

Comments and suggestions to Draft Variation 351

Attention: Territory Plan Variation Unit

Thank You for the opportunity to comment on DV351.

My comments, questions, and suggestions follow:

Either a New Suburb OR a Carcinogenic, Toxic, Asbestos Waste Dump (CTAWD) – Not both

Surely no responsible Government would even consider proposing to build a new residential suburb with a CTAWD located slap-bang in the middle! - especially considering the now, world-famous, ACT “Mr Fluffy” fiasco. One would have thought that our Government would have learnt its lesson and not permit any of its residents to live in close proximity to any potential health risk, whether it regards the risk to be minimal or not. Don’t forget no one wants to be the “minimal”! We all need to be assured that we are safe.

Location

Located on the plateau between the Murrumbidgee River and Ginninderra Creek this area is undoubtedly one of the most virgin, rugged and picturesque places in the ACT/NSW landscape. The dissected river and creek steep banks are spectacular and lend themselves to a variety of leisure-time pursuits. These corridors are not included in the proposed new suburb but could well be opened up and transformed for public use.

The very steep and sometimes sheer cliff faces indicate that there is large and complex geological faulting in the region. The flow of the Murrumbidgee River through a steep gorge and the abrupt right-angled turn to meet the confluence of the Ginninderra Creek attest to this together with breathtaking lower and upper falls on the Ginninderra Creek.

The contrast between the NSW side of the proposal and the ACT side is disgraceful. ACT has built its West Belconnen Landfill Site (WBLS) right up to the ACT/NSW border with dumping facilities for diverse ‘waste’ including toxic and carcinogenic materials. It is not only an eye-sore, sticking out like a sore thumb, but traffic, smoke and odour do little to appease the eye and nose. Amazingly work in this dump is not being curtailed for the proposed new suburb but indeed it is the ACT Government’s preferred dumping site for in excess of 150,000 tons of toxic and carcinogenic, asbestos contaminated ‘construction and demolition’ waste from 1022 “Mr Fluffy” homes in the ACT (and possibly more homes in NSW?).

You don't have to be a surveyor to map the border between ACT and NSW. On the ACT side is the shambles of waste disposals contrasting the NSW side of a pristine pastures. Why the NSW Government has never complained is inconceivable!

Other Potential Landfill Sites

The CBRE Emergency Landfill Options Paper has indicated 17 potential sites in the ACT and surrounds (p. 7) that are at least 5km from urban areas or future residential areas and not within a nature reserve or a proposed nature reserve. Have these sites been considered for CTAWD? Are SWOT analyses available for these "other potential landfill sites?"

There are also many abandoned mines and mine shafts close to ACT which would be ideal disposal sites which could be safely sealed after disposal. I note that the Woodlawn mine at Tarago and the Pine Forest "Bowl" are recommended for study. I understand that the ACT Government considered using abandoned shafts/holes at the Murrumbidgee Sewerage Works for disposal of the ACT 2003 Bushfire C&D waste. Has this site been considered for "Mr Fluffy" C&D waste?

All Reports were prepared before decision to dump "Mr Fluffy" at WBLs

All reports, including environmental and 'waste' management reports presented by the Riverview Group were prepared **before** the Government's decision to dump all of the toxic, carcinogenic asbestos, C&D 'waste' in the WBLs (January 2015). This potentially danger to health (PDTH) dump is located on the ACT/NSW border slap bang in the middle of the proposed new suburb - within 1km of proposed residential homes.

All of the Environmental Reports need to be amended to include the potential affect this dumping of in excess of 150,000 tons of contaminated C&D waste could have on the decision to build a new suburb (although the WBLs Master Plan has not yet been prepared or approved by EPA).

The last thing we want in the ACT is another "Mr Fluffy" disaster legacy left by us for our children and grandchildren. It should be noted that we trusted our Government when they approved "Mr Fluffy" loose-fill roof insulation and look what has happened!

EIS and Environmental Reports required for extended WBLs

TAMS advise that an EI Statement or Environmental Reports have never been prepared for the current WBLs. Now that it is proposed to extend and accept 150,000 tons of "Mr Fluffy" C&D, Carcinogenic Waste at the WBLs, EIS, EPA and Emergency Contingency Spill and Clean up reports should be publically available for

the new, updated landfill area and transporting toxic, carcinogenic C&D waste across Canberra to the WBLS. Guarantees for public safety should also be stressed and be publically publicised by our Government.

“Eau de Parkwood”

I understand that there have been complaints from residents of West MacGregor about the occasional foul smells emanating from Parkwood eggs. Proposed residences in West Belconnen are much closer to Parkwood Eggs – have the foul smells been monitored in West Belconnen?

Communication

Although this is an ACTPLA Project (DV) there was minimal communication, consultation and presentation by ACTPLA and discussions were conducted by the Riverview Group. On a number of occasions ACTPLA were not even represented at public presentations. Fortunately the Riverview Group represented ACTPLA admirably with professional and very competent talks and open and frank discussions. It would have been nice to have had an ACTPLA representative to introduce the Riverview Group and explain its own DV351!

‘Once in a hundred year’s event’

I may have missed the report but the effect of a flood on this rugged topography bounded by rivers should be considered. Even with extended periods of very heavy rains the many steep-sided (dry) creeks and ridges and an ‘unstable’ WBLS will be prone to serious erosion and possible landslides. A once in a hundred year event could be catastrophic especially in the vicinity of the river confluences.

Like many areas in the ACT faulting at depth and just below the surface is very common. Are any geotechnical surveys proposed to confirm a stable subsurface?

DV351 and EPA Approval of WBLS Master Plan

Compared to other well researched and presented ACTPLA DVs, DV351 seems deficient and incomplete. Many statements are contingent and are not definitive. Throughout the document statements are qualified by phrases such as: maybe located; shall be prepared; where possible; may be adjusted etc.

Structure Plan – West Belconnen (p. 7, 6.10, Belconnen land fill, 5.3) states:

“A master plan is to be prepared for the land fill site that will determine uses and activities within the site, which will be the subject to an appropriate audit process and approval of the Environment Planning Authority. The master plan will inform future Territory Plan zonings for the land.”

Surely the master plan should have been prepared before DV351 was released for public comment and inevitable approval, **especially as EPA approval cannot be given until the master plan is prepared.** What does 'future Territory Plan zonings for the land' mean?

Presumably the Master Plan will discuss a SWOT analysis of the WBLs and discuss how the dangerous "Mr Fluffy" waste will be safely disposed of and sealed for ever. Hopefully the Master Plan will discuss how TAMS propose to stabilize the WBLs, especially from extended periods of heavy and continuous rain (as it is reported that the waste will only be sealed by "several" metres of soil). Such heavy rains could trigger super-saturated soils, leaching and slumping (soil slides). How the WBLs can be secured from a once in a hundred year flood event is also an extremely important consideration.

I look forward to the WBLs Master Plan.

Thanks

This is a beautiful part of ACT/NSW and the Riverview Group have done fantastic work over several years. The Group must have been as shocked and baffled as the rest of the community with the last minute decision by TAMS to dispose of huge volumes (from in excess of 1022 homes) of potentially carcinogenic, "Mr Fluffy", C&D waste at the WBLs in the heart of its proposed pristine, new suburb.

I would like to thank Riverview Group personnel for their detailed and open discussions, their kind assistance and hospitality.

The diorama in the Kippax Office is a wonderful tool to explain the proposed development and such 'real life' models should be considered for all relevant DVs in the ACT in the future. "A picture (model) is better than a thousand words!"

Thank you for the opportunity to comment on DV351.

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