

The 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, on Great Southern Highway, St Ronans, Shire of York.

251

It is wrong to allow a noxious industry like a landfill in this environment. York is a Shire for agriculture, tourism, retirement and recreation and this "development" is the opposite of these things.

We have lived in York all our lives and represent many past generations of farmers in the district, dating from 1860. We feel that the fabric of a farming and historic town should be preserved. "The environment of the region [Wheatbelt] needs to be protected from incompatible land use to ensure the protection of extensive biodiversity assets." (p 31, *Wheatbelt Regional Plan 2010-13*, 2012 Revision.) Proposed changes to land use should complement the natural and rural environment, not put it in jeopardy.

There is no apparent advantage to the Shire of York. In fact, why should a heritage town and Shire take Perth rubbish for 20 years? The Western Australian Government recommended that, "... landfills should not leave an environmental legacy for future generations to address." Now, York is being asked to accept waste from the Metropolitan area, much of which is a type that should never be disposed to a landfill, when so much good science is available as to why landfill are an environmentally poor way to dispose of waste. It is a landfill that will operate for 20 years, followed by a maintenance program of another 20 years. A small Shire such as York should not be required to monitor and remediate such a landfill. It will be crippling economically. Once this land is designated as a rubbish dump, it is useless for ever and will adversely affect the surrounding environment, including water catchment areas. It is a very unjust burden on our children and grandchildren.

Tourists travel to York for day trips and weekends and like to see not just historic buildings, but to travel through the bush and farms on the way. They won't follow stinking rubbish trucks on a winding road, which throw gravel at windscreens from the poor road shoulders. The semitrailers cut corners, go over the centre line, tailgate and are a real danger to other motorists. There are very 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 in poor condition and there are too few passing lanes. It is dangerous now, let alone with the increase in high-sided semi trailers.

In their application SITA describes the use of a regional landfill. We are alarmed at the prospect of rubbish trucks converging on Allawuna, through the town of York from other areas in the wheatbelt. This application should be denied.

Name: Betty Draper

Address:

Signatures:

Betty Draper

YORK

6302

SHIRE OF YORK	
FILE	PS - GEN. PP. 3-1
OFFICER	INITIALS
KIRA	
25 MAY 2015	
1147928	
REFERRED TO COUNCIL	
DATE	INITIALS

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

SHIRE OF YORK	
FILE	PS. GEN. PRO. 3-1
OFFICER	KIDA
INITIALS	[Signature]
25 MAY 2015 1147824	
REFERRED TO COUNCIL	
DATE	INITIALS

252

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.

Allawuna is in a most strategic position as a water recharge area and is a tributary to the Mundaring water catchment area. I am astounded that the Departments concerned have not requested comprehensive groundwater studies considering that the area has massive groundwater aquifers, and that the region is subject to storm events on a regular basis, thus adding to the variables concerning the safety of leachate.

One major concerning factor is that York is placed under the South West Seismic Zone (SWSZ) and landfill should not be sited along the unpredictable seismic fault line, and that the so-called indestructible HDPE liner will not be able to withstand the force of seismic activity in the magnitude of >5. Scientific predictions forecast that a major earthquake is due within this very area, and when the liner splits, the tributary which feeds into Perth's major water supply will be poisoned beyond salvation.

The inclusion of three Borrow pits in the landfill proposal will cause environmental destruction to farmland which we as a nation can ill-afford to lose, being ranked as the most fertile farm lands in the State of Western Australia. The mining of the soil will be similar to the extractive industry but not subject to the same conditions.

Another alarming factor is the inadequate provision of the Great Southern Highway to cope with the increased traffic flow of the trucks entering and exiting the landfill site. This coupled with the large amount of traffic already unaccounted for in the recent survey that was conducted, and also the wheat/fertiliser trucks that service the rural community, it is a recipe for disaster. I do not believe that the Government will upgrade the road accordingly.

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

Kevin Binning

York WA 6302



SIGNATURE

21 May 2015

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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This type of proposed landfill by SITA is a very obsolete concept in the modern western world. One only needs to look at the sophisticated recycling methods that the Scandinavian countries use to tackle their waste and wonder why Western Australia still has a backward view on this subject. The amount of money needed to pursue and wear down the residents of York with this proposal would have been better spent sending two delegates to the Scandinavian countries to learn how to deal with rubbish in a sophisticated manner...we must be the laughing stock of the western world with its "cover up and its gone" mentality.

Allawuna is in a most strategic position as a water recharge area and is a tributary to the Mundaring water catchment area. I am astounded that the Departments concerned have not requested comprehensive groundwater studies considering that the area has massive groundwater aquifers, and that the region is subject to storm events on a regular basis, thus adding to the variables concerning the safety of leachate.

One major concerning factor is that York is placed under the South West Seismic Zone (SWSZ) and landfill should not be sited along the unpredictable seismic fault line, and that the so-called indestructible HDPE liner will not be able to withstand the force of seismic activity in the magnitude of >5. Scientific predictions forecast that a major earthquake is due within this very area, and when the liner splits, the tributary which feeds into Perth's major water supply will be poisoned beyond salvation.

York was the first inland town to be discovered in 1831 by Ensign Dale, and it is an important tourist town providing employment for its citizens. This will be destroyed if this landfill proposal goes ahead. If the intrepid tourist dared to brave the perilous journey along the Great Southern Hwy without sustaining serious injury by the increased volume of trucks to the landfill alone (the survey by the Department of Transport failed to calculate the TOTAL amount of traffic on the highway) their first impression will be the ghastly rubbish tip on formally pristine farmland. They will probably be too nauseated to enjoy a meal in the townsite IF they actually make it to the "tourist town".

The inclusion of three Borrow pits in the landfill proposal will cause environmental destruction to farmland which is frequently praised as being Western Australia's "food bowl". Why desecrate these highly productive farmlands when the world is crying out for clean, green food which is being produced in this fertile region.

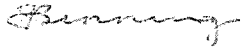
Only when the last tree has been cut down,
the last fish been caught,
and the last stream poisoned,
will we realise we cannot eat money.

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

Judy Binning

York WA 6302



SIGNATURE
21 May 2015

I147824

~~147824~~

254

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.

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.

I am very concerned about the amount of traffic that will frequent the Great Southern Highway should this proposal go ahead. This coupled with the amount of trucks servicing the rural industry alone will result in an extremely dangerous situation for motorists in general.

Allawuna is in a most strategic position as a water recharge area and is a tributary to the Mundaring water catchment area. I am astounded that the Departments concerned have not requested comprehensive groundwater studies considering that the area has massive groundwater aquifers, and that the region is subject to storm events on a regular basis, thus adding to the variables concerning the safety of leachate.

The fact that York is in the South West Seismic Zone (SWSZ) and that the forecast for the region to experience a severe earthquake in the near future is very real. It is ludicrous to even consider placing a landfill site in this precarious zone, especially when it is a known fact that the HDPE liners will not be able to withstand the force of seismic activity in the magnitude of >5. The resulting factor of leachate spilling poisons into the tributary will be disastrous.

The inclusion of three Borrow pits in the landfill proposal will cause environmental destruction to farmland which is frequently praised as being Western Australia's "food bowl". This is prime agricultural land not the sandy, gutless soils that fail to produce top quality produce that the world is demanding.

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

Terry Slade

York WA 6302

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

SIGNATURE
21 May 2015

Records

From: joadamson
Sent: Sunday, 24 May 2015 5:12 PM
To: Records
Subject: SITA Landfill

SHIRE OF YORK	
FILE	PS-GEN-PP0.3-1
OFFICER	INITIALS
KiKa	
25 MAY 2015	
1147836	
REFERRED TO COUNCIL	
DATE	INITIALS

255

Dear Sir,

As a rate payer to the Shire of York for over 50 years I wish to lodge my protest against the SITA landfill plans.

My reasons are as follows:

The condition and nature of the road between the Lakes and York is unsuitable for heavy road haulage.

There are already numerous grain trucks, sheep trucks and then to add SITA trucks will lead to further deterioration of the road.

York prides itself as a tourist destination and SITA trucks will destroy the environment and the attractiveness of the countryside for future generations and tourists alike.

Yours sincerely

Annette Johnston.

Records

256

From: Jake F Davies
Sent: Sunday, 24 May 2015 1:41 PM
To: Records
Subject: Submission of Objections - Allawuna Landfill
Attachments: Letter to Shire of York - Jake Davies, Allawuna Landfill Proposal.pdf
Importance: High

SHIRE OF YORK	
FILE	P5.GEN-PP0.3.1
OFFICER	INITIALS
RDA	[Signature]
25 MAY 2015	
1147834	
REFERRED TO COUNCIL	
DATE	INITIALS

To The Shire of York,

Please find attached my submission to object to the landfill proposal by SITA on Allawuna Farm.

If there are any issues with my submission or you wish to discuss this further, please do not hesitate to contact me at your earliest convenience.

Kind Regards,

Jake Davies

Shire of York
PO Box 22
York, WA, 6302
records@york.wa.gov.au

24th May, 2015

To The York Shire and Councillors,

I wish to register my objections to the Landfill Proposal by SITA on Allawuna Farm – Lots 9926, 4869, 5931 and 26934 Great Southern Highway, St. Ronan's, York. I understand that in essence the proposal has not changed from the previous proposal documents but wish to voice my objections on the following grounds.

Landfill activities are not consistent with the objectives of General Agriculture and in particular on land that has been historically used for cropping and grazing. In my opinion, the landfill does not fit York's town planning scheme.

Shire of York Town Planning Scheme No 2

4.15 General Agriculture Zone

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.

- 1. 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.*
- 2. 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*
- 3. To allow for facilities for tourist and travellers, and for recreation uses.*
- 4. 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 is of no benefit to York, its' community or its' natural environment. Landfill is not an agricultural activity and should not be placed in a zone that will have disastrous effects upon the surrounding agricultural properties.

This proposal does not provide facilities for tourist and travellers or any recreation uses and will have a detrimental effect on tourism in York.

This proposal is not consistent with the objectives of York's **Community Strategic Plan** which states:

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 the protection and enhancement of our rural land and spaces.

One of the **priorities** under this objective is to establish land use strategies to ensure that rural and farming land is protected.

One of the **objectives** is to “Facilitate Sustainable and Managed Development”.

One of the **priorities** under this objective is to protect primary agricultural areas through effective land use management.

The proposal is not consistent with the **Local Planning Strategy** which includes “protection of sustainable agriculture and; preserve and enhance the environment and natural resources”

Economic

- 1. Encourage Tourism that is complimentary to the character of the Shire and is compatible with the lifestyle and aspirations of the community*
- 2. Protect broad acre agricultural areas from inappropriate development and intrusion by urban and semi-rural uses*

Landfill does not comply with any of the objectives in York’s Community Strategic Plan and Local Planning Strategy, both of which are concerned with preserving, enhancing and protecting agricultural land. Landfills have been well documented for their noxious affects upon the environment and the positioning of Allawuna next to a catchment area is unsuitable for this purpose.

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.*

The landfill proposal has caused an enormous amount of stress and deep concern within the community of York and the local shire and Councillors. York is a historic town relying upon agricultural and tourism business. The landfill has the potential to destroy both of these industries to some degree, which is of no benefit to York.

In accordance with planning policy, the proposed landfill site is both illogical and unsuitable due to the following factors:

- The location is in an agricultural zone;
- The site is situated alongside a significantly unsuitable highway not designed to transport high volumes of heavy trucks and with few overtaking lanes;
- There is no water supplied to the site; &
- The power supplied to the site is unsuitable for large applications.

“Woodglen Farm”, Avon Loc 9386 Great Southern Highway, York 6302.

The following is general background information that illustrates my current and future situation on my property.

I am 22 years old and am currently employed as a graduate civil and structural engineer. My engineering qualifications are planned to serve as a secondary profession. My primary source of income and profession for the future will come directly from working and managing my family farm. The farm is extremely close to my heart as I am the fourth generation of Davies to have farmed this property. The farm is situated only 668 metres away from the boundary of Allawuna, and is very susceptible to many of the dangers exhibited by the proposed landfill. I plan to live on the farm for the entirety of my life and plan to raise a family on it. The farm is extremely important to me. I have planned my entire future to revolve around it and could not imagine living anywhere else. This landfill proposal severely affects the farm's future in a wide range of ways and it is for this reason that I am so strongly opposed against the proposal.

I have grave concerns regarding the air emissions from the landfill. Quality of breathing air is immeasurably important. It is one of the primary inputs into our bodies, and any contaminants will be filtered and absorbed by our bodies. Methane released from the landfill is a significant concern to myself, being situated so close to the proposed site. This gas is noxious, odourless and colourless in nature and will cause serious illness when the wind is blowing towards the North-East. The effects of this harmful gas will most likely be constant, and will seriously impair my well-being and general health. Working on the farm, nearly all of the waking day is spent outside, exposed to all air and contaminants carried by the wind.

Figures in the supplementary report have been misinterpreted by SITA. This is prime agriculture land in a high rainfall area, which produces high volumes of valuable produce. The landfill has the potential to destroy agriculture in the area, especially organic properties that are located nearby and threatens to affect the Bio-security of all the surrounding agricultural land. The land is pristine and clean and we should not be allowing it to become contaminated and destroyed for future generations.

Maps provided by the Department of Agriculture and Food, Western Australia show that land at Allawuna has greater than 70% moderate to high capability of Dry land cropping and Grazing. In comparison to this, the data provided by SITA stated that Allawuna only had fair capabilities, which illustrates the poor understanding that SITA has of this area.

