department of Environment, WA, November, 2005)

It appears there has not been any detailed study undertaken on the underground water systems in the area. The referral document for the Allawuna landfill (Bowman & Associates, 2013) states that the base of the landfill has been designed to maintain a minimum separation of 3 metres from the depth of the “confined groundwater”. Precise data for the pit base to groundwater separation has not been presented, and that which has appears to be flawed. Again examination of the bore logs show that much of the proposed landfill will lie in the water table. “ Geologically, this location is quite different to other landfill sites and brings with it some potential complications that need investigation...most landfills are located on materials of defined and known characteristics with good knowledge of the geology, ground water patterns and movements.” (Stephens, Lindsay, 2013, Comments on the General Geology of Proposed Landfill Site –Allawuna, York, p1). Stephens continues his report with comments about the lack of local geology or regolith, lack of correlation between the bore holes, lack of knowledge of aquifers, lack of knowledge of granite highs, the possibility of an infilled palaeochannel to the west of Thirteen Mile Brook. He has now the paleochannel and proven that water flows directly to the Helena CatchmentIt is not fully known where the paleochannels run (no mention in any report) and where the aquifers lay, the size of them and how they interact. There is no knowledge of how the surface water and the groundwater interact. The whole notion of interconnectedness of the water systems has been ignored.

A recently published study by the CSIRO titled “South-West Western Australia Sustainable Yields”, coordinated by Dr Don McFarlane, came to the conclusion that a far greater interaction takes place between groundwater and surface water, than previously understood. (Radio interview on ABC, Don McFarlane and Geoff Hutchinson). This has significant implications for the hydrology of the proposed landfill site. Any spillage of leachate could well leak into the ground water and consequently into the Mundaring catchment. (CSIRO study titled: South-West Western Australia Sustainable Yields <http://www.csiro.au/en/Organisation-Structure/Flagships/Water-for-a-Healthy-Country-Flagship/Sustainable-Yields-Projects/SWSY.aspx>)

Even if all this knowledge were at hand, an earthquake would in all likelihood re-arrange these aquifers and the relationship between each other. In time, the pollution of the Mundaring catchment is a real possibility.

INTERGENERATIONAL LEGACY

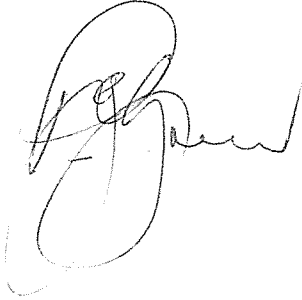
The Western Australian Government recommended that, "... landfills should not leave an environmental legacy for future generations to address."

Eight years later, York is being asked to accept waste from the Metropolitan area, much of which is a type that should not be disposed to a landfill in 2013, when so much good science is available as to why landfill are an anachronistic way to dispose of waste. It is a landfill that will operate for 37 years, followed by a maintenance program of 40 years. The Department of Environment states,

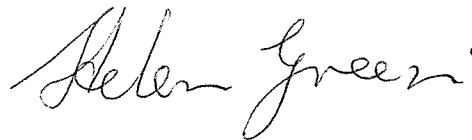
"Landfills have served a key role in the management of solid wastes and are likely to continue to be an important component of the waste management system for at least the next 10 years. The implementation of the waste management hierarchy of waste avoidance, waste reduction, waste reuse, waste recycling and finally waste disposal has resulted in significant diversion of waste from landfill. This will continue, however, landfills will continue to underpin our waste management strategies until waste disposal is replaced by these measures. In the interest of intergenerational equity, today's landfills should not leave an environmental legacy for future generations to address. Furthermore, for as long as landfilling remains part of our waste management strategy, best practice measures must be adopted to ensure that landfills are managed acceptably. (BPEM, 2005.)

This report was written in 2005 and now in 2013 we are considering the retrograde proposal to establish a landfill in prime agricultural land near sensitive environmental receptors of recognised valued amenity. The proposal to establish this landfill ignores the notion of "intergenerational equity". In fact, it condemns the Shire of York to 37 years of rubbish dumping, and a further 40 years of maintenance of the site.


Peter Green

A handwritten signature in black ink, appearing to read 'Peter Green', written in a cursive style.

Helen Green

A handwritten signature in black ink, appearing to read 'Helen Green', written in a cursive style.

28

SHIRE OF YORK	
FILE	P5. Gen/PO-3-1
OFFICER	K. RA.
INITIALS	
11 MAY 2015	
1147479	
REFERRED TO COUNCIL	
DATE	INITIALS

1.

ALLAWUNA LANDFILL PROPOSAL

The amended proposal by SITA Australia Pty Limited to develop Allawuna Landfill, for Class 11 disposal of waste at Lots 9926, 26934, 4869 and 5931, Volume 285/78A Great Southern Highway, St Ronans, Shire of York,

In the State Administrative Tribunal 's summary of reasons for the decision on the 10th April 2015 to approve the amendment, Senior member Peter McNab states: "And of course the proposal use does not change," and also, "...the conclusion is that the essence of the proposal remains unchanged.

For these reasons I consider that nothing has substantially changed that would require me to amend my original submission against the proposal. I believe my original submission is still valid and to this end I am resubmitting my original submission as follows. I have signed and dated it to reflect my continuing objection to the proposal, amended or otherwise.

I believe it is inappropriate to allow a noxious industry of this type in an environmentally sensitive and fragile area. York is a Shire whose main pursuits are agriculture, tourism and recreation and this "development" is the direct opposite of these pursuits.

General Agriculture Zone:

I don't believe the proposal is consistent with the objectives of General Agriculture and in particular on land that has been used successfully for cropping and grazing. The Shire of York Town Planning Scheme N0 2 clearly encourages the retention and expansion of agricultural pursuits. This is a noxious industry which shows no benefit to the district and is detrimental to the natural and rural environment.

Regard to residential use of adjoining land:

In moving to my small farm, I sought that peaceful rural amenity, close to bushland and forest. This proposal has the potential to seriously affect my amenity. My rural space will disappear with the odour, noise, pollution, views of rubbish and large trucks entering and leaving the property. I have recently been advised that my property would be very difficult to sell and has depreciated in value. I feel very disadvantaged, while a multinational company and one farming couple gain at my expense and also that of my neighbours.

The proposal indicates that the capped landfill will be 350 metre AHD. Clearly, it will be visible from Wambyn Road and the Great Southern Highway. The visual pollution is detrimental to neighbouring residents, the reputation of a heritage town and Shire, and to tourism.

Community Strategic Plan:

The Community Strategic Plan aims to preserve the environment for future generations and to sustain the natural environment. It is obvious that SITA will attempt to use much more of the farm than that stated in the proposal. Why buy a farm of this size to merely use 52 hectares? A massive landfill that caters for Metropolitan waste will seriously affect future generations and falls far short of these objectives of the Plan.

Tourism is an important part of this town. This business will not encourage tourism and the development and diversification of businesses that will strengthen and broaden the economic base of the community. SITA has promised economic advantages to the Shire of York. The details from the company are missing – landfills require few workers and the truck drivers will be located in Perth. With the location chosen most of the needs of the landfill will be sourced from the Metropolitan area. This development will not benefit the Shire of York, economically or aesthetically.

Health problems from air and water pollution:

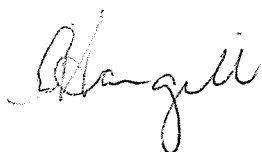
As a retired health professional, I am also very concerned about the emissions of toxic gases, micro particles and fires in a landfill. Landfills cause health problems. Despite the specified buffer zones, the windy, gusty conditions in this area will carry toxins and dust to surrounding properties. I also have serious concerns about water pollution. How can landfills be forced to move from the Swan coastal plain, because they leak and cause environmental problems, and then be situated in the water table, feeding into the Avon-Swan Catchment? I am now informed that research reveals that there is a direct link to the Helena River and the Mundaring Catchment. By SITA's own admission, the liners leak. (How convenient that the SITA modelling was 8.83 litres per day per hectare, when the mandatory allowance is 10 litres per day per hectare!) Given the proximity to water table, underground water and catchments any leakage is too much. It appears that it is permissible to contaminate rural water supplies, but not the city supplies.

Potable water:

I collect my domestic water from roofs of house and sheds. Stock on my farm are watered from dams. All of these sources have the potential to be polluted from this landfill. I need assurances that there will be regular testing of my water supply and recompense if pollution should occur.

There are also legitimate concerns about the road. SITA and the Main Roads Department can provide all sorts of statistics. When the increased truck movements are included with all other vehicles, the percentage increase appears small. But if the truck increase only is considered, the percentage is much more alarming. This road is too narrow, the shoulders are poor condition and there are too few passing lanes. It is dangerous now, let alone with the increase in high-sided semi trailers.

Adrienne Scargill



COPY

29

Submission

Re: Amended Landfill Proposal by SITA on Allawuna Farm –
Lots 9926, 4869, 5931 and 26934 Great Southern Highway, St.
Ronan's, York.

SHIRE OF YORK	
FILE	PS. GEN. PRO. 3.1
OFFICER	INITIALS
K. RA	[Signature]
12 MAY 2015	
1147515	
REFERRED TO COUNCIL	
DATE	INITIALS

My SUBMISSION IS WITHOUT PREJUDICE

from K Edis

York WA 6302

May 11 th 2015

I **do not** want the Landfill because of the following reasons.....

The proposed tip location is in a ,
HIGH RISK EARTHQUAKE ZONE

If the liner cracks during an earthquake, it would not be able to contain pollutants anymore and so toxic pollution will be able to leak out through those cracks into the ground soil and water SEE section 1 below for a relevant article from news.com.au on this subject.

Water

The proposed tip is close to '13 mile brook' this brook runs into the **AVON CATCHMENT AND SWAN RIVER**

There is even a sign near the property entrance and river stating this. SEE section 2 below for photo of this sign.

Any loose rubbish and pollution that is : either accidentally spilled near the tip.
: and/or that have blown out of the tip.
: and/or that has been possibly washed out of the tip during one of the flash floods the area is subject to.

Could be washed into the **AVON CATCHMENT** and down stream to the **Swan River** in **Perth...**

Smell

There is evidence SITA already run smelly tips in Australia SEE section 3 Below for links to the EPA Victoria website regarding odours.

This would *not* be nice for residents in the immediate area, Nor any people down wind from the tip.

COPY

Also users of the Great Southern Highway unfortunate enough to suck the smell into their cars while passing the Rubbish Tip property may not wish to return to York again.

Fire

What If the Tip CATCHES ON FIRE ?

Landfill is highly flammable and could cause seriously extended closure to Great Southern Highway impacting businesses, residents and emergency services such as **ambulances**.

Tourism and Employment.

York may see a noticeable decrease in tourists to York , discouraged from visiting after being stuck behind road-train rubbish trucks, or offensive smells from driving past the tip .

A decrease in tourism should cause a decrease to the use of Yorks hospitality and tourism businesses, which in turn would lead to layoffs and downsizing of those businesses.

Less tourists spending money in York should lead to a smaller York economy with less employment opportunities for locals.

Land value and Economy

If the tip goes ahead....

All the residents who are 'waiting to see what happens with the tip' to decide whether or not they should sell,

combined with all the residents who have *already* put their property on the market to 'beat the rush' of leavers,

will cause a 'flood' to the real estate market with houses and properties, which I would imagine lead to price reductions in a desperate effort to offload these unwanted properties.

Abandoned and vacated houses for sale in disrepair with neglected yards will leave them ripe for vandalism.

With less residents and lower land values, could the rates be reduced?

Leading to less revenue for the shire of York?

History.

With the proposed Tip , York seems headed to become a lower class satellite tip town of aged pensioners preferably with no sense of smell , whom , once dead and gone won't be replaced by new residents.

Who would want to live in York? A ghost town with a functioning tip, maybe only a petrol station and downsized IGA, all thats left after suffering an

COPY

economic seisure?

What a sad death rattle for Western Australia's Historic First Inland Town.
A beautiful jewel of the state, discarded (what an apt word) in preference for a rubbish tip.

York has the potential to really shine again, but we need to be given the chance.

York could be a bigger destination for tourists. We could be prosperous again like we used to be.

More tourists bringing their dollars to spend in our local economy, but we need to start off with NO TIP.

Here are all the information sections that I have collected for you to look at.

SECTION 1 - SOIL QUALITY -

<http://www.news.com.au/national/australias-earthquake-hot-spots-revealed/story-fndo4eg9-1226519537825>

Moe, York, Kirwan, Tenant Creek Australia's hotspots for earthquakes

1 YEAR AGO NOVEMBER 19, 2012 2:45PM



Moe in Victoria is at high risk of earthquakes. *Source: Herald Sun*

MOE in Victoria, York and Kirwan in Western Australia and Tenant Creek in

COPY

the Northern Territory are the regions in Australia with the highest potential for earthquakes, according to a new Earthquake Hazard Map of Australia launched today.

Seismologists from Geoscience Australia developed the map by analysing the location of past earthquakes nationwide.

Since 1950 Australia has experienced 168 earthquakes above magnitude 5.0 and last year alone, 82 earthquakes were recorded at a magnitude 3.0 or above.

The Minister for Resources and Energy, Martin Ferguson, said the map estimates the likelihood of a particular area experiencing strong ground shaking from earthquakes and it is this, rather than the magnitude of an earthquake, that endangers people, buildings and infrastructure.

The new risk map is expected to impact Australian building standards.

"Although these maps do not enable us to predict earthquakes, they will allow engineers and planners to design and locate buildings and infrastructure so as to better protect our communities," Minister Ferguson said in launching the map.

He also expects the modelling and data, which have been made available to the public, will be used by emergency managers, researchers and the insurance industry.

View the [Earthquake Hazard Map of Australia](#)

SECTION 2 - WATER QUALITY

Inside the circled area note the small sign. This is the property entrance sign 'R & A CHESTER Allawuna'

Note also the blue and brown sign on the left of the photo, it reads '13 Mile Brook Swan- Avon catchment'. 13 Mile Brook is part of the the Swan Avon Catchment - This '13 Mile Brook' passes through 'Allawuna'.



COPY

SECTION 3 - AIR POLLUTION

The following articles are samples from the EPA Victoria website (page links below).

<http://www.epa.vic.gov.au/about-us/news-centre/media-releases/media/%202009/june/25/sita-to-face-court-on-pollution-charges>

SITA TO FACE COURT ON POLLUTION CHARGES

SITA Australia Pty Ltd will be required to front the Sunshine Magistrates' Court on three charges relating to the environment. EPA Victoria has brought three pollution charges against the company, relating to **odours** allegedly discharged from the company's Brooklyn composting facility in September last year. EPA chairman Mick Bourke said the charges followed extensive investigation into odour in the Brooklyn area. "These charges reflect the serious nature of the alleged offences. EPA initiates enforcement options where necessary to bring about improved environmental performance."

The matter is set down for mention on August 11.

<http://www.epa.vic.gov.au/about-us/news-centre/media-releases/media/2010/july/07/sita-penalised-for-smelly-site>

SITA PENALISED FOR SMELLY SITE

A Brooklyn company responsible for composting green waste was convicted in the Sunshine Magistrates' Court yesterday (July 6) when it appeared on a charge of breaching its licence. SITA Australia Pty Ltd pleaded guilty to the charge and was fined \$35,000. The court heard that in May last year residents living in Yarraville and Brooklyn lodged several reports about **offensive odour** at their homes over a three day period. The residents described the smell as nauseating, overpowering and smelling like rotten vegetables, rotting compost or faecal matter...

<http://www.epa.vic.gov.au/about-us/news-centre/media-releases/media/2010/february/01/guilty-verdict-for-sita-s-brooklyn-site>

GUILTY VERDICT FOR SITA'S BROOKLYN SITE

A Brooklyn composting facility was late last week (January 29th) found guilty and ordered to pay \$40,000 to a local council's environment and sustainability program for an odour incident in September 2008. SITA Australia Pty Ltd pleaded guilty in the Sunshine Magistrates' Court to breaching its EPA licence by allowing **odours offensive** to humans to be discharged beyond the boundary of its Brooklyn premises. The Court heard that local residents had complained on the day of the incident of an unbearable and sickening smell coming from the site...

<http://www.epa.vic.gov.au/our-work/%20publications/publication/2012/september/1503>

Hallam Road Landfill - Final Enforceable Undertaking – Community Information
EPA has negotiated an Enforceable Undertaking with SITA Australia following **odour offences** at its Hallam Road landfill site. Through the EU, SITA is obliged to invest heavily in best practice management for future cells and community engagement projects.

COPY

<http://www.epa.vic.gov.au/about-us/news-centre/news-and-updates/news/2012/april/11/hallam-road-landfill-update>

Hallam Road landfill update

Odour from Hallam Road has been a longstanding issue for EPA and the community. The landfill's operator, SITA Australia Pty Ltd, has informed EPA that 'cell 8' - the major source of odour - will be closed by June. The cell is expected to be completely 'capped' by the end of September and should lead to an immediate reduction in odour. EPA has now finalised a brief of evidence against SITA paving the way for serious enforcement action...

<http://www.epa.vic.gov.au/about-us/news-centre/media-releases/media/2012/september/24/large-scale-works-required-in-enforceable-undertaking>

Large scale works required in enforceable undertaking

EPA Victoria has negotiated an enforceable undertaking with SITA Australia following **odour offences** at its Hallam Rd landfill site. EPA CEO John Merritt said the EU is an appropriate response by SITA Australia for the hardship experienced by the community as a result of odour from the site. "We have listened to the community and think it appropriate that measures suggested by them at the restorative justice conference have been added to the undertaking," Mr Merritt said. The EU is legally binding and many of the measures will become part of SITA's licence...

<http://www.epa.vic.gov.au/about-us/news-centre/media-releases/media/2010/october/21/hallam-road-landfill-fined-for-july-odour-incident>

HALLAM ROAD LANDFILL FINED FOR JULY ODOUR INCIDENT

SITA Australia Pty Ltd has been fined almost \$6,000 by EPA Victoria following an **odour** incident in July this year. EPA received 15 odour complaints from residents living around the Hallam Road landfill in Hampton Park. EPA's southern metro manager Cameron Brown said EPA officers investigating reports were able to confirm the presence of landfill gas odour in parts of the Lynbrook residential estate. "SITA was fined for failing to adhere to a licence condition stipulating that offensive odours must not be discharged beyond the boundary premises," he said...

I do **not want** the proposed Tip in the shire of York.
Thankyou ,



K Edis

York WA 6302.
May 11 th 2015

MY SUBMISSION IS WITHOUT PREJUDICE.

This is the end of our submission.

COPY
30

Submission

**Re: Amended Landfill Proposal by SITA on Allawuna Farm –
Lots 9926, 4869, 5931 and 26934 Great Southern Highway, St.
Ronan's, York.**

My SUBMISSION IS WITHOUT PREJUDICE

From: J Edis

York WA 6302.
May 11th 2015

SHIRE OF YORK	
FILE	P.S. Gen. P.P.O. 3.1
OFFICER	INITIALS
R. RA	[Signature]
12 MAY 2015	
1147574	
REFERRED TO COUNCIL	
DATE	INITIALS

I **do not** want the Landfill because of the following reasons.....

HIGH RISK EARTHQUAKE ZONE

The proposed tip location is in a high risk earthquake zone.

The structural integrity of any building following an earthquake can never be fully guaranteed. Therefore the structural integrity of the tip's liner may also be compromised after an earthquake. If the liner cracks then it would no longer be able to be guaranteed to restrain toxic pollutants, thus possibly leaking them into the soil and potentially the ground water.

WATER

The proposed tip is close to '**13 mile brook**' this brook runs into the **AVON CATCHMENT AND SWAN RIVER.**

Any loose rubbish and pollution that is: either accidentally spilled near the tip...
: and/or that have blown out of the tip...
: and/or that has been possibly washed out of
the tip during a possible flash flood...

... Could be washed into the **AVON CATCHMENT** and down stream to the **Swan River in Perth.**

WIND AND STORMS

Willy-willies, dust storms or high wind storms of any kind can occur (especially due to climate change) and thus any rubbish that is uncovered or in transit may be swept up and carried to neighbouring properties, contaminating land in the surrounding areas.

SMELL

It seems highly possible that the proposed tip could exude rubbish related smells. This would *not* be nice for residents in the immediate area, Nor any people down wind from the tip. Also users of the Great Southern Highway unfortunate enough to smell the odours while passing the Rubbish Tip property may not wish to return to York again.

FIRE

Bush fires are a known danger in Australia. What if the tip were to be caught in a Bush Fire? Landfill is highly flammable and could cause seriously extended closure to Great Southern Highway, impacting businesses, residents and emergency services such as **ambulances**. Plus airborne pollution caused by such fires could cause negative health issues and risks to affected areas.

TOURISM AND EMPLOYMENT

If the tip was to go ahead, York may see a noticeable decrease in tourists to York, discouraged from visiting after being stuck behind road-train rubbish trucks, or offensive smells from driving past the tip. A decrease in tourism should cause a decrease to the use of York's hospitality and tourism businesses, which in turn would lead to layoffs and downsizing of those businesses.

Less tourists spending money in York should lead to a smaller York economy with less employment opportunities for locals.

LAND VALUE AND ECONOMY

If the tip was to go ahead, there would most likely be a rush of residents trying to sell their properties in order to move away from a 'tainted-tip-town', thus causing an over saturation of properties for sale in the real estate market and therefore bringing about a drop in land value within the Shire of York and neighbouring areas.

I do ***not want*** the proposed Tip in the shire of York.

