



**LYNBROOK RESIDENTS ASSOCIATION**  
With community comes happiness

# **Submission to the Legislative Council Economy and Infrastructure Committee**

## **Inquiry into the development and expansion of Waste-to-Energy (WtE) infrastructure in Victoria**

**Submitted by:** Lynbrook Residents Association Pty Ltd

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**Date:** March 17 2026

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### **Introduction**

To whom it may concern,

This submission is made on behalf of the Lynbrook Residents Association (LRA), a volunteer-led community group representing residents in Lynbrook and surrounding suburbs in Melbourne's south-east. The LRA has a strong history of community advocacy, engagement and environmental stewardship, including organising community events, promoting local wellbeing, and advocating on planning and infrastructure issues that directly impact residents.

In recent years, the LRA has been actively engaged in advocacy relating to the proposed Hampton Park Waste Transfer Station (WTS), which is intended to process significant volumes of municipal waste and act as a feeder facility to waste-to-energy (WtE) incinerators. This proposal has raised substantial concerns within the community regarding cumulative environmental impacts, transparency of decision-making, and the adequacy of regulatory oversight.

Notably, the Environment Protection Authority (EPA) has refused the development licence for the Hampton Park WTS on the basis that the project would pose an unacceptable risk to human



health and the environment. This decision is currently subject to proceedings at the Victorian Civil and Administrative Tribunal (VCAT), following an appeal by the proponent, Veolia.

This local context is highly relevant to the broader Inquiry, as it illustrates the real-world implications of waste infrastructure planning, the limitations of current consultation processes, and the risks associated with advancing waste-to-energy supply chains without comprehensive and independent assessment.

I write to express serious concern regarding the development and expansion of Waste-to-Energy (WtE) infrastructure in Victoria, and to call for a far more cautious, transparent and evidence-based approach before any approval is considered.

While we support better waste management outcomes and recognise the importance of reducing reliance on landfill, this does not justify progressing large-scale WtE infrastructure without first addressing long-term health, environmental, transport, planning and community impacts in a meaningful and publicly accountable way. The decisions made through this Inquiry will shape Victoria's waste system for generations and beyond, and must therefore be grounded in precaution, transparency and the public interest.

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## **Scale of Waste-to-Energy Expansion in Victoria**

The rapid expansion of waste-to-energy projects in Victoria is a serious concern, particularly given that multiple projects have already been allocated capacity under the State's Waste to Energy cap framework. This includes both new project allocations and existing operator capacity, representing one of the largest and most advanced pipelines of waste-to-energy development in Australia.

Victoria's current pipeline represents approximately 2 million tonnes of annual processing capacity and includes sites such as Maryvale, Wollert, Sunbury, Dandenong South and Laverton North. In contrast, New South Wales has only two major proposals and none currently operational or under construction, with development largely focused in designated regional



precincts. Queensland currently has no active projects following the withdrawal of the Ipswich proposal. Western Australia has one operational facility at Kwinana and one under construction at Rockingham. South Australia and Tasmania have no active waste-to-energy incinerator projects, with Tasmania instead focusing on biomass and bioenergy alternatives. The ACT maintains a policy position against waste incineration, while the Northern Territory has no large-scale incineration projects and is limited to landfill gas-to-energy and small-scale bioenergy trials.

This comparison highlights that Victoria represents one of the most advanced waste-to-energy pipelines in Australia. The purpose of this Inquiry is not to reject innovation outright, but to allow a comprehensive and transparent evaluation of whether this scale of development aligns with genuine sustainability objectives. Key decisions must be guided by long-term environmental and public health considerations, rather than defaulting to incineration as a convenient or expedient solution.

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## **Suitability of Existing WtE Plans and Policies**

The current policy and planning framework does not adequately account for the real-world impacts of WtE facilities on surrounding communities. These impacts extend well beyond the facility boundary and include air quality, emissions, odour, noise, traffic volumes, and broader effects on health, amenity and liveability.

Communities are entitled to clear, independent and locally relevant evidence regarding cumulative impacts, particularly where WtE facilities may be co-located with existing waste infrastructure such as landfills or transfer stations. In growth areas, this concern is amplified as residential density increases and sensitive land uses such as schools, childcare centres and aged care facilities are introduced.

A consistent and critical issue is the lack of genuine, early and transparent community consultation. Many residents only become aware of these proposals after key decisions are already underway, which undermines public confidence and creates a perception that



consultation is procedural rather than meaningful. For infrastructure of this scale, consultation must be undertaken early, in plain language, and in a way that allows communities to genuinely influence outcomes.

All WtE proposals should be subject to a comprehensive and independent Environmental Effects Statement to properly assess cumulative and long-term impacts.