Fire hazards are also a concern from the landfill. The Avon Valley relies on local volunteer fire fighters to battle many of the fires as there are not the resources to employ a large fire fighting team for the area. The volunteers receive no benefits, and provide their time at great personal risk on the basis that they know that others will help them if they're properties are to ever fall victim to bushfires. SITA has stated that they expect the local volunteers to help them when required, which is deemed frequent on landfill sites due to the flammable gases and constant working of machinery. Landfill fires are not as simple and straightforward as other fire types. They contain countless types of toxins and harmful gases that will be absorbed by the fire fighters. Not only does this have the potential to affect their health post-fires but it also has the likelihood of impairing their abilities on the fire ground, greatly increasing their risk of being rendered unconscious, dazed or irrational. These risks cannot be allowed on the fire ground as the chance of a fatality occurrence will become significantly and unacceptably high. The local fire fighters are not equipped in any way to manage harmful toxins or gases and nor can the money be spared to fund such equipment. Nearly all of the farming community in York are volunteer fire fighters, including

myself and my family. SITA have stated that they will make provision for only one water truck on the Allawuna site. This will not be suitable as a single fire fighting unit is not capable of controlling a bushfire, regardless of the unit's capacity. All fires occurring on the high risk site will rely almost entirely on the surrounding bush fire brigade. The fire plan discusses burning of the remnant bush land area periodically on a yearly basis. This was never a part of the original plan and is not an environmentally sound idea. No reason has been given for doing this.

Dust emissions are one of my largest concerns regarding the proposal. Fine dust particles from the landfill contain many toxic substances, from carcinogenic toxins to asbestos. This fine dust can be carried by the wind over vast distances with ease and is impossible to control. I have seen wind do this countless times, stripping un-vegetated paddocks of topsoil and carrying it kilometres away to neighbouring farms. This would be the same of the proposed landfill, unprotected loose particles on the hillside where there is a large amount of unprotected area from Southward winds, which would blow directly towards my property. This dust has the potential to significantly impact upon the health of my livestock, my land's bio-security, my family and myself. The dust would settle on all areas and surfaces. Dust settling upon the paddocks and dams would be directly consumed by the livestock and may significantly alter and impair their health and genetics.

The dust would also settle within my home and on my roof. There is no water provided in this area. All of the water that we use is collected through dams and water tanks. Our only source of drinking water comes from the roof of our house. Dust settling upon the roof would then wash off with the rain and into our water tanks, being consumed directly with every glass of water. The health impacts that this will have upon myself has the potential to be extremely significant, illness, headaches, diseases and conditions. However, my major concern is for my future family, the children that I plan to raise in what should be a healthy and positive environment. The health effects that drinking the dust contaminated water could have upon a developing child are extremely concerning. They could easily develop significant health conditions and illnesses, which have the potential to significantly reduce their quality of life as well as their life expectancy. In no way does a private waste company have the right to expose families to these conditions simply because it is deemed convenient for them to dump waste in an irresponsible manner and in an inappropriate location. Residents should not have to pay the price so that SITA can make a profit; it is unethical, immoral and unacceptable.

The new proposal indicates that borrow pits will be used for the landfill, which were never included in the original proposal, nor do they lie within the original landfill site. The borrow areas will change the way that Allawuna will be run and will reduce the capabilities for agricultural use as has been proposed by SITA. The pits will cover an area of approximately 20ha and will not allow for cropping to be carried out as originally stated in the original proposal. The borrow pits are likely to change waterways and cause erosion; dust; and wind damage. This will change the existing layout of the land and will affect how water then reacts with the existing areas. The development of the borrow areas will change and increase the constant noise and dust levels with excavation activities now being proposed to extract 856,000 cubic metres of soil from Allawuna and the cartage of this soil to the landfill site. There has been insufficient information given on rehabilitation of the area used for the borrow pits and how long it will take for it to be used for agricultural activities again, suggesting that no thought or consideration has been given to this matter. The borrow areas may not only affect neighbouring properties but could adversely affect properties downstream by changing water flow and contaminating surface water. No thought has been given to the enormous rocks that can occur in this area and their effects on the borrow areas or the landfill site. This raises the question as to whether blasting will

be required. This is an extremely quiet and peaceful area and the creation of the Borrow pits will seriously add to the effect of impacting our amenity with dust and noise over the 10 year period SITA have stated.

There is a large potential for the landfill to leak leachate into the ground and thus water system on the proposed site. HDPE liners are in no way tear proof, it was stated by the lead consulting engineer of the proposed landfill Mr Bruce Bowman, that they can easily be pierced and compromised like any other similar material. With such a vast array of rubbish, it is almost certain that there will be sharp objects that will pierce through the liner once applied with vertical pressures from the bulldozers and earthworks equipment.

The liner also has large potential to be compromised by earthquakes. The wheatbelt is a hot zone for earthquakes with an earthquake of magnitude 7.1 predicted to occur at York in the near future. The HDPE liners have been shown to tear at a magnitude of 5, which would almost certainly occur if predictions are even vaguely met. The magnitude of earthquakes is measured on the Richter scale, which is logarithmic in nature. This means that an earthquake of magnitude 7 is actually 100 times greater in amplitude than an earthquake of magnitude 5. If an earthquake is predicted to occur in the area that is 100 times greater in amplitude than the tear threshold of the liner, how can the liner in anyway be expected to offer any protection to the ground water contamination. The border of the proposed property is signed by the Water Corporation to be within the catchment area of the Mundaring Weir, which not only acts as a source of drinking water for a large area of Perth and the Hills, but also areas as far as the Goldfields region. This has very similar potential to affect these people and their families as the dust contamination for my own drinking water. I feel that if this proposal is to even be considered, clean and reliable water needs to be supplied to all residents in the area by the Government. It is grossly unethical to expect ratepayers who have no other source of clean water to cart water because of any likely contamination caused by this proposal.

Noise emissions will be highly disruptive to the area and will seriously affect the amenities for both residents and local fauna. The continual noise of heavy machinery will be audible for kilometres as unlike in residential areas, there is no other constant noise that cancels and drowns out large sounds. The noise could be highly disastrous to the fauna, especially in neighbouring and nearby reserves, which already acts as a reduced habitat for native animals. If they are pushed further away from the site by the noise then there allocated land will be even smaller. This would likely reduce the populations of fauna, which would be a great blow to the local environment. The discomfort to residents would be extremely annoying, many of whom have purchased properties in this area to be removed from the noise and stress of residential areas.

There is large potential for the landfill to discharge physical pieces of rubbish across land to both neighbouring properties and nature reserves. Wind in the region reaches significant velocities, with many willy-willies (mini tornados) forming on hot days and can pick up items as heavy as sheets of metal. As previously stated, the proposed site geography is very open from wind travelling in a Northern direction. The fences proposed by SITA are only proposed to be 1.8 metres high, which will not be sufficient in preventing wind and willy-willies against displacing rubbish beyond the landfill boundary.

Flash flooding is also a large concern in the area and has the potential to carry rubbish swiftly and unpreventably off-site into local streams such as 13 Mile Brook.

I object to this proposal. The precautionary principle should be used here on the grounds that it will cause unnecessary contamination to an extremely pristine and important area and has the potential to pollute important potable water sources. The landfill will not benefit York in anyway and has the potential to destroy our agriculture industry, our tourism industry, our hospitality industry and valuable employment that these industries bring to York. I therefore ask that this proposal be rejected.

Yours sincerely,

Jake Davies

York WA 6302

Records

From: Glenn & Kay Davies
Sent: Sunday, 24 May 2015 10:40 AM
To: Records; Kira Strange
Subject: Allawuna Lanfill Proposal Submission
Attachments: Glenn Davies Shire of York Submission.pdf; Allawuna_Dryland cropping.pdf; Allawuna_Grazing.pdf

257

Importance: High

SHIRE OF YORK	
FILE	PS - GEN. PRO. 3.1
OFFICER	INITIALS
KRD	[Signature]
25 MAY 2015	
1147833	
REFERRED TO COUNCIL	
DATE	INITIALS

To The Shire of York,

ATTN: Kira Strange,

Please find attached my submission against the Allawuna Landfill Proposal.
Thank you.

Kind regards
Glenn Davies

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

24th May 2015

To The Commissioner James Best, the Shire of York and all Councillors,

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

I wish to make a detailed submission below of some of my concerns and the affects that the landfill will have upon our health, our property, our lives and that of our community.

PLANNING

1. Shire of York Town Planning Scheme No 2

On page viii of the Executive Summary for SITA, the Shire of York Town Planning Scheme is discussed and the objectives of general agricultural zoning given. Clause 3.2.4 of the Town Planning Scheme states that if the use of land for a particular purpose is not specifically mentioned in the Zoning Table and cannot reasonably be determined as falling within the type or class of activity of any other use the local government may:

- a) determine that the use is consistent with the objectives and purposes of the particular zone and is therefore permitted; or
- b) determine that the use may be consistent with the objectives and purpose of the zone and thereafter follow the advertising procedures of clause 7.2 in considering an application for planning consent; or AMD 9 GG 17/10/03
- c) determine that the use is not consistent with the objectives and purposes of the particular zone and is therefore not permitted.

This proposal is not consistent with the objectives of the zone and therefore should be dealt with as in part (C). The “maybe” response given by Council to the landfill and “land use” is totally unacceptable and Council need to reject the proposal.

4.15 General Agriculture Zone

2. The Allawuna proposal is not acceptable to the objectives of the **General Agriculture Zone.**

- 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 and should not be placed in an area where it has the potential to destroy farm bio-security and cause health risk factors to food for human consumption. The landfill will not encourage expansion of agricultural activities.

- 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**

Landfill is detrimental to the environment and has no benefit to this area. This is a pristine clean agricultural environment, which will be affected by waste for many hundreds of years, if this proposal is approved and will no longer be able to be used for agricultural purposes..

- c) **To allow for facilities for tourist and travellers, and for recreation uses.**

The landfill will not provide facilities for tourists and travellers or any recreation uses and I believe this proposal will have a detrimental effect on tourists and travellers to York.

- d) **To have regard to residential use of adjoining land at the interface of the General Agriculture zone with other zones to avoid adverse effects on local amenities**

The landfill proposal has already adversely affected the adjoining landowners as well as the residents of York. The community is extremely unhappy with the proposal.

3. From a planning aspect this proposal is not consistent with the objectives of the **Shire of York Strategic Community Plan** and its environmental goals.
4. This proposal is not consistent with the Shire of York's Local **Planning Strategy**. The objectives of the strategy are to protect sustainable agricultural production, preserve and enhance the environment and natural resources and to protect the National Parks, State Forest and associated water catchments.
5. This proposal is not consistent with the **Avon Arc Sub-Regional Strategy and the Wheatbelt Land Use Planning Strategy (WLUPS)**. The key issues of its objectives are the protection of agricultural land and avoidance of land use conflicts and protection of scenic values.
6. This proposal is not consistent with the objectives of the newly released **State Planning Policy 2.5 - Land Use Planning in Rural Areas** published in the Government Gazette on 27th November 2013.
7. The newly proposed changes to the landfills finished size and shape have changed considerably to the original proposal. I am concerned about the effects that runoff and erosion from rainfall will have upon the finished pit. The newly planned steep sides may well be prone to deep gouging by rain and no plans have been presented on how this will be managed.
8. I am deeply concerned about the contamination to surface and ground water in the area, as we all rely on good quality water to run our farming properties. Water that becomes contaminated by leachates or toxins cannot be used for Agriculture. As we have no other source of water available in the area the Shire and the

Government must provide alternative supplies of water before a proposal as this is ever considered.

9. *SITA stated that they will: "Raise 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;"* I do not believe that SITA can know the exact winter groundwater level and have not performed enough in depth testing to know with certainty where the level exists. Golder Associates have only been employed very recently by SITA and even they make disclaimers about the information they have provided.
10. I am concerned by drawings D105 and D106 Appendix A. The base of the landfill is shown as being only 2 m above the estimated groundwater height. In my opinion this does not provide sufficient margin for error. An estimated groundwater height cannot be taken as the base data. Actual data collected over a long period of time from this area must be used, as this will allow for correlation of seasonal rainfall data with water table movements.
11. In my experience, this type of country does not suit this project. The area is prone to localised saturation and water table fluctuation. It would only require one stream to emerge under the liner in a wet year and the leaching of contaminants would be unavoidable.
12. SITA appear to have performed extensive tests to their pit site and borrow sites but did not complete extra testing in relation to the Mundaring Weir Catchment area, 13 Mile Brook and the Helena River Catchment to the west of the proposed landfill. SITA have not carried out extensive testing on the westward flow of groundwater into the Mundaring Weir catchment and still dismiss the fact that water flows from an east to west direction and that contamination will affect drinking water. Water is an essential part of life especially as there is no scheme water and therefore everyone in this region relies solely on water derived from the area.

Borrow Pits

13. *SITA have stated that they will: "Require, as a consequence of the reduction in material excavated from the raised Landfill, sequential development of three borrow areas comprising a total of approximately 20ha commencing from approximately Year 10 onwards;"*

The borrow pits were never included in the original proposal and do not lie within the original proposed landfill site. The borrow areas will change the way that Allawuna will be run and not allow it to be used for agricultural use to the extent it

was first proposed. The pits are extensive in size and this will not allow for cropping to be carried out as originally stated in the old proposal.

