

No.	Date Submission Received	Name	Property Affected	Summary of Submission
1.	24-Apr-15	Western Power	n/a	- No specific comments to make. - The following should be considered, prior to works commencing; - Western Power must be contact if your proposed works include; any changes to existing ground levels around poles and structure; and/or working under overhead power lines and/or over underground cables. - Obliged to point out that any change to the existing power system, if required, is the responsibility of the individual developer. - Supplementary report advises that modifications to proposal do not change traffic movements, therefore the required upgrades to the access and intersection remain the same. - With regard to proposed Fire Management Plan, MRWA requests that a secured gate be installed at the crossover for the proposed Emergency Access Route to Chidlow York Road to ensure that this access is only used for emergency purposes. - Can confirm that there are currently no Aboriginal sites registered with the DAA within the area of proposed development. No known heritage reasons why the development cannot proceed. - Should be noted that the area subject to the proposal is within the publically marked area for DAA 3758 (Helena River), however is not within the actual boundary of this heritage place. The publically marked area for DAA 3758 has been enlarged to mark actual location of the place. - Recommended that the developer be made aware of Cultural Heritage Due Diligence Guidelines to assist developer with planning and considering Aboriginal heritage during proposed works. Suggested that the developer contact DAA on this matter should they have any further heritage concerns. - Proposed location remains the same. - Closest registered place to the proposed development is St Ronan's Well, York. However the proposal is located at some distance south of the registered curtilage of this place. - The proposed development does not appear to impact upon any place of State cultural heritage significance. - Geological Survey of Western Australia has assessed this proposal on behalf of the Department of Mines and Petroleum with respect to access to mineral and petroleum resources, geothermal energy and basic raw materials. - No comments to make on proposed amendments. - No objections to the amended proposal
2.	29-Apr-15	Main Roads Western Australia	n/a	- Supplementary report advises that modifications to proposal do not change traffic movements, therefore the required upgrades to the access and intersection remain the same. - With regard to proposed Fire Management Plan, MRWA requests that a secured gate be installed at the crossover for the proposed Emergency Access Route to Chidlow York Road to ensure that this access is only used for emergency purposes.
3.	30-Apr-15	Department of Aboriginal Affairs	n/a	- Can confirm that there are currently no Aboriginal sites registered with the DAA within the area of proposed development. No known heritage reasons why the development cannot proceed. - Should be noted that the area subject to the proposal is within the publically marked area for DAA 3758 (Helena River), however is not within the actual boundary of this heritage place. The publically marked area for DAA 3758 has been enlarged to mark actual location of the place. - Recommended that the developer be made aware of Cultural Heritage Due Diligence Guidelines to assist developer with planning and considering Aboriginal heritage during proposed works. Suggested that the developer contact DAA on this matter should they have any further heritage concerns.
4.	5-May-15	State Heritage Office	n/a	- Proposed location remains the same. - Closest registered place to the proposed development is St Ronan's Well, York. However the proposal is located at some distance south of the registered curtilage of this place. - The proposed development does not appear to impact upon any place of State cultural heritage significance.
5.	13-May-15	Department of Mines and Petroleum	n/a	- Geological Survey of Western Australia has assessed this proposal on behalf of the Department of Mines and Petroleum with respect to access to mineral and petroleum resources, geothermal energy and basic raw materials. - No comments to make on proposed amendments. - No objections to the amended proposal
6.	15-May-15	Public Transport Authority of Western Australia	n/a	- No additional comments to make from submission made 14 March 2014 - Tourism planning issues only, does not reflect comments of other branches of the Department of Planning or a formal position of the Western Australian Planning Commission.
7.	19-May-15	Policy Development and Review (Tourism Planning) Department of Planning	n/a	- No additional comments to make from submission made 14 March 2014 - Tourism planning issues only, does not reflect comments of other branches of the Department of Planning or a formal position of the Western Australian Planning Commission.