Thankyou ,



J Edis

York WA 6302.
May 11th 2015

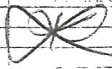
MY SUBMISSION IS WITHOUT PREJUDICE.

This is the end of my submission.

Records

From: Colin Cable ◀
Sent: Tuesday, 12 May 2015 4:41 PM
To: Records
Subject: Aluwunna W5830 Proposal.
Attachments: img158.jpg; img159.jpg

31

SHIRE OF YORK	
FILE	PS. GEN. PRO. 3.1
OFFICER	INITIALS
K.R.A.	
12 MAY 2015 11475-23	
REFERRED TO COUNCIL	
DATE	INITIALS

Shire of York.

P.O Box 22.

York WA 6302.

To the Commissioner James Best and the Shire of York.

Re the S.I.T.A Alluwuna Landfill proposal W5830.

MY objections to this proposed Landfill by S.I.T.A at Alluwuna should not proceed due to the following Environmental factors.

I am very concerned about our dwindling natural drinking water resources and the potential contamination of such resources.

Having been a member and President of the Talbot Brook Land management, and Catchment Association Inc., for a period of the past 16 years I think I am an authority to write to you about my concerns over this Application for a Landfill adjacent to 13 mile Creek and the Helena Catchment.

Our group has undertaken some of the largest re-vegetation projects in the upper reaches of the 13 mile Creek and Helena Catchment ever seen in York and the surrounding Communities to halt further salinization from entering the 13 mile Creek system and the adjacent catchment. My observations and salinity testing of water along this Creek system were developing saline areas in the upper reaches near Helena Road and further down the Creek system the water was quite fresh and drinkable.

So our main aim was to protect the upper fringes of the Helena catchment to halt the further spread of salinization. Most of the funding for these projects was sourced from the Dep't Of water in Northam, Swan River Trust, and the Avon catchment Council. Approx. 300,000 native seedling stems were planted in the upper catchment by partnering the dep't Of Water in Northam which complemented their 2007 Strategy to reduce or halt further salinization of the Helena Catchment. Our Association has received many State Landcare awards also State & Territory awards for the protection of natural waterways. I have personally been a Semi Finalist in the State Landcorp Environmental Sustainability award.


The establishment of a large putrescible Landfill further down the Catchment and the 13 mile Creek system completely undermines the entire volunteer and Govt objective's to try and preserve our natural drinking water resources for future generations to enjoy and protect.

The Talbot Brook Land management Association Inc. and myself would be the foremost Authority on the protection of the Helena Catchment and also the most credible knowledge of this Catchment and its surface and groundwater systems.

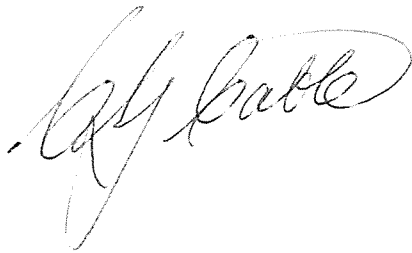
My main concerns with this development are its effect and ultimate contamination of the Helena catchment. Not only the Helena Catchment but also has the potential risk over the years to contaminate the Canning catchment also.

This project or application should never been allowed to proceed as to the location adjacent to the Helena Catchment also State National Park.

The topography next to this area is completely unsuitable and the risk of further contamination over the years has a far reaching effect of not just the Helena Catchment. My knowledge of not just the Catchment but surrounding soil types and topography and vegetation forbid such an industry as this to proceed as its effects are only logical.


Colin Cable. 

12th May 2015.



Shire of York
P O Box 22
York WA 6302
records@york.wa.gov.au

32

SHIRE OF YORK	
FILE	PS. GEN. PRO. 3.1
OFFICER	INITIALS
KRA	
12 MAY 2015 11/07489	
REFERRED TO COUNCIL	
DATE	INITIALS

To The Commissioner James Best and the Shire of York,

RE: The SITA Allawuna Landfill Proposal Lots 9926, 4869, 5931 and 26934 Great Southern Highway, St. Ronan's, York.

I object to the proposed landfill at Allawuna by SITA Australia and believe that the proposal should not be permitted.

The proposal is against the principals of the Shire of York's Town Planning Scheme, which states under general agriculture zone "to ensure the continuation of broad acre agriculture as the principal land use in the district encouraging where appropriate the retention and expansion of agricultural activities." Landfill is not an agricultural activity and will only destroy valuable agricultural land.

The proposed landfill is not acceptable with the Shire of York's Local Planning Strategy, which states "protection of sustainable agriculture and preserve and enhance the environment and natural resources." The proposal does not meet the objectives of York's Community Strategic Plan which states, "Protect and Enhance our rural land and spaces" and has a priority to "Establish land use strategy to ensure rural and farming land is protected." Landfill does not enhance nor preserve and should not be placed in our agricultural areas, especially near important water sources.

The landfill will not benefit York in anyway, but has the potential to destroy our agriculture industry, our tourism and hospitality industries and valuable employment that these industries bring to York. I therefore ask that this proposal be rejected.

We also think that the water quality in the run off to Mundaring Weir will be affected. As this water is relied on, not only in our own area but as far as Kalgoorlie and all in between.

No engineers or Minister can give a 100% guarantee that our water quality will not be affected.

Yours sincerely *J.P. Muller*
NAME *J+P MULLER*
ADDRESS _____ YORK, WA 6302.
DATE *9-5-2015*
SIGNATURE *J.P. Muller*

Due 25th May 2015

To The York Shire and Councillors

33

Re: Re application for landfill proposal by SITA on Allawuna Farm – Lots 9926, 4869, 5931 and 2693, Great Southern Highway, St. Ronan's, York

Name: Ian Crombie

Address: _____

Date: 12th May 2015

Signature: *IAC*

YORKSHIRE OF YORK	
FILE	PS GEN. PPO. 3.1
OFFICER	INITIALS
KIRA	<i>[Signature]</i>
13 MAY 2015	
11475-35	
REFERRED TO COUNCIL	
DATE	INITIALS

OVER COUNCIL
13/5/15

As a ratepayer and resident of York, I object to the landfill proposal at Allawuna Farm for the following reasons.

Water Contamination: The close proximity of the underground freshwater aquifers will be subject to waste leaching, thus contaminating potable water which supplies both the Avon region and well as the Perth city and environs with valuable water.

The adjacent Thirteen Mile Brook drains into the Helena water system, which in turn supplies the Mundaring catchment region with necessary water for Perth City and its residents. The Six Mile Brook, also on the property drains to the east and delivers water into the Avon river system.

Air Pollution: With the estimated high dust dispersal, coupled with toxic airborne particles the surrounding farm sites and housing will be affected. These foreign elements will contaminate surrounding pastures, crops and animal feed lots as well as incapacitating those who inhale these materials. Not only the clearly visible dust, but perhaps more importantly the waste particles being distributed into dams and water sources that supply stock as well as horticultural and agricultural practices with much needed water. These waste toxins will fall onto nearby buildings, thus draining into rain water tanks, used for human consumption.

Waste Management: With the inevitable solid and liquid waste, such scavengers as Silver Gulls, rats and mice are bound to be prevalent. This not only increases the population of these unwanted pests, but also will attract native fauna, therefore exposing these creatures to noxious pathogens. It only needs one Wedge-Tailed eagle to feed on a salmonella-stricken gull to introduce such disease into the entire bird chain.

Chemical Storage: Where are toxic chemicals to be stored?? It is common knowledge in the mining, soil and rock excavation business along with landfill projects that no membrane will hold these chemicals. Apart from the disastrous leeching, seeping predicament, what if somebody trespasses (particularly an unsuspecting child) onto the site and comes in contact or ingests these poisonous chemicals? Unsafe site and negligent!!

Site Management: The application of masses amounts of water to attempt to alleviate the dust problem will exacerbate the seepage problem. With additional water the contaminated water has to go somewhere---the adjoining water courses or ground water. Apparently there has been mention of fires to burn some of the refuse. Just imagine the catastrophe should a fire get out of control and wipe out the adjacent National Park and Reserve. During 6 months of the year there is a total fire ban, will SITA adhere to these laws, or will they be exempt and undertake their ignition on a regular basis?

Odour, Noise Emissions: Nearby farming properties as well as sites along the Gt Southern Highway will be exposed to revolting noxious odours. Not the sort of advertising for a country retreat, work place or announcement of fresh country air. This is not the location for a tip? These offensive odours will be accompanied by noisy, rambling large trucks and trailers conveying the refuse along the designated route. Coupled with this noise pollution will be the excavating machinery, cranes, dumpers, pumps water trucks etc on the actual site. Not good enough!

Future Site Development and Expansion: Should this re-application be approved, SITA have refused to rule out an expansion of their industry should they wish to in the future!

Other Issues:

- York is a primary agricultural region, the western hub of the Wheatbelt
- York is used by thousands of travellers everyday as a main thoroughfare to the eastern Wheatbelt,
- York is the oldest inland town in WA. It is steeped in history heritage and the arts.
- York has a vibrant family orientated feel, emphasised by the successful educational, medical and sporting bodies within the shire.
- Devaluation of nearby properties
- Devaluation of housing or business with the Shire of York
- Drastic reduction in tourism – a major source of York's commerce, wealth and general interest

Shire of York
P O Box 22
York WA 6302
records@york.wa.gov.au

34

SHIRE OF YORK	
FILE	PS-GEN-PP0.3-1
OFFICER	INITIALS
K.R.A.	R
13 MAY 2015 1147542	
REFERRED TO COUNCIL	
DATE	INITIALS

To The Commissioner James Best and the Shire of York,

RE: The SITA Allawuna Landfill Proposal Lots 9926, 4869, 5931 and 26934 Great Southern Highway, St. Ronan's, York.

I object to the proposed landfill at Allawuna by SITA Australia and believe that the proposal should not be permitted.

The proposal is against the principals of the Shire of York's Town Planning Scheme, which states under general agriculture zone "to ensure the continuation of broad acre agriculture as the principal land use in the district encouraging where appropriate the retention and expansion of agricultural activities." Landfill is not an agricultural activity and will only destroy valuable agricultural land.

The proposed landfill is not acceptable with the Shire of York's Local Planning Strategy, which states "protection of sustainable agriculture and preserve and enhance the environment and natural resources." The proposal does not meet the objectives of York's Community Strategic Plan which states, "Protect and Enhance our rural land and spaces" and has a priority to "Establish land use strategy to ensure rural and farming land is protected." Landfill does not enhance nor preserve and should not be placed in our agricultural areas, especially near important water sources.

The landfill will not benefit York in anyway, but has the potential to destroy our agriculture industry, our tourism and hospitality industries and valuable employment that these industries bring to York. I therefore ask that this proposal be rejected.

To Whom it May concern,

I totally object to the SITA landfill at Allawuna. Why? Because: - I travel this road twice a day 5 day a week as a school bus driver. The traffic is bad now without having to contend with trucks entering and leaving Allawuna. Even now it is nothing to be met by at least 5 semi-trailer's coming back through York, the number plates indicate they are from, Merriden, Corrigin, Southern Cross, Quairading, Beverley and York; other trucks have Metro plate, presumably from Mackey Hay, and I have had some near misses with trucks wanting the entire road! And cars wanting to overtake the bus, not always in the safest of manner or appropriate place either. I object because: - any spills or seepage will adversely affect the underground water course which will have a flow on affect and in turn affect the water for the surrounding farmers, stock and the wild life. Allawuna is within the state water catchment area, so WHY would the state government permit SITA to use the area as a rubbish dump when the run off will eventually flow into Mundaring Weir! The government already suggests that farmers not to use fertilizers because the run off gets into rivers and eventually the sea, so why are they even considering SITA using farmland in a water catchment area for a rubbish dump? I am also concerned with the noise, dust and smells of the place; I feel these will distract people travelling on the highway. I know how distressing the smell of a dead animal is when driving past one! Please, people think again before you accept SITA and their proposal look deeper at the underwater course and save our environment think of the future, think of others and the effect this will have on us! Stop! SITA PLEASE.

Yours sincerely,
Josie Prunster (3rd Generation York local)

York WA 6302
12/05/2015

Records

From: Liz Christmas
Sent: Thursday, 14 May 2015 10:02 AM
To: Records; Kira Strange
Subject: Submission re SITA proposal version 2015
Attachments: 2015 Submission to SOY re Landfill Proposal.pdf

35

SHIRE OF YORK	
FILE	PS-GEN. PRO. 3-1
OFFICER	KIRA
INITIALS	[Signature]
14 MAY 2015	
1147550	
REFERRED TO COUNCIL	
DATE	INITIALS

Herewith, my attached

SUBMISSION TO Shire of York and for the J.D.A.P.
regarding S.I.T.A's **AMENDED** application (declared as a **NEW APPLICATION**) for
establishing a **LANDFILL WORKS/WASTE MANAGEMENT FACILITY** on
ALLAWUNA FARM, Lot 4869 on Plan 224502, Lot 5931 on Plan 117294, Lot 9926 on Plan 126311 an Lot 26934 on Plan 158673 Great
Southern Highway, St Ronans, WA, 6302; i.e.
Works Approval Application W5830/2015/1 for a
Category 64, Class II or III putrescible landfill site.

I would appreciate it if you would you acknowledge receipt of this Submission, on receiving it and checking that it opens correctly.

Yours Sincerely,

Liz Christmas


YORK, 6302

**SUBMISSION TO Shire of York and for the J.D.A.P.
regarding S.I.T.A's AMENDED application (declared as a NEW APPLICATION) for
establishing a LANDFILL WORKS/WASTE MANAGEMENT FACILITY on
ALLAWUNA FARM, Lot 4869 on Plan 224502, Lot 5931 on Plan 117294, Lot 9926 on Plan
126311 an Lot 26934 on Plan 158673 Great Southern Highway, St Ronans, WA, 6302; i.e.
Works Approval Application W5830/2015/1 for a
Category 64, Class II or III putrescible landfill site.**

Submitted by Liz (J. Elisabeth) Christmas

Firstly, **nothing essential has changed between the 2013-4 Application by SITA and this current one.** One pit is reduced, and 3 Borrow Pits are added. **There is still activity of the same nature as mining and major disturbance of the landform by unnatural (human-and-heavy machinery induced) means.** The inclusion of the Borrow Pits would cause environmental destruction and loss of farm land. Their mining, just as with the original digging activity on the main pit will be a major disturbance; the original will be vaster and deeper from the start, but the borrow pits will be mined repeatedly. As has been pointed out, "the mining of the soil will be similar to an extractive industry but not subject to the same conditions".

As with the previous Proposal, there is still the possibility of 'unintended consequences'. The changes embodied in the current Application do not remove this risk.

Secondly, **the Responsible Authority Report on Allawuna proposals produced by Shire of York administration found 16 reasons the former application was not acceptable:**

- 7 ways in which the proposed project was inconsistent with Objectives/Clauses of the York Town Planning Scheme No. 2/York Local Planning Strategy;
- 4 ways in which it was inconsistent with State Planning Policy;
- 2 ways in which it is inconsistent with The York Community Strategic Plan: failure to prove that it will benefit York economically, and adverse effect on the environment and rural nature of this place; **(one might add that this is a prime heritage area of the state, being the First Inland Town of W.A.);**
- Substantial community opposition to the Landfill;
- Failure to demonstrate an adequate sustainable water supply for environmental mangement and other purposes;
- Ad hoc nature of the proposed landfill.

I cannot comment on the last point, but I see no reason why the changes in the current 2015 Application make any difference to the other 15 points.

=====

As before, I object to the Proposed Development on a range of grounds. My objections relate to the (no doubt unintended) potential risks to:

- water (both drinking catchment and any that may end up polluted and flowing onto or seeping into productive farmland or nature reserves, affecting crops, animals, humans and infrastructure);
- productive farmland;
- forrest and nature reserves and the native flora & fauna in them (some of which are rare and protected);
- human health;
- wildlife health;
- health of farm and domestic animal health; i.e.

potential risks arising from:

- accidental puncturing of natural water courses, no matter how unexpected that is;
- occasional flooding of land and leaching of pollution (beyond expectations) by unpredictable catastrophic storms;
- spontaneous combustion within the pit;
- earthquake;
- bushfire;
- accidental release of emissions from the site, as well as unpreventable emissions from trucks;

- considerably increased road traffic involving heavy vehicles, complicated by the fact that the road between the lakes and York is (with only a small exception) narrow and unfit for such a burden, and made more unsafe for drivers of ordinary vehicles by the intended additional double trucks;
- noise affecting local wildlife, interfering with their survival signals through sound & vibration.

I invoke the **Precautionary Principle**, roughly translated as “**where there is any doubt at all, First Do No Harm to humans or the environment**”. If the action would cause harm to human life or health, is seriously and effectively irreversible, or is inequitable to present or future generations, or is imposed without adequate consideration of the human rights of those affected, then it should be avoided. The onus to Do No Harm is on the Proponent of the Project. (Rio Conference 1992, for instance)

I also object to the attempt to persuade the population, against their better judgement and consciences, by (in the February 2015 document, pages 3 & 4) virtually beginning the proposal by (under the header ‘Key Outcomes’) presenting the ‘carrot’ of increased local employment. I object to the stated attempt to get e.g. Avon Waste onside, ahead of time, by offering them what would be a lucrative contract. Likewise, the page 26 pre-approval carrot of ‘sourcing labour, plant and materials from the broader York region’ — also a haulage contract, and free Shire of York waste for the life of the project.

Such ‘carrots’ can be conceived to amount to **placing of undue pressure by way of an inducement**. That is, at the very least, immoral.

Claimed duration of the Landfill: I am not convinced that the Project would last only the proposed approximately 20 years, because there is no guarantee given that SITA would not apply for permission for an extension of duration when the 20 year end drew near — and even if one were stated now, there is no guarantee of no later application.

Ingenuous claim of reduced potential risk to the local environment: The ‘Supplementary Report’ claims a reduction of ‘any potential risk to the local environment’. This is ingenious, as:

- any risk is bad enough if it results in lasting, serious or pervasive damage;
- risks are multifactorial, meaning no risk depends on only one factor at a time, but also on factors interacting with that one factor;
- even if the SITA company could do the best they are aware of, and every employee likewise, neither they nor we are in control of the weather, seismological activity or disturbances, bushfires started by lightning or arson or careless behaviour;
- even if it is true that ‘there [currently] is no paleochannel within the vicinity of the [proposed] Landfill’ (SP p.3) an earthquake or earthquakes of sufficient power and/or frequency could alter the geology significantly;
- reduction in the area, maximum height, and volume of the waste deposited does not eliminate the risks under (c) above;
- the construction of borrow pits, sequentially or not, involves another disturbance of the structure of the landform and could have its own unintended effects;
- even if “[i] the modified Landfill does not impact drinking water and is not within a Prescribed Drinking Water Supply Area [and if] [ii] The Department of Water confirms that the Landfill is not within the Mundaring Weir Catchment Area” the word “currently” should apply before the word within in both (i) and [ii] — we cannot say how a catastrophic event might change the situation, and whether the Catchment or not (something I debate from data on pages 12-13 and 16-17), we cannot say that it might not propel pollution into any water course affecting man or land or animals or flora, and 1,000 metres distance between the proposed Landfill area and the Mundaring Weir Catchment or any water course could be nothing in a bad enough catastrophic seismic event;
- the proposed rehabilitation with stockpiled topsoil will only be as good as it can be if none of the unintended and no other unforeseen catastrophes occur to pollute the stockpile or drastically alter the shape of the land or the surrounding topography.

Regarding (d) and other elements above, the Proponents tell us (SP p.3) that it is Golder Associates that “undertook further, more detailed site investigations and particularly into groundwater and sub-soil conditions” and that it is this that has led to “modifications to the Landfill design that will further minimise any potential risk to the local environment”.

However, **Golder Associates make the following Disclaimer** (http://www.der.wa.gov.au/images/documents/our-work/consultation/allawuna/Appendix_W_-_Limitations.pdf) :

“Golder did not perform a complete assessment of all possible conditions or circumstances that may exist at the site referenced in the Document....Conditions may exist which were undetectable given the limited nature of the enquiry Golder was retained to undertake with respect to the site. Variations in conditions may occur between investigatory locations, and there may be special conditions pertaining to the site which have not been revealed by the investigation and which have not therefore been taken into account in the Document. Accordingly, additional studies and actions may be required....Services provided allowed Golder to form no more than an opinion of the actual conditions of the site at the time the site was visited and cannot be used to assess the effect of any subsequent changes in the quality of the site, or its surroundings, or any laws or regulations....Where data supplied by the client or other external sources, including previous site investigation data, have been used, it has been assumed that the information is correct unless otherwise stated. No responsibility is accepted by Golder for incomplete or inaccurate data supplied by others...Golder may have retained subconsultants affiliated with Golder to provide Services for the benefit of Golder...Golder accepts no responsibility for damages, if any, suffered by any third party as a result of decisions made or actions based on this Document.”

Markings on the haulage trucks to be used:

SP p28 includes the undertaking that “Prime movers used for the movement of the trailers may show markings of the haulage contractor provided that such markings do not indicate the source or nature of the materials being hauled (other than to comply with any legal requirements, for example over length).”

I OBJECT: **This is (a) deceiving the public and (b) can be taken as an indicator that the company does not want people to know what they are doing or who they are.** Why? Are they pretending they are saving York’s face, and not their own?

Likewise on page 28 they make the **assumption that we want any ongoing consultation with them, by way of a Community Reference Group** or any such thing. We would be selling our souls to a contract we believe unethical in the first place.