14. The borrow pits will change waterways, cause erosion, dust, wind damage and change the existing layout of the land, which will affect how water then reacts with the existing areas and have the potential to damage groundwater and surface water tributaries and change water flow.
15. The development of the borrow areas will change and increase the constant noise and dust levels that were first discussed in the original proposal with excavation activities now being proposed to extract 856,000 cubic metres of soil from Allawuna and the cartage of this soil to the landfill site. There has been insufficient information given on rehabilitation of the area used for the borrow pits and how long it will take for it to be used for agricultural activities again. No thought has been given to the enormous rocks that can occur in this area and their affects on the borrow areas or the landfill site. This raises the question as to whether blasting will be required.
16. The borrow areas will not only affect neighbouring properties but could adversely affect those properties well down stream by changing water flow and contaminating surface water.
17. The borrow areas will affect the Amenity of the surrounding area. This is a very quiet area with noise being heard over great distances. The constant noise that the landfill activities will make echo through the surrounding areas as there are no large barriers to stop this noise.
18. *SITA have stated that they will: "Reduce the size and extent of the leachate ponds and stormwater dam required."* Reducing the size and extent of the leachate ponds and storm water dam is not logical. Decreasing the size of leachate ponds can only lead to adverse effects with over flowing ponds leading to contamination of 13 Mile Brook. A decrease in the storm water dam is not based on reason. Stored water will be an important requirement on site with no scheme water available and this has been undervalued and miscalculated.
19. The dry creek bed and small seasonally dry creek line that SITA refer to is extremely incorrect. Water lies close to the surface as was evident in SITA's bore MB06 where water is being forced to the top. Unpredictable weather conditions and significant downpours in this area often cause flash flooding and these dry creek beds can become fast flowing rivers in the period of a few minutes. SITA and their consultants have grossly misunderstood this area and the way that the soil and land react with water.

Changes in Impact

20. SITA have stated, *"Groundwater is present throughout the site, predominantly unconfined (i.e. with a water table)."* Unconfined aquifers are those into which water seeps from the ground surface directly above the aquifer. I am concerned about unconfined aquifers because they are not "protected" by an impermeable layer. If leachate leaks into the soil above the unconfined aquifer, it will seep into and contaminate the groundwater.
21. The visual landscape will be impacted as it will be seen when travelling on Catchment Road, which runs the whole extent of the western boundary of Allawuna. Mt. Observation lookout and picnic area is located nearby and is 341 MSL while SITA state the landfill will be 350.5 MSL.

Fire Management Plan

22. A Fire Management Plan was not submitted with the original application. The proposed fire plan is incorrect and the community, especially the volunteer fire fighters who are being expected to fight the fires, have in no way been consulted. Without the consent of the volunteers to assist in fires on Allawuna, the potential for disaster is substantially elevated. As a DCBFCO I find it difficult that we have not been consulted but our names used in SITA documents. I am not comfortable with asking people to attend a fire on Allawuna. I am very concerned about our position as fire officers, if a fire occurs in the landfill at the same time as occurring on neighbouring properties. SITA only have 1 fire unit of their own and are obviously expecting volunteers to assist them. This will place all Bushfire officers in a difficult position.
23. This is an extremely volatile area for bushfires especially being positioned immediately adjacent to the Mt. Observation National Park, the Mundaring Weir water catchment area and the 44,000 hectares Wandoo National Park. It is also in close proximity to the Wambyn Nature Reserve (215 hectares) and Saint Ronan's Nature Reserve (118 hectares).
24. The fire plan discusses burning of the remnant bush land area periodically on a yearly basis (7.1). This was never a part of the original plan and is not an environmentally sound idea. No reason has been given for doing this.

Fire Fighting Equipment

25. SITA have stated that the: *"Fire fighting equipment retained on-site will be available to the assist with local fire management when not required on-site."* This was never part of the original proposal. This statement is incorrect as there will

never be a time when the equipment will not be required on-site due to the volatility and risks of a landfill.

26. SITA have stated that they will make provision for only one water truck on the Allawuna site. This will not be suitable as a single fire fighting unit is not capable of controlling a bushfire, regardless of the unit's capacity. All fires occurring on the high risk site will rely almost entirely on the surrounding bush fire brigade.

Earthquake & Seismic Activity Design

27. *Sites within York and the surrounding localities are subject to Seismic Activity. This ranges from minor tremors that can't be felt to earthquakes that can have the potential to cause structural damage. In this regard, buildings are required by the Building Code of Australia to comply with the following standard: AS 1170.4-2007 Structural design actions - Earthquake actions in Australia. Certification of compliance with this standard, by a Practising Structural Engineer, will be required for most buildings that comply with the Australian Standard A.S./NZS 1170.2-2011 Wind Actions.* <http://www.york.wa.gov.au/earthquake-seismic-activity-design.aspx>

28. SITA have changed their existing proposal after further investigation by Golder Associates to address concerns raised, but still continued to ignore all claims of seismic activity within the York/St. Ronan's area. Seismic activity is a constant and real threat which affects landfill design just as they legally affect building designs in the area (shown above).
29. Geo Science has predicted that York is one of the top 4 hot spots in Australia that will experience an earthquake and predict a magnitude of 7.1. Earthquakes potentially change surface and underground water courses and are known to tear landfill liners at a magnitude of 5. As the site sits above an aquifer, there is potential for liquefaction & collapse of the pit in the event of an earthquake. SITA's changed proposal should consider the safety of the environment and be made with full consideration to seismic activity.

Conclusion

30. Figures in the supplementary report have been misinterpreted by SITA. This is prime agriculture land in a high rainfall area, which produces high volumes of valuable produce. The landfill has the potential to totally destroy Agriculture in the area especially organic properties located nearby and threatens to affect the Bio-security of all the surrounding agricultural land. The land is pristine and clean and we should not be allowing it to become contaminated and destroyed for future generations.
31. The development proposal does not contribute to ensuring that broad-hectare agriculture is the principal land use and will not encourage the retention and

expansion of agricultural activities. The modified proposal extends the areas impacted by the landfill activities due to the necessity for borrow pits, which are to be located in areas currently used for grazing and cropping. This proposal is not consistent with the York Town Planning Scheme, nor is it correct and orderly planning, when consideration is given to the newly released State Planning Policy 2.5 - Land Use Planning in Rural Areas.

32. Maps attached to this submission which were provided by the Department of Agriculture and Food, Western Australia, show that land at Allawuna has greater than 70% moderate to high capability of Dry land cropping and Grazing. In comparison to this, the data provided by SITA stated that Allawuna only had fair capabilities.

PRECAUTIONARY PRINCIPLE

33. I believe the Precautionary Principle should be used as this proposal has the potential to risk and cause harm to the public and the environment. There is a lack of extensive and conclusive scientific knowledge with this proposal having consequences that are uncertain and potentially dangerous especially to our environment and the health of community members living in close proximity to the landfill.

The Allawuna landfill will contaminate an environmentally sound agricultural area that has a high value in land production positioned adjacent to Mundaring water catchment area and important sensitive National Forest. The land is pristine and clean and we should not be allowing it to become contaminated and destroyed for future generations.

I believe this is the wrong position for a landfill and other long term alternatives need to be considered. Great Southern Highway is already an extremely dangerous road to travel, as has been evident with the RAC, Elephant in the Wheatbelt and the latest government review stating that Great Eastern Highway and the Chidlow – York Road are the worst stretches of highway in the deadliest region of WA. The increase in continual use by extra trucks will only increase the death toll, on a road that was only designed for 8 tonne trucks and not road trains. Accidents will further burden our community and community resources. It is often forgotten by governing authorities that it community members who attend and contend with each and every issue in regional areas.

There is an enormous public concern over this proposal and the affect it will have upon the environment and future generations. We cannot ethically approve a proposal that has the potential to destroy a large percentage of our Agricultural and Tourist Industries and change our historical standing. This proposal will not bring any significant benefit to the York community despite the claims that SITA are making, but has the potential to destroy much of our existing employment opportunities and high capacity Agricultural land. I feel that we are no longer looking at this proposal in it's' entirety but only a small proportion of what is intended in the future.

I respectfully ask that this proposal be reject on all grounds.

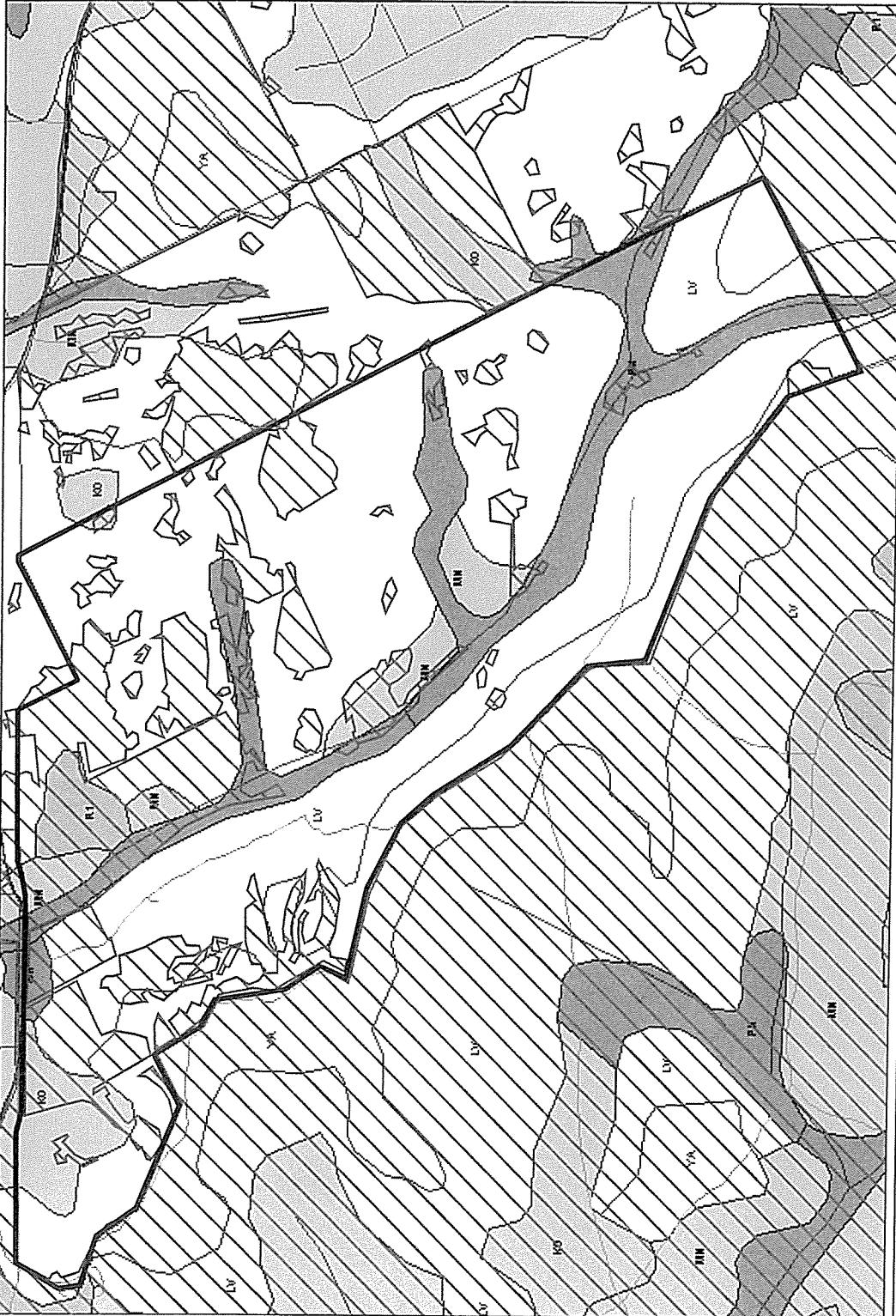
I thank you for the opportunity to make a submission to the Shire of York.