8.	20-May-15	Department of Planning – Wheatbelt	n/a	- The Western Australian Planning Commission (WAPC) has no jurisdiction on this matter and the following is provided as general advice. - In October 2014 the WAPC endorse the Wheatbelt Region Planning and Infrastructure Framework (RPIF) to provide a basis for ongoing planning and development at a regional scale. Regarding waste management, the RPIF states: "Generally, the WAPC favours the identification and zoning of sites through a scheme amendment process... Subject to environmental and land use suitability, sites adjacent to the major transport routes of

				Great Eastern Highway, Great Northern Highway and Brand Highway are considered most suitable for regional landfill. - It is noted that the amended application proposed to reduce the footprint, overall volume of waste and nominal life of the landfill facility. - Notwithstanding, the modified proposal remains significant in terms of its scale and nature, and raises issues such as the impact on transport networks and amenity.
9.	21-May-15	Wheatbelt Development Commission	n/a	- Feedback remains as per submission submitted 17 April 2014 even with the proposed amendments. - We would like to add that the WDC are currently seeking funds for site identification as mentioned in previous feedback.
10.	22-May-15	Department of Water	n/a	- The subject site is located within the upper reaches of the Avon River Management Area proclaimed under the <i>Waterways Conservation Act 1976</i>, and within a proclaimed surface water area under the <i>Rights in Water and Irrigation Act 1914</i>. The site is also located in proximity to a minor waterway known as Thirteen Mile Brook. - Local Hydrogeology - The upper catchment location and design of the proposal site should have a low impact on groundwater and surface water resources over its active life and beyond. - The Geotechnical Investigations undertaken are extensive, including 114 test pits, and indicate that the proposed landfill is located above suitable ground. This site is described as predominantly composed of very stiff clayey material that once loaded with waste and compacted fill is not expected to significantly consolidate. - Discrete areas of loose material may need to be replaced with compacted fill to form a suitable foundation. - It is understood that a double geosynthetic liner is required in order to comply with Victoria Best Practice Environmental Management Landfill Guidelines 2014 because the hydraulic conductivity of the clayey material onsite increases by an order of magnitude when exposed to saline waters. In zones where trial pit refusal was encountered additional fill might be required in addition to geosynthetic puncturing layer. - Groundwater pressure release subsoil drains have been recommended to prevent erosion of embankment toes where groundwater is shallow or seeps to the surface. - The Hydrogeological Site Characterisation Studies (Appendix E1) show that the landfill is set in Achaean granitic geological setting, with a classical saprolitic regolith profile developed from the weathering process. The additional studies undertaken by Goldern Associates are generally sufficient to indicate that there is no evidence of the presence of extensive paleochannel systems that might link the landfill site to other catchments. Groundwater generally flows westward to Thirteen Mile Brook. - In the minor ephemeral creek immediately east of the new landfill site groundwater can appear as seepages in winter that moves towards Thirteen Mile Brook. Findings are supported by a simple groundwater model constructed to examine how local topography and drainage features are likely to constrain groundwater levels and seepages in the vicinity of the landfill footprint. - Findings agree that the groundwater quality is variable at the site but generally the water has no beneficial use as a human drinking water supply - Storage Dams - The Surface Water, Groundwater and Leachate Management Plan reports on the investigations into the requirements and specifications for leachate and stormwater management at the proposed site. - A Retention Pond of 2000kL for subsoil drainage, and a Stormwater Dam of 36000kL for water supply requirements, have been proposed. Stormwater Dam is proposed to be filled by diversion bunds and interception drains that will be required to control surface water runoff from surrounding areas. - It is understood that an assessment is yet to be undertaken for an emergency/contingency water supply for extreme dry periods. - The DoW notes that the Stormwater Dam proposed overlays the eastern minor ephemeral creeks.