=====

Most things have in no way changed between SITA’s original application and this current 2015 one. Hence, I include here the following points.

THE PROPOSED LANDFILL IS LOCATED IN THE VICINITY OF 2 GAZETTED NATURE RESERVES, A NATIONAL PARK, DRINKING WATER CATCHMENT AND FEEDER STREAMS.

SITA’s claim: http://www.sita.com.au/media/about_us/SITA_A4-Booklet_WEB.pdf page 3

“located away from homes, nature reserves and other sensitive areas”

does not ring true.

The proposed landfill site is indeed in special and significant areas:

1. on **Arable Land** on a Farm zoned **General Agricultural**;
2. in the vicinity of the **Gazetted Nature Reserve, St. Ronan’s (No. 30591)**; and just a little further from **Wambyn Nature Reserve (No. 21981)**;
3. in the vicinity of **13 Mile Brook**, followed by **Talbot Brook, St. Ronan’s Brook etc.** , and **Wundabiniring Brook**, as one travels towards Perth; and
4. as one travels along the road towards Perth, immediately adjacent to Allawuna Farm is a notice saying **National Forest**, followed by a road to the left (i.e. on the same side) with notices saying **Mount Observation** (land) and **Drinking Water Catchment** (water).

The proponents of the Allawuna Landfill Project want us to understand that the Landfill is 1000 metres from the National Forest. However, driving up that Mount Observation road to the left reveals that the Allawuna property fence in some places is right up to that road, and cut straw, for instance, has blown onto it recently. This indicates that a little wind, a little fire from wind blowing from the East up the hill from the landfill could easily set fire to the National Forest, scatter pollutants from the Landfill etc... **1000 metres or not from the actual Landfill, the Forest is not sufficiently protected from the risks.**

Furthermore, **Easterly and N.Easterly winds are common in the York Area**, increasing the risk.

Despite the Land and Water significance of these places, this proposal to bury putrescible waste has been boldly put forward in this, of all places: where National Forest, Nature Reserves, Drinking Water Catchment and Farmland are adjacent to and/or overlap each other.

ALLAWUNA FARM is IN A GENERAL AGRICULTURAL ZONE, so I reiterate some of what is covered also by the RAR summary quoted on page 1 above.

SHIRE OF YORK TOWN PLANNING SCHEME NO. 2 *Updated to include Amd 51 gg 3/09/13*

4.15.1 Objectives:

(a) To ensure the **continuation of broad-hectare agriculture as the principal land use** in the district encouraging where appropriate the **retention and expansion of agricultural activities**.

BUT

(b) To **consider non-rural uses** where they can be shown to be of benefit to the district and **not detrimental to the natural resources or the environment**.

The general principles are:

- retain broad-hectare agriculture, even expanding that use where appropriate;
- only allow a non-rural use where they can be shown to benot detrimental to the natural resources or the environment.

I am arguing:

1. that **the proposed Landfill operation is at serious risk indeed of being detrimental to the natural resources and the environment** — at the very least Water as a natural resource, not only for Drinking Water, but also for the water that nourishes the National Park, Gazetted Nature Reserves, and surrounding farmland; but also to air and land via emissions.
2. The proposal is not consistent with **State Planning Policy 2.5 – Land Use Planning in Rural Areas, Part 4. Objectives of this Policy**
 1. To **protect rural land from incompatible uses** by –
 - I. Requiring comprehensive planning for rural areas
 - II. **Make land use decisions for rural land that support existing and future primary production and protection of priority agricultural lands, particularly for the production of food;** and
 - III. Providing **investment security for the existing and future primary production sector**
 2. To promote regional development through provision of ongoing economic opportunities on rural land
 3. To promote sustainable settlement in, and adjacent to, existing urban areas
 4. To **protect and improve environmental and landscape assets**
 5. To **minimise use conflicts**.

I believe that clauses 1.II, 2 and 3 must all be subservient to 1.II, 1.III, 4 and 5, and the material presented below will illustrate how I have come to my conclusions.

As one expert said on Landline Sunday 16th March 2014, on average:

- ONE FARMER IN AUSTRALIA FEEDS 150 PEOPLE IN AUSTRALIA,
- and 450 PEOPLE OVERSEAS;
- and that THIS NEED WILL INCREASE OVER TIME.

We don't need less, but more farming.

NATURE RESERVES

The closest Gazetted Nature Reserve, **St. Ronan's**, is one of **only two gazetted nature reserves in the Darling Range/Western ('Wet Mediterranean') area of York Shire**. From the publication *Nature Reserves of the Shires of York and Northam: Management Plan 1987-1997*, published by C.A.L.M., this nature reserve and the other of the two (Wambyn Reserve, No. 21981, a little to the North-East in this area) are **uniquely different in many respects from the only 2 such Reserves on the Eastern ('Dry Mediterranean') side of York** which is topographically different to the Western side, the topographic divide corresponding roughly with York Town, the Avon River, and Northam-Quairading Road.

Details of e.g. the St. Ronan's Reserve topography, vegetation and fauna, some of which are scarce or even unique in the region, are found in the Chapter on St. Ronan's (in Part 3), and Appendices 1 and 2. **These 4 Gazetted Nature Reserves are the sum total that York and its environs (and hence this part of the state) has**. The potential damage to the balance of Indigenous Vegetation and Fauna in close vicinity of the Proposed Landfill site would not and could not be compensated for by the protection of the Eastern side reserves alone, because of the very uniqueness of the biodiversity and ecosystem on the

Western side as opposed to that on the Eastern — damage dependent on damage to the Land, Air and Water.

STRESS PLACED ON THE WILDLIFE AND FLORA IN THE NATURE RESERVES, THE ROAD RESERVES AND FORRESTED PATCHES ON FARMS

Barnaby's Cockatoos have been cited as an example of indigenous wildlife which are threatened by clearing (and other aspects of earth, air and water) if the Landfill Proposal goes ahead. It has been said that SITA arranged for an audit of nesting etc... of Barnaby's Cockatoos on the site and saw no evidence of such. This would be because they were not there when the Barnaby's Cockatoos were. I have visits by Barnaby's Cockatoos to my property in the centre of York, to my pine and giant gum trees, every year. The visits used to begin predictably just before Christmas and occur daily for about 3 weeks before the Corellas replaced them for much longer. However, **the visits are not as predictable or long now (but just because they are less predictable does not mean they do not need their trees, and does not mean that because SITA's people didn't see them they weren't there at other times; they are true fly-in-fly-out creatures) and can sometimes be at unexpected times of the year. No doubt this is due to the weather being less predictable, combined with so much more development having occurred in the corridor from Eastern Central Wheatbelt through across the Hills to the Metropolitan area. The more damage we do here, the less relevant ecosystem there will be for the Barnaby's along with the other wildlife, whether land-living or air-living.**

From *Nature Reserves of the Shires of York and Northam: Management Plan 1987-1997*, published by C.A.L.M., there is a **rich range of vegetation**, including Powderbark Wandoo, Jam, Sheoak, Marri, a host of thicket, heath, scrub and woodland plants, among them **some rare finds**: 2 types of *Lomandra* not often found North of Narrogin, and the only known examples of *Darwinia sp. nov.*, and beyond the Darling Scarp, the *Calothumnus* being found only in this reserve and Boyagin Nature Reserve. Similarly, it is not common to see the *Lomandra nutans* anywhere else in the region, other than here, Clackline and Wambyn reserves.

There is also a **rich range of fauna**, including: 9 mammal species — the highest number recorded on any nature reserve in the York-Northam area; 1 monotreme, the Echidna, showed many signs of being there, and one Wambyn resident has recalled seeing some; small native mammals included dunnarts and western pygmy-possum. White-striped mastiff-bats are also in the area.

In the area were found **55 types of birds**, including: the Splendid Fairy-wren, 3 species of thombili, and many species of honeyeater. Among reptiles were 20 species of lizard, 1 of snake as well as 4 of frogs. Skinks, gekhos, legless lizards, bobtails, and bungarra were all widespread, but one type of gekho and the western bearded dragon were only in the wandoo woodland, and the ornate dragon only on granite outcrops.

A glance at the Appendices also indicates that there are **also other species of flora and fauna in St. Ronan's that don't appear to occur in the majority of the York-Northam Reserves. One type of gekho and the common scaly-footed legless lizard had not been found on any other Reserve in the area.**

So, in St. Ronan's Reserve (which has been intensely studied) there are rare species, and species rare to the area. The environment and the state do not need them decimated through dust, fumes, noise, and vibrations etc...

CONSIDERING IMPACTS ON THE INDIGENOUS FLORA AND FAUNA OF THE AREA BY: Emissions of gases, noise, etc... or discharge etc... via land, air and water

1. These flora and fauna comprise a **specific ecosystem inherent in the area**, and diminution or destruction of any native population among them by any impact caused by the operation of the proposed landfill would by virtue of the interplay between each population do harm to or destroy other populations in the ecosystem.
2. By necessity, there is already a certain amount of **traffic emitting noxious gases** toward the forest, reserves, road reserves etc... which are home to **native flora and fauna. Those there at present have adapted to the current moderate to low levels of traffic fumes. If this moderate traffic is increased to heavy levels such as with several trucks per hour per day per week at much closer intervals,**

then the level of fumes the flora and fauna can cope with could reach doses that some will not be able to cope with, and we will see the death of some. This applies to the proposed truck traffic on the farm itself as well as that on the road past/through forested areas, whether National Park, Gazetted Reserve or not.

3. There is already a certain amount of **noise caused by moderate traffic** on the road, and enough space in time between most of the traffic that e.g. birds can hear each other's sounds, such as warnings of danger; but the vastly increased rate and proportion of heavy trucks will lead to proportionately less and smaller intervals for such signals to be exchanged and heard. This puts these creatures at more risk. **Some sounds they need to be able to detect for their safety may be overridden by more traffic noise.** At the very least they will move away to try and find homes elsewhere, if they can find suitable habitat. The same effects would arise from increased noise from heavy duty machinery. The worst case scenario is loss of rare species.

From *The Effect Of Noise On Wildlife: A Literature Review* http://wfae.proscenia.net/library/articles/radle_effect_noise_wildlife.pdf

Most researchers agree that noise can effect an animal's physiology and behavior, and if it becomes a chronic stress, noise can be injurious to an animal's energy budget, reproductive success and long-term survival.

From *Annotated Bibliography; Impacts of Noise on Wildlife* http://www.nature.nps.gov/sound/assets/docs/Wildlife_AnnotatedBiblio_Aug2011.pdf

Barber, J.R., Crooks, K. R., & Fristrup, K. M. 2010. The costs of **chronic noise exposure** for terrestrial organisms. *Trends in Ecology and Evolution*, 25(3), 180-189. Abstract:

Growth in transportation networks, resource extraction, motorized recreation and urban development is responsible for chronic noise exposure in most terrestrial areas, including remote wilderness sites. **Increased noise levels reduce the distance and area over which acoustic signals can be perceived by animals.** Here, we review a **broad range of findings that indicate the potential severity of this threat to diverse taxa**, and recent studies that document **substantial changes in foraging and anti-predator behavior, reproductive success, density and community structure in response to noise.**

Stone, Eric, 2000, *Separating the noise from the noise: a finding in support of the "Niche Hypothesis," that birds are influenced by human-induced noise in natural habitats.* *Anthrozoos*, 13(4): 225-231. Abstract:

It was possible to test the hypothesis that ambient noise alone would play a role in structuring bird communities in riparian habitats in Boulder, Colorado, USA. Point counts of birds were conducted in openspace/minimally disturbed, residential, commercial and industrial neighborhoods. Within the same disturbance parameters and land use, **species richness and PIF scores (a weighted value based on species importance) consistently and significantly decreased as ambient noise increased.** These results can be viewed as support for the "Niche Hypothesis" (Krause 1987, 1998), that **wildlife species' acoustic niches are adversely affected by human-induced noise pollution**

4. Land creatures such as lizards and dunnarts or similar will be at more risk and discomfort because of the **increased amount of vibrations through the ground as a result of increased average weight and rate of trucks on the roads.** They may have **difficulty interpreting signals, or simply be scared into dangerous situations by e.g. vibrations overriding something else they need to detect by feel.**

5. **Plants will be affected by increased dust and fumes coating them; and our rainfall much of the year is not sufficient to clear the effects. Plants will also be affected by any lessening in the animal populations that results from the increase in pollution (sound, vibration or chemical emissions) caused by the increased use of heavy vehicles/trucks.**

By contrast to the protective ozone in the upper atmosphere, "**ozone at the surface** is deleterious and is produced primarily from emissions of fossil fuel combustion. (EnviroNews Vol. 6 No.1 - Millennium Issue - January 2000 *Air Pollution, Global Climate Change and Agriculture: A Vignette of the Last 50 Years of a Millennium*; by Sagar V. Krupa, Prof. at the Department of Plant Pathology, U. of Minnesota. In the same journal, Vol. 8 No. 3 =July 2002, *Air Pollutants, Plants Response, Soil Microbes and Ecosystem Biodiversity*, Dr. J.H.B. Garner (U.S. Environmental Protection Agency) points out:

"Scientific studies for more than three decades have shown that burning of coal and oil produces emissions that affect the growth and reproduction of crops, forests and the ecosystems on which life depends.....

Sulphur dioxide (SO₂), nitrogen oxides (NO_x) and ozone (O₃), the most phytotoxic [toxic to plants] pollutants, result from the emissions of**automobile exhausts and volatile organic compounds (VOCs)** emitted from a

number of sources. [In turn]... Acidic rain is formed in the atmosphere [in major part] from emissions of sulfur and nitrogen oxides ...[compounding the effect on crops, forest and total ecosystem]

Changes in nitrogen supply ... can alter biodiversity. Atmospherically deposited nitrogen can act as a fertiliser in nitrogen-poor soil. Not all plants ... are capable of utilising extra nitrogen. Most plant species growing in nutrient poor conditions are adapted to such habitats and can only compete successfully on soil low in nitrogen.

[some effects are:] leaf injury and increased needle... drop off..[and changes in] the fungal microflora involved in leaf decomposition on the forest floor”...

Ozone exposures [from engines/automobiles/the combustion of oils] can result in (1) changes in letter quality and quantity, (2) decreased carbon allocation to roots, (3) altered root exudation and soil ... CO₂ flux, and (4) decreased root growth and possibly increased root mortality....” as well as altering the biochemical and microbial activities in the soil, in a resultant deteriorating ecological system.

Severely stressed ecosystems do not recover readily, but may be further degraded. [Relevant] stresses [include] (1) physical restructuring (e.g. changes resulting from [change of] land use);(4) discharge of toxic substances into the atmosphere, onto land, and into water.”

ALREADY EXISTING LANDSCAPE STRESS

The Department of Environment and Heritage's *Landscape Health in Australia Report (2001)* which seems to no longer be available on the Net, though it was in 2005, refer to Landscape Stress, and rates subregions of Australia into stress classes, from greatest to least. **In WA, the Avon Wheatbelt is one of the two areas they singled out as 'endangered subregions' in terms of the risks to their ecosystems** (the other was the Dandaragan Plateau).

From eyeballing the series of topographical maps in the article for vegetation for 2001:

- i. The Avon Wheatbelt is in the 'intensive landuse zone':
- ii. only <10% of its natural vegetation remained in 2001, and there is very little connectivity between patches of natural vegetation;
- iii) <2% of the subregion was in conservation reserves;
- iv) >90% of the native vegetation that remained was outside of conservation reserves ;
- v) 10%-30% of it was in land tenures associated with conservative land use practices;
- vi) there was 30% dryland salinity risk or hazard;
- vii) more than 10% of the native vegetation was threatened by salinity;
- viii) there was moderate-to-major change in hydrological conditions;
- ix) **somewhere between 10 and >49 of our native plant species were [already] under threat.**

That was 2001, 13 years ago. This is 2014, and it is most likely that the figures are considerably worse now after decreasing rain, let alone any more clearing that has gone on in the region.

From eyeballing the maps for native fauna — birds, reptiles, mammals and fish:

For the Avon Wheatbelt 5 to 19 species were considered threatened. Again, we cannot expect this to have improved, and it could well be made worse by the issues here raised.

From the same Report: the issue of Dryland Salinity:

“By 2050 the southern subregion of the Avon Wheatbelt [is expected to have] almost 42% of its native vegetation threatened by high dryland salinity risk”.

Other factors that will complicate the already stressed land

Add to the **lower rainfall** the following risks to the land:

- a) potential leaching of higher-than-safe levels chemicals through water if an **industrial accident** occurs or a **high level earthquake** occurs, or
- b) pollution from **heavy doses of dust kicked up by trucks**, and **emissions from truck exhausts** and **that from other heavy machinery involved in processing the proposed rubbish**, for instance.

Under these circumstances:

- i) Land normally used for agriculture will be less productive;
- ii) Land ditto may be sufficiently contaminated that production on it is unsafe;
- ii) Wildlife and native flora will be damaged or destroyed;
- iii) The existing ecosystem will be damaged or destroyed.

IT WOULD BE MORALLY WRONG TO INCREASE THE ALREADY MASSIVE STRESS ON THE LANDSCAPE AND ITS NATIVE FLORA AND FAUNA.

STRESS PLACED ON AGRICULTURAL ANIMALS AND PLANTS IN THE IMMEDIATE NEIGHBOURHOOD OF THE PROPOSED LANDFILL ACTIVITY LIKELY TO BE SIMILAR TO THAT ON WILDLIFE

1. If there is a fire from combustion within the Landfill (see further on) or a spill of chemicals or an earthquake leading to a spill of Landfill contents whether raw or in the process of rotting down, and then, say, a major windstorm occurs, then farm animals could be at risk of ingesting unsafe fodder or breathing in unsafe air, etc...and the fodder in the fields and water likewise polluted, being unsafe for animals and humans, and also taking away any organic rating that the farmers nearby already have and having been striving to keep.

2. Just as wildlife and native flora are affected by the various disturbances in the noise and emissions environment, we can expect farm animals and crops to be affected. Ditto for vibrations. The various animals rely on messages via sound (e.g. birds), vibrations (e.g. kangaroos, animals that walk on the ground, smell (e.g. certain insects such as beetles) for self-protection etc...

The following ill-effects can occur: hearing loss or threshold shifts, physiological effects and 'fight or flight' responses, changes in digestive patterns, behavioural effects such as migration, effects interfering with mating messages and reproduction, etc...

<http://www.airandnoise.com/Animals.html> *Effects of Noise on Animals: Effects of Noise on Wildlife*”;

<http://www.nonoise.orf/library/fctsheets/wildlife.htm> (U.S. National Park Service 1994 etc... data);

<http://wildasia.net/main/article.cfm?articleID=169> *Elephants and Wildlife in Sri Lanka Escape Asian Tsunami: Impact*;

www.yptenc.org.uk/docs/factsheets/env_facts/communication.html;

www.geocities.com/thesciencefiles/cowmusic/page.html.

One of interest in a seismic activity prone area (which York is) is: <http://www.fascinatingearth.com/Seismic%20Cows.htm>.

SEISMIC RISK FACTORS interacting with existing risk factors, and with a Landfill operation if built.

SITA's documentation <http://wawaste.com.au/docs/140106b%20AD%20Volume%201%20Allawuna.pdf> acknowledges (pp 26, 27):

“4.10.....The area around Northam, from the Darling Scarp to Merredin is an area of notable seismic activity...”

However, it downplays the significance of seismic activity for the locality of the planned Landfill, saying:

“the location of the landfill is to the southwestern edge of this zone of activity.....”

A search of the Geoscience Australia Earthquake Database (12/12/2012) [— the legend for the map they show says 12/12/2013 —] showed no record of any earthquakes within 4 km of the Site boundary, with the nearest being a magnitude of 2.5 earthquake 4 kilometers to the north east of the site. No earthquakes of magnitude greater than 3.8 have been detected within 20 km of the site.....

They want us to believe (pages 36 and 76 of the 2014 Application) that their modelling showed that their engineering under the conditions described in the Earthquake Data Base is adequate to meet the very small threat that they deem to exist.

While the Perth area and coastal plain are not to date centres of seismic activity (source: *Seismicity of Western Australia* http://www.seismicity.see.uwa.edu.au/welcome/seismicity_of_western_australia)

York is in one of the areas of WA most at risk for earthquake. Not only have there been 'frequent intense bursts of seismic activity' to the north of Meckering, and other major earthquakes south of York — (Beverley and Brookton being among them), but the **strongest example we know of in the area was the Meckering Earthquake, of 1968.** Its effects were so great that they extended even to the old Royal Hotel in York, about 36 km away, on the corner of South St. and Avon Terrace — sufficient that the hotel had to be demolished, and various verandahs in the main street had to be taken down as they also were affected and had become dangerous. It lasted 40 seconds, and measured 6.9 on the Richter Scale. From the University of Western Australia's summary:

http://www.seismicity.see.uwa.edu.au/welcome/seismicity_of_western_australia/wa_historical/meckering

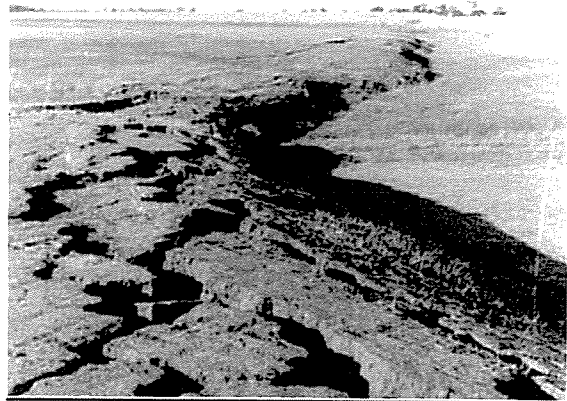
“It caused ground rupturing nearly 40 km long, some of which is still to be seen today. The maximum heave was 2.4 m, max vertical displacement was 2.0 m, and the maximum strike slip

movement (dextral) was 1.5 m. The maximum felt intensity on the Modified Mercalli scale was 9.....the focus of the earthquake was about 7km deep.....The earthquake and its aftershocks were accompanied by surface faulting extending over an area of 200 km² and an arcuate dextral thrust fault 37 km long was formed.....The Meckering Earthquake was located in a well-documented zone of seismic activity which is about 60 km wide and extends across the southwest corner of Western Australia.”