Yours sincerely,

Glenn Davies

YORK WA 6302

Dryland cropping



LEGEND

Cities and Towns

- A Major town names
- A Towns names
- All cities and towns

Hydrology

Hydrology

Roads - Detailed

Freeway

Highway

Primary

Secondary

Minor

Track

Connector

Proposed

Vegetation

Remnant vegetation

Properties

Subsystems

A Subsystem/phase label

Subsystem/phase label arrow

Subsystem/phase boundary

> 70% of Land has high capability

50-70% of Land has high capability

>70% of Land has moderate to high capability

50-70% of Land has moderate to high capability

50-70% of Land has low capability

>70% of Land has low capability

Insufficient information

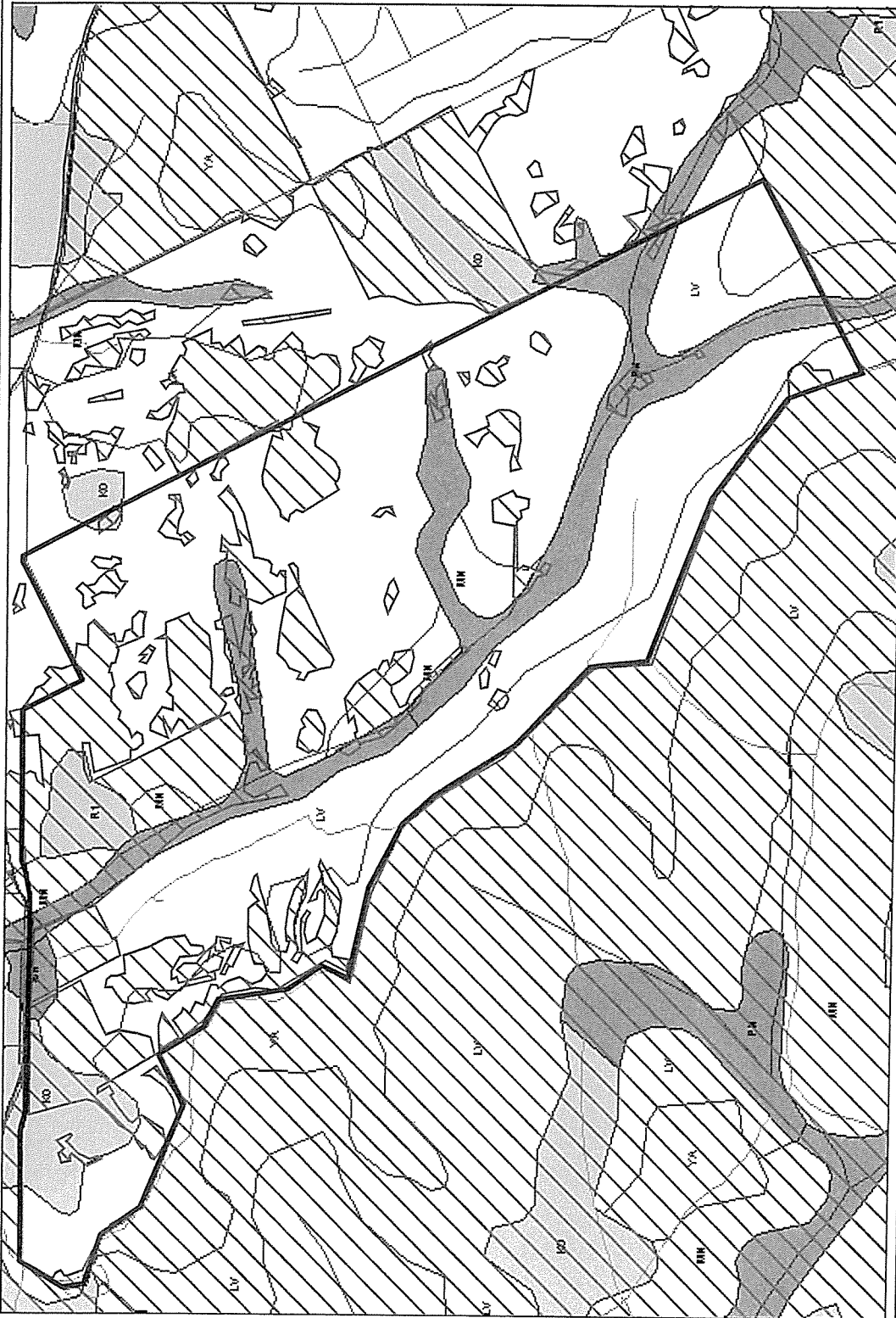
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Grazing



LEGEND

Cities and Towns

- A Major town names
- A Towns names
- All cities and towns

Hydrology

- Hydrology
- Roads - Detailed

Roads

- Freeway
- Highway
- Primary
- Secondary
- Minor
- Track
- Connector
- Proposed

Vegetation

- Remnant vegetation

Properties

- Subsystems

- A Subsystem/phase label

- Subsystem/phase label arrow

- Subsystem/phase boundary

- >70% of Land has high capability

- 50-70% of Land has high capability

- >70% of Land has moderate to high capability

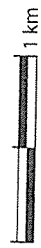
- 50-70% of Land has moderate to high capability

- >70% of Land has low capability

- >70% of Land has low capability

- Insufficient information

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Department of Agriculture and Food



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SHIRE OF YORK	
FILE	PS. GEN. PO. 3.1
OFFICER	INITIALS
KIRA	(Signature)
25 MAY 2015	
1147929	
REFERRED TO COUNCIL	
DATE	INITIALS

Name: Terry and Robyn Davies
 Address: _____ York, WA. 6302.

York, WA. 6302

Date: 20th May 2015.

Shire of York
 P O. Box 22
 York. W.A. 6302

To the Shire of York,
 Commissioner: - James Best.
 Planning: – Kira Strange.
 Records: Shire of York.

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

WITHOUT PREDUDICE:

We are a neighboring property to the East of the proposed landfill site. Our boundary is approx. 1.5 kms from Allawuna. We are broad acre farmers with approx. 3,000 acres producing free-range sheep, cattle and crops – lupins, barley, canola, wheat and oats for the domestic and international markets and free-range eggs and pigs for local food markets. The effect of a landfill so close to our property (if allowed) will impact greatly on our markets due to the negative destruction of landfills, and the known potential to contaminate our water sources, bio-security, land and air quality, flora and fauna, roads and our amenity will be ruined forever. This area is prime Agricultural land and we are the 5th generation to do so on this particular property. Therefore we strongly object to this landfill proposal.

The strategic role of governments and government departments is to maintain and sustain a healthy, well managed environment for everyone. The collective health, wellbeing and capability are to be protected and how we care for it is imperative to the sustainability for generations to come. Our environment is so fragile and we need help from governments (Local, State and Federal) and associations alike to help protect our precious land from proposals such as landfill that do not fit into prime agricultural land or the schemes and objectives of the Town planning of York. Allawuna is zoned agricultural with a use not listed. Therefore it is against the Town Planning rules.

The planning rules for the Shire of York –and also the rules for earthquake prone area are such that even if you want to put a fence, shed, renovations to homes and build any structure what so ever they have to abide by the planning rules. Even then it is a hard process to go through. Being in an earthquake zone – the planning laws are very strict. Why a landfill is even being considered in such an area is beyond comprehension.

SHIRE OF YORK TOWN PLANNING SCHEME NO 2:

4.15 General Agriculture Zone:

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.

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 of the environment.

c) To allow facilities for tourists and travelers and for recreation uses. To have regard to residential use of adjoining land at the interface of the General Agricultural zone with other zones to avoid adverse effects on local amenities.

This proposal is NOT consistent with the objectives of York's Community Strategic Plan which states:

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 our Enhance our Rural Land and spaces.

One of the PRIORITIES under the objective is to 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 main PRIORITIES under this objective is to PROTECT PRIMARY AGRICULTURAL AREAS through Effective Land Use Management.

This proposal is not consistent with the LOCAL PLANNING STRATEGY WHICH INCLUDES Protection of sustainable Agriculture and to Preserve and Enhance the Environment and Natural Resources.

GENERAL OBJECTIVES:

Economic:

- 1: Encourage tourism that is complimentary to the character of the Shire and is compatible with the lifestyle and aspirations of the community.
2. Protect Broad Hectare Agricultural areas from inappropriate development and intrusion by urban and semi-urban uses.

The proposal is NOT consistent with the STATE PLANNING POLICY 2.5 – LAND USE PLANNING IN RURAL AREAS.

Part 4: Objectives of this Policy:

a) To protect rural land from incompatible uses by:

1. Requiring comprehensive planning for rural areas.
11. Make land use decisions for rural land that supports existing and future primary production and protection of priority agricultural land.
111. Providing investment security for the existing and future primary production and agriculture sector.

- b) To promote regional development through provision of ongoing economic opportunities.
- c) To promote sustainable settlement in, and adjacent to, existing urban areas.
- d) To protect and improve environmental landscape assets
- e) To minimize use effect.

This landfill proposal at Allawuna is against the AVON-ARC Sub-Regional strategy key issues as its objective is to protect agricultural land and avoidance of land use conflicts.

: The key guiding principles are preserving the cultural heritage of the region.

: Conserving and enhancing the natural environment.

: Recognizing Agriculture as a significant land use and economic activity.

: Improve the landscape value.

: Promoting, protecting and expanding a regional greenway system.

: Encouraging tourism activities which provide benefit to the region.

Local Government has been instructed to include landfill as a prohibited use on agricultural zoned land by the Minister for Environment Hon. Albert Jacobs.

The application for planning approval for this landfill site is not a standard application therefore careful consideration should be taken into account as this proposal will not only affect the Town of York but the proposal brings with it huge ramifications to a much wider geographical audience. This proposal affects to many other communities and towns this must be taken into consideration.

In the FORC – Forum of Regional Councils Policy statement 2013 it was stated that the five major areas promote better waste management. Their objective is to maximize the value of waste and minimize the volume of waste to landfill.

The State Governments Best Practice Policy Environment Management is to make sure that the Local government is responsible for providing a framework for the orderly development of waste management facilities for the private and public sectors. York, Toodyay and Mundaring already have these in place so there is no need for a major landfill in a prime Agricultural area as Allawuna. It is already proven that Henderson, Miller Road and Red Hill have substantial long term air-space capacity for many years. North Bannister has recently approved a new class 11/111 landfill, Dardanup has two approved landfills and Fernview (Gin-Gin) has recently opened. A landfill site at York is unwarranted and unwanted.

SITA state there will be employment opportunities created by having this landfill proposal at Allawuna. I have personally spoken to the truck drivers involved in Perth and told they have their entire fleet ready and no more will be employed by them. SITA are telling the public of York that Avon Waste is in talks with them. This doesn't mean they are going to be employed yet and Avon Waste already has the run for the waste disposal in the major wheat belt towns now servicing in excess of thirty-two towns which is a huge area - Avon Waste will have to purchase bigger trucks, as they don't have any of the road trains that SITA say they will be using for the landfill site. This is a huge

expenditure for a small family owned business especially if SITA are going to abide by their word and only have the landfill going for a maximum of 20 years. Most of the other businesses in York are Agricultural based or regular daily things like banking, groceries, chemist, 2 small garages that are closed daily and on week-ends for fuel and a few real estate agents and gift shops. York is a Tourist town that a lot of the bed and breakfast and coffee shops rely on to survive. York does not have big businesses like the city does, therefore, sourcing materials and everything that the town needs comes from Perth or other areas. SITA are telling the local community this project will bring in to the town millions of dollars in revenue. The trucks will be going to Perth and back to the site regularly, fuel tankers will be stored on site and as this site is a 40 km round trip to York and back to the site from York – none of the trucks will be going back into the Town of York unless they do employ local drivers and then that will be worse for the roads and the three bridges section if any of this traffic goes back to the town. If Avon Waste does have the contract for SITA- will this mean that rubbish will be taken through the town of York from all the wheat belt towns that Avon Waste service to Allawuna. SITA have stated that the workers come from Perth and they will be driving back to Perth with the empty trucks and loading again at Kewdale for the next morning to be ready to go early. The promise of bringing in dollars to the community and local employment is a very false. Unless SITA investigate local people who may have interests in companies further afield who deal with the types of machinery etc. that will be needed for the site – local employment will be negligible – except maybe for Avon Waste. The Minister for roads has expressed grave concern for the three bridges section of this road if local people are employed and go back to the town of York after work.

SITA first stated they would employ a few people from York and maybe inexperienced. Does this mean that anyone who has no Occupational Health and Safety knowledge or First-Aid skills or any type of sense about working in this type of industry will be employed. The safety aspect of this is very dangerous giving the knowledge that people who are employed don't have any experience in dealing with huge landfill sites either during the construction phase or everyday running of a mega-landfill site that is a dangerous place with vehicles moving at all times and trucks and machines coming and going on a regular basis. Also managing landfill fires – if occurs, protection of spills into the water – the list is endless of what problems can and maybe will occur.

The Department of Agriculture and Food - DAFWA- is committed to ensuring land and water resources meet future industry needs. This is in line with the State Governments priority plan for Agriculture and Food to assist the Western Australian agric-industry and food sector to achieve its sustainable potential in a rapidly changing and growing World. Land use for Agriculture and food industries aims to have sufficient land and water resources to support development needs of agriculture and food in Western Australia. If non-agricultural developments such as landfill are allowed into these areas, where food and water are at a premium then this will be detrimental to the whole community. The proposed site for landfill is classed as having more than 80% high-land capability which is a prime location for agriculture because of the water, soil-types and proximity to towns and services. The cropping capacity at Allawuna is of high value and the crop averages are very good. Also it is a prime holding of land for livestock.

West of York is some of the most sought after land throughout WA and also we pay the highest rates to the Shire of York. We don't have any services to our properties = no rubbish collection, scheme water or mail delivery service – so the rates we pay are purely on the value of the land. This area is also known as one of the highest rainfall areas as well. We have years of rainfall charts to prove this to be true.

We have had two professional valuations on our property here – not far from the proposed landfill site - and we questioned whether a landfill site in close proximity to our farm will affect the values and we were told that if a landfill is placed at Allawuna it will dramatically affect our values of our land and the volume of buyers for this sought after area will be less because no-one wants to live near a landfill site.

The 13 mile brook runs through our property from the south east for approx. 3 kms then northwards toward our boundary then runs directly west into McColl's property and continues west through Allawuna, then through to the catchment areas. SITA have stated that the water runs north from the 13 mile, but this is incorrect – as proven by SITA that it actually runs east to West through Allawuna. The landfill is going to be placed on the east upward slope of Allawuna and there are water tributaries that run through the middle of this. SITA have stated in response to public feedback from a site visit that they will relocate the leachate dams further upwards to the east — resident site tour. However the location is in a large paleo-channel water recharge area. (Table 6 – Groundwater levels – page 11) also – attachment 1– DOW. Golder Assoc. also stated that in a their bore monitoring data that they drilled down and they drilled 21 metres and there was pure sand they were drilling through – this was in the area where the paleo-channel is – so there bore data and monitoring logs and types of soil varied greatly – therefore this proves how the types of soils vary greatly under this farm, as does our own property in the same area. There is conflicting information from SITA on the use of the water. SITA have stated they will not be using the water from the site because it is a seasonably dry creek bed, yet in another report they state they will be using water from the site. They have also stated it is saline, but after testing, it isn't. Will they be putting more traffic on the roads if they have to cart water to the landfill site. Since 1993 the Talbot brook land management association inc.- TBLMA- has planted more than a million trees throughout the tributaries and creek lines that flow throughout the area to the 13 mile brook to clean up the waterways which then flow directly to the Swan/Helena/Avon river catchment systems, eventually to the Mundaring weir and Canning Dam for Human potable (drinking) water for some of Perth and most of WA through to the wheat belt and to the goldfields. These projects, which have taken years with many volunteers including schools have been backed by numerous Government departments; Enviro-fund (Canberra), National heritage trust, Swan river trust, Avon catchment council, Lottery west, Gordon Reid foundation, DOW, Men of the trees, and also Carbon-Neutral backed by the Water corporation. We are now starting to see the results from these projects, with water testing's being done and the reduction of salinity levels and creating wildlife corridors for the species that had shifted are now re-colonizing. To put a landfill site in the middle of the 13 mile brook will contradict years of hard work and destroy the environment and our precious drinking water.

