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Contact: Scott Martin

Sheelagh Laguna
Department of Planning & Environment
PO Box 39
SYDNEY NSW 2001

Dear Sheelagh

**Subject: Woodlawn Bioreactor Expansion MOD-6 New Leachate Storage Dam
(MP10_0012-Mod-6)**

Thank you for the opportunity to provide input into the application for the abovementioned development proposal.

Upon review of the Modification Report prepared by Element, Council would like to raise the following matter in relation to odour. It is noted that these concerns reflect Council's similar advice provided in relation to the recent MBT modification application (MP06_239-Mod-3) in December 2023.

The Woodlawn Bioreactor site has a history of odour generation that has created amenity issues for the residents of Tarago over a prolonged period. Whilst it is acknowledged that an Air Quality Impact Assessment has been undertaken (Todoroski Air Sciences, 11 November 2023), Council is concerned that the methodology employed does not adequately assess or address the cumulative impact of odour upon residents within the Tarago Village.

Table 4, of the Air Quality Impact Assessment demonstrates that the project will in fact increase odour impact. Whilst this has been deemed to be "negligible" as a result of the predicted odour concentration remaining under the target of 6 OU, the fact remains that odour has been predicted to increase which in turn fails to provide an improvement to current site conditions, and therefore continues to expose Tarago residents to elevated levels of odour.

Whilst the methodology aligns with NSW EPA Guidelines, the lived experience by Council and Tarago residents is that other factors such as topography and weather conditions (e.g. temperature inversions) have a critical role in determining the impact of odour within the village. Therefore, any negligible increase at the source has the potential to increase the impact at the receiver.

In relation to meteorological data, Council believes it would be more appropriate for the air quality modelling undertaken to support the proposal to be re-modelled utilising localised meteorological data as opposed to data gathered from the Goulburn Airport Automatic Weather Station (AWS). Council's rationale is two-fold.

Firstly, there is a distance of approximately 32km between the Goulburn Airport AWS and the Woodlawn site. Over this distance, the weather that is experienced in both locations can differ greatly and frequently.

Secondly, the terrain/topographical variations between both locations is significant. Council records indicate that the Goulburn Airport is situated at approximately 645AHD, whilst the proposed location of the new leachate dam is approximately 785AHD.

Past experiences have demonstrated that smaller elevation differences across shorter distances can have significant implications on meteorological conditions, therefore Council requests that this matter be addressed prior to the finalisation of an assessment. To this point, it is Council's understanding that meteorological data for Tarago may already be available as a result of the studies that have been undertaken for Woodlawn's ARC project.

Should you have any questions in relation to the above, I can be contacted on (02) 4823 4480.

Yours faithfully

A handwritten signature in dark ink, appearing to read 'SA M', is positioned above the printed name.

Scott Martin
Director Planning & Environment