				- o In accordance with the Water Quality Protection Note 53 – Dam construction and operation in rural areas May 2014, the DoW's preference for dams is to be positioned off-stream due to potential downstream impacts from decreased flow. This issue has been identified but not further investigated. - o In addition, licenses will be required from the DoW for the construction of the dam and the taking of water, under the <i>Rights in Water and Irrigation Act 1914</i>. - o Please note that at this stage there is no guarantee of licenses being issued. • Conclusions and Recommendations - o No objections to the proposal - o Preference for proposed dam to be located off-stream - o A DoW license will be required to construct the dam and to take water - o Rehabilitation and revegetation of the Thirteen Mile Brook should be considered as general best management practice for development adjacent to degraded waterways - o Assessment for an emergency/contingency water supply for extreme dry periods should be undertaken.
11.	25-May-15	Department of Environment Regulation	n/a	• DER accepted a works approval application from SITA Australia Pty Ltd for a Class II putrescible landfill on 29 April 2015. • As per Schedule 1 of the <i>Environmental Protection Regulations 1987</i>, a premises on which 20 tonnes or more of waste is accepted for burial per year is categorised as a Category 64 prescribed premises. • DER is currently undertaking an assessment of the works approval application. • As part of the assessment, DER has regard to environmental impacts of proposed emissions and discharges to the receiving environment, including amenity for residential areas and other sensitive land uses. • Under the Environmental Protection Authority's <i>Guidance Statement No.3 (GS3)</i>, separation distance for landfills vary according to the types of waste accepted. The generic separation for a Category 63 putrescible landfill is 500 metres from subdivisions and 150m from single residences. The nearest residence (a single dwelling) is located 1900 metres from the proposed landfill location. • The separation distance is to mitigate the risk of impacts from noise and odour, dust and gases. • Based on DER's assessment to date, there are no sensitive uses within the separation distance. • DER also requires the applicant to complete a detailed assessment of all emissions including those listed in GS3. • DER also assesses the site specific operations and management. Specific to facility design, management and biophysical characteristics of each individual proposal. The application must demonstrate that the emissions and discharges can be regulated such that the proposal will not result in environmental harm. • The Department cannot yet advise on whether a works approval will be granted or refused. • DER advises that the environmental implications of the proposal, can be adequately assessed and managed under the provisions of Part V of the EP Act. Therefore, DER recommends that the Wheatbelt Joint Development Assessment Panel proceeds to determine the amended development proposal independently of the Department completing its assessment of the works approval application.
12.	25-May-15	WA Department of Parks and Wildlife	n/a	• DPAW previously provided comment on the original proposal in relation to black cockatoo habitat and vegetation. • DPAW is satisfied that the identified potential impacts on the site have been adequately addressed. • It should be noted that lands adjoining Allawuna Farm, namely Wandoo National Park are managed by DPAW for the purposes of conservation and recreation. It is this department's expectation that the proposed development will be managed in such a way that does not impact upon the values of Wandoo National Park.
13.	25-May-15	Department of Health	n/a	• The DOH has no objection to the amended development as proposed providing adequate monitoring of environmental water quality is maintained prior to and during the operation of the landfill and there are contingencies in place in the event of adverse water quality results.

				It noted that SITA will implement a complaints register and will record, investigate and where appropriate, respond to mitigate complaints regarding pests, dust, odours and other issues resulting from Allawuna Farm Landfill.