There is no scheme water west of York so we all rely on rainfall capture and bores to supply ourselves and our stock. In their 1st application to the Shire SITA stated that this area is of a low rainfall – now they are stating it is a high rainfall area. Our average rainfall is between 480mms to 520 mms. (Rainfall charts are available on request).

The dust emissions from the inclusion of Borrow pits as well as the landfill itself is going to be horrendous to the surrounding properties because in this area we have strong winds throughout the whole year coming from different directions N/W, S/W, N/E and S/E. As we have no scheme water available here we rely solely on rainwater tanks for drinking and dam water for household use. The winds can be very severe and during summer the dust is atrocious. It will be an impossible task for SITA to dampen the dust down as regularly as it will need to during the summer and the contamination will be detrimental to the health of humans and livestock as we all rely on the catchment of rain water, surface and ground water for every day survival.

We are concerned about the conflicting data SITA have supplied regarding the water studies undertaken at Allawuna. In the hydro - geological site characterization studies first undertaken by Envall. Golder Associates reviewed the drilling logs and data and found the logs to be very limited with respect to the geological descriptions so there remained uncertainty in the provenance of those materials, therefore the groundwater monitoring data for the site was insufficient to provide and find the maximum groundwater level for designing and for use in the engineering for the landfill. Many gaps were identified in the Envall data. If there were problems with the first tests and data received by SITA how can we be sure that Golder have it right – especially as they have found so many flaws in the first set of data that were supplied to SITA, the public and the relevant Government departments. Water is of the utmost importance to everyone – no one can live without water and if our water supplies and catchment areas are banked up or blasting occurs because SITA will have to blast because of the types of rock underground – this will upset many of the underground and sub-surface tributaries that run into and around the 13 mile brook and as mentioned are a huge part of the catchment areas for most of WA. Also the damage to our houses – when they blast – which may be inevitable when they try and put borrow pits in and the landfill itself considering the granite rock.

When some of the bores were placed around the property groundwater was observed to be flowing around the outside of the bore indicating that the annular seal of the wells were not competent, also as to the amount of water there actually is in this area. This proved that the artesian flows underground were too much to be confined. The levels of groundwater are not able to be measured properly because the fluctuating changes in the underground pressures and the external pressures that create differing groundwater levels. In some of the reports there is known to be “unconfined” aquifers – an unconfined aquifer means that it is an “unknown” quantity therefore it is difficult to specify proper testing results –SITA have carried out tests over a very narrow window of time. SITA state they are going to place the landfill 2 metres above the groundwater level – how do SITA know where the level is for groundwater and what test did they do to prove this is right. THE UPPER SURFACE OF AN AREA FILLED WITH GROUNDWATER, SEPERATING THE ZONE OF AERATION FROM THE ZONE

OF SATURATION. WATER TABLES RISE AND FALL WITH SEASONAL MOISTURE AND WATER ABSORPTION FROM VEGETATION. THE WATER TABLE IS NOT FLAT – BUT HAS PEAKS AND VALLEYS THAT GENERALLY CONFORM TO THE OVERLYING LAND SURFACE. Like topographical undulation, there is the same tendency in the underground water table. Topographical slope is directly linked with the ponding time and infiltrated volume of water potentially yielding capacity. Soil porosity, permeability, structure of the rock and alignment of the rock beds strongly regulate the groundwater aquifer, hydrostatic pressure as well as yielding groundwater table depth. At Allawuna the underground granite rock will be the dictator as to how a landfill development will be created. Throughout summer we can have severe flooding with some years we can show where we have had over 100 mls of rain in a matter of minutes. This area here is prone to higher storm damage and higher rainfall. In the water report that Golder have done they have SIMULATED the tests and this is not a true reflection of what can really happen. SITA state they may need alternate water supplies during dry years and they will source this from underground water on the property – how will they use this water for anything if they are stated as saying it is mostly salty or there is not much water there. They have also commented on the fact that the thirteen mile brook and the six mile brook are adjacent to the landfill and they both drain into the Avon River. This surely will be a major disaster waiting to happen. The potential for contamination is very high, as previously stated, because of the differing weather patterns we have.

SITA state they are now placing a SMALLER storm water dam in the vicinity of the landfill – this is also a disaster waiting to happen because of the weather patterns and rainfall. In Appendix E2 page 14 – Works Approval application – SITA state there needs to be more detailed tests to identify the potential of the actual water supply. They also state in Appendix E2 – 4.2.3 they will not be lining the storm water dam and previously it was stated they would be. The rainfall averages were taken from 15.5 kms away – this is not a true indication of here at Allawuna – because when we have had severe weather patterns nothing may occur 15 kms away.

Ground and surface water monitoring should occur with Continuous Turbidity Monitors installed where landfill is next to or adjacent to a natural waterway and SITA have not mentioned these.

Accordingly, the Government guiding principles state that storm water dams must only carry storm water runoff and not waste water or wash down rubbish, litter or any other contaminant that may enter the adjacent human (potable) water catchment area. If SITA are now proposing to make this storm water dam smaller the problems associated with this are going to be huge, considering the unknown weather patterns that regularly occur in this area. A smaller storm water dam has the potential to wash away with the first storm we have – which, as mentioned happens any time throughout the year – winter or summer. (See – attachment 2 - photos of driveway and inceptor bank after only 34 mls of heavy rain – 26th Feb. 2015). Imagine after 100 mls what the effect will have on a very small storm water dam adjacent to our waterway will do.

The information SITA have used in their application to all Departments, DER and Shire so far, differs greatly. They are only working on computer models and each time their data has given different outcomes from the actual situation at Allawuna. In each different

report from SITA their irregularity of the land surface models and construction drawings and computer modeling all alter eg. AHD – (Height data). SITA stress tested for 1 in 100 year storm event over a 24 hour duration which they estimated up to 851 mms of leachate to the filling dams and state this would overflow and leak leachates and toxic emissions into the catchment area. Also the leachate collected will be pumped (constant noise emissions) into the leachate dams where evaporation will concentrate the liquid, emit odours and compound the toxicity of the leachate each time it is pumped back into the active cell surface. When questioned at the SITA presentation on the 19/11/12 they stated they would fix this by putting in another liner and keep putting liners under to help stop the toxins going into the underground waterways, however this is too late as the leakage has occurred to the surface and groundwater and they cannot eliminate the risk. SITA should be made to put PERMEABLE REACTIVE BARRIERS under the ground before a landfill is allowed and this is not possible because of the granite rock and the nature of the land at Allawuna.

During heavy storms – which happen frequently, it can wash away and contaminate storm water. Contaminates and emissions that leak into the storm water drainage systems will eventually discharge into the adjoining waterway and pollute it. SITA are now planning to make the storm water holding dam smaller - if this occurs it needs to be immediately treated but when this happens it is too late (See contaminated Sites – SITA Aust.) pollution has already covered the surface and below. Damage occurs in the initial part of a storm in less than 20 mins. Fine colloidal clays suspended in run-off require a long time to settle, often exceeding the economic or practical detention storage capacity. Flocculants may need to be added to help settlement, but they cause emissions and contaminate the waterways as well. Residual flocculants should not be released as it degrades water quality poisoning the land and the aquatic habitat (the Helena river has many fish species) SOURCE – Fish of the Helena River by DOW. Chemical sludge will require off-site disposal to a landfill licensed to accept this waste, so more movement of waste. The topography of this site – on the side of a hill will make the construction of this site near groundwater and surface water a very feasible potential hazard to important local water sources. Erosion is likely to be severe and inevitably emit and discharge leachate, toxins and gases of the landfill to the environment. During construction and operation the impact from airborne pollutants will affect houses and farms and destroy the amenity of adjacent residents. Because of the slope of the landfill site the toxins and leachate gases are going to end up in the waterway faster than SITA predicts due to increased osmotic pressure from the damp/wet (water recharge zone) beneath the site. If spillage occurs which it has at most landfill sites to date – then it is probable that the leachate may back flow along the 13 Mile brook system creating more discharges and emissions to the land and east of the brook. The underground waters are known to flow in different directions, and the poisons from this landfill filtering into the water will carry toxins, disease causing organisms in the leachate gases that collect in the water causing zoonotic diseases and ill health to human, flora and fauna. In addition the leachate ponds themselves through the attraction of water and rotting food odours will attract mosquitoes, flies, rodents, rats, mice, rats, feral cats and dogs, foxes, cockroaches, meat ants and numerous species not normally found in this area with the problems on flowing to surrounding land and farmers for many years, scaring species already living here. Bee

keepers use this area frequently every year and landfill will destroy them. It is a well known fact throughout the world landfill sites attracts scavengers of all types that are not natural to the environment. They destroy the land and the waterways and scar the natural land. Emissions and discharges to the water and land are never going to be rectified. The proposed landfill site is adjacent to and surrounded by 3 national parks – Mt. Observation- National Park, Wandoo -National Park and Wambyn Nature Reserve and St. Ronan's. The underground water drawdown away from the water table will kill and damage the trees in these parks and cause major destruction to the land. These parks and reserves are within the Mundaring catchment area and are not to be contaminated. Everywhere in this area there are signs saying Catchment Area – Do Not Contaminate. DOW has stated that in drinking water catchment areas in a Priority 1 or 2 or 3 area – landfill is Incompatible. See: DOE Water Quality Protection Note – Drinking Water Source Areas. DOW in *Landfill for Disposal of Putrescible Materials - Water Quality Protection* note that within proclaimed drinking water sources (Mundaring Weir catchment) Class 11 and 111 landfill sites are incompatible with their department's protection policy, and planning. The establishment of a putrescible landfill or extension of existing landfill in these areas and zones will be opposed by their department.

Leachate generated by the decomposing waste is the most mobile form of pollution that is generated by land filling activities, every landfill site in the world is known to leak. SITA state that the groundwater is being monitored now and also that it is a seasonably dry creek bed. As mentioned, their bores are wet and some saturated completely. SITA also that in response to the leachate discharge to the environment, remediation will take place. This will be impossible due to the type of terrain and the time to detection should the leak occur beneath the pit into the fractured rock aquifer.

SITA now state that the clayey soils are not suitable material for use as a liner due to the high permeability. The likelihood of erosion is very high if this clay material is used and there is a high likelihood of this happening during the operational stage – and after the landfill starts then remediation will have to be undertaken and by then the leakages would have occurred. SITA also state that the site has low levels of pesticides and hydrocarbons now before landfill, an expected outcome for a site that is a Clean and Green Agricultural area. We are also concerned that SITA having won the tender for the Fiona Stanley hospital and also most of the major hospitals in Perth, and many other industries in the city. This will inevitably expand their license to Class 111 (Even though at public meetings they have only said Class 11, but application is for Class 111) and Medical-Waste which is why liners and leachate dams are being built (not needed for Class 1 & 11) – to meet the needs of Class 111 and 1V landfill criteria. If so, who is going to monitor this site, SITA themselves a Government department or the York shire. The risk of Class 111/1V will expose our waterways, land and environment to severe contamination, pollutants and discharges. Heavy metals, toxic retardants, materials leaked from old computer parts, mobile phones, T.V parts, batteries, lead, cadmium, persistent organic pollutants – POP and (PDBE), polybrominated diphenyl ethers – which are found in textiles, fabrics, furniture and most household goods, arsenic, chrome, cobalt, zinc, plastic, glass, paper, cans, fluorides, asbestos etc. are all thrown away into

bins. Typical leachate has high concentrations of nitrogen, iron, organic carbon, manganese, phenols, and chemicals and pesticides, solvents, and is highly toxic to air quality, land and water, humans, animals and the environment. These mentioned are going to be in a Class 11 landfill but will fall into the Class 111 category anyway, because people throw all types of rubbish into wheelie bins and waste disposal bins, and any type of bin. SITA state they are only going to monitor the trucks coming into the site with one camera placed over on the side of the entrance to the landfill site. The trucks are enclosed, so how are they monitoring these trucks properly. In 2009 alone 234 million electronic items were sent to landfill. We have to close the loop and stop this destruction to our land, environment, air quality, waterways and protect our amenities.

