

19 March 2026

Cootamundra-Gundagai Regional Council
255 Sheridan Street
Gundagai NSW 2722

Attention: Donna Clarke

Via NSW Planning Portal

Dear Donna,

**Re: Response to Exhibition Submissions – PAN-598802
Tumblong Reserve Road, Tumblong**

Habitat Planning acts on behalf of MHE Waste Pty Ltd in relation to Development Application (DA) modification to increase processing capacity from 60,000 tonnes to 99,000 tonnes at the existing Tumblong Non-Putrescible Waste Disposal Facility (Tumblong Landfill). The development was placed on exhibition from 23 January 2026 until 23 February 2026, and then subsequently extended until 6 March 2026.

This letter provides a collective response to the key matters raised within the four (4) exhibition submissions received by Council.

1. Processing Capacity Increase

The modification seeks approval for an increase in processing capacity of existing, approved operations. The proposal does not constitute an expansion of the site. There are no changes to the approved waste type, existing on-site infrastructure, operational footprint or overall lifespan.

The modification is limited to allowing a greater volume of waste to be received and deposited within the already approved and constructed landfill cells. Through optimisation of the existing cells, the proposal aims to improve operational efficiency without introducing new environmental impacts.

This could, in turn, provide an opportunity for the site to reach its final rehabilitated form sooner than currently anticipated.

2. Groundwater Concerns

Groundwater impacts have been raised by a couple of the submissions in relation to potential pollution. A comprehensive Leachate Management Plan (LMP) has been submitted as part of the modification application. This plan outlines the design and operational measures implemented to minimise the risk of leachate generation and migration, and to ensure the appropriate collection, storage, treatment and disposal of leachate over the life of the landfill. These measures are specifically intended to protect both surrounding surface water and groundwater systems.

As identified in the original Groundwater Impact Assessment prepared by McMahon Earth Science dated November 2019, groundwater is encountered at approximately 58 metres below existing ground level (at an elevation of 209.47m AHD). This represents a substantial separation between the base of the landfill and the underlying groundwater system. The report also noted that concentrations of nickel in samples of groundwater prevents the aquifer from being used as a source of drinking water. Furthermore, elevated concentrations of manganese also suggest the aquifer is depleted of any oxygen and hydraulically disconnected from the overlying surface water system. The landfill cells

are designed and constructed with composite liner systems in accordance with the NSW Landfill Guidelines which are specifically intended to prevent leachate leakage. As a result, groundwater inflow to the landfill is expected to be negligible and the potential for leachate to impact groundwater is considered to be very low.

Ongoing groundwater monitoring is also undertaken in accordance with the landfill's regulatory Environmental Protection Authority (EPA) Environmental Protection Licence (EPL) 21440 requirements to ensure that groundwater quality is protected.

3. Odour Emissions

Odour and air quality emissions from the facility have been raised throughout the submissions with particular reference to historical odour events. The proponent acknowledges these concerns. During earlier stages of operation, odour issues were identified, investigated and addressed in consultation with the EPA. The outcomes of these investigations have informed a range of operational and management improvements since 2021 including an EPA Pollution Reduction Program. These lessons have been incorporated into current site practices and underpin the updated odour modelling by Northstar and management framework submitted with this modification application.

The facility has since maintained compliance with licence conditions and now operates under a comprehensive suite of management plans required under strict enforcement by the EPA in accordance with the EPL 21440, including:

- Leachate Management Plan prepared by Insitu Advisory – The purpose of the LMP is to provide a clear and comprehensive framework for the effective management of leachate generated at Tumbalong Landfill and to satisfy condition U1 of EPL 21440.
- Landfill Gas Management Plan prepared by Northstar – The purpose of the LGMP is to satisfy the requirements of conditions U2 and O3 of EPL 21440. The LGMP must be reviewed at least every 2 years by a suitably qualified consultant with at least 5 years' experience in the area of waste, landfills and landfill gas management.