Seventeen months after the main event at Meckering, at 1.15 a.m. on 11th March 1970, a magnitude 6.0 earthquake occurred at Calingiri, 80 km northwest of Meckering. This earthquake was again shallow, with a focal depth of about 1 km, and was accompanied by surface faulting similar to that at Meckering.

This location of the faulting at Meckering and Calingiri, in an otherwise stable Precambrian Shield, has shown that damaging earthquakes are a potential hazard in Western Australia.”

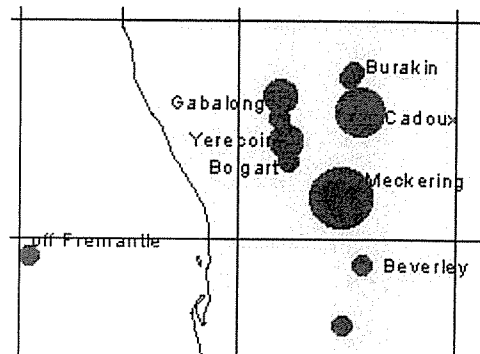
<http://www.abs.gov.au/ausstats/abs@.nsf/94713ad445ff1425ca25682000192af2/fecb2ab6de16171eca2570de0005871b!OpenDocument> reports that the damage spilled down into the Perth metropolitan area.



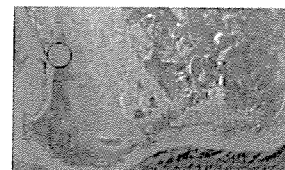
Going back to http://www.seismicity.see.uwa.edu.au/welcome/seismicity_of_western_australia#SW,

“in the South West Seismic Zone we have had 11 major or strong earthquakes between 4.5 and 5.5 magnitude in 11 years, from 1990 to 2009.. (averaging 1 per year), compared to 18 in the 43 years from 1946 to 1989 (averaging roughly 3 in 7 years, or 1 per 2.3 years). The rate has increased.

Clearly, Meckering’s of 1968 is shown as the biggest, furthest-reaching, and at 7km depth, but we have also had two of 5.0 or more in Beverley, not far south of us — 5.4 on 18 Jan. 1963 and 5.0 on 23 Feb. 1966.



We cannot say that there would not be one in York or west of it, because there was one in Mundaring on 6 Feb 2014, measuring 2, at 4 kilometers depth, (<http://www.ga.gov.au/earthquakes/getQuakeDetails.do?quakeId=3473567>),



and on 9 Dec 1980 there was one measuring 5.2 West of Fremantle (see map, bottom of page 3)

To the North of York, from <http://www.ga.gov.au/earthquakes/initRecentQuakes.do> we have evidence of very frequent (mostly smaller) earthquakes through the South West. For instance, at Burrakin, at Koorda, at Kellerberin, at Beacon, at Ballidu and one SW of Meckering.

To the South of York, at Beverley, including a significant one, at Brookton. at Wagin, at Dumbleyung, at Narrogin, and at Hyden.

To our North West, at least two at Quairading on in 2013, and one NW of York on 28th May 2013.

On 26th Feb. 2014 (while I was writing this Submission) there was a Significant 4.6 one W. of Kalgoorlie on 30 Sept 2013 a 3.7 one nr. Norseman — and a smaller one on 4th Feb.—, various down Katanning way over a period of months, etc... **The 26th Feb 2014 one in Kalgoorlie was felt very long distances away** (<http://www.theaustralian.com.au/news/nation/earthquake-rocks-was-goldfields/story-e6frg6nf-1226838104006>):

“A string of phase arrivals, or seismic waves associated with the Kalgoorlie earthquake, was recorded in areas including Kambalda, about 100km away, Mundaring in Perth’s Hills region, 500km from the epicentre, and Forrest, 657km away.”

For anyone who has lived in The Hills, as I have, such as Darlington or Glen Forrest, this extended

impact is evident in the cracking of house walls at the very least.

If an earthquake such as Meckering's of 1968 were to occur anywhere in York — or more critically so in the close vicinity of Allawuna Farm — then with a 200 km² area of faulting there would almost certainly be extensive leaching of noxious levels of chemicals and biological agents throughout such an area at the very least. That includes into the Drinking Water Catchment and the National Park and Nature Reserves and Farms. Other strong earthquakes could have similar ripple effects.

Earthquake Swarms in the South West Seismic Zone : http://www.seismicity.see.uwa.edu.au/welcome/seismicity_of_western_australiaearthquake_swarms

There have been swarms of earthquakes in York, Kellerberrin, Burakin and several other places in the SWSZ. E.g. **YORK** Nov 1994 - Jan 1995:

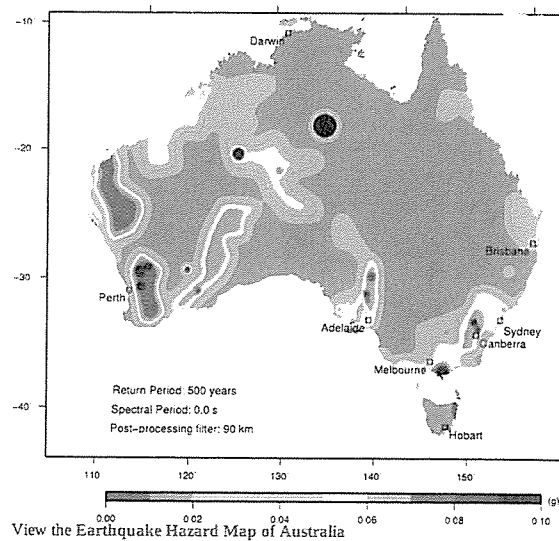
“A swarm of events occurred about 10 km SE of York, beginning on 26 Nov 1994, and continuing into Jan 1995. The largest event was magnitude 2.6, and occurred on 29 Nov. [Twenty Seven] 27 events were located during the swarm, although there were many other events, too small to be accurately located. Portable instruments were deployed in the area to accurately locate some of the events.

YORK	Nov 1994 - Jan 1995	2.6	27 events located
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THE EARTHQUAKE HAZARD MAP OF AUSTRALIA 2012

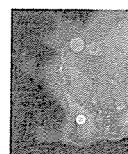
Based on reading of *The Earthquake Hazard Map of Australia 2012*, “a national scale map of earthquake hazard which has been developed by scientists at Geoscience Australia following an assessment of historic and ancient, pre-historic earthquakes in Australia” (<http://www.ga.gov.au/ausgeonews/ausgeonews201212/productnews.jsp#product2>) a NewsCorp article by Lisa Cornish (Former Manager of data.gov.au and Data Journalist for News Limited) 19 November 2012 reports the then Minister for Resources and Energy, Martin Ferguson, when launching the Map, as reporting, among other things, that **IT IS THE STRONG GROUND SHAKING FROM EARTHQUAKES, NOT THE MAGNITUDE THAT MAKES AN EARTHQUAKE DANGEROUS** (whereas SITA seems to think the big issue is the Magnitude):

“the map estimates the likelihood of a particular area experiencing **strong ground shaking from earthquakes** and it is this, rather than the magnitude of an earthquake, that **endangers people, buildings and infrastructure**”, and hence “Although these maps do not enable us to predict earthquakes [as likely to occur at a specific place on a specific day], they will allow engineers and planners to design and locate buildings and infrastructure so as to better protect our communities”. The article also reported that Martin Ferguson “also expects the modelling and data, which have been made available to the public, will be used by emergency managers, researchers and the insurance industry.”



Analyst Lisa concluded from studying the Map that the following 4 places in Australia have the **highest potential for earthquakes**: Moe (Vic.), York, and Kirwan near Burakin & Dalwallinu (WA) and Tenant Creek (NT).

The **MOST RECENT WA earthquake that I am aware of occurred AS A M3.1 on 27 April, 2015, at Kalgoorlie**. There were people in York who felt tremors as a result and phoned Geoscience Australia.



M3.1 W of Kalgoorlie, WA.
Sydney time: 27 April 08:42
UTC time: 26 April 22:42
<http://www.ga.gov.au/earthquakes/>

Another time we could not be sure that an earthquake would not happen near or within close range of Allawuna Farm, which could cause trauma to the infill site.. It could (if strong enough, and

regardless of what the proponents wish to think is likely chance) rupture the plastic, or shake and dislodge it sufficiently that at least what is near the surface could well spill out over, and leach into the water courses. The collected Landfill bundle/unit could tilt on its axis sufficient to spill out in whole or in part — e.g. if the rupture of the earth's surface was immediately contiguous to the bundle/unit. Even multiple smaller earthquakes in the vicinity could cause serious destabilisation of the Landfill storage and operations.

THE ISSUE OF SAFE DRINKING WATER

http://www.sita.com.au/media/about_us/SITA_A4-Booklet_WEB.pdf

Page 1 of this article states:

“In 2006, the WA Department of Environment and Conservation directed that all new landfill developments must be located off the Swan Coastal Plain.

The direction to locate landfills off the Swan Coastal Plain serves **to improve the security of Perth's drinking water.**

The reasons stated for choosing the Allawuna Farm site for the proposed Landfill site include:

“a more sustainable, **environmentally safe** and cost effective solution than existing arrangements”
[and] **large buffers** can be maintained between the landfill and other potentially sensitive land uses, including water catchments, homes and existing agricultural activities”

There is **no certainty** that either the claim of increased security of Perth's drinking water or the claim of improved environmental safety are true or justifiable.

Likewise, there is **no large buffer** in the case of:

- (a) leachate due to a rupture in the shell of the dump (either top surface or plastic lining) by something cataclysmic such as a large earthquake, nor
- (b) in the case of a combustion fire affecting the lining and the clay below (see page 18 below)
- (c) in the case of runoff or seepage if a major major storm dumps unforeseen sudden extreme rain thus massively increasing water flow on the land in the vicinity, nor
- (d) in the case of a major wind storm such as the one York and other towns in the Avon Valley suffered on 29 January 2011.

THE DRINKING WATER CATCHMENT AREA, AND OTHER CATCHMENT AREA

From the article *Mundaring Weir Catchment Area Drinking Water Source Protection Plan: Goldfields and Agricultural Water Supply [and] Perth Integrated Water Supply System;*

REPORT NO. 69, June 2007. <http://www.water.wa.gov.au/PublicationStore/first/72102.pdf>

From page 2:

“Over its history, the Mundaring catchment has been modified from its original native forest condition through human use. Land use has also resulted in **significant degradation in some sections of the catchment**, particularly in areas of steeper slopes and adjacent to major stream and riparian zones.”

Add to that (p. 2) rainfall has decreased since the 1970s and:

“For most of the catchment, the **monthly pan evaporation is in excess of the rainfall for seven or eight months of the year**.....[because we have] a Mediterranean-type climate with warm, dry summers and cool, wet, winters.”

and there is a **net loss of water from the catchment:**

“due to the prolonged period of low rainfall in recent years, the mean annual stream flow has significantly reduced to 17.2 GL. The long-term average annual draw from the Mundaring Weir catchment is 22.3 GL. The total annual draw from the Mundaring reservoir, including pumpback from the Lower Helena Pipehead Dam, is 31.3 GL”

We might remember that Mundaring Weir has not overflowed since 1996; it has not even come near it!!

This all makes the catchment so much more vulnerable if its water intended for drinking safety gets polluted. Not only is there a net loss of water, but **if leachate etc... makes its way into the water it will be less diluted because the net water is less, and so the intensity of the pollution is greater than it would be if previous greater water amounts such as pre-2007 were in the catchment.**

The water in the catchment is coming from close-ish to the surface (page 3):

“The major source of stream flow in the catchment is generated by **lateral flow through the upper soil layer over the winter months**. The catchment hydrology also includes the presence of **permanent shallow groundwater in the soil profile, which may discharge to streams in the valley floors.**”

By virtue of these factors, Perth's drinking water is already not secure — but adding the risks

from pollution via the dump, such as by a split in the seal of the dumped waste by an earthquake, or the spreading of pollution from dried up powdery rubbish dust near the surface of the dumped waste makes it even less secure. **The damage doesn't have to come from deep down. If there is an upheaval of some kind, what is near the surface will also be leaching into the upper soil or, say, add a wind/dust storm or such and it will enter the catchment water intended for drinking via close-to-surface seepage, or flow in the case of heavier rains when they next occur.** But then see also the reference to paleochannels on page 11 below.

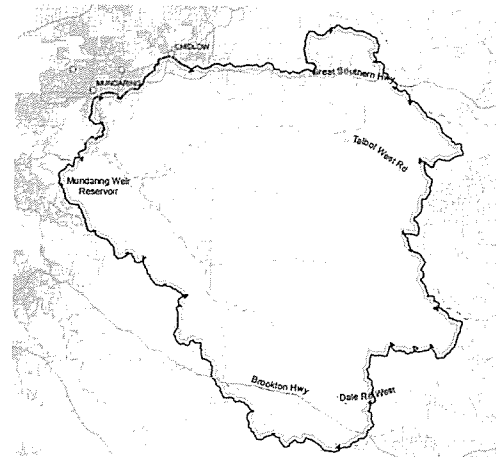
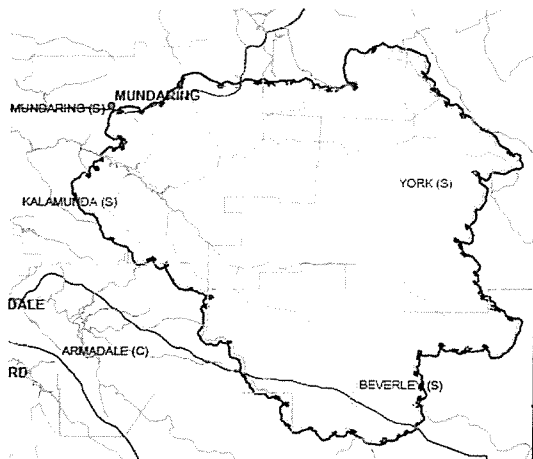
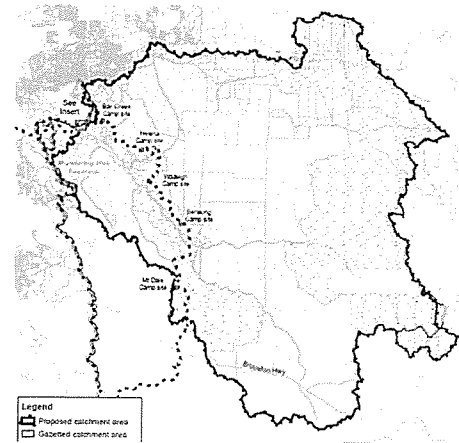
Page 4: The Mundaring Weir Catchment Area was proclaimed under the *Country Areas Water Supply (CAWS) Act 1947* in 1972 to ensure protection of the water source from potential contamination.

From the maps supplied in the article, it appears that virtually the whole of the Western side of York (i.e. West of the Avon River, both East and West of Allawuna Farm) is part of the Mundaring Catchment Area, even if some of it is not strictly in the gazetted catchment area [as in 2007], so we can expect that what happens in the vicinity will affect not only the area towards Mundaring Weir, but also towards York, in terms of impact on rivers and land by way of runoff and seepage.

Dark edge indicates Proposed [official] Catchment Area, and the solid grey indicates the Gazetted Catchment Area as at 2007. In fact, on page 56 it was recommended that the boundaries be widened to encompass this full area, as I understand it.

The maps here identify York in the Catchment, and e.g. Talbot West Road, for orientation to location.

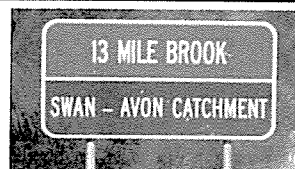
2007



The boundary of the Mundaring Weir **Catchment Area** is also the boundary of the Mundaring Weir **Surface Water Area**, proclaimed under the *RIWI Act 1914*. Additional land use controls were enacted over the Mundaring Weir catchment in December 1978 when the catchment was proclaimed under Part IIA of the CAWS Act to restrict the clearing of native vegetation that would cause salinisation of water resources.

SITA proponents want to think of only the plain grey area of the top map (or less?) as being the Drinking Water Catchment Area, but that only represents half of the truth as acknowledged in the

REPORT NO. 69, June 2007. <http://www.water.wa.gov.au/PublicationStore/first/72102.pdf>. Moreover, before you reach Allawuna Farm, on the left is the notice here shown: 13 Mile Brook flows into



Catchment, even if not directly flowing into the Mundaring Weir Catchment — Whether drinking water catchment or not. It also does not need polluting.

— though it is referred to as Spencers Brook Water Catchment in SITA's Works Approval Application.

WATER QUALITY PROTECTION MATTERS AND ONUS ON LANDOWNERS: a matter of DUTY OF CARE.

(Page 11) “The Mundaring Weir catchment is a **gazetted clearing control catchment**, which provides a mechanism for Government purchase of clearing rights. It also **assists with offsetting the impacts of water quality protection strategies on landowners. The former Water Authority purchased clearing rights or compensated those [landowners] who did not gain approval to clear on several properties in the north-east of the catchment.**”

Here, the principal was made clear that the landowner has a duty of care to protect water quality insofar as what he/she does (or causes to be done) could indeed have impacts on the water quality. This I feel is a solid legal argument that **Duty of Care on the part of the Landowner (in this case the owners of Allawuna Farm) constitutes an obligation they would be breaching if the proposed landfill at any time leached into the catchment, or its dried surface dust at any time blew onto the land and into surface- and near-surface- water in the catchment.** Likewise, if any activity on the part of the company running the Landfill operation (whom they have agreed on being on their property) caused any damage to the environment.

PROPOSED LAND USES IN THE CATCHMENT AREA, as per the DEPARTMENT OF WATER

(Page 14)

3.2 Proposed land uses:

It is anticipated that **private land within the catchment will continue to be used for low intensity agriculture or other low intensity use**, and further fragmentation should not be permitted. This activity is compatible with the **priority 2 source protection classification [i.e. risk minimisation]** proposed.

It seems to me that **a Putrescible Waste Dump does not meet the criterion of ‘low intensity use’.** The **Risk would be increased** by such a dump:

- * it disturbs the land and air;
- * it creates noise: frequent intermittent noise, with some noise going on for some time;
- * it introduces a wide range of ‘foreign substances’ into a concentrated space; etc....

(Page 16)

“The overall source protection objective for the catchment is to **maintain existing water quality and** initiate measures to **improve water quality** where possible.”

So not only is the goal to **maintain** but to **improve** the water quality — an even greater argument for not introducing counterproductive chemical elements. Here it is stated quite clearly by the Department of Water (p. 16):

“All public land in the Mundaring Weir catchment should be managed for Priority 1 (P1) source protection. The objective of this priority classification is to protect water quality according to the **principle of risk avoidance.**

A P1 source protection classification is appropriate as:

- The Mundaring reservoir is the **primary source of public drinking water** for the G&AWS (Goldfields and Agricultural Water Supply), without which supply to this region can not be maintained, and **should be afforded the highest level of protection**; and
- Most existing land use practices are compatible with P1 source protection, or can be managed for P1 source protection with the use of best management practices.”

The Department of Water recognizes the following **hazards which are not dissimilar to those of a Landfill operation**; for instance:

- (p. 26) Risk from activities involved in Gravel Pits: e.g.” turbidity from extraction”. This could apply particularly when the Landfill pit is being dug; we can add turbidity (and dust polluting the air) from when the rubbish is being deposited in the pit; possible spills from trucks or machinery (one could say if something accidental happened, such as a rollover or breakdown of some unloading mechanism)
- (p. 30) Roads and tracks: “Turbidity from erosion of unsealed roads and tracks; fuel and chemical spills from vehicles and machinery”;.....
- (p. 32) Major Roads (Shire roads and Main roads): “The potential risks to water quality include: Fuel and chemical spills from vehicles and their loads;.....
- (p. 35) Rubbish Dumping: “Pathogen contamination from domestic rubbish; nutrient, chemical, heavy metal and fuel contamination from domestic or industrial waste;....
- (p. 54) DEC activities such as Fire management and feral animal control.

SURFACE WATER, GROUNDWATER AND CATCHMENT

SITA does pay attention to this (Original Works Application, p 17):

“The landfill is located in the upper reaches of the **Spencers Brook water catchment**.....Both surface water and groundwater from the site flows away from the Mundaring Weir PDWSA.”