SITA state that the proposed landfill site is not in the catchment area – it is and the maps from DOW (Attachment 3) prove this property is in the middle of the catchment. Previous studies have shown that groundwater becomes contaminated very quickly by leachates. SITA have stated it will take 178 years to travel 5 meters to the groundwater, this is totally unfounded and scientifically proven that it will take less than 5 years with the amount of rubbish that is going to Allawuna. Landfill is rubbish that cannot be recycled this means contamination IS going to happen, no matter what precautions they have in place – if any precautions are at all. SITA also state they are not going to be near 13 mile brook –the surface water and groundwater systems in the vicinity of the proposed landfill footprint are only separated by surface clay. The HDPE - LINER system to stop contamination to the water is made of 2mm thick material. These are going to be put into the ground on a slope level, the clay underneath is presumed to be seasonably dry but clay cracks as it dries if it has low sodium content and this area consists of fresh water (low soil sodium) – this will cause the clay liner to crack and fissure as reported by Qualcon. If the HDPE liners are too wet the glued seams disintegrate. The liners that SITA are proposing to use are only glued and stitched. They are known to disintegrate and the stitching stretches with the weight. They also ultimately fail due to natural deterioration and have an inherent leakage rate (10 L/ha/day plus) due to manufacturing imperfections. According to the Qualcon reports the liners were oven dried to only 50C thus causing the liners to heat and curling occurs. SITA say in 4.6 there are a number of possible causes of liner breach manufacturing and operational defects. Plastics are NOT inert. State of the art plastic (HDPE) liners from 1mm thick to 100 mms thick allow chemicals and gases to pass through their membranes, become brittle and swell and breakdown. (SOURCE) = www.zerowastelandfills.com. Certain types of acids in the waste itself can also render the liners useless and the acidic types of waste are usually the ones that can spread through the waste allowing it to come in contact easily with the liners. Also certain acids in the soil and waste render the liners useless.

Detection in new landfills can be very difficult since the only way is by monitoring wells. SITA have not mentioned if they are putting monitoring wells in. Landfills leak in very narrow plumes initially and may travel as far as 5km before saturation causes enough sideways spread to be detected by monitoring bores, hence leaks are very hard to detect. New landfills are typically located next to bodies of water making it even harder for remediation due to the incursion of surface water. Federal and State Governments and departments have allowed landfills to be located next to water bodies under misguided

principle. SITA have knowingly misled by stating only small amounts leak per day, given their sites all over the world leak. Penetration of the liners by sharp materials is also a very likely scenario with compaction. SITA have stated many times that their liners are indestructible, then why are they putting procedures for failure in place? Constructing a landfill site at Allawuna is geologically very different from most other landfill sites because of the water table and geology. Geo-science Australia has established that York W.A. is one of 4 places in Australia most prone to a major earthquake of magnitude of greater than 7.2. (Cornell-McGuire). The liners are on top of fractured rock. Even smaller tremors are known to fracture rock and liners are known to tear above magnitude 3 due to differential pressure, so with a larger earthquake pressure on the granite aquifers causes water to be forced out under pressure sufficient to rupture a HDPE liner. Any leakage may well not be detected until ill health prompts detection in surrounding bores or soaks, erosion to the land will be a major problem when the leachate ponds overflow. Finally, the weather patterns in this area are very unstable and flooding regularly occurs within close vicinity of the groundwater, this region is prone to earthquakes (as proven) resulting in failed bores from changes to subterranean stream flow and directions. Conjunction of natural geological loads & hazards foretell of disasters waiting to happen. What is the future for this highly productive, water catchment region in which tourism, agriculture and lifestyle provide amenities for the landowners, locals, and metropolitan population. Independent Hydro- geological reports were sought from – Rock water Pty Ltd. Landform Research – General Geology. (Reports avail).

The current owners of Allawuna - (Chester's) applied many times to clear land and under the planning laws of our Shire were not allowed because they are in a water catchment area. Later they tried for a license for a quarry on their property, which was dismissed a number of times by Government departments because of planning again, to this day they are still not allowed. The neighboring landowner (Ralph McColl) also tried to subdivide land and was not allowed through Shire of York laws for Agricultural land. Shire of York has a letter from Chester's and others when they tried to subdivide their land. There is a covenant (See – works approval application) - over the front part of Allawuna and other places on this property by the DER yet SITA say they have to clear this for the trucks to enter – this needs to be investigated thoroughly by the right Dep. If the DER or relevant department let this clearing occur it will open up a whole new set of problems for the management of many environments in the future.

Fires are a major problem within landfills and there are numerous burning around the world at this time. It takes years for a landfill fire to burn out and SITA expect our local volunteers to go – they are NOT allowed near a landfill fire. SITA supposedly have “upgraded” or “changed” their fire management plan. No amount of planning can be enough because a landfill fire is an unknown quantity – in other words – it is not what any of our firefighters or volunteers or professional firemen come across, it is very different from just an ordinary fire incident.

Fires happen in our area every year through lightning strikes. The destruction to the land with chemical build up from the landfill, chemicals stored on site, and the gaseous flares pose a real risk to the air quality, farmers and the flora and fauna of the National Parks surrounding this area. SITA have stated that they are going to have 150,000 Litres of

water on site, one for firefighting, a totally inadequate amount because it takes millions of gallons to try and help control a landfill fire, of which water cannot stop – flocculants must be used adding toxic discharges to the water and land even then they can burn for years. SITA are saying they will also rely on the local bush fire brigade to help. The local fire-fighting chief has spoken to one of the representatives in the Department of emergency fire and emergency services DFES and it becomes a HAZMAT operation, because in a landfill situation they have to section the fire with heavy machinery, thus causing the liner to be ripped through and because of the toxic fumes from the household waste local crews have expressed major concerns for this area, being next to more than 55,000 hectares of National parks, and the risk to the firefighters involved, volunteers (mainly farmers) who have to risk their life and health to help. Local volunteers cannot participate because of the explosive nature of landfills and risk of airborne pollution and they are not obligated by law to attend. Fires create their own winds and blow and change directions rapidly. Landfills can burn for years, as overseas examples have shown and if flocculants are used to cover fire these also contribute to more toxins leaching into the land and water. Landfill gases caused by the combination of methane and carbon dioxide are the result of anaerobic bacteria in the landfill and other gases from the plant and equipment and a continuous diesel powered generator. Carbon dioxide, methane and water vapor have gradually increased over the years, causing global warming to the earth and landfills are a major contributing factor. SITA have stated that their fire unit will be available to the local community if it is needed – this means that their unit may be away from Allawuna when they have a fire themselves – therefore them taking the unit off site is very dangerous. SITA also state that most fires on farms are started by gun shots – this is a total untruth.

On a still day, the noise emission is going to be considerable and this will impact on air quality, animal (stock) and human well being. The noise from machinery working on site will be echoed through the environment for kms. Also now SITA have decided to put borrow pits in the site and this will create a lot more noise and dust. The generator used on site and the reversing beepers of all the machinery will be non-stop and maybe blasting – Volume 1 page 66 – 11.4 - If blasting is necessary then the land will be fractured underneath causing further changes in the water aquifers; altering water flows and directions and impacting on bore and spring yields. DER guidelines recommend a buffer zone up to 500 metres from the site to neighbors and SITA expressed that they will put buffer zones and bund walls to provide acoustic screening where noise levels will impact sensitive areas, this is not possible if the rest of Allawuna is going to be farmed. SITA state the buffer zones to houses in the area, but not the actual boundary to which we use for stocking purposes, we farm right to our boundaries and work outside. Warning lights on the machines will be flashing constantly.

Our Bio-Security and rural amenity will be severely damaged and when the rotting smells of the landfill attract flies, mice, rats, feral pigs – of which are a huge problem in this and the Talbot Brook area – one of the neighbours put poison baits from the Ag. Dep. out last week and approx. 40 feral pigs were dead. Other problem wildlife are foxes, cockroaches, mosquito's, feral cats, rats, mice and numerous other species, which will have negative surrounding impact to the farmers and the altered ecology and the natural

environment, land, air and water. Despite SITA stating they will be using scare devices and traps, the magnitude of the pest plague problem is well known; also the species that naturally live in these surrounding National Parks are going to become extinct. These techniques are ineffectual on a rural scale therefore for most neighboring farms that are Bio-Dynamic or certified Organic or Free-Range will be affected. It is a catastrophe waiting to happen. There are over 26 small landowners within close proximity to this landfill as well, lifestyle blocks that are going to be worth nothing if a landfill is constructed next to them.

Eventually, landfill gas will be collected and flared to convert the methane and used for the generation of electricity. SITA state they are going to feed this back into the power grid. How do they propose to do this when our power lines are so old. The lines were put in 1966 (See – Contracts with Western Power) and most of the farmers are regularly cut off. THE SHIRE AND LOCAL GOV.S HAVE PROVEN THAT BECAUSE THE POWER LINES ARE INADEQUATE – YORK CAN ONLY ACCOMMODATE 86 MORE HOMES BEFORE POWER USAGE REACHES CAPACITY. Some farmers have installed stand alone solar systems (not being fed back to the grid) because the lines are too old. A lot of properties have been cut off from the Muresk line because of numerous power outages and put onto the end of the York line. The service is still very inadequate and even today we have regular outages. Are SITA going to upgrade the whole Western Power system? Having spoken to Niall Stock CEO of SITA on 19/2/14 he doesn't know. The length of time before Western Power or SITA are able to rectify the power line system in this area to enable the methane flaring is unknown and the emissions are going to be destroying the land and air quality forever. Flaring is odorless and non – visible, so the damage to the air quality and emissions to the land is insurmountable. The power lines as mentioned are very old and in the Country Local Government Fund Regional Strategy (Royalties for Regions) report there is only enough Power line capacity to accommodate 86 more houses in York before it reaches capacity (Towards a Wheat belt Infrastructure Plan Report 2 – 2011/12 – page 45 –). This also applies to the telephone coverage in our area. Allawuna have always used satellite phones with very poor reception and the mobile service is non-existent from the Cut hill Road towards York to the Lakes turn-off.

SITA state that the landfill will not be visible to tourists etc. but Mt. Observation – which is directly to the West of Allawuna is a tourist place. The landfill will be seen as it is going to be the height of the Duxton Hotel – (old taxation building) in the city which is 16 stories high and the perimeter even larger. Also along the Helena and Catchment roads this landfill site is seen from there. The Helena road goes straight through to Perth and a lot of people use this way to join up to the West Talbot Road and the Brookton Highway. The Shire of York puts out scenic routes for tourists to explore when coming to York and Tour 5A = Lakes to York via Helena Road. This will change when/if a landfill site is at Allawuna that has 3 roads around the boundary.

THREE BORROW PITS are now going to be included in the proposed landfill site. This was never mentioned to the public of York or surrounding towns and SITA now are saying they need these to cover the landfill. They are stating that the landfill is going to

be smaller now than when they first applied. There will be millions of tons of dirt excavated to use as cover. Rehabilitation will never be achieved because of the amount of dirt shifted. SITA also state that they may go through small tributaries of water when digging these. The top borrow pit has a main tributary running right through the centre of it straight into the thirteen mile brook. Also the way the landfill is going to be situated now is going to incorporate another main tributary into the landfill footprint. (SEE – DOW maps - attachment 4). These borrow pits are going to have a major impact on the noise emissions, dust and the risk of fires is going to be much higher with the movement of so many more trucks and machines working at the site. More of Allawuna farm will be ruined with the making of these huge pits and the waterways are going to suffer because when the flooding happens, which, as mentioned is a real threat, then the mud from these pits will wash or worse the pit itself will be filled and it they will have to be pumped out or left to dry out and that will render them useless.

When BORROW pits need to be used the characteristics of the landscape, such as the topography of the site and the vegetation and the eco-systems that it supports as well as the chemical and physical properties of the soil should be taken into consideration. As there is a huge BORROW pit being put above the landfill site at the top – that has a tributary within – (SEE -Map attachment 4) – the impacts are typically the release of contaminates from the activity to the land and the land disturbance. These impacts can reduce the viability of surrounding land, degrade the soils, make it susceptible to erosion, affect the health and bio-diversity to eco-systems and where acid sulphate soil and acid drainage is involved cause degradation and also significant offsite impacts. This can last decades and be irreparable. Predicting the impacts to this land disturbance can be complex. Many influences can be a factor like soil profiles, underlying geology, topography, rainfall in the area of disturbance and the types of contaminants released.

Kaolin clay is also found in abundance on this property – it is made up of aluminium, silica and oxygen atoms. If it is, smelter grade alumina it is used to make aluminium. There is a very strong demand for this type of clay – therefore SITA will use this to their advantage.

SITA have stated that the need for this landfill at Allawuna is essential, but the fact is there is enough air space at other sites for many years to come. There is no gain by putting another landfill in this pristine, clean and green agricultural environment with the potential to contaminate the water resources, the air quality and land and the environment, destroy flora and fauna and create major fire hazards that is surrounded by national parks. SITA are simply relocating pollutants to another area that will be permanently contaminated. The main human contributor to the earth is landfill.

The roads are a huge issue for an industry such as landfill. The trucks and vehicles will be coming from Kewdale up Great Eastern Highway through Glen-Forrest, Mundaring and then turning right onto the York/Chidlow road following through to Allawuna for the next 25 plus years and as the population throughout the wheat belt grows the amount of traffic does as well. The emergency services e.g. Ambulance, Police, Firefighters and many more have expressed concern and many said they will not be volunteering to help if they have to drive on this road. This leaves the population of the wheat belt – and the city

in a very dangerous position as more lives will be lost. The York/Chidlow road is the main highway that leads through to the central wheat belt through York and is classed as being in the wheat belt North region. (Attachment 5 – Crash History – Main Roads) SITA have stated they have spoken to main roads and are saying the roads are not a concern, but in actual fact I have spoken to the Minister for roads and it will become a concern when these trucks are on the road. It is not only York people who use the road, but many tourists, school children going back to Perth schools, commuters to work and if the tier 3 rail closes, hundreds of trucks will be carrying grain, livestock trucks, fertilizer carriers, farmers, people go to Perth for specialist Dr's, the list is endless. This road is unfit for the amount of traffic that is on it now. The amount of fatalities is a major concern as part of this road is already classed as a black spot area.

