

## **Introduction**

The TCPA is a peak land use planning organization with over 50 members that are committed to the principles of sustainable planning.

This submission is on behalf of our executive committee and has been developed in consultation with and has the support of the TCPA membership.

The TCPA strongly opposes the proposal to establish a Long Term Containment Facility for prescribed industrial waste near Nowingi.

This submission describes our concerns in the following areas:

- (i) Incompatible adjacent land-use
- (ii) Violation of the Victorian Greenhouse Strategy
- (iii) Net Benefit to Society has not been established

### **Incompatible adjacent land-use**

The Hattah-Kulkyne National Park and the proposed Long Term Containment Facility for prescribed industrial waste are incompatible adjacent land uses. The close proximity of the National Park to the proposed facility is of great concern. Clearly the Hattah-Kulkyne National Park is of international significance and its fragile ecosystems are considered too sensitive and will be threatened by the proposed Hazardous Waste Storage Facility.

The TCPA considers that a criteria for siting such facilities should include a reasonable buffer (e.g. 10 kilometres) from areas such as National Parks.

### **Violation of the Victorian Greenhouse Strategy**

The EES acknowledges that “53% of the GHG Emissions for Operation of the Facility in the First Year are from transporting the waste material to the site.” (EES 8-22)

The TCPA is concerned at the magnitude of increase in GHG emissions that would be generated by the transport of waste to the proposed site.

As acknowledged in the ESS:

“The evaluation of GHG emissions indicate that containment of residual Category B wastes in a LTCF at Nowingi is likely to generate between 20,000 tonnes of GHGs in the low volume scenario and up to 30,000 tonnes of GHGs in the high volume scenario. This is approximately double the GHG emissions estimated for ongoing disposal of waste on the existing landfills.” (EES 8-25)

How can this substantial increase in GHG be justified?

The transportation of hazardous waste from Melbourne and Geelong to Nowingi, a distance of approximately 500 kilometres, directly contradicts the following action areas that underpin the current Victorian Greenhouse strategy:

*Positioning Victoria's economy for a low carbon future*

Transporting the waste from Melbourne and Geelong to Nowingi will lead to on-going reliance on fossil fuel and thus a dependence upon carbon related fuel sources. This is the case for both transport scenarios, road and rail. Both transport modes rely heavily on diesel products to provide the energy.

*Government leadership*

The increased fuel consumed and emissions that would be produced clearly contravene good sustainable planning principles. Good leadership involves setting an example for others to follow. By supporting such a high energy proposal the government would be sending a misleading signal to the broader community. Clearly the leadership role government seeks and should have with regard to global warming and climate change is severely compromised by this proposal.

**Unnecessary Transportation Risk**

It is generally accepted in traffic crash analysis that exposure to road crashes is directly proportional to the distance travelled. The Nowingi site presents a substantial increased risk by an order of magnitude over current transport operations. The TCPA considers that is unnecessary and unacceptable for the Victorian community to be subjected to such risks.

The proposed site at Nowingi exposes both motorists and communities to transport risks that are not necessary if an alternative site is selected within 100 km of Melbourne.

The Environmental Effects Statement concludes that the transportation risks are 'acceptable'. This is a highly presumptuous statement that fails to acknowledge those stakeholders who bear the risk.

Consultative planning would consult all the major stakeholders and acknowledge the unacceptability of the proposal to the communities along the proposed transport corridors. Failure to incorporate such views is an abdication of responsibility by the proponents of this proposal.

The TCPA does not accept the following statement:

“The overall risk profile resulting from the use of either road or rail to transfer waste from Melbourne to Nowingi is very low and does not pose an unacceptable threat to society or the environment. While use of rail transport poses a slightly lower risk profile

than road transport, predominantly because rail does not have the same threat in regard to number of vehicle accidents, neither form of transport poses any unacceptable risks.” (EES:9-39).

The TCPA supports the principles of natural justice that underpin our planning system. In particular the right to be heard and on behalf of the communities at risk we question the efforts of the proponent with regard to consulting the communities that will be exposed to the transport risks.

The TCPA does not accept the statement that, “The impact of increased traffic due to the transport of waste to the site will be negligible in terms of accident risk and increased road maintenance requirements (EES:9-39)”. The crash risk based on the predicted number of vehicles and analysis of the nature of the prescribed waste will not be negligible.

The TCPA is concerned the preferred route includes the Calder Alternative Highway and that this is acknowledged to have a higher average crash rate than the rest of the State (EES:9-42).

Issues associated with the shoulder treatment and intersection sight distance are of a major concern (See EES:9-43,44). Even the proponent seems to have strong reservation regarding the preferred route, “According to CRASHSTATS and Vic Roads Black Spot information, there are two sections of the Calder Corridor that have unacceptable crash rates”. (EES:9-44)

Other issues such as:

- (i) the remoteness of several sections to emergency services
- (ii) potential flooding between Charlton and Wycheproof and the appropriateness of detour routes
- (iii) the crossing a number of open water races (owned and operated by Coliban Water), which are used to supply drinking water to towns and stock and irrigation water to the district (EES:9-45)

are of major concern and seem to indicate that the preferred route and corridor are generally unsuitable to the transportation of hazardous waste.

Also, we consider the event of a truck crash with release of waste at various locations along the preferred route should be included in the risk analysis within the EES.

### **Net Benefit to Society has not been established**

The fundamental planning principle of net benefit to the community has not been established in this proposal. This is largely due to the location of the site at Nowingi. The EES fails to demonstrate a clear net benefit over current waste management practices.

Increased transport costs as well as environmental risks associated illustrate that this proposal will have net cost and Victorians will have to pay considerably for it over its life (many generations).

The TCPA strongly advocates that the government should not support projects that fail to demonstrate a clear net benefit to society. The onus is on the proponent to establish the rationale for a net benefit. This is clearly lacking in the Environmental Effects Statement. The omission of net benefit for Victorians in the EES in this proposal is sufficient ground to reject this project based on accepted planning principles. The TCPA challenges the proponents to articulate this benefit or accept that this proposal is flawed and should not proceed.

The EES acknowledges that, “Most industrial waste is produced or treated in the Melbourne metropolitan area but these wastes are produced by the consumption of manufactured goods across the entire State (EES:1:10)”. It is the view of the TCPA that producers or generators of waste have a responsibility for the disposal of it within their locality. Thus the site should be located close to or within the Melbourne metropolitan region.

The TCPA would like to have the opportunity to present these issues to the Independent Planning Panel.

Yours faithfully,

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