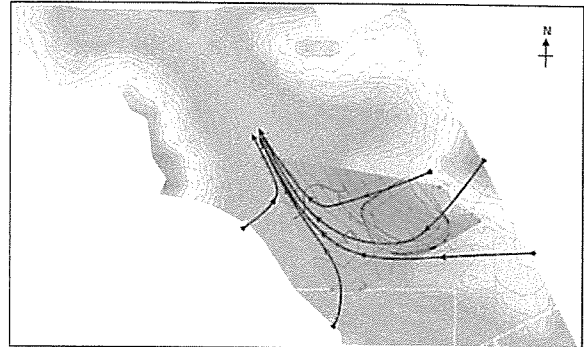
But then on p.27:

“The groundwater under the site flows along under the valleys and turns northward along 13 Mile Brook”.

But on P 29, “Figure 3 shows the hydraulic equipotentials and groundwater flow directions beneath the site.....Flow beyond the bore field boundaries has been inferred based on comparison between the measured bore heads and the surrounding topography.....”

Maybe so, but wait till you get a Major Earthquake or series of lesser magnitude but frequent shaking...

And if not, **it is still flowing towards catchment of one kind or other .**



They also say:

“The surface water and groundwater systems in the vicinity of the proposed landfill footprint are disconnected by the thick layer of surface [which is not surface] clay that covers the area.....”

Again: **With a Major Earthquake or an Earthquake Swarm, or with clay dessication due to internal combustion in the landfill, the situation might change with dangerous results in pollution.**

WHAT THE PROPOSED WORKS INVOLVES and claims

- | | | |
|----------------------|----------------------|----------------|
| 1. Landfill | 4. Office | 7. Borrow Pits |
| 2. Evaporations dams | 5. Storage facility | |
| 3. A Stormwater dam | 6. Truck weighbridge | |

Sources of the waste:

- Residential wheelie bins
- Construction sites, with any asbestos sealed in a double layer of plastic and buried deep in the landfill
- Shops, restaurants and other businesses.

Containment of the waste:

- Plastic and clay on the bottom
- Some kind of covering on top as it fills

SOME OF THE CLAIMS THAT CAN BE DISPUTED

Question: Since material from construction sites will be included, with **asbestos** specifically mentioned, how can the asbestos brought in later be ‘buried deep in the landfill’? **Surely, the later it comes in, the higher in the landfill it would be?**

Leachate:

“Water that comes into contact with the waste – known as leachate – would be captured, pumped out from the bottom of the landfill and into evaporation dams.”

Leachate Dams: Map shows them awfully close to 13 Mile Brook!

Stormwater Dam: Further away, but towards someone else’s Property, and I think still in a slope that runs in the direction of 13 Mile Brook.

Buffers:

SITA claims (page 4) that buffers are **adequate**. **They are not in the event of certain major disasters**, including Earthquake and Duststorms of the magnitude of that which hit York on 29 January 2011.

Claim (p. 6) they will capture gas (for Power) from the Landfill: dealing with gas is another potential hazard, both for escape into the environment, and for explosion or fire.

Claim there will be no disturbance to 13 Mile Brook: doesn’t take other risk factors for that into consideration. Everything is multifactorial, and they are treating each factor as standing on its own causativeness.

Claim they will salvage recyclables at the tip face (and other resource recovery perhaps): another point of risk of spills, scatter, etc.....

Environmental Requirements?

Page 7: SITA claim they have met all the environmental requirements, ensured compliance with all standards, etc... **BUT: Unless and until they build and operate the facility, this is not proven.**

Their first Works Application claimed (p. 18 of Application 1), by interpreting in the way that suits them, that because the EPA

“determined the proposal as ‘not assessed’ as the potential environmental impact of the proposal is not so significant to warrant the EPA’s assessment”

that this shows that :

“From an environmental perspective, the Allawuna Farm site is an ideal location for a putrescible landfill.”

Such a conclusion is a **step too far in logic**. It does not follow that because something is “‘not assessed’ as the potential environmental impactis not so significant as to warrant the EPA’s assessment” equates to “it is ideal”. The true algebra is (where \neq means ‘is not equal’):

potential environmental impact not so significant \neq potential environment makes the site ideal

As I understand it, NOTHING HAS CHANGED IN REGARD TO E.P.A. ADVICE and the current Application has nothing in it that would change it. So Minister Jacobs’ early February 2014 to those who appealed the EPA decision makes it absolutely explicit that the site is not necessarily ideal:

My decision should not, however, be taken to infer that the proposal is environmentally acceptable. Rather, my decision acknowledges that concerns with respect to water quality, air quality, vegetation clearing and potential environmental impacts will be considered by the DER for applications made under Part V of the EP Act. If the DER’s assessment of an application indicates that the environmental risks posed are unacceptable, the DER can refuse to issue a works approval, licence or clearing permit.

reflecting the fact that following the appeal to the EPA against their decision the Appeals Convenor concluded:

Allawuna Class II Landfill Facility, Shire of York
SITA Australia Pty Ltd

Appeals Convenor’s Report
January 2014

CONCLUSION AND RECOMMENDATION

For the reasons outlined in this report, it is concluded that the EPA decision not to assess this proposal was justified, noting that risks associated with the interaction between the proposal and ground and surface water, air quality and related matters are within the scope of matters the DER is able to consider as part of applications received under Part V of the EP Act.

It is further concluded that a decision not to assess the proposal is not intended by the EPA to be a determination that the proposal is environmentally acceptable and will necessarily be approved by other decision making authorities. Rather, the decision acknowledges that concerns with respect to water quality, air quality and related matters will be considered by the DER for applications made under Part V of the EP Act, and if the DER’s assessment of applications received indicate that the environmental risks posed are unacceptable, the DER can refuse to issue the relevant instrument (such as a works approval, clearing permit or licence), or can ensure conditions are attached to the instrument to mitigate identified environmental impacts.

Claims of lessened risk due to low permeability clay that is pretty thick. How thick now the pit is not intended to be so deep?

Question: At what depth does that clay begin and end? They cannot surely say that it encases the whole intended pit.

Existing Agriculture can continue on the rest of the site that is not taken up by the operation: well, minus the road and its immediate surrounds, minus the narrow sectors between the operation and 13 Mile Brook at a certain point, minus the potential side-effects of potential noise, air pollution etc....., minus the 350 hectares of bushland.

Claim that SITA will maintain about 350 hectares of bushland on the Allawuna Farm site: (this will not have changed, if it is true that (SP p3):

“The modifications to the Landfill...Do not change the position of the Landfill within the Allawuna Farm”

How will SITA maintain the area of bushland they have determined? Actively? How? And how if a Natural Disaster occurs?

Claim (p. 9, original application, but unchanged in App.2, they claim) of ‘only a small increase in traffic’: One truck each way every 20 minutes (6 per hour all up) X 8 hours X 5.5 days = 264 per week, or 48 per full day. That is **quite an increase in pollution** to what the environment already receives — even this ends up only an approximate number. (Not to mention the risk to human life of other drivers.)

Claim (p.10)

“The landfill is located away from key groundwater and drinking water sources and would have no impact on their flow paths;

Beyond the protected Mundaring Weir water catchment area;

Set back from 13 Mile Brook, to ensure no impact on its flow.”

These things they cannot guarantee.

Note the word **“protected”** for Mundaring Weir Catchment Area. **It is playing with words, because “protected” is being applied to a certain section, while ignoring what could happen to the actual, factual area with potential runoff into the Catchment.** (See maps on page 12 above)

Claims about the low-permeability clay and the rate of the groundwater movement in metres per year, and that ‘any water that comes into contact with waste in the landfill....[being] carefully collected and treated’, there are no guarantees if there is an industrial accident to the operations, or in the case of a big enough and close enough Earthquake.

Works Approval Application 1 Executive Summary (no change here) claims that the very low permeability of the clay **would limit the flow of surface water into the groundwater beneath the site;** but:

1. Even the proponents use the word ‘limits’, which admits that there is some possible, if minor or slow, leakage possible;
2. Is only referring to areas as low as where the clay starts; i.e. it does not prevent leakage at levels above the clay, if the plastic gets pierced by something cataclysmic or above where the plastic is, at the level of loading at the time something occurs to start unintended leakage.

Plans for a series of Cells, beginning with 1 & 2, moving on to 3 and more:

Logically, the more Cells that there are, and the longer adding Cells goes on, the more risk there is of some kind of unintended accident causing environmental damage. Even with the cell numbers now reduced: A lot can go wrong in the intended 20 years, and the long Post-Closure Management phase of another many years — particularly the many Waste Placement years.

Types of Waste to be included in the *Landfill Waste Classification1996(As amended December 2009.... for a Class II landfill.)*

The very fact that the first type is called Clean Fill marks out the rest as being varying types and levels of waste which each has some element of risk if not handled correctly or in large enough proportions. So

- (a) how they are handled,
 - (b) how they are treated, and
 - (c) whether or not there is some accident or catastrophic event
- all affect how harmless or dangerous the operation is.

NEAREST PUBLIC DRINKING WATER SOURCE AREA (Works Application 1 point 4.5) Claims

To quote:

“The nearest Public Drinking Water Source Area .. is the Mundaring Weir catchment, the boundary of which is located 1,000m west of the proposed landfill development.”

This applies to the 2007 Protected Catchment Area, but does not apply to the real area which impacts it via runoff, close to surface seepage, and groundwater — particularly if a major storm and flood, or a major Windstorm causes overflows of the intended dams, or piercing of the protective layers by flying debris or debris or materials dislodged by flood, or some other unexpected cataclysmic event.

Again to quote:

“Comprehensive site hydrogeological investigations have found no evidence of connection between the proposed landfill design and location and the Mundaring Weir PDWSA.”

This does not entirely make sense, because the whole landscape and hydrogeology is interconnected, and anything cataclysmic is bound to have ripple effects to the whole.

Despite SITA's claim (SP p3) that Golder Associates'

"Geotechnical investigations of the Landfill footprint and areas adjacent to the Landfill footprint confirm previous advice from the Department of Water that there is no paleochannel within the vicinity of the Landfill":

the data cannot, according to Golder's own disclaimer (see my page 3 above) be assumed to be reliable now or in the future.

Importantly, it appears that there are **paleochannels** in the area, some covered and some open as soaks, and that these run into the Helena River System which in turn joins into the officially protected Mundaring Water Catchment Area. So pollution that finds its way into these paleochannels will eventually find its way into the drinking water catchment. The worse the accident or catastrophe that occurs to affect the system, and the more frequently these things occur (as they are indeed doing) the greater the risk through the Landfill operation would be.

http://archive.agric.wa.gov.au/objtwr/imported_assets/content/lwe/land/bn_landscapes_soils_northam.pdf

This study informs us (in the section on the Darling Range south west of York, which refers to the area of Talbot Brook Road etc...) describes and illustrates waterlogging that goes with paleochannels as often occurring in winter, and wet drainage lines. The illustrations show the same kind of soil (basically greyish) that can be seen in a dam hump as one looks out to the left when passing Allawuna Farm, just before the National Park and Water Catchment Area notices.

This is one of the illustrations from that section of the article:



Another aspect of the "Drinking Water Source" issue is the fact that homes in the area are not linked up with mains water, and have to collect water from their roofs in tanks. In the scenario that we have a major summer windstorm such as is described and illustrated in 3. below, the leachate (with all its toxic substances) which has dried up in summer could blow onto the roofs (as dusts and pollens do even in the lesser yet still violent summer winds in York) and could find its way into the residents' water tanks and hence drinking water.

=====

IT WOULD BE IRRESPONSIBLE TO SAY THAT NO DISASTERS COULD OCCUR THAT WOULD INTERACT WITH THE PROPOSED LANDFILL TO BECOME A MAJOR CATASTROPHE. WE MUST NEVER SAY "IT COULD NEVER HAPPEN HERE", in the light of natural events which have happened here in the past.

HISTORIC NATURAL DISASTERS I know of IN YORK OTHER THAN EARTHQUAKE, and which (if similar occurs again) could affect the Project Area and interact with it to create a major catastrophe

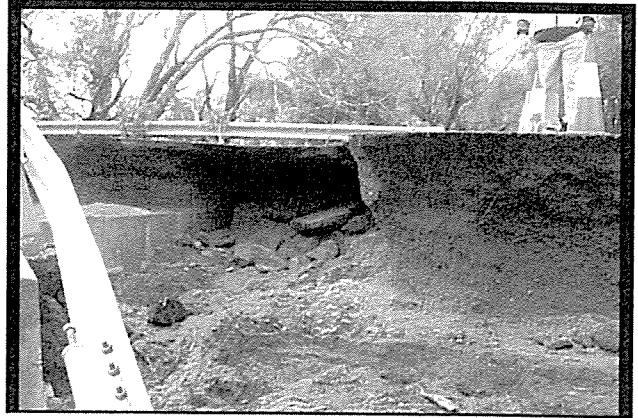
1. SEVERE STORM THAT SWATHED THROUGH THE AREA WEST OF YORK NEAR OR IN THE ST. RONAN'S AREA AND WHERE SOME OF THE RIVERS IN THE VICINITY RUN, CAUSING FLOODING AND SERIOUS DAMAGE

On 29 October 2008, without warning, there was a sudden storm, with about 100ml of rain falling in about 20 minutes. It was localised in an arc or path to the South West of York, in the general vicinity of St Ronan's, passing up through the Wambyn/Mokine area to the South West of Northam. It "washed away everything in its path" as one of the people living in the area described it. Roads had to be closed, and even several days later when I was able to pass through there was clear evidence of erosion beside the Great Southern Highway, fallen branches and uprooted trees.

On the **night** it occurred, the flash flooding washed away the stone and concrete foundations of bridges, undermining and breaking up road, and scattering debris. Four intersecting roads were impassable for some time. These 4 photos were taken on Mokine Road.

This rain event differed markedly from what the Eastern side of York got; the Eastern side only got 11.5mm.

<http://www.watoday.com.au/wa-news/storms-wash-out-york-bridges-20081029-5b2d.html>



<http://www.watoday.com.au/photogallery/wa-news/flood-damage-at-york-20081029-5b2h.html>



A storm of that suddenness, magnitude and ferocity in the area of Allawuna Farm could well cause undesirable leachate into the water catchment rivers and subsoil.....

2. 27th JANUARY 2009 SEVERE STORM AND FLASH FLOODING IN YORK AND QUAIRADING

<http://www.bom.gov.au/cyclone/history/wa/2009.shtml>
Tropical Cyclone *Dominic*, 22 - 27 January 2009

A low moved off the Kimberley coast during 24 January. This system moved steadily west and intensified into Tropical Cyclone *Dominic* by 0900 WDT 26 January. *Dominic* turned southwest and reached category 2 intensity before crossing the west Pilbara coast near Onslow at 0600 WDT 27 January. Wind gusts to 133 km/h (72 knots) were recorded at Onslow Airport and there was some minor structural damage and power lines brought down. *Dominic* weakened quickly over land although the remains of the system caused heavy rainfall and flooding in many parts of southern Western Australia. The Gascoyne River inundated many parts of Carnarvon. A train was derailed east of Kalgoorlie on 30 January apparently because of flowing water. **Flash flooding was also reported in the wheatbelt including York and Quairading.**

Just east of Mount Bakewell in York, a friend measured the rainfall as 57mm on 27th January 2009.

3. 6TH JANUARY 2013 SEVERE RAINFALL EVENT IN THE AREA

I am informed by a resident of that area that on January 6th 2013, coming from the North West in a band about 5km wide 40mm of rain fell there in a half hour. It affected properties in the vicinity of Allawuna Farm.

Some landowners there have photos of the event. The photo here, taken by Jenni McColl on that day, represents some of the flash flooding at 13 Mile Brook.



I am also informed that the leachate ponds are located uphill from the landfill site, and that leachate will

therefore be being pumped uphill from the landfill site to the evaporation dams. Obviously, if there are heavy rains or storms like those of 6/1/13 and 29/10/08, then leachate will flow back downhill and contaminate whatever is below it, including 13 Mile Brook, the landfill pit and around it, etc... This will:

- (a) require a massive cleanup and decontamination;
- (b) potentially damage the surface water which feeds the catchment via one route or another, not to mention other watercourses in the area. Apparently the soil is a of a porous, gravely type and will absorb liquid rapidly.
- (c) the barely porous clay at the bottom will not release the added water, and pumping out massive amounts of water would be an enormous challenge. The pit could fill and a mix of water and rubbish would overflow.

4. 29 JANUARY 2011 UNFORESEEN SUDDEN MASSIVE DUSTSTORM WITH THE FEROCITY OF A TORNADO HIT YORK -NORTHAM REGION

This duststorm travelled in a very short space of time, arising from erosion in Dalwallinu, with dusts travelling and accumulating and depositing their contents from Dalwallinu to Northam and York — a distance of about 203.7 km (Department of Agriculture and Food, Wind Erosion Roadside Survey Report No. 2 May 2011 http://archive.agric.wa.gov.au/objectwr/imported_assets/content/lwe/land/erosion/rss2.pdf — see the top right hand 2 pictures and captions below).

The winds in this storm were sufficient to structurally damage approx. 30 houses in York alone, several losing their roofs. Numerous fences and trees fell, including giant branches. Roofing, fences and all sorts of objects were blown into other people's properties. **If such a storm occurred again, including over the area of the proposed Landfill and surrounds, a serious accident could occur to any aspect of the Landfill via flying debris.**

Further, the storm arrived so suddenly that there was **no forewarning** to anyone not outside and looking in the right direction. Even then there was only a short space of time. For people out in it, it became impossible to see ahead of oneself. On impact it whirled around in all directions, so that even shut indoors one felt that it was battering from all sides.

If such a storm occurs around Allawuna, any rubbish in the process of being unloaded, or not yet covered, would be blown wherever the wind sent it, as would the material intended to cover it, thereby polluting the land around for some distance, and the next time rain fell it would enter the water system by absorption or by runoff. Hence, it would blow unhealthy chemical and biochemical elements (including asbestos dust if present):

- into houses and airconditioners;
- into the streams ground surface and drinking water catchment;
- onto normally productive farmland;
- onto normally healthy national park and its ecosystems, and ditto for the gazetted nature reserve nearby.

<http://www.redbubble.com/explore/2011+29+jan+storm+york>



http://archive.agric.wa.gov.au/objectwr/imported_assets/content/lwe/land/erosion/rss2.pdf



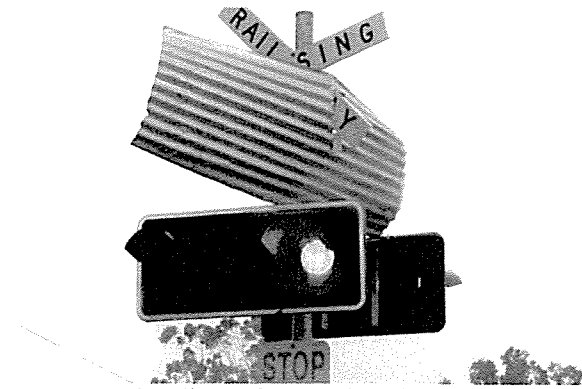
Figure 1. Dust Cloud caused by wind erosion near Dalwallinu (29 January 2011)
(Photo courtesy of Rebecca Butcher)

http://archive.agric.wa.gov.au/objtwr/imported_assets/content/lwe/land/erosion/rss2.pdf

The summer period between the pre-harvest survey (Oct/Nov 2010) and the pre-seeding (April/May 2011) was marked by strong localised storms causing wind and water erosion in some areas, and other areas remaining hot and dry. Prefrontal winds produced dust clouds in parts of the wheatbelt (Dalwallinu on several occasions, Northam and York), indicating that some ground was vulnerable to wind erosion.

Right side Caption:

Wind debris on the fenceline of a paddock in the York district after the storms in Jan 2011, the result of high winds and detachment by stock.

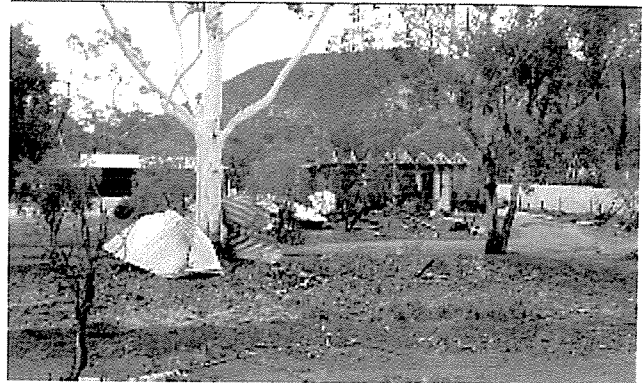
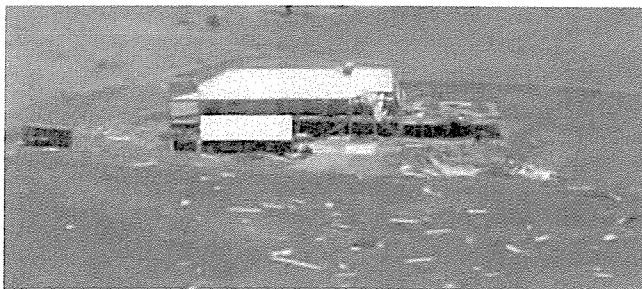


<http://www.abc.net.au/news/photos/2011/02/01/3126605.htm?site=perth>

Right and below left:



Search
© ABC
21°C
Perth



Source (this and above Right): <http://www.abc.net.au/news/video/2011/01/30/3125231.htm?site=perth>



<http://www.abc.net.au/local/audio/2011/01/31/3126152.htm?site=perth>
ditto above Right



Anyone seen a shed? (Submitted by Michelle Ann and Daniel Treasure) (Unspecified)
Caption: Anyone seen a shed? (Shed had flown)
Source: <http://www.abc.net.au/local/photos/2011/01/31/3126094.htm?site=perth>

POLLUTION FROM TRUCK EXHAUST ON THE HIGHWAY AND ON THE PROPERTY

Ref: blumberg-lab.bio.uci.edu/past%20teaching/bio2B.../airpollution.pptf

A conference on "Air Pollution: Impacts on Body Organs and Systems" was held in Washington D.C. by the National Association of Physicians for the Environment on November 18, 1994 supported the contention that air pollution can enter the human bloodstream through the nose, mouth, skin, and the digestive tract. This includes harmful chemicals such as benzene, lead, carbon monoxide, volatile nitrites, pesticides and herbicides.