The RAC and the main roads have done an analysis and both have stated that the stretch of road from the lakes turnoff – York/Chidlow road – is one of the deadliest roads. In 2008 studies were carried out by the RAC and the York/Chidlow road and this part from the lakes turnoff to York is the worst road in Australia. Under the AUSRAP safety assessment program any road that has a star rating less than 3 is considered to be in urgent need of remediation to lift the safety performance. Since the report there has been dozens more accidents on this stretch of road. The report states that the traffic will double with freight trucks and general traffic in the next decade from 2008. It is now 2015 and no further remedial action has been undertaken on this road. Main roads has also stated in a report that the Chidlow/York road forms the most important link from the metropolitan region through to the wheat belt and most of the traffic eastbound is with overweight traffic with trucks delivering grain, fertilizer, general freight and cars commuting back and forth and tourist traffic. The horizontal alignment, narrow seal width and limited passing opportunities have been identified as inadequate for the volume and type of traffic that use this road now. This is already such a dangerous road so when the extra trucks are put onto the roads for landfill – the problem will escalate immensely. Maintenance costs resulting from edge wear are extremely high. Studies prove that the York/Chidlow road has a total crash rate at 1.5 times the average for roads of a similar standard, and a heavy vehicle crash rate 3 times higher than roads of a similar standard. Of course these figures will change dramatically if this landfill at Allawuna goes ahead. These findings are paramount to the fact that if extra trucks are put allowed on the roads the danger will escalate. Many more accidents and deaths will occur.

SITA also state the amount of traffic will only increase marginally – this is a total fallacy on their behalf. In 2008 the RAC have proven that the M010 – York/Chidlow part of the Great Southern Highway is one of the worst parts of road in Australia. How can a Multi-National company like SITA be telling the Governments untruths and every report they have done is different!

York relies quite heavily on the tourism industry. Weekdays there are busloads coming to see York and the surrounds and week-ends all throughout the year. Overseas tourists come to York as it is the 1st oldest inland Town of WA. Bed and breakfast places, hotels and eateries rely on this to survive. York isn't far from Perth and the Tourist Bureau has many people commenting on York – as the Shire will know.

Flora and Fauna in this area and surroundings are going to be destroyed. There are many species found in the area that are not found anywhere else in the wheat belt. The surrounding National parks will be affected, thus affecting the flora and fauna. SITA have stated in their Executive Summary to the council that they have no concern about the Flora and Fauna. Die-back and weeds are of major concern now and with all types of garden refuse put into bins, the problems will escalate. SITA say they are going to put a weed management strategy in place, but we know this will not happen how will they know what gets tipped into the landfill. Fauna— Black Carnoby Cockatoos are an endangered species and for hundreds of years are known to live and breed in this area as well as others birds species – SITA have not done enough studies into the habits of these birds and to rely solely on investigations for only a couple of months of the year without tracking these birds throughout breeding seasons and beyond is wrong. The leachate dams will attract seagulls and other species to the water and rotting food smells harboring disease vectors to the local species, they will become extinct. Now with the inclusion of BORROW pits – more of the land will be destroyed and this will further damage the habitats for many species.

SITA say they have carried out odour modeling tests. It is a proven fact that odour cannot be measured so for SITA to say they have done tests is completely unfounded as there is no way to test odours. This is a fact and is recognized worldwide. Sniffing sticks are used and they are not a true indication of what in reality cannot be done.

In May 2013 SITA informed the public that a Community Reference Group (CRG) - will be set up. An eleven page document was distributed advising of how this is going to happen and what the group entails. To this day nothing has been actioned regarding this group.

The property rights of all Australians that a landfill of this magnitude, in the location that it is are going to be affected. The rights of all concerned are to ensure detailed scrutiny of any scientific basis of decisions and to encourage a balanced approach to agricultural business by promoting ecologically and economically sustainable natural resource management. Also to hold government and government officers and departments accountable for their actions regarding decisions that affect property rights. Also, because of where this proposed landfill will be situated; the water and irrigation rights may be affected.

There are many discrepancies between SITA having their first presentation in York on 19/11/12, through to now – May 2015 – which SITA have changed numerous times. SITA have scattered bits of information to the public and as to what they have finally put to the relevant government departments. SITA have stated on many occasions the air quality, water, environment, land, flora and fauna and roads will not be affected and no emissions or discharges are going to be a problem, this is totally unfounded and misleading. The information has varied greatly in every report or document SITA have written or submitted, firstly to the EPA and even on their disc for a works approval to DER and now in their many Executive Summaries for the York Shire and now back to all

the mediations and directions hearings and further consultants that SITA have bought in to try and dispel their untruths. Their scientific reports leave us with no confidence in their ability to even tell the truth to the Australian Government or anywhere in the world because SITA have one of the world's worst reputations for landfills. Our waterways, land, air, tourism, roads and amenity will be ruined forever if this proposal is allowed in such a pristine environment. York is known as WA.'s 1st oldest inland Town in a 1st World Country. We don't want to become a 3rd world country. Most countries in the world now are recycling their waste and have zero tolerance for landfills – even 3rd world countries.

SITA have told so many mistruths and given so much misleading information to the public and all departments they have dealt with about this proposal that we just hope that the Shire of York will research and justify as to what SITA have put into their reports about this landfill. It is a major issue not just for York residents but for most of WA, the surrounding landholders and farmers. We are going to be affected for not only the lifespan of the proposal, but forever, as once that first load of rubbish is put there, that is the first step to disaster. York has gone through a period where it almost became a ghost town in the early 1980's – we don't want to become another Wittenoom.

Who will be responsible for compensation when a major disaster happens at the landfill site – SITA, Governments, Government departments or our local Shire who did not act in an appropriate manner to help stop a proposal of this magnitude in an agricultural zoned area and a tourist town close to Perth that is some of the best agricultural land in WA.

An Environment management plan was not carried out fully before and there are certain departments that have concerns. Listed below:

THE DEP. OF PARKS AND WILDLIFE – a plan for the managing of the black cockatoos and other species the environment has to be prepared and approved with satisfactory arrangements to implement these plans.

DEP. OF WATER: Assessment must be made of the maximum extent and height of any leachate mounding under the landfill site. The calculations of groundwater travel times need to be reviewed and verified. A landfill operating strategy that includes ground water and surface water monitoring needs reviewing, an acceptable monitoring bore network needs to be installed and monitoring should occur between the landfill site and the leachate dams and the 13 mile brook. A comprehensive geotechnical investigation across the entire site needs to be undertaken.

DEP: OF PLANNING & TOURISM: Management of noise, dust and odour that will be an issue for tourism.

DEP. OF HEALTH: The DOH has concerns about the topography of the site – and now with a BORROW pit above the site – suggests collected leachates and water captured by interdunal swales may discharge into the 13 mile brook at the base of the landfill. This will in turn find its way into the Avon River and catchment area particularly during

winter and storm events. DOH recommends that the Shire of York address these concerns.

MAIN ROADS: No traffic assessment has been done east of the proposed landfill. If any traffic to do with the landfill comes east of the site towards York – then main roads have not been consulted and if any trucks are going to be going further into the town site from Allawuna – main roads will have to do a traffic management assessment..

(SWALSC) SOUTH-WEST: Aboriginal Land and Sea Council have many concerns about the landfill. The area around Allawuna is a place of ceremonial and mythical significance to the local Noongar and Balladong people. There concerns include the contamination of the waterways. Also the black cockatoos that live in this area, as they have spiritual significance to the Noongar people as they represent the Rainbow Spirit. There major concern is that there has been very little consultation with the SWALSC.

MUNDARING SHIRE: state that the Shire of York does NOT have a community need for a major landfill and is therefore an unnecessary requirement. Shire of Mundaring is greatly concerned about the water supplies. The other main issue for Mundaring Shire is the additional heavy traffic through SoM is detrimental and fears that lives will be lost. The Shire of Mundaring recommends that the application be refused.

DAFWA: have stated that the fencing around the site – which SITA have 1st stated 1.8 metres be substantial enough to stop the feral pigs from entering the site. This is not possible – unless they bury the fence underground – because with the amount of feral pigs around they will soon dig under to get to the rotting smell of the landfill. Especially as SITA have stated they are only covering the site each night with 300 mls loose cover of sand.

DFES: even though a revised management plan has been put in place – there is many concerns from everyone that landfill fires are a mega problem. If a landfill does occur it will be a major catastrophe and no amount of words from SITA can change the fact that being next to over 55,000 hectares of surrounding bush land and parks that even if a fire doesn't start at the landfill – it may be a lightning strike in the neighboring surrounds that occur – which is frequent in this area.

There are many more Departments – Wheat belt NRM, WDC and numerous others that have concerns that need addressing and careful consideration before this landfill is allowed in this area.

The population of WA is expected to increase to over 2.4 million people by 2026. Demand pressures associated with economic and population growth are occurring in an environment where the quality and availability of rural land has declined due largely to natural resource degradation and climate change. A growing economy and population will increase pressure of rural land. Essential services such as water supply, areas for conservation also increased demand for food. Rural land accommodates significant environmental assets and natural landscape values. Rural land resources are becoming increasingly contested leading to increased competition and conflict. Our Agricultural

land is the most precious thing that we can act now to save. Not let it go to overseas multi-national companies who come into our precious waterways – which are a very scarce commodity and put in landfills where the prime land will be ruined forever. Not only where they put the landfill site – but also all surrounding farms and whole communities will suffer as well in more ways than just from our land.

- ATTACHMENTS: 1: Maps = DOW = Paleo-channel.
2: Photos = Storm water runoff 26th Feb. 2015.
3: Maps = DOW = Mundaring water catchment area.
4: Maps = Top borrow pit showing water tributary through.
5: Main Roads = Crash History = York/Chidlow. Jan 2010 - Dec 2014.

Robyn Davies. *ROBYN GAIL DAVIES.*

R.G. Davies

20/5/15.

Terry Davies. *TERRY WILLIAM DAVIES.*

T.W. Davies

20/5/15.

ATTACHMENT 1

PALEO-CHANNEL

NEAR LANDFILL



Palaeochannel connection across the surface water divide.

Proposed Landfill (Not to scale)