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## **Waste Caps and Long-Term System Impacts**

A fundamental concern with WtE infrastructure is the risk of locking Victoria into a waste-dependent system. Facilities of this nature require long-term feedstock to remain commercially viable, which may create structural pressure to maintain or even increase waste volumes over time.

This runs counter to circular economy principles and undermines efforts to prioritise waste reduction, reuse and recycling. If not carefully managed, WtE may disincentivise investment in higher-value recovery systems and embed incineration within the waste hierarchy.

Any policy framework must ensure that WtE remains a last-resort option and is subject to strict controls on the types and volumes of waste that can be processed

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## **Regulatory Framework and Governance**

Public confidence in environmental governance is critical, yet there is growing concern that current regulatory settings do not provide sufficient transparency or accountability.

Approvals that rely on conditions rather than demonstrated compliance create uncertainty for communities and shift risk downstream. The absence of publicly available business cases and cost-benefit analyses limits the ability of stakeholders to assess whether these projects deliver genuine public value.



There is also a need to strengthen the role of local government in decision-making. Communities expect that councils will have a meaningful say in infrastructure that directly affects their residents, rather than acting as referral authorities in processes largely determined at higher levels.

Independent oversight is essential. This includes rigorous environmental monitoring of air, soil and water, as well as a comprehensive and independent review of the scientific evidence regarding the health impacts of WtE facilities.

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## **Environmental and Health Impacts**

While WtE facilities are often presented as modern and well-regulated, there remains uncertainty regarding long-term and cumulative impacts. Communities should not be expected to accept assurances without robust, independent scrutiny.

Key concerns include emissions to air, the management and disposal of ash by-products, and the potential for pollutants to accumulate in surrounding environments over time. These risks are particularly relevant in areas where multiple sources of environmental stress already exist.

The potential impact on food systems and water quality also warrants careful consideration. In international contexts, concerns have been raised about contamination affecting agricultural production and local ecosystems. These risks, even where uncertain, must be taken seriously under the precautionary principle.

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## **Traffic, Amenity and Planning Considerations**

WtE proposals must be assessed not only in terms of the facility itself, but also the broader planning and transport impacts. Increased heavy vehicle movements can significantly affect road safety, congestion and local amenity, particularly in suburban and growth areas.

The compatibility of WtE infrastructure with surrounding land uses is a critical issue. Many proposed or potential sites are located near residential communities, open space, schools and



future development areas. Once established, these facilities represent long-term land use constraints that can shape community outcomes for decades.

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## **Alternative Waste Management Approaches**

Victoria has an opportunity to lead in circular economy practices by prioritising waste avoidance, resource recovery and recycling innovation. Investment should focus on improving separation systems, expanding organics processing, and supporting product stewardship and reuse initiatives.

WtE represents a linear solution that permanently destroys material resources. While it may play a limited role in managing residual waste, it should not be positioned as a central pillar of the waste system.

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## **Adequacy of Community Consultation**

Community consultation to date has often been perceived as inadequate, reactive and overly technical. This has contributed to growing mistrust between communities, industry and government.

Meaningful consultation must be transparent, accessible and undertaken early in the decision-making process. Communities must be provided with clear information, independent expertise and genuine opportunities to influence outcomes.

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## **Application of the Precautionary Principle**

Where there is uncertainty regarding long-term health and environmental impacts, decision-making must err on the side of caution. The precautionary principle is not a barrier to progress, but a safeguard to ensure that progress does not come at an unacceptable cost to communities. Given the scale and longevity of WtE infrastructure, it is essential that this principle is applied rigorously.



## Recommendations

In light of the above, I respectfully urge the Committee to adopt a cautious and evidence-based approach to Waste-to-Energy development in Victoria. Consideration should be given to pausing or deferring further approvals until more comprehensive and independent assessments are completed.

All WtE proposals should be subject to a mandatory Environmental Effects Statement, supported by transparent and publicly available business cases and cost-benefit analyses. Regulatory frameworks should ensure that approvals are only granted where full compliance is demonstrated, rather than relying on conditional approvals.

Genuine community consultation must be strengthened, ensuring early engagement, accessible information, and meaningful opportunities for communities to influence outcomes.

Finally, policy settings should prioritise waste reduction, reuse, recycling and circular economy outcomes ahead of incineration-based solutions, ensuring that Victoria is not locked into a long-term waste-dependent system.

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## Conclusion

In summary, the Lynbrook Residents Association is not opposed to progress, but progress must be responsible, transparent and grounded in the public interest. Communities should not bear the long-term consequences of decisions made without full scrutiny.

This Inquiry presents an important opportunity to ensure that Victoria's waste strategy aligns with long-term environmental, health and economic outcomes. A cautious and considered approach to WtE is essential to maintaining public trust and achieving sustainable outcomes for future generations.

Yours faithfully,  
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Treasurer  
Lynbrook Residents Association