Pathogens in car exhaust include: (above article plus http://www.dieselnet.com/tech/env_top.php)

- 1.-Carbon Monoxide (danger to humans and animals)
- 2.-Nitrogen Dioxide (produces nitric acid & ozone; contributes to acid rain; a respiratory irritant)
- 3.-Sulphur Dioxide (produces sulphuric acid; contributes to acid rain; a respiratory irritant)
- 4.-Particles such as PM-10 — Particulate Matter (into the lungs; a mix of solids, organics, and sulfates) which is still a relative 'unknown quantity' regarding its effects, but considered a major health concern.)
- 5.-Benzene (see below)
- 6.-Formaldehyde (ozone precursor and carcinogenic)
- 7.-Polycyclic hydrocarbons (see below)
- 8.-Carbon Dioxide (global warming)

and a range of other harmful more complex versions of some of the above, as well as

It stands to reason that **the more heavy vehicles there are on the road, the more pollution will occur from these sources.**

5.- Some information on **Benzene:**

- Benzene has been found in 337 of 1177 National Priorities List **hazardous waste sites** [in the US].
- used as materials to produce industrial products and pesticides
- environmental sources of benzene: found in gasoline, ...**vehicle exhaust fumes, underground storage that leaks, wastewater from industries that use benzene, chemical spills, groundwater next to landfills containing benzene,** and food products that contain benzene naturally.

7. Some information on **Polycyclic hydrocarbons:**

- PAHs are a group of chemicals formed during the incomplete burning of coal, **oil and gas, garbage,** or other organic substances.
- used in medicines, and to make dyes, **plastics,** and **pesticides**
- **found in the air, water and soil**
- **occur in air attached to dust particles, or in soil or sediment as solids**
- **PAHs attached to dust and other particles in the air originate from vehicle exhausts, asphalt roads, coal, coal tar, wildfires,** agricultural burning and **hazardous waste sites.**
- can be ... in soil near where coal, wood, gasoline have been burned, or from **soil near waste sites** such as former manufactured gas sites and wood-preserving facilities.
- enter the body through the lungs

Solution

Air pollution prevention is the best solution for immediate reduction of harmful effects of environmental toxins. Public support is necessary to reduce environmental air pollution.

Governments can encourage the reduction of vehicular usewith a variety of transportation options.

One suggestion in the case of this project was **The Avon Proposition** (<http://wawaste.com.au/proposition.html>). This includes:

a single landfill site to cater for all metropolitan waste that needs to go to landfill, subject to the following conditions:

1. The site should be in a low rainfall area. [Western York is "Wet Mediterranean Climate"]
2. It should be away from a population centre.
3. It should be on land already cleared.
4. Choice of a site must take into account local seismic activity.
5. The site should be large enough to provide sufficient waste disposal facilities for the next three generations.
6. All organic waste should be processed and used as a soil improver.
7. **Metropolitan waste should be transported to the site exclusively by rail."**

This does not, however, deal with the likely effects of spread of organisms and dust pollutants in the case of very major storms or duststorms.

DUST, PATHOGENS AND OTHER POLLUTANT TRANSFER POSSIBLE WITH MOVEMENT

- of soil when it is being removed to dig the pit
- from any accidental spill of rubbish when loading it into the pit
- if blown by heavy wind when transfer is occurring (as with the 29 Jan 2011 windstorm, it might creep up unexpected)
- if washed into the surrounding surface ground, waterway, leachate evaporation dams, or stormwater dam.
- of dust at any stage: tipping, construction of cells, from excavation material stockpiles, etc..
- of dust due to truck movements on the unsealed road at the site.

These and other such things are acknowledged by SITA (e.g.11.2 <http://wawaste.com.au/docs/140106b%20AD%20Volume%201%20Allawuna.pdf>), and they suggest how they will deal with it, but even when they say:

“If dust inspections indicate that dust is being generated from the site, and is crossing the Site boundary, then additional dust management techniques may be adopted such as mulching, hydro seeding, chemical crusting agents or additional use of water trucks or sprays”

That is not foolproof; mulch, chemical crusting agents, sprayed water inmixed with the dust or chemicals or mulch dust, can still blow around, even across Site boundary, towards the landowners’ or neighbour’s homes, the treed areas, the National Park, etc.... **especially in the case of a major windstorm.**

RISKS FROM FIRE

Fire could occur in the Landfill, due to **industrial accident** or **bushfire** or fire started by **lightning**. Fires are often started by lightning in York’s rural area. Even though they are often put out quickly, such a fire could still impact on the Landfill — **even more so if set off ‘after hours’.**

On page 74 of the original SITA document, they acknowledge that **flammable materials** will be onsite, and state:

“Fire can also originate from the surrounding bushland and farming areas, particularly during dry and hot weather conditions either naturally or due to deliberate lighting.”

They believe they have put in place adequate management strategies. However:

1. this site is with in close contact of bushland,
2. in **one of the hottest areas out of Perth in Summer** (e.g. Jan-Feb 2013 there were about 10 days of over 40° temperatures, with nights barely cooling;
3. where **very strong winds occur** even in Summer (not to mention the **extreme example we had on 29 Jan 2011** with the wind/dust storm), and:
4. **lightning frequently starts fires here**, even on farms (common knowledge around here).

This all seems to suggest that this area could be volatile for fire-weather, and mitigate against easy extinguishment.

Then also:

5. there is always the possibility of an **industrial accident** causing fire (an employee could light a cigarette inappropriately, or fail to follow safety guidelines, for instance),
6. the relevant department might start a **hazard reduction fire which gets out of control and drops embers** on the landfill.

http://en.wikipedia.org/wiki/Bushfires_in_Australia (quoting a range of Research Documents)

“Australia's climate has been trending toward more bushfire weather over the last 30 years.

In 2007, a study by the CSIRO ... found evidence that climate change will lead to increases in very high and extreme fire danger rating days and earlier onset of the fire season. Other studies investigating the historical record identify significant changes in Australia's bushfire season as a result of human activity.

The article charts “some of the most severe” Bushfires in all States from 1851 to 2014. The earliest and most frequent were and are in Victoria, and 1851 to 1961 (110 years) none of them in WA. However, **there is an increase in the number/frequency in WA, over time.**

The locus of proneness to bushfire seems to have shifted to include Western Australia more frequently.

Below are the large WA fires in Perth Hills and Avon Valley areas referred to in the article: 1961, Jan-March, [Dwellingup etc.,] Darling Scarp & Mundaring); CAUSE: hot NE winds & high

temperatures following Pilbara cyclones.

- 1997, [3-]8 Jan, 10,5000 hectares burnt out in Wooroloo, 16 homes destroyed; [also damage to Wooroloo Prison Farm —http://www.ga.gov.au/webtemp/image_cache/GA6524.pdfCAUSE: ?
- 2009, 29 Dec, Toodyay, 3,000+ hectares, 38 homes destroyed; CAUSE: heat >45°; power line fault may or may not have been involved (http://en.wikipedia.org/wiki/2009-10_Australian_bushfire_season)
- 2011, 6-8 Feb, Roleystone-Kelmscott, (72 homes destroyed, 32 damaged, Buckingham Bridge on Brookton Highway collapsed and closed for 3 weeks whilst a temporary bridge was constructed and opened a month after the fires); CAUSE: High temperatures, sparks from angle grinder use igniting grass, as per news coverage.
- 2014, 12 Jan, Parkerville, 386 ha, 1 dead, 56 homes lost. CAUSE: temperatures >40°, and fallen power line on one property, according to news at the time.

Other close to York

http://en.wikipedia.org/wiki/2010-11_Australian_bushfire_season

2011, 5 Feb, Swan Valley, (CAUSE: tree falling on electrical transmission tower)

http://en.wikipedia.org/wiki/2011-12_Australian_bushfire_season

2012, January, Wooroloo and Chittering and 6 Feb. Chittering Estate, also small one in Toodyay (<http://www.perthnow.com.au/news/western-australia/homes-destroyed-as-fires-rage-down-south/story-e6frg13u-1226256900590>)

http://en.wikipedia.org/wiki/2013-14_Australian_bushfire_season

2013, 14 Dec, Toodyay, > 50 hectares; CAUSE: powerlines?

The severity and frequency have been increasing.

http://www.ga.gov.au/webtemp/image_cache/GA6524.pdf

2005, 15 Jan: Largest bushfire in Perth Hills in 40 years. The fire was believed deliberately lit and burnt 27,000 ha of state forest, national park and bushland in Mundaring, Pickering Brook, Karagullen and Barton's Mill.

2015, 10 May overnight: A fire was started at the York Waste Transfer Station, on Spencer's Brook Road. This was reported by York Police as follows:

From: York.Police.Station@police.wa.gov.au

Subject: Fire at Rubbish Tip - York

Date: 11 May 2015 1:21:44 PM

Overnight [Sunday] someone has lit fire to one of the mulch piles at the York Rubbish Tip.

The fire is still burning this afternoon.

Some residents of York may experience smoke from the fire this afternoon. Fire Fighters and the Shire of York are at the scene attempting to reduce the smoke level."

Later the police wrote:

"DFES Officers spent most all of Monday containing the fire from spreading to other piles. Heavy smoke fell across parts of the town throughout the day."

This was not a major fire by many standards, and there was no toxic waste involved, but it was started at night and burnt overnight, and was still burning the next afternoon. The smoke in itself would be a health hazard to people with asthma or other lung diseases, and an irritant to animals as well. **If this had involved toxic waste of any kind, it could have been far more dangerous to health. Imagine if it had been at a large SITA facility.**

The transfer station in question is managed by Avon Waste, and it is Avon Waste to whom SITA have offered the contract of managing the Proposed Allawuna Landfill.



Photo: York Police e-mail to citizens

Clearly **Avon Waste had not been guarding the site against someone starting a fire, and neither did they have a good enough system in place to stop the fire quickly once started.**

So if, despite all SITA's efforts and engineering technology, a moderate or catastrophic fire occurred, starting in the landfill (e.g. through explosion, which SITA documentation indicates is potentially possible <http://wawaste.com.au/docs/Appendix%20G%20-%20EPG%20&%20Contingen.pdf>) or spread to it through an external source, such that they were unable to bring to an end quickly, what would be the likely impacts on the water, land and air in the environment of the area?

<http://www.waste-management-world.com/articles/print/volume-11/issue-4/Features/understanding-landfill-fires.html>

“A serious landfill fire results in the downgrading of a ‘controlled’ landfill to ‘uncontrolled’ status, or in practical terms the waste mass becomes inadvertently reconnected to the environment. All the costs and effort of engineering a perfect containment system are wasted if fugitive emissions, often including dioxin and untreated leachate, are released through a perforated cap or liner.

Landfill fires occur frequently. In the USA there are around 8300 fires a year (US Fire Administration, 2001) and in the United Kingdom around 280 to 300 a year.

Landfill fires vary in scale from minor outbreaks on the surface, to massive tyre conflagrations with the potential to cause environmental incidents exceeding for instance, the impact of the Exxon Valdez oil spill in 1989. In human terms, the uncontrolled atmospheric emissions arising from these fires, which often continue for years, are potentially lethal with well-proven acute and chronic health impacts.

Recent landfills are very largely comprised of combustibles such as plastic and textiles, which maintain their fuel value into virtual perpetuity.

How do landfill fires start?

For surface fires the reasons are obvious – a heat source of some type has contacted the surface, for instance deposits of hot wastes, lightning, or arson. For deep-seated fires (below 4.5 metres) the initiation mechanisms are quite different. Accidentally initiated fires normally start for one of three reasons:

- **Spontaneous Combustion:** where a buried heat source, resulting from biological decomposition or chemical oxidation, produces a rise in temperature if the waste mass cannot dissipate the heat faster than it is being produced – a process known as ‘thermal runaway’
- **Spontaneous landfill combustion** has been traced to a batch of mercury cell batteries which short-circuited during the final settlement of a landfill, and to cotton rags soaked in aluminum paint. Combustion accelerants can also help to make the party go with a zing, the dregs of distilled alcoholic drinks bottles are an example....
- **Legacy Heat: the inadvertent burial of a heat source.....**
- **Piloted Ignition:** from a point heat source, happens when ignited waste is buried in the landfill.”

SITA’s documentation <http://wawaste.com.au/docs/Appendix%20G%20-%20EPG%20&%20Contingen.pdf> **acknowledges that there could be smouldering waste taken to the site** (p.17). Returning to the above article:

“Deep-seated landfill fires do not ‘burn’ in the accepted sense. These fires are a form of combustion, known as **pyrolysis**, where the thermal reaction takes place in an oxygen-starved environment. The combusting material is consumed very slowly and at low temperature. As the waste is heated it begins to devolatilize

The **volatiles** are either incompletely combusted into other species for example carbon monoxide, dioxin from PVC, hydrogen sulfide from gypsum drywall board, or re-deposited on the surface of cold wastes lying in front of the advancing temperature front. Once devolatilization is complete the remaining fuel, in the form of fixed carbon (visualize this as the charred wick on a candle after it is blown out) can remain hot, under starved oxygen conditions, for years.

Atmospheric emissions

Atmospheric emissions from landfill fires are often dismissed as a nuisance. The following are two examples of just how serious the ‘nuisance’ is:

- **Dioxin emissions:**.....
- **Gases and Vapors:** landfill fires emit a toxic cocktail of ‘Most Wanted’ fugitive gases including formaldehyde, hydrogen cyanide, hydrogen sulfide, nitrogen oxides and many others (OEPA, 2006). Visible smoke might not be visible since compacted waste acts as a good particulate filter, but fugitive gases are able to percolate towards the surface. Emitted smoke is a hazard
- A particular problem with smoke, which is largely unburned carbon, is particles that have become activated, in the form of an adsorbent, with a huge appetite for mopping-up ‘most wanted’ contaminants. Very small particles, known as Sub PM2.5s (smaller than 2.5 millionths of a meter in diameter) are capable of remaining airborne for days, and together with adsorbed contaminants will pass directly into the bloodstream once inhaled.
- **Groundwater emissions:** This is an interesting issue. An uncontrolled release of leachate can occur, even to an otherwise dry site, if groundwater is admitted through a perforated basal liner. Manufacturers of HDPE / LLDPE liners recommend an upper temperature limit of between 60°C and 71°C. Exceeding these temperatures, for even a short time, causes a depletion in the membrane antioxidants and a spectacular loss of service life. At 10°C the service life of a liner might be 375 years; at 60°C the service life will have decreased to around 20 years.”

This being the case, SITA’s plan to use HDPE geomembrane (<http://wawaste.com.au/docs/Appendix%20F%20-%20Construction%20Sp.pdf> page 36, section 14) **is subject to this risk.**

I think this establishes the case regarding each of :

- (a) external source fire risk and
- (b) internal source fire/combustion risk and
- (c) the **unwanted side-effects that are seriously dangerous to the environment.**

But there is also this from the same paper:

“... you might say, ‘thank goodness for our **clay/Bentonite (CLPS) secondary membrane protection layer**’ - but the effects of **heat dessication on clays** is even more spectacular and results in the formation of very **large fissures which can be visualized as sort of ‘self-excavating’ leachate drains.**

Geotechnical engineers will tell you that a perforated basal containment system cannot be repaired at any reasonable cost.”

So, in case of e.g. internal combustion in the Landfill, **EVEN WITH BOTH THE MEMBRANE AND THE CLAY LINER, LEACHATE CAN ESCAPE INTO THE GROUND** and so potentially **POLLUTE THE UNDERGROUND WATER CHANNELS (THE PALEOCHANNELS)** that eventually find their way into the **Drinking Water Catchment.**

The above article was written by Patrick Foss-Smith who is a British environmental consulting engineer specializing in landfill and underground fires.)

NOISE POLLUTION

While the Noise Levels during both Construction and Operation were measured <http://wawaste.com.au/docs/Appendix%20M%20-%20Noise%20Investiga.pdf> (page 14) as falling within the EPNR 1997 criteria, I believe that for the people living at 3462 Great Southern Highway, St. Ronan’s, the fact that it will be ongoing is a danger.

The EPA’s ***GUIDELINES FOR THE USE OF THE ENVIRONMENT PROTECTION (NOISE) POLICY 2007*** http://www.epa.sa.gov.au/xstd_files/Noise/Guideline/guidelines_noise_epp.pdf acknowledges (p1) that there is a “range of factors that influence how a person responds to the noise, including:

loudness; duration; predictability; certain characteristics, such as a tone (ringing or humming), impulse (‘bangs’ or impacts), a modulation (where the noise level changes in its loudness, tone or character) or low frequency (base noise which has the ability to travel and penetrate or bend around structures) noise; time of day; activities of the person affected; relationship between the person affected and the noise; familiarity with the noise and its purpose; area in which the person is affected and the noise is located, and how loud or quiet that area is expected to be; history of the area in which the person is affected and the noise is located;

[and so] the Noise Policy balances the interests of those whose legitimate activities cause noise, and the rights of those who are exposed to and potentially affected by the noise.”

They express the need (p.5) to

“balance social, economic and environmental considerations in the management of noise issues [by] ensuring that protection from excess noise is in accordance with World Health Organization guidelines

They offer guidance (p. 13-14) on the factors that may be relevant in subjectively deciding whether a noise is unreasonable in the circumstances: e.g.

- Is the noise **loud** either in an absolute sense, or relative to other noise that might be present or expected in the area?
- Is the activity of a **duration**, volume or **characteristic** that is significantly different to that expected or typical in the area?
- **Could a reasonable person tolerate the noise** given the time of day and the duration of the emission and/or the fact it is not typical of activities conducted in the area?

“Not all of the factors need to be present for an opinion to be formed that the noise is causing an unreasonable interference. Ultimately, the level, nature and/or extent of a noise are important criteria”

I believe these are serious questions when considering the Landfill Construction and Operation in the vicinity of not only the farm operated by the owners of the land on which it is proposed to set up the works, but also the farm nearest to it, and possibly at least the one nearest to it across the road (when the wind is blowing a certain way, at least). I would expect The Construction Phase to be the worst from the noise point of view, with varying levels, some sounds of longer duration than others, etc..... Sudden noises and whining noises could be the most irritating; that does not mean that the Operational Phase

would not have health/environmental implications, though.

The World Health Organisation has been studying Community/Environmental Noise since 1980 <http://whqlibdoc.who.int/hq/1999/a68672.pdf> page v, Community/Environmental noise including (p.vii)

“noise from road, rail and air traffic, industries, construction and public work, and the neighbourhood.”

Adverse Health Effects they refer to include:

• Cardiovascular and Physiological Effects (pp. 29-30)

“The overall conclusion ... cardiovascular effects are associated with long-term exposure to LAeq,24h values in the range of 65-70dB or more, for both air- and road-traffic noise”

• Mental Health Effects (pp. 30-31)

“Environmental Noise is not believed to be a direct cause of mental illness, but it is assumed that it accelerates and intensifies the development of latent mental disorder. Studies ... cover a variety of symptoms including anxiety; emotional stress; nervous complaints; nausea; headaches.....increase in social conflicts, as well as general psychiatric disorders

Despite the weaknesses of the various studies, the possibility that community noise has adverse effects on mental health is suggested by studies on the use of medical drugs, such as tranquilizers and sleeping pills, on psychiatric symptoms and on mental hospital admission rates.”

- Effects on Performance;
- Effects on Behaviour and Annoyance;
- Effects of Combined Noise Sources..... Etc....

The Precautionary Principle is invoked by the WHO, *ibid.* page 48, thus:

“In all cases, noise should be reduced to the lowest achievable in a particular situation. Where there is reasonable possibility that public health will be damaged, action should be taken to protect public health without awaiting full scientific proof.”

The Landfill’s proponents have given the noise levels for the varying aspects of the transport, construction and operation aspects of the Project. However:

1. their figures do not take into full consideration the **possible effects of ongoing noise phases.**
2. They focus on higher-range noise figures which may not have long-term effects if not long-term in themselves; but
3. They have not paid adequate heed to the long-term effects of lower-decibal long-term noise which may well reach the neighbour farmers, and will certainly reach the owners of Allawuna Farm unless they sell up and move out.

As a retired Psychologist, with a Master’s Degree in Psychology, the potential for serious effects of noise on the nearest neighbours (whoever lives there now or later) concerns me greatly.

I have refrained from reference to effects on **Fauna**, however, noise does have impacts on their survival and wellbeing, too. (e.g. *Annotated Bibliography; Impacts of Noise on Wildlife — National Park Service — http://www.nature.nps.gov/sound/assets/docs/Wildlife_AnnotatedBiblio_Aug2011.pdf and *Effects of Noise on Animals; Effects of Noise on Wildlife <http://www.airandnoise.com/Animals.html>)**

I would say the same for vibrations, for both humans and animals.

In fact, the data indicates that noise and vibrations can lead to death of native animals, whether birds or ground-dwelling, or water-dwelling, via interfering with the air or ground signals they send each other. We have, in the area around the the proposed Landfill, remnant species which are special to the forest and the gazetted reserves of the area. They do not need to be further decimated or lost.