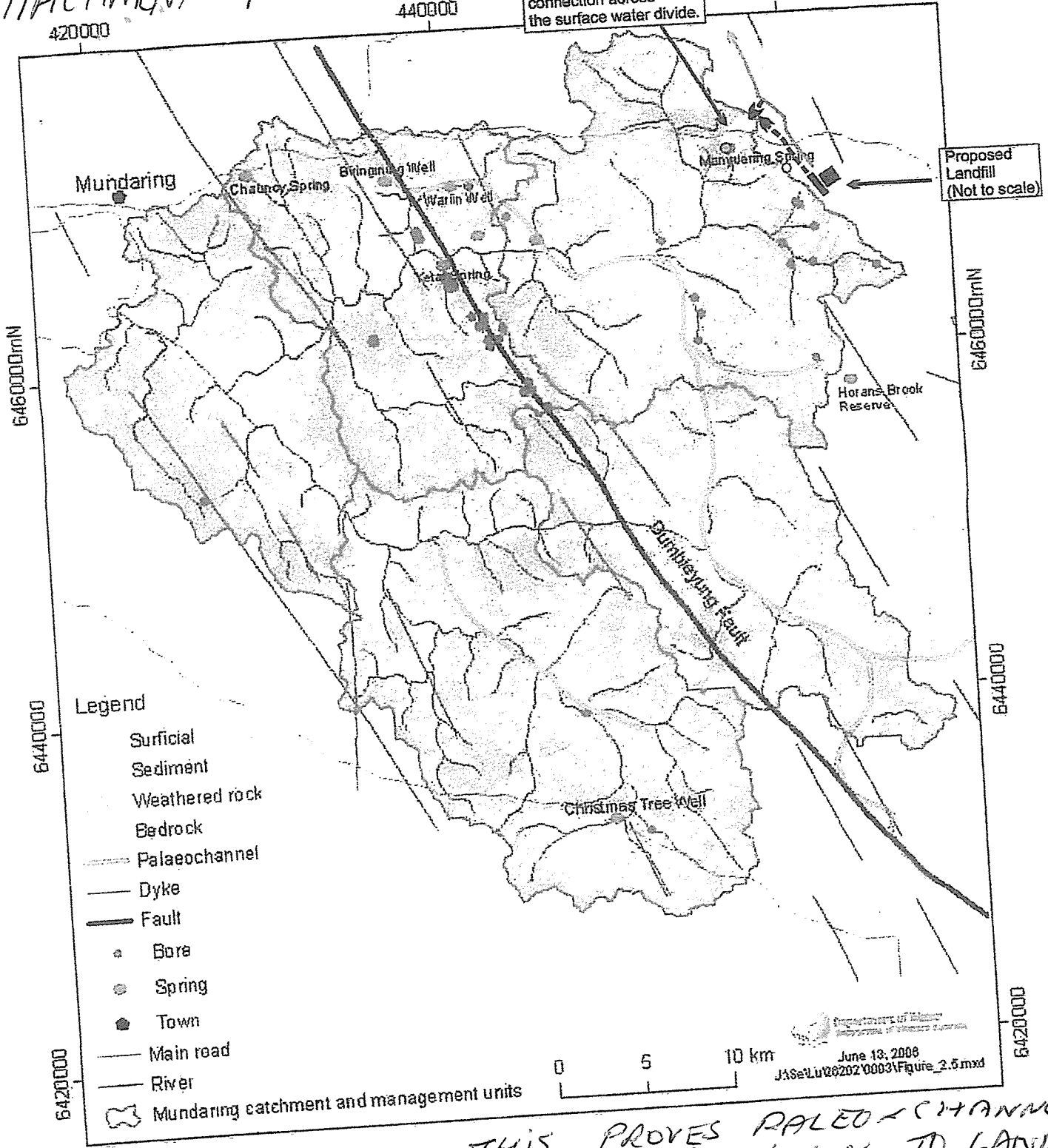


Figure 2.5 Hydrogeology

THIS PROVES PALEO-CHANNEL IN PROXIMITY TO LANDFILL

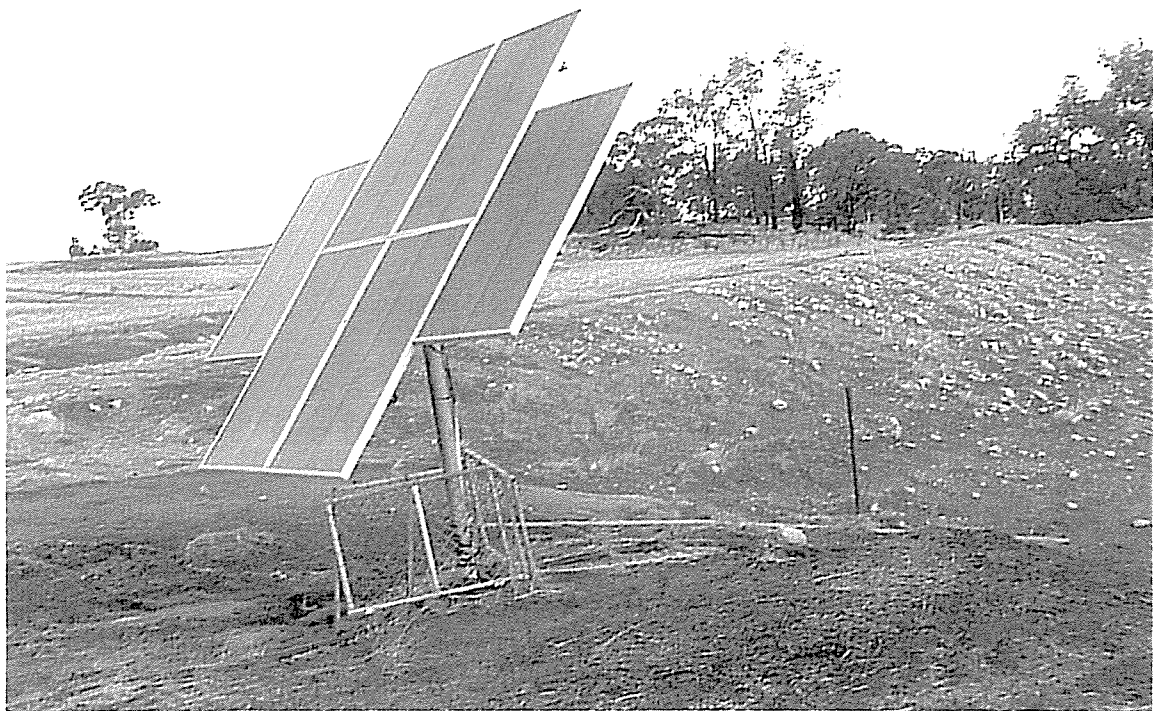
Notice the palaeochannel connection from the valley outside the Helena Catchment to Manyuering Spring, shown in green as sediment. Manyuering Spring probably receives water from the connection to the palaeochannel underlying and parallel to the stream to the north east, outside the Helena Catchment.

T + R DAVIES FORK.

PHOTO = STORM / FLOOD - 1ST PHOTO SHOWS WASHING
26/2/15 = INTO DAM (HOUSEWATER) AFTER ONLY
34mm RAIN IN LESS THAN AN HOUR
= DIRT + PDK DEBRIS IN DAM



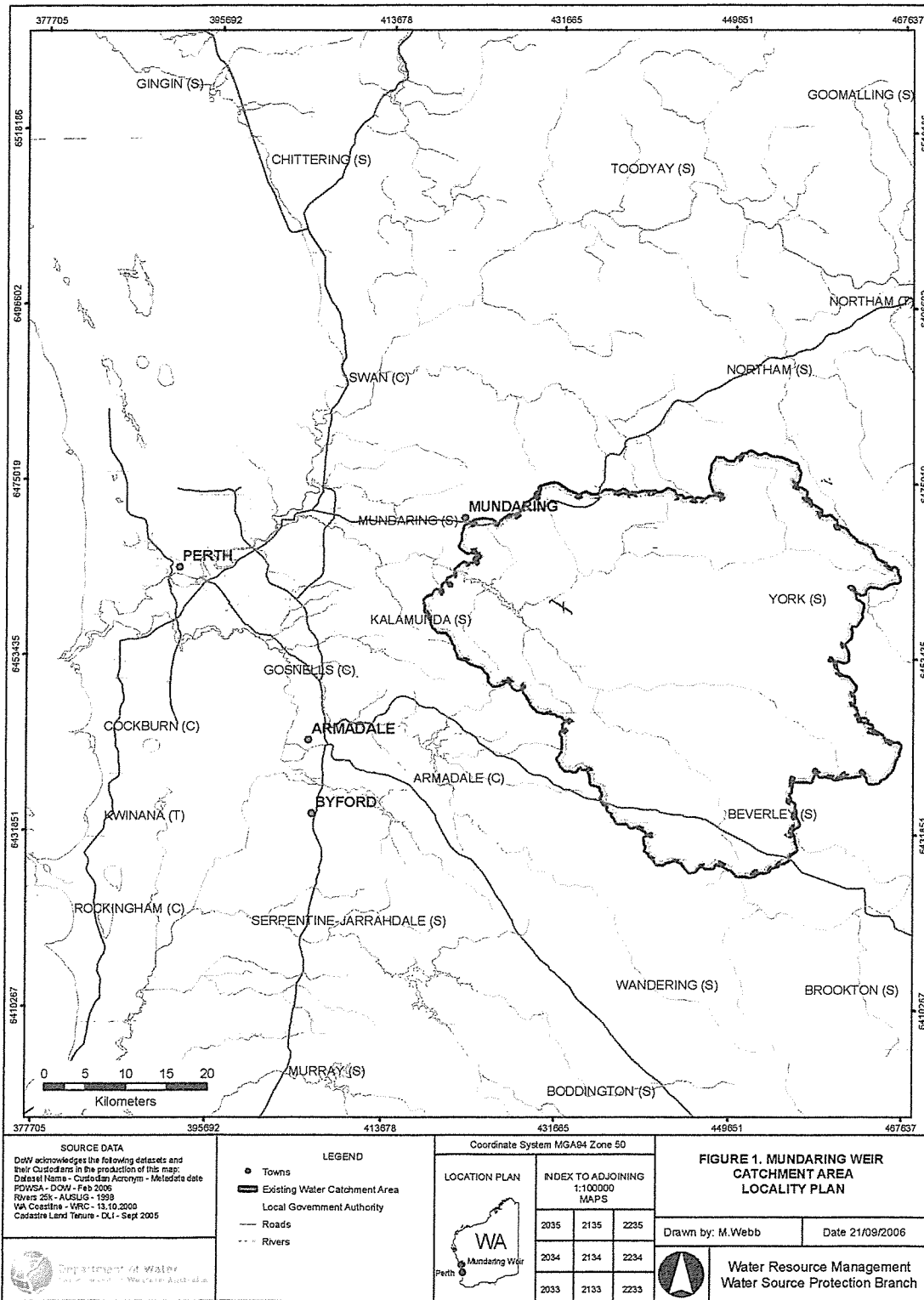
ATTACHMENT 2 TO SUBMISSION.



SOLAR PANELS TO PUMP OUR
WATER FROM TOP PICTURE
DAM INTO TANKS FOR
HOUSEHOLD USE.

TERRY + ROBYN DAVIES - VORAK.

ATTACHMENT 5 = MUNDARING WATER CATCHMENT AREA.



J:\pp\wp\B2010\0001\MundaringPDWSA_Fig1_p.mxd

Figure 1. Mundaring Weir Catchment Area locality map

STIA STATE THE LANDFILL IS NOT IN MUNDARING CATCHMENT - THIS

Department of Water

FROM: T + R. DAVIES.
 YORK

PROVED IT IS.

Summary Crash History

YORK/CHIDLOW

ATTACHMENT 5

Selection Criteria	Value
Road	CHIDLOW YORK (M010)
Date	01/01/2010 to 31/12/2014
Road SLK	0.00 to 46.02

Severity	Count	Percentage
Fatal	7	9.1%
Hospital	9	11.7%
Medical	16	20.8%
PDO Major	32	41.6%
PDO Minor	13	16.9%
Other / Unknown	0	0.0%
Total:	77	100.0%

MR Type	Count	Percentage
Involving Overtaking	4	5.2%
Involving Parking	0	0.0%
Involving Animal	16	20.8%
Involving Pedestrian	0	0.0%
Entering / Leaving Driveway	2	2.6%
Other / Unknown	55	71.4%
Total:	77	100.0%

Light Conditions	Count	Percentage
Daylight	48	62.3%
Dawn Or Dusk	6	7.8%
Dark - Street Lights On	1	1.3%
Dark - Street Lights Off	1	1.3%
Dark - Street Lights Not Provided	19	24.7%
Other / Unknown	2	2.6%
Total:	77	100.0%

Object Hit	Count	Percentage
SEC Pole	1	1.5%
Traffic Light Post	0	0.0%
Traffic Sign	1	1.5%
Commercial Sign Post	0	0.0%
Tree	27	41.5%
Other	36	55.4%
Total:	65	100.0%

Road Grade	Count	Percentage
Level	41	53.2%
Crest Of Hill	6	7.8%
Slope	21	27.3%
Other / Unknown	9	11.7%
Total:	77	100.0%

Road Alignment	Count	Percentage
Curve	36	46.8%
Straight	32	41.6%
Other / Unknown	9	11.7%
Total:	77	100.0%

Speed a Factor	Count	Percentage
Yes	2	2.6%
No	9	11.7%
Other / Unknown	66	85.7%
Total:	77	100.0%

Road Condition	Count	Percentage
Wet	8	10.4%
Dry	59	76.6%
Other / Unknown	10	13.0%
Total:	77	100.0%

MR Nature	Count	Percentage
Rear End	1	1.3%
Head On	5	6.5%
Sideswipe Opposite Dirn	0	0.0%
Sideswipe Same Dirn	4	5.2%
Right Angle	6	7.8%
Right Turn Thru	0	0.0%
Hit Pedestrian	0	0.0%
Hit Animal	11	14.3%
Hit Object	34	44.2%
Non Collision	11	14.3%
Other / Unknown	5	6.5%
Total:	77	100.0%

From T + R DAVIES

YORK. W.A. 630.

FROM: T + R DAVIS
YORK.

TOP BORROW PIT *

WITH ATTACHMENTS: 4

ENTRANCE TO ALLIWINA

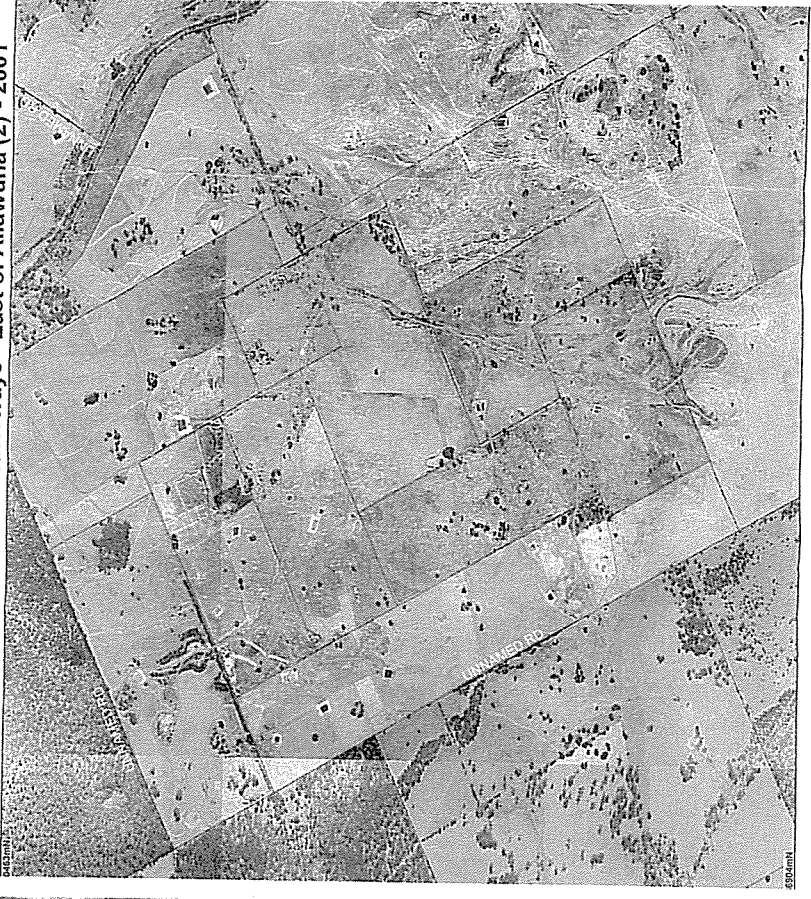
Waterways - East of Allawuna - 2012



LEGEND

- Road Centrelines - Linedata
- Waterways - Linedata
- Statistical Image Blocks
- Hydrography, points - IDOW
- Water
- Shrublands
- Grasslands
- Open Forest
- Forest
- Urban
- Blank

Waterways - East of Allawuna (2) - 2001



Stream Area Ann.