Late Submissions				
14.	27-May-15	Waste Authority, WA	n/a	- The Waste Authority is committed to reducing waste to landfill and maximising the recovery and recycling of materials. - The Waste Authority provided comment on the application for the proposed landfill at this property on 25 February 2014. The advice is still applicable. - DAFWA does not routinely comment on development applications but can provide the following general advice to the Development Assessment Panel: - DAFWA considers rural land uses to be the best use of land zoned for rural purposes. DAFWA currently has a project identifying high quality agricultural land in the coastal areas. - High quality agricultural land is defined as "areas of land identified from a combination of soil, land capability, water resource and rainfall data as the most productive and versatile for either irrigated or broadacre agriculture" - Priority Agricultural Land is considered to be of State, regional or local significance for food production purposes. Priority agricultural land is derived from High Quality Agricultural Land data that has been subject to consultation and refinement, and has removed land required for existing and future urban/development areas, public use areas and land required for environmental purpose. - If the application is approved, DAFWA request that - The landfill facility requires suitable fencing to prevent the incursion of feral pigs onto the site form nearby forested areas. - A vegetated buffer is established around the landfill site to help prevent the drift of wind blown material from the landfill site onto the adjacent farmland. - The application proposes that "On completion, the landfill will be re-habilitated and may be used for agricultural use." DER lists landfill sites as a potentially contaminating activity. DAFWA would recommend that the rehabilitated site is not used for agricultural purposes. Revegetation would complement agricultural uses on the adjacent farmland.
16.	08-Jun-15	Wheatbelt Natural Resource Management	n/a	- Wheatbelt NRM Inc. has a politically neutral position on the application for use of Allawuna Farm for use as a landfill. - After review of the application NRM make the following recommendations: Ground and Surface Water - The proposed site should have low impact on groundwater and surface water. There should be no adverse impacts on the surrounding environments. To mitigate any potential emerging threat, careful site design, environmental monitoring and reporting to relevant authorities must happen regularly. - There is the potential for poisoning of wildlife as a result of contact with Leachate. Appropriate management strategies will need to be implemented to reduce this impact. There should be a range of tactics used to avoid acclimatisation. The effectiveness of management options will need to be monitored closely and a contingency plan put in place to address issues immediately as they arise. We recommend an adaptive management approach in line with changing conditions. Impacts on Agriculture - Provided the site is well managed, there are no foreseeable, major negative impacts on agricultural activities. However, it is noted that under certain climatic conditions, both sound and odour will travel further than predicted potentially making the environment unpleasant for those working on neighbouring properties. The potential for this impact should be investigated further and preventative strategies implemented to minimise impacts. - Weeds and plant pathogens pose a threat to farming enterprise if organic matter is not dealt with in an appropriate manner.

				Impacts on Biodiversity - There is a real potential for damage to flora and fauna in adjacent bushland remnant, if threats are not managed appropriately. Application of the precautionary principle should be applied in the decision making process to reduce negative impacts on biodiversity. - A Nature Map inquiry showed the presence of several nationally important species all of which could be impacted if potential threats are not considered and managed appropriately. - Potential impact on adjacent remnant vegetation should be investigated and strategies put in place to minimise impacts. - There is potential poisoning of fauna as a result of contact with leachate, and refuse and subsequent secondary poisoning of native fauna. Edge sensitive species may be impacted by increased noise and vehicle movement in the area, forcing them to retreat further into remnant vegetation potentially limiting their capacity for dispersal and ability to forage food. - Birds can be attracted to landfill sites in large numbers. The birds may transfer pathogens to drinking water collection or storage areas, as well as depositing seed laden excreta and food scraps in bushland. - There is the potential for a population increase of the more aggressive species (Galah, Corella, Australian Raven) that have a reputation for taking over habitat and nesting sites of more sensitive species. Large flocks will damage native vegetation on agricultural crop. Scavenger species and waterbird population increases may exceed the carrying capacity of the surrounding environment and will require management and monitoring. - Feral animal population will increase in response to increased food availability. This increase will have a devastating impact on Wildlife in the area if not managed. Daily covering on its own is unlikely to act as a sufficient deterrent, so a combination of measures will need to be implemented. Recommendations - That an appropriately qualified and diverse advisory group be established to guide environmental risk mitigation for the site, development of the Operational Management Plan and monitoring of indicator thresholds. - That planning approval be subject to a comprehensive environmental management plan addressing the impacts discussed above. - An effective monitoring regime be put in place and reviewed regularly to understand efficacy of risk mitigation. - A biosecurity plan be developed to mitigate the risk of incursions through landfill activities – so that there is a predetermined framework for responding to biosecurity incursions.
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