ODOUR EMISSIONS — THE ASPECT SITA ADMITTED TO MOST UNCERTAINTY ABOUT in APPN.1

<http://wawaste.com.au/docs/Appendix%20L%20-%20Odour%20Investiga.pdf>

- If odorous loads are received, these are buried amongst existing waste as soon as possible.
- Waste will be covered at the end of every day to a minimum cover thickness of 225 mm
- Covering will be sand, earth, etc... (well, now it will be **earth from the Borrow Pits, at least; not much has been said about this, though**)

In my view, if contaminated coverings are scraped off as suggested would happen under certain circumstances, they can spread contamination, but moving on...

4.3 ODOUR SOURCES (p.9)

The key odour-emitting sources are considered to be:

- the working tip face; and
- the leachate dam, used primarily for the collection of sub-surface leachate from the working area.

The stormwater dam used for the collection of stormwater runoff from outside the working area was considered to be a negligible odour source based on observations of the equivalent facilities at the Henderson Landfill in Perth. (p. 100)

“the odour emissions were primarily obtained from a sampling program of odours from the City of Cockburn’s Henderson Landfill which is considered comparable in terms of capacity, waste and management practices to the Allawuna proposal site.”

In my view, it is risky to judge one setting by another; the topography of the two places, Henderson and Allawuna over the Hills, is quite different, and different factors will come into play in affecting outcomes.

SO THE CONCLUSIONS THAT CAN BE DRAWN ARE ALL PRETTY HYPOTHETICAL, as SITA admits in the following (Application 1, p.17; 8.2)

QUALIFICATIONS AND UNCERTAINTIES

“The largest uncertainty is considered to be the odour emission rates. These were determined from odour emissions at the Henderson landfill, which is similar in capacity to the final capacity at Allawuna and in terms of waste being received.

It is considered that the odour emissions rates used for modelling odour impacts from the proposed Allawuna Landfill should be conservative because:

- the odour emissions sampled from Henderson were after a prolonged period of hot weather in Perth, therefore the putrescible waste being received was in a more advanced state of decomposition – and more odorous, than for average temperatures. The use of a “summer-time” odour emissions rate year-round at Allawuna should be an over-estimate;
- comparisons with the odour emission rates derived with those from other sites in Perth and from values derived overseas indicates that the odour emission rate used for Allawuna is at the high end of these values; and
- the modelling includes what should be an over-estimate of odour emissions from the leachate dam since the emission rate is based on continuous maximum capacity of the dam.

Uncertainties that could result in the criterion odour contour being larger than predicted include:

- management practices deteriorating from those assumed; and
- poor integrity of the landfill gas capture system to be installed.

These matters are, however, subject to regulatory controls.

Given there is a wide margin between the most stringent of the predicted extent of the unacceptable odour impacts and the location of odour-sensitive premises (i.e. nearly 2 kms), there should be considerable confidence that the proposed Allawuna Landfill, if operated according to the assumed management practices, will not cause unacceptable odour impacts.”

We must remember, however, that not all dangerous gases give off odour, and hence may not be detected before doing harm.

SITA IS SAYING (SR, PAGE 17; 3.7):

“{8.7}

A landfill gas collection system will be used to extract and control landfill gases generated.”

But anything can fail if the weather and seismic conditions are bad enough, or major fire occurs.

RISKS THROUGH FAILURES IN SOLID & LIQUID WASTE MANAGEMENT

Cover material <http://wawaste.com.au/docs/Appendix%20L%20-%20Odour%20Investiga.pdf>
(page 8 of Application 1, and page 17, 3.8 of SR)

Cover material

- The cover material will typically be sand, soil or biodegradable sheeting.

NOW it will be earth from the Borrow Pits, at least; not much has been said about this, though; and nothing has been said in the Supplementary Report as to whether that is all that will be used, or whether it will be supplemented by sand or biodegradable sheeting. It appears that the borrow pit material will be supplementing the previously

suggested substances, as it says:

“Earthwork modelling based on the revised, higher Landfill floor level has identified an imbalance in material required for construction, daily cover and capping, necessitating **the recovery of additional materials from elsewhere within Allawuna Farm. It is projected that the additional materials will be required from Year 10 onwards.**”

In Application 1 they went on:

- The choice of material used as daily cover will be an important management consideration at the landfill as it could potentially limit gas and leachate movement, thereby stratifying the waste.
- At least two weeks cover material will be available at the waste facility under all weather conditions. This material can either be obtained on-site, or alternatively delivered to the site.

Cover stockpile

- A cover stockpile will be maintained adjacent to the tip face at all times.
- There will be enough cover material in the stockpile to cover waste in accordance with the above

(page 9 Appl)

The daily cover may be scraped back before additional waste is placed on top and if this occurs, the daily cover will then be stored for reuse.

In my view, there are risks in wind/dust storm, flooding rains, and simply moving materials, as well as the suggested ‘scraping off of materials’ leading to contamination of the environment.

It is also confusing as to whether the Borrow Pits are to be incorporated right from the start or only after 10 years.

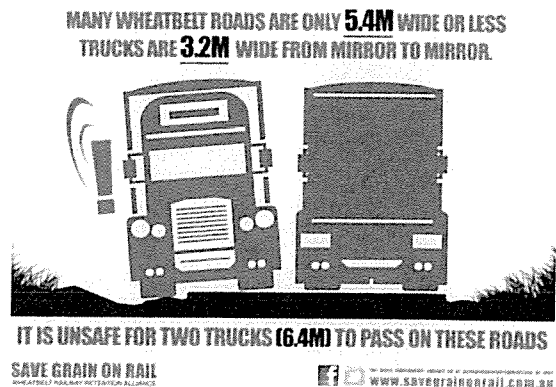
CHEMICAL STORAGE

This speaks for itself as a risk in the case of a Seismic disaster or a fire or explosion, or if a wind/dust storm of major force causes some object to fly into the storage area.

INCREASED RISK OF DEATHS AND INJURY TO PEOPLE THROUGH INCREASED NUMBERS OF LARGE TRUCKS ON OUR NARROW ROAD TO THE LAKES

The original proposal of Six double-trucks X 8 hours p.d. X 5 days p.w = 48 X 5 = 240. Then there is the trucking in of sand to cover the rubbish, and other ancillary vehicles for operators of machinery etc... Someone estimated up to 108 movements per day, which would be (for 5 days) 540 pw. If there is another half-day Saturday, that is even more. That is a lot of extra vehicular movement from SITA alone.

The cartoon inserted opposite from Facebook (hence the public domain) applies to the other extra trucks we will get if grain does not end up being rail-freighted due to rail closures. The road widths may be just a little greater between Allawuna Farm and The Lakes



(but not much more in most parts). The principle is the same.

The Supplementary Report makes all sorts of vague promises (page 28) about the haulage vehicles and conditions of use which might be set up, but is rather non-specific, promising to work out various aspects with Main Roads and “provide a copy of the Waste Haulage Vehicle Management Plan to the Shire (if requested by the Shire) and post a copy on SITA’s website.”

I illustrate with my own personal example below; i.e. My experience late October 2013, illustrating how unsafe this road is even without the extra trucks SITA would be putting on the York—Lakes road.

I had the experience of nearly being pushed off the road between here and The Lakes by a very long double truck. I had to focus on the narrow path it left me to negotiate through.

I was returning to York late afternoon still in full daylight, somewhere the Perth side of 13 Mile Brook, Allawuna Farm, Mount Observation and so on, and as soon as the truck became visible (only maybe 100 meters away, because trees were blocking the view to that point) coming round a long bend towards me, it was already my side of the double white lines and did not shift back off that trajectory. Once that far over from its side of the road it probably couldn't because of its size and steady speed.

Since my vehicle is narrow (the narrowest in town) and the road had a one-foot approx bitumen apron the other side of the rough white line that marks the official edge, I was able to steer between the truck

and the gravel. **Had my car been a larger, more average-sized or large one**, it would have been forced onto the gravel, and could quite probably have skidded into a tree and/or turned over. I, or anyone else in a similar situation, could have been **dead or maimed. IT COULD HAVE BEEN ME; IT COULD HAVE BEEN YOU. IT COULD HAVE BEEN OUR BEST FRIEND, OR OUR SON OR DAUGHTER OR MOTHER OR FATHER OR BROTHER OR SISTER.**

It is another timely warning about the risks on that road and the likely accidents from a vast increase in large trucks if the SITA dump were allowed; AND:

- Allawuna is positioned on the Great Southern Highway, **one of the Wheatbelt's main arteries to Perth. With the increase in traffic from the closure of the three tier rail the Highway has become increasingly more dangerous;**
- **The Wheatbelt road fatality is six times the state average and 11 times the metro average** according to the RAC;
- **Almost 2 in every 3 fatalities in the Wheatbelt occur during daylight hours**, according to the RAC.

GREATER DETERIORATION OF THE ALREADY POOR YORK-LAKES ROAD FROM THE EXTRA HEAVY VEHICULAR TRAFFIC

This is undebatable. It speaks for itself — even with the provisions of p28 of the Supplementary Report.

A VERY DANGEROUS PLACE TO HAVE A TRUCK ENTRY TO ALLAWUNA FARM:

I drive out that way pretty often, and it seems to me that that area is a very dangerous place to have trucks etc... entering Allawuna Farm. Coming from Perth it is downhill, just round a bend on the main road, with a Right Hand Turn into the property. **Even with a wide entry area built and a widening of the road at that point, I believe it would be quite dangerous — particularly for the other traffic on the road at the same time.**

DAMAGE TO YORK'S TOURISM INDUSTRY, PEOPLE'S ENJOYMENT OF ECO-TOURISM, ETC..

If native flora (the wildflowers, for instance, that draw people to York annually) which are particularly visitable in the very area of forest and reserves in the area, end up decimated by fire and emissions emanating from the pit and from trucks, or caused by lightning strike or windstorm or earthquake, then:

- Eco-Tourism will be seriously depleted;
- The Town of York will have less visitors and trade that comes from eco-tourists.

Further:

- People already tell us they find the Lakes-York road inadequate;
- If it deteriorates because of the extra traffic they will not wish to travel on it;
- They will fear travelling it if there are too many long and wide trucks are on it (yes, they will still be plying the road week-days during holidays);
- If they have an accident or near-accident due to truck widths or trucks coming over the white lines, they will be discouraged from coming back.

This particular area is designated for EcoTourism, in particular to see native vegetation, wildflowers and birds. In our own Visitors' Centre, we have pamphlets about these things, so we clearly are promoting EcoTourism.

www.yorktouristbureau.com.au/Flowersandbirds.shtml (and its related print pamphlet)

<http://members.ozemail.com.au/~wildflowers/oneday.html> (One-day trips from Perth — Wildflower Society of WA (Inc) section on 'East')

birdswa.iinct.net.au/guides/pdf/17a_northam.pdf

<http://yorktouristbureau.com.au/Birds%20of%20York.pdf> (and its print pamphlet *A selection of the more common Bush Birds of the Shire of York*)

Do we want to promote developments which undo EcoTourism? It is counter-productive to do so.

tourism.murdoch.edu.au/reports/YorkReport.pdf is a **Murdoch University study done in 2004**, under the leadership of then Tourism Management Lecturer Jim Macbeth. It acknowledges the part of the York

CEO Ray Hooper and his then Secretarial Assistant, Natasha Brennan. The study made a series of 12 recommendations regarding Tourism in York in its Report titled *Shire of York Destination Management Strategic Plan*. **Of the 12 issues and recommendations:**

- **the first was funding for the then Tourist Bureau, and**
- **the 2nd was Nature-Based Tourism in York.**

Clearly they saw this as a high priority for York's tourism.

<http://www.deh.gov.au/biodiversity/publications/series/paper5/twoch4.html>

This report by DEH cites the following from a 1994 Newspoll survey, for the Commonwealth Dept. of Tourism, of 1200 Australians in the sample:

“53 per cent ... planned to visit national parks of natural attractions in the next 12 months. Of those surveyed, 54 per cent rated ‘getting close to nature’ as very important, and 46 per cent rated ‘learning about nature’ as very important in choosing a nature-based holiday. Of particular note, say the surveyors, is that the single most emphatic demand was for ‘*activities which don't damage the environment*’. Seventy percent [70%] of respondents felt strongly enough to rate this as very important.”

We all have friends and relations (whether from WA, Interstate or Overseas) who come to the South West (including York) specifically because they are drawn by hearing of our Wildflowers.

DAMAGE TO FARMS, LOSS OF RURAL INDUSTRIES, etc.. due to LOSS OF ORGANIC STATUS, DAMAGE TO SOIL AND CROPS, and LOSS OF MORALE, PEOPLE HAVING TO RE-SETTLE etc....

- I am informed that already, seeing this coming, an Egg Production business has already closed;
- Neighbouring farmers already see themselves **losing Organic status** for their produce;
- Soil and crops are bound to be affected if **pollution leaks** from the Landfill due to any Accident or Natural Disaster.
- Neighbouring farmers are already undergoing a great amount of **Psychological Stress and Distress**, and this will increase if Noise, Pollution, Vibration from the extra traffic on the road and in the Allawuna property, any of the Natural Disasters referred to above interact with the Landfill structures and processes.
- **Some farming may cease, depleting income to the area and causing owners to sell, move away, try and find work or build up another farm elsewhere etc....** with all the trauma that goes with having to start again from scratch.

A lot of disruption altogether.

SITA has argued (SR, p.22) that a high proportion of the **soils in the Shire of York** are of only Fair Capability cropping land. **That is ingenuous, given that York does pretty well by way of crops and animal production.** It is a very **sneaky argument SITA has made to denigrate what is being done by farmers, and to use it as an excuse to apply for a Waste Facility in a productive farming region and near valuable forest and native reserve land etc....**

POTENTIAL DISILLUSIONMENT WITH THE SHIRE OF YORK IF THE PROPOSED LANDFILL IS ALLOWED

This may not be thought by some to be the most rational reason for rejecting the proposed Landfill development. But if it is allowed, THERE WILL DEFINITELY BE DISILLUSIONMENT AND DISTRUST OF YORK SHIRE OFFICERS AND COUNCILLORS.

How do we know? **For instance:**

- **The large number of Submissions sent to D.E.R. and the large number we know have already been done for SOY and DAP.**
- **The number and proportion of hands raised in a Town Hall Public Meeting when a participant asked for a show of hands of those AGAINST the proposed Landfill: about 220 out of the 240 persons in attendance. The only people who did not raise their hands against it were the Shire Councillors and Officers present, the representatives of SITA present, and the couple who own Allawuna Farm.**
- **The rounds of clapping at this meeting and others when questions or comments were made**

which indicated a desire for the Landfill to NOT go ahead.

- We already saw the powerful reaction against a Councillor who sided with SITA. He resigned not too long after, having experienced this reaction.

SOLUTION

1. ABANDON THE PLAN TO BUILD A WASTE STATION HERE

2. RECYCLE EVERYTHING THAT CAN BE RECYCLED

SITA says (p. 5 of their original Booklet) they already have **composting facilities, resource recovery facilities and materials recycling facilities**. Instead of this proposed facility, they should build more of those facilities in Industrial Areas of Perth and the Coastal Plane, and **manufacture new and useful things from whatever can be recycled that way**

This will lead to new avenues to employ people.

3. IF A LANDFILL SITE MUST BE BUILT, BUILD IT IN AN AREA:

- Already totally devastated by drought and salinity that cannot be productive farm land;
- Further away from town or farming;
- Further away from National Parks, Water Catchment and Gazetted Nature Reserves;
- In an area where earthquakes have not been known to occur (and where no faults can be found) at least within 500 km radius;
- Where it can be transported by rail. (The company could consider building a rail line or maintaining a 3-Tier rail line if one exists that goes to such a vicinity.)

4. THE PRECAUTIONARY PRINCIPLE SHOULD BE APPLIED: Roughly translated as “where there is any doubt at all, First Do No Harm to humans or the environment”. If the action would cause harm to human life or health, is seriously and effectively irreversible, or is inequitable to present or future generations, or is imposed without adequate consideration of the human rights of those affected, then it should be avoided. The onus to Do No Harm is on the Proponent of the Project. (Rio Conference 1992, for instance), and whatever is done should be done with a reasonable margin of safety.

As stated by Sagar V Krupa, Professor of the Department of Plant Pathology, University of Minnesota, in *Air Pollution, Global Climate Change and Agriculture*.....EnviroNews Vol. 6 No. 1 — Millenium Issue — January 2000:

“Prevention is better than cure — the post-mortem problem is harder and much more economically draining to fix.”

5. WE SHOULD NOT BE SWAYED BY ANY INGENUOUS ARGUMENTS THAT ARE PUT FORWARD IN THE APPLICATIONS

SIGNED: **Liz Christmas**



BA Hons.(Sydney), BA Hons.(Murdoch),
Dip. Ed. (UWA), M.Psych. (Curtin), etc..

Records

From: Peter & Helen Crowhurst
Sent: Thursday, 14 May 2015 10:51 AM
To: Records
Subject: Allawuna Farm Development Proposal
Attachments: Scan0277.pdf

Please find attached a submission on the above proposal

Peter Crowhurst

36

SHIRE OF YORK	
FILE	PS-GEN-PP0.3.1
OFFICER	KIRA
DATE	14 MAY 2015
REFERRED TO COUNCIL	
DATE	1147573
INITIALS	

Peter Crowhurst

YORK WA 6302

14 May 2015

SUBMISSION

Re: Revised Development Proposal for the use of
Allawuna Farm Lot 4869 (PT) 2948 Great Southern Highway | Saint Ronan's
as a landfill site

Firstly, I hereby lodge an objection to the above detailed Development Application on the grounds of road safety ramifications. The carriageway of the Great Southern Highway is inadequate to cater for the large number of heavy truck movements proposed by SITA. Normal private motor vehicle movements are currently seriously impeded by large heavy grain and fertilizer trucks forced onto this highway by the closure of the freight rail line between York and Quairading which add to the previously numerous heavy truck movements operating to and from the BGC quarry at The Lakes. These slow moving operations cause enormous frustration to lighter faster vehicles and has the potential to lead to rash and possibly dangerous decisions by drivers. The addition of SITA truck movements will seriously add to what is already a most undesirable situation.

Secondly, I lodge an objection to the Development Application (DA) on the grounds that this new application is substantially the same proposal, albeit on a downsized scale, that the original DA proposed AND WHICH went through all legal avenues and was refused. The same reasons for refusal should be applied to this amended proposal.



F P Crowhurst

Shire of York
P O Box 22
York WA 6302

37

SHIRE OF YORK	
FILE	PS-GEN-PP0.3-1
OFFICER	K. RA
INITIALS	<i>[Signature]</i>
12 MAY 2015	
1147537	
REFERRED TO COUNCIL	
DATE	INITIALS

To The Commissioner James Best and the Shire of York,

RE: The SITA Allawuna Landfill Proposal Lots 9926, 4869, 5931 and 26934 Great Southern Highway, St. Ronan's, York.

I object to the proposed landfill at Allawuna by SITA Australia and believe that the proposal should not be permitted.

The proposal is against the principals of the Shire of York's Town Planning Scheme, which states under general agriculture zone "to ensure the continuation of broad acre agriculture as the principal land use in the district encouraging where appropriate the retention and expansion of agricultural activities." Landfill is not an agricultural activity and will only destroy valuable agricultural land.

The proposed landfill is not acceptable with the Shire of York's Local Planning Strategy, which states "protection of sustainable agriculture and preserve and enhance the environment and natural resources." The proposal does not meet the objectives of York's Community Strategic Plan which states, "Protect and Enhance our rural land and spaces" and has a priority to "Establish land use strategy to ensure rural and farming land is protected." Landfill does not enhance nor preserve and should not be placed in our agricultural areas, especially near important water sources.

The landfill will not benefit York in anyway, but has the potential to destroy our agriculture industry, our tourism and hospitality industries and valuable employment that these industries bring to York. I therefore ask that this proposal be rejected.

Yours sincerely

Christine Theresa Sara

York 6302
May 5, 2015

C. Sara
.....

Shire of York
P O Box 22
York WA 6302

38

SHIRE OF YORK	
FILE	PS. Gen. Mo. 3.1
OFFICER	INITIALS
KRA	DR
14 MAY 2015	
1147536	
REFERRED TO COUNCIL	
DATE	INITIALS

To The Commissioner James Best and the Shire of York,

RE: The SITA Allawuna Landfill Proposal Lots 9926, 4869, 5931 and 26934 Great Southern Highway, St. Ronan's, York.

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Yours sincerely

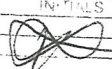
Maldwyn Robert George Sara

York 6302
May 5, 2015

M. Sara

Shire of York
P O Box 22
York WA 6302
records@york.wa.gov.au

212-1215/15

SHIRE OF YORK	
FILE	PS. GEN. PPO 3-1
OFFICER	K. RA
INITIALS	
15 MAY 2015	
1147622	
REFERRED TO COUNCIL	
DATE	INITIALS

39

To The Commissioner James Best and the Shire of York,

RE: The SITA Allawuna Landfill Proposal Lots 9926, 4869, 5931 and 26934 Great Southern Highway, St. Ronan's, York.

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The landfill will not benefit York in anyway, but has the potential to destroy our agriculture industry, our tourism and hospitality industries and valuable employment that these industries bring to York. I therefore ask that this proposal be rejected.