Both management plans have been updated for the proposed modification to increase waste from 60,000 to 99,000 and outline specific measures for managing odour. The LGMP has been renamed to an Air Quality Management Plan (AQMA) as part of the DA modification package.

The specific odour management controls that will continue to be implemented at the facility have been outlined within the Air Quality Impact Assessment (AQIA) and AQMP by Northstar who are a qualified air quality consultant. These operational controls, *that are also detailed in part by EPL 21440 and the Landfill Guidelines, 2016*, include:

- Controlled irrigation of leachate onto active landfill cells in accordance with expert advice (including timing, weather conditions and avoidance of aerosol formation)
- Minimisation of waste drop heights and prompt placement of daily cover
- Restriction of the active landfill "tip face" to approximately 600m²
- Application of daily cover (minimum 150 mm) at the end of each operating day
- Progressive capping of completed landfill areas
- Limiting vehicle speeds across the site to reduce dust and odour dispersion
- Aeration and hydrogen peroxide (H₂O₂) dosing of leachate storage dams
- Treatment of odorous emissions from leachate storage via odour control units

- Use of additional odour control technologies where required (e.g. masking agents, chemical treatment, carbon adsorption, or biofiltration)
- Routine odour monitoring (including flux hood testing of key sources such as leachate ponds and landfill cells)
- Hydrogen sulphide (H₂S) monitoring to establish correlations with odour emissions
- Maintenance of an odour and air quality complaints register, available to EPA upon request

While the AQIA concludes that the increase in waste accepted by the facility will *comply* with all odour criterion, ongoing monitoring is proposed in accordance with the AQMP. If monitoring identifies elevated emissions or a verified odour complaint is received, immediate corrective actions are to be implemented. The specific remedial actions include staff performing a visual inspection to identify potential components of the site that may require remediation. Indicators may include:

- Surface cracks on intermediate or finally capped landfill cells
- Surface cracks proximate to extraction wells
- Structural damage at extraction wells
- Leachate or soil accumulation within extraction wells
- Depressions in the landfill surface
- Ponding on the landfill surface
- Distressed or dying vegetation
- Checking that the H₂O₂ dosing rate in Leachate Dam 1 is sufficient to deal with the leachate loading rates
- Checking that the aeration pumps in Leachate Dam 1 are operating effectively
- Checking that the leachate stored in Leachate Dam 2 has not become stagnant / anoxic; and
- Checking that the precipitated solids in Leachate Dams 1 and 2 are not being disturbed / agitated, allowed to build up excessively, or are exposed to air to create an emission pathway.

Remedial actions will include the control of the identified pathway, such as the application of additional cover materials, cover compaction, removal of roots penetrating cap materials. All personnel involved in air quality and odour management are appropriately trained in accordance with EPL 21440 and the AQMP. Ongoing competency development ensures that monitoring, reporting and response procedures are consistently implemented in accordance with the EPA's standards.

It is highlighted that the EPA has been consulted throughout the development application process and has indicated that it raises no objection to the proposed modification.

4. Economic Matters

While the submissions relating to potential land evaluation are acknowledged, this is not a planning matter to be considered in the assessment of development applications. It is also noted that property value is typically influenced by a range of factors and is not directly attributable to a single development.

5. Vehicle Size and Traffic Matters

The modification is supported by a Traffic Impact Assessment (TIA) which has been prepared by McLaren Traffic Engineering. The facility utilises 20m truck-and-dog combinations which is the largest vehicle to access the premises. B-double vehicles are neither proposed nor required for the operation of the facility.

The proposal will result only in the need for one (1) additional haulage vehicle driver to accommodate the increased processing capacity and remains within the previously assessed operational envelope in terms of traffic generation and site capacity.

Should you have any queries please contact the undersigned, David Hunter or Kathleen Bolger directly on 6921 8588 or david@habitatplanning.com.au.

Yours Faithfully,

Emily Hewitt
Consultant