Yours sincerely

NAME CONSTANCE ANNE NICHOLSON
ADDRESS YORK 6302
DATE 13th MAY 2015
SIGNATURE Constance Nicholson

Shire of York
P O Box 22
York WA 6302
records@york.wa.gov.au

40

SHIRE OF YORK	
FILE	P5-GEN-PP0.3.1
OFFICER	KIRA
DATE	15 MAY 2015
INITIALS	11476 20
REFERRED TO COUNCIL	
DATE	
INITIALS	

To The Commissioner James Best and the Shire of York,

RE: The SITA Allawuna Landfill Proposal Lots 9926, 4869, 5931 and 26934 Great Southern Highway, St. Ronan's, York.

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The landfill will not benefit York in anyway, but has the potential to destroy our agriculture industry, our tourism and hospitality industries and valuable employment that these industries bring to York. I therefore ask that this proposal be rejected.

ALL BUSINESSES WILL SUFFER INCLUDING
B & B'S & HOTELS & RESTAURANTS AS
TOURISTS WILL NOT WANT TO TRAVEL FROM
THE LAKES TO YORK AND HAVE TO DRIVE
BEHIND THE MANY RUBBISH TRUCKS THEY
WILL END UP GOING ELSEWHERE
THE ROAD TO THE LAKES IS NOT GOOD NOW
WHAT WILL IT BE LIKE WITH ALL THE ROAD TRAINS
TRAVELLING TO THE DUMP

Yours sincerely
NAME
ADDRESS
DATE
SIGNATURE

BAORDAN?
9/5/15
BAORDAN

Shire of York
P O Box 22
York WA 6302
records@york.wa.gov.au

41

SHIRE OF YORK	
FILE	P5. GEN. PPO. 3-1
OFFICER	KIRA
INITIALS	<i>[Signature]</i>
15 MAY 2015	
1147621	
REFERRED TO COMPTON	
DATE	INITIALS

To The Commissioner James Best and the Shire of York,

RE: The SITA Allawuna Landfill Proposal Lots 9926, 4869, 5931 and 26934 Great Southern Highway, St. Ronan's, York.

I object to the proposed landfill at Allawuna by SITA Australia and believe that the proposal should not be permitted.

The proposal is against the principals of the Shire of York's Town Planning Scheme, which states under general agriculture zone "to ensure the continuation of broad acre agriculture as the principal land use in the district encouraging where appropriate the retention and expansion of agricultural activities." Landfill is not an agricultural activity and will only destroy valuable agricultural land.

The proposed landfill is not acceptable with the Shire of York's Local Planning Strategy, which states "protection of sustainable agriculture and preserve and enhance the environment and natural resources." The proposal does not meet the objectives of York's Community Strategic Plan which states, "Protect and Enhance our rural land and spaces" and has a priority to "Establish land use strategy to ensure rural and farming land is protected." Landfill does not enhance nor preserve and should not be placed in our agricultural areas, especially near important water sources.

The landfill will not benefit York in anyway, but has the potential to destroy our agriculture industry, our tourism and hospitality industries and valuable employment that these industries bring to York. I therefore ask that this proposal be rejected.

This beautiful tourism town does not want a rubbish dump on our main Rd into York the constant Rubbish trucks on Lakes Rd concern me for more people trying to overtake

Yours sincerely

NAME Louisa Walker

ADDRESS

DATE 6-5-15

SIGNATURE *[Signature]*

Shire of York
P O Box 22
York WA 6302
records@york.wa.gov.au

SHIRE OF YORK
FILE *PS. GEN. SPO. 3-1*
OFFICER *K. RA* INITIALS *[Signature]*
15 MAY 2015
1147623
REFERRED TO COUNCIL
DATE INITIALS

OTC - 15/5/15
42

To The Commissioner James Best and the Shire of York,

RE: The SITA Allawuna Landfill Proposal Lots 9926, 4869, 5931 and 26934 Great Southern Highway, St. Ronan's, York.

I object to the proposed landfill at Allawuna by SITA Australia and believe that the proposal should not be permitted.

The proposal is against the principals of the Shire of York's Town Planning Scheme, which states under general agriculture zone "to ensure the continuation of broad acre agriculture as the principal land use in the district encouraging where appropriate the retention and expansion of agricultural activities." Landfill is not an agricultural activity and will only destroy valuable agricultural land.

The proposed landfill is not acceptable with the Shire of York's Local Planning Strategy, which states "protection of sustainable agriculture and preserve and enhance the environment and natural resources." The proposal does not meet the objectives of York's Community Strategic Plan which states, "Protect and Enhance our rural land and spaces" and has a priority to "Establish land use strategy to ensure rural and farming land is protected." Landfill does not enhance nor preserve and should not be placed in our agricultural areas, especially near important water sources.

The landfill will not benefit York in anyway, but has the potential to destroy our agriculture industry, our tourism and hospitality industries and valuable employment that these industries bring to York. I therefore ask that this proposal be rejected.

I cannot believe that no mention has been made of the disastrous impact on traffic + the road by the number of road trains talked about. The road is deteriorating all the time, since the closure of the Pier 3 rail lines + the increase in wheat trucks, on the road.

Yours sincerely

NAME JANET M. CASEY
ADDRESS YORK 6302
DATE 14/5/2015
SIGNATURE *Janet M Casey*

Gary Pike

York

April 29, 2015

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

Dear Sir

Re: Landfill Proposal by SITA on Allawuna Farm - Lots 9926, 4869, 5931 and 26934 Gt Southern Hwy, St Ronan's, York

I am writing to object strongly to the above mentioned proposal.

I have resided in York for 25 years, operating a business as a sole trader, raising my two children here and enjoying living in this beautiful rural area.

My reasons for objecting to this proposal are many and I have listed some of these below.

Allawuna is situated next to Mundaring water catchment area and if contamination occurs from Leachate it will affect drinking water and waterways in the area.

Groundwater aquifers exist in the area and there have been no comprehensive groundwater studies performed to date for the whole region.

This area is seeing an increased frequency and intensity of storm events and flooding. The Avon Valley is part of the South West Seismic Zone and therefore if Landfill is placed on a seismic fault line it could result in catastrophic results if HDPE liners should tear due to an earthquake.

Leachate leaking into our waterways and farm land will contaminate water and clean food.

The inclusion of three borrow pits in the landfill site would cause environmental destruction and loss of farm land.

Allawuna is on the Gt Southern Hwy, which is one of the main Roads to Perth. Since the closure of the three tier rail this Highway has already become extremely dangerous. There would be a huge extra amount of heavy vehicles using this already extremely dangerous substandard Road. The Wheatbelt road fatality rate is six times the state average according to the RAC. Almost two in every three fatalities in the Wheatbelt occur during daylight hours according to the RAC. I strongly object to the extra amount of traffic this landfill would cause, making an already hazardous

SHIRE OF YORK	
FILE	PS GEN PPO 3-1
OFFICER	KIRA
INITIALS	A
15 MAY 2015	
114 75 75	
REFERRED TO COUNCIL	
DATE	INITIALS

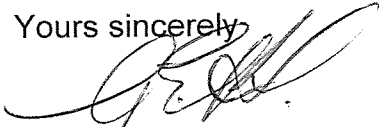
43

highway many times more dangerous and inevitably causing more fatalities in our area..

Because Allawuna is situated on the Gt Southern Hwy we will have a dramatic decrease in the number of tourists visiting York. This will cause a decrease to our hospitality and tourism industries resulting in less money for the town and higher unemployment rate

Given these reasons I urge you on behalf of the residents of York to reject the proposal from SITA for the Allawuna Landfill in our area

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Gary Pike', written in a cursive style.

Gary Pike

SHIRE OF YORK	
FILE <i>PS. GEN. PPO. 3. 1</i>	
OFFICER <i>K. RA</i>	INITIALS <i>KR</i>
18 MAY 2015	
REFERRED TO COUNCIL <i>1142649</i>	
DATE	INITIALS

44

York, 63022

.10/05/ 1

*Drop Box
18/5/15*

Shire of York,
Avon Terrace
York, W.A. 6302

re. Proposed Land Fill,

Dear Sir,

It is my intention to advise that this proposal, though it purports to amend the previous Proposal it still in my mind stinks. Apparently it is but a rehash of the original submission. The object of which seems to disregard, in an offhanded manner, all other objections made by all and sundry.

The original, and I think the present, applications, though they take note of local conditions, it would seem obvious to me that the results of such a development in a "Farming Area" should be given consideration.

The traffic from The Lakes turnoff is no great length. But no Authority has taken into account the effect of such semi trailer vehicles will have on local and traffic to surrounding towns. The delays and additional costs, and safety of this domestic and agricultural traffic should be taken into consideration. I have not seem any mention of transport costs rising for all points North, East and West.

In short, it seems to me that the present application disregards the flow on of the present application. This scheme has greater effects on W.A. than just York, and these effects should also be considered, along with the present application.

A. B. Dodds.

TO: SHIRE OF YORK,
P.O. Box 22,
YORK, W.A., 6302.

OFFICER	INITIALS
KIRA	X
18 MAY 2015	
1147659	
REFERRED TO COUNCIL	
DATE	INITIALS

45

Re: SITA ALLAWUNA FARM LANDFILL.

DATE 16-5-2015

NAME: JOCELYN WINIFRED PHILLIPS
ADDRESS: YORK 6302

Dear Sir,

The amended application from Sita Allawuna Farm Landfill proposed use does not change, the proposal is still the same as original, therefore the previous submissions to the Shire of York against the original application are still valid. The Shire of York's Planning Officer's report is therefore still valid. The JDAP's reasons for upholding the Shire of York's Council's decision and refusing the Sita Allawuna Farm Landfill, are still valid.

I object to this proposed Sita Allawuna Farm Landfill (rubbish dump). This should not be permitted as it does not fit within the Shire of York's Town Planning Scheme No.2, which states, under the General Agriculture zone "...to ensure the continuation of broad-acre agriculture as the principal land use in the district, encouraging where appropriate the retention and expansion of agricultural activities". Landfill enterprises are not an agricultural activity, should not be placed in our broad-acre farms, but instead Landfills destroy and poison our environment. This area produces sheep, cattle, wool, grain etc. for human consumption. Good farmland in a high and consistent rainfall area should be protected. Metropolitan population is expected to reach 3 million in the near future, creating more rubbish. Allawuna Farm and surrounds has abundant paleo water channels, flowing into the Mundaring Weir Water Catchment area. Fresh water is a precious and finite commodity and must be protected. The main access road to York, The Great Southern Highway, is extremely dangerous and is not suitable for the extra trucks and roadtrains this proposal will bring.

York is a historic tourist town, and is a popular destination for tourists, retiree's and growing young families, and is a lovely town to live, work and visit.

This proposed Landfill will not benefit York. I ask that the proposal not be accepted.


Yours sincerely,

SIGNATURE

Jocelyn W. Phillips

TO: SHIRE OF YORK,
P.O. Box 22,
YORK, W.A., 6302.

Re: SITA ALLAWUNA FARM LANDFILL.

SHIRE OF YORK	
FILE	PS. GEN. No. 3.1
OFFICER	INITIALS
KRA	
18 MAY 2015	
1147658	
REFERRED TO COUNCIL	
DATE	INITIALS

46

DATE 16-5-2015

NAME: KEITH FREERICK PHILLIPS.

ADDRESS: YORK. 6302.

Dear Sir,

The amended application from Sita Allawuna Farm Landfill proposed use does not change, the proposal is still the same as original, therefore the previous submissions to the Shire of York against the original application are still valid. The Shire of York's Planning Officer's report is therefore still valid. The JDAP's reasons for upholding the Shire of York's Council's decision and refusing the Sita Allawuna Farm Landfill, are still valid.

I object to this proposed Sita Allawuna Farm Landfill (rubbish dump). This should not be permitted as it does not fit within the Shire of York's Town Planning Scheme No.2, which states, under the General Agriculture zone "...to ensure the continuation of broad-acre agriculture as the principal land use in the district, encouraging where appropriate the retention and expansion of agricultural activities". Landfill enterprises are not an agricultural activity, should not be placed in our broad-acre farms, but instead Landfills destroy and poison our environment. This area produces sheep, cattle, wool, grain etc. for human consumption. Good farmland in a high and consistent rainfall area should be protected. Metropolitan population is expected to reach 3 million in the near future, creating more rubbish. Allawuna Farm and surrounds has abundant paleo water channels, flowing into the Mundaring Weir Water Catchment area. Fresh water is a precious and finite commodity and must be protected. The main access road to York, The Great Southern Highway, is extremely dangerous and is not suitable for the extra trucks and roadtrains this proposal will bring.

York is a historic tourist town, and is a popular destination for tourists, retiree's and growing young families, and is a lovely town to live, work and visit.

This proposed Landfill will not benefit York. I ask that the proposal not be accepted.

Yours sincerely,

SIGNATURE *Keith F. Phillips*

Records

From: Tom Burbidge <
Sent: Sunday, 17 May 2015 12:52 PM
To: Records
Cc: Tom Burbidge; Kate McHardy; Doug & Lorraine Williams; Michael Kyd; Tom Johns; Peter Booth; Meg Wilson; Arthur & Kerry Storm; Sandra Zagabria; Greg Jones; Estelle Brennan; Max Hore & Jenny Johnson; Colin James; Tom Burbidge; Jen & Ken Fallaver; Rob Rowe; Ruth Hampton; Eva Marjanovic; Eileen Birlenbach; Kristi Turner; Gwyn and Ray; Anne Lynch; Jo Hallam; Michael Le Vaux; John & Rosemary Smith; Rachael Sarich; Mark Knox; Rusty Geller
Subject: MRRA to SoY - objection to SITA landfill 2015

47

Mundaring Residents and Ratepayers Assoc Inc. (MRRA) ABN 67 028 659 669
Mundaring WA 6073

SHIRE OF YORK	
FILE	PS-GEN-190.3-1
OFFICER	INITIALS
KIRA	
18 MAY 2015	
1147656	
REFERRED TO COUNCIL	
DATE	INITIALS

The Shire of York
P O Box 22
York WA 6302

Date: 17th May 2015

To: The Commissioner James Best and the Shire of York,

The Mundaring Residents and Ratepayers Assoc Inc (MRRA) make this submission **against** the Landfill Proposal by SITA on Allawuna Farm – Lots 9926, 4869, 5931 and 26934 Great Southern Highway, St Ronans, York.

Name: Thomas Burbidge

Address: Mundaring WA 6073 Work phone _____

As Secretary for the MRRA, I have been directed to object to this land use.

1. It is too close to the catchment boundary for the Goldfields water supply.

Under no circumstance should this drinking water source be able to be rendered unusable.

- a/ High rainfall could flood the leachate ponds and contaminated surface water reach the Helena River.
 - b/ An earthquake or a tip fire could rupture the sealing membrane, allowing underground leakage to reach the river.
 - c/ Should the leachate ponds dry out, local strong winds could drift leachate dust into the Helena River catchment area.
 - d/ In its proposed 20 year life, the chance of a catastrophic event is quite likely.
- As SITA will not comment on lodging further applications, the original 40 year life should apply.

2/ The increase in large-truck numbers on Great Eastern Highway.

- a/ They will going through Sawyers Valley, Mundaring and Glen Forrest townsites.
- b/ The SITA data on truck numbers seem rather conservative.
- c/ There seems no restriction to daytime operation, they can add a night shift and double the proposed truck traffic.

3/ Miscellaneous

- a/ The Great Southern Highway from The Lakes to Allawuna farm should be up-graded for the new usage by large trucks.
- b/ Previously, the Metropolitan Local Government Review Panel recommended all Perth waste be transported **only** by rail.

Thank you considering this submission,
Tom Burbidge,
MARRA Secretary,

Mundaring WA 6073

Work: _____
email: _____

Signature:

A handwritten signature in black ink that reads "Tom Burbidge". The signature is written in a cursive style with a large, stylized 'T' and 'B'.

No virus found in this message.

Checked by AVG - www.avg.com

Version: 2014.0.4335 / Virus Database: 3722/7183 - Release Date: 03/12/14

SHIRE OF YORK	
FILE	PS. GEN. PP. 3-1
OFFICER	INITIALS
KIRA	<i>[Signature]</i>
19 MAY 2015	
1147692	
REFERRED TO COUNCIL	
DATE	INITIALS

YORK.
18.5.2015.

48

OVER COUNCIL
19/5/15

Dear Sir,

I object to the amended application from Sita for Allawana Farm Landfill because:

- 1) Traffic: There will be an increase in road users because of the coming and going of the trucks. This a major risk.
- 2) Noise: Operating noise from the landfill and trucks during operating hours.
- 3) Dust Emissions: Dust generated from the landfill during constructions, land clearing, movement of waste will be constantly in the air and the water system. Asbestos fibre is another concern
- 4) Odour Emissions: Odours from decomposed waste, transport of waste, chemicals and light winds in the area causing a major health risk
- 5) Air Emissions: Gases from the landfill, trucks, fires will cause another health problem to the community as well as the flora and fauna
- 6) Lights: The lights will be a distraction to the road users and the nearby farms

7) Discharge to Water: Seismic activity, paleo channels are a great risk to catchment areas, ground water for human and animal use

8) Discharge to Land: Leachate ponds, storms, surface, ground water will cause contamination to farm, produce and the 13 Mile Brook
Gas contamination is another problem

9) Solid and Liquid Waste: Wind blown waste, litter, wild disease and food issues.
Leachate in pit and ponds overflow
Truck spillage on journeys to the landfill
Storms will cause the leachate to flow into the surface and ground water

10) Chemical Storage: Incorrect storage of fuel Herbicides/Pesticides at the landfill will be a major problem

Yours sincerely
BFC

18.5.2015

M^s B. Fallon

I147692

49

In the State Administrative Tribunal summary of reasons for the decision on the 10th April to approve the amendment, Senior Member Peter McNab states: "And, of course the proposed use does not change." and also: "the conclusion is that the essence of the proposal remains unchanged."

For these reasons I consider that nothing has substantially changed that would require me to amend my original submission against the proposal. I believe that my original submission is still valid and to this end I am re-submitting my original document along with this statement, signed and dated to reflect my objection to the amended proposal.

B. Fallon

13.5.2015

50

Brian J. Hanley
W.K. Allester

Ref. Amended development assessment
application, Proposed Landfill at
Allawanna Farm.
Shire of York.
Acting Chief Executive Officer,
Mr. Graeme Simpson.

SHIRE OF YORK	
FILE PS GEN. PO. 3.1	
OFFICER	INITIALS
K. RA	Σ
19 MAY 2015	
1147678	
REFERRED TO COUNCIL	
DATE	INITIALS

YORK. W.H. 6302.
15th May 2015.

Objection to Proposal. Submission

Dear Mr. Simpson,

Thankyou for your

correspondence, in reply the following.

Regardless of the ongoing
family footwork of those connected to the Delta landfill site
and the change of application conditions, in our eyes and our
regard for York, no changes will ever alter our concern
that the landfill will be of no benefit to our community
whatsoever and will for future generations create problems
beyond our present comprehension.

I spent a great deal of my
youth as a direct decendent of the first settlers of York, in
York and surrounding districts. Although my connections
with the place were intermittent over the years, my partner and
I have returned to settle in the town, thus an invested
interest in the preservation of the area. After all we have
the fact that we are the first inland farming settlement in
Western Australia, surely this is enough reason for us to
preserve the quality of our agricultural history. Why
turn good land over to waste? Once the land is contaminated
by landfill, the damage is done, what of future generations
who will inherit the problem?

From the information I have heard and read from various sources, it seems to us to be quite shortsighted of our government to be even entertaining the idea of landfill being placed directly over a water table that is important enough to be part of the Perth supply, let alone the local area. Another point is the fact we are in an earthquake zone in which we frequently experience small earth tremors, beggars believe that waste should be dumped in such a high risk area. Having been told by Sita of all the precautions they will put in place, membranes etc, to line the pits, we still find it hard to believe any sort of lining would hold back a pit full of waste. One good shake up, as in the past like the blackening quake would surely breach such precautions, and who would know of the seepage resulting until it is too late to rectify the situation.

Why in this the 21st Century is there any need for the potentially dangerous method of landfill at all? Other countries around the world with much greater waste disposal problems than ours, have reduced the need for landfill and have found alternative and much more environmentally friendly methods of waste recycling. Some countries even import others waste for profitable recycling production. Our question is why are we going down this outdated path of landfill at all? Is it just the easy way out to put waste in a hole in the ground, it is so 19th Century!!

Since the closure of the third tier rail system, more pressure has been placed upon the Southern Highway especially from the Lakes to York, and the local connecting roads to grain and stock producing farms in surrounding communities.

The added heavy vehicle transport reqs bringing waste at frequent intervals from Perth, as well as the sand trucks to cover the waste, would surely place undesirable pressure on the highway. Indeed this added traffic would prove to be a deadly hazard to other road users.


We are both in retirement and could take the attitude of, Not in our lifetime, but our concern is for the future generations still to come. As the first inland farming settlement, York surely has a place in our short history to warrant some respect. We have travelled extensively overseas and observed with great admiration the preservation of towns and cities, some even to the extent of complete rebuilding from the ground up after bombing in World War Two.

Surely as an historic town, York should be held up to those still to come as the beginning of this wonderful and wealth generating state.

We should be venerating York and our heritage not denying the road to it with a landfill site. Please consider the long term and not the short term solution and benefits, if any, of this landfill proposal.

Yours Sincerely,

Brian F. Hanfley.
W. K. Allester.


William Hanfley