

# Aussie Recycling Greenacre Soil Processing Upgrades

## Scoping Report for SSD

January 24



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*Acknowledgement of Country*

4Pillars acknowledges the Traditional Owners of the land on which this site is located, the people of the Eora and Darug nations. We pay our respects to their Elders past and present.



*Disclosure statement*

Mr James Hammond, CEO of 4Pillars is engaged, via an EnviroNow services agreement, to provide environmental consulting services to Aussie Skips Recycling Pty Ltd.

This document has been prepared by 4Pillars and Mr Hammond in their capacity as independent environmental professionals. The statements and conclusions of this document are based on an objective evaluation of the available facts and data.

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*Document control*

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## 1. Introduction

This Scoping Report has been prepared to support Aussie Skips Recycling Pty Ltd's (**Aussie Recycling**) application for State Significant Development approval (SSD) for upgrades to their existing waste facility at 13 Bellfrog Street, Greenacre (the Premises / Site), where they propose to increase operations and expand activities.

Under the EP&A Act, the development application (DA) for an SSD project must be accompanied by an EIS that addresses the project-specific Secretary's Environmental Assessment Requirements (SEARs).

To obtain a project-specific SEARs for an SSD project, the applicant must submit a scoping report to the NSW Department of Planning and Environment (**DPE**), which is prepared in accordance with the *State significant development guidelines – Preparing a scoping report* (2021).

### Relevant history

Aussie Recycling currently operates the premises under an existing DA (2012/175) (**the DA or the Consent**) (see **Appendix 1**) issued by Strathfield City Council and EPL (EPL 21389) (see **Appendix 2**). These approvals allow the Site to operate as a 'materials handling yard' (as characterised by the DA) and a facility carrying on the scheduled activity of 'Waste Storage' under the EPL.

The DA as issued authorises a scale of activity that is defined by truck movements, rather than by an annual mass or volume limit. Previously, Aussie Recycling and their agents have argued the DA as written theoretically permits more than 500,000 tonnes per annum of waste materials to be received and handled. Despite this, 200,000 t has been used as a reasonable upper limit for the operation of the existing DA, which was issued via a local development pathway. We understand that the NSW EPA are currently not satisfied that development consent exists for operations above 200,000 t.

We note that there has been a previous (withdrawn) application for a similar scope of works at the Site. Reasons for withdrawal and a detailed overview of the development is location in Sections 3.1 and 3.2

### Proposed development

Aussie Recycling seek to increase the scale and nature of activities at 13 Bellfrog Street, Greenacre, building on the activities permitted under the existing DA/EPL. The proposed changes are summarised in Table 1 below and in further detail in Section 2, these are referred to as the "**Proposed Development**" or "**Proposal**" throughout the report.

## 2. Site context and history

Site and Existing Development overview					
	<table border="1"> <thead> <tr> <th>Lot / DP</th> <th>Street address</th> </tr> </thead> <tbody> <tr> <td>LOT 15 DP1133214</td> <td>13 Bellfrog Street, Greenacre, 2190, NSW</td> </tr> </tbody> </table>	Lot / DP	Street address	LOT 15 DP1133214	13 Bellfrog Street, Greenacre, 2190, NSW
Lot / DP	Street address				
LOT 15 DP1133214	13 Bellfrog Street, Greenacre, 2190, NSW				
<b>Local Government Area</b>	Strathfield				
<b>Zoning</b>	E4 – General Industrial ( <i>Strathfield Local Environmental Plan 2012</i> )				
<b>Local Environmental Plan and Development Control Plan</b>	<ul style="list-style-type: none"> <li>- Strathfield Local Environmental Plan 2012 (LEP)</li> <li>- Strathfield Consolidated Development Control Plan 2005 (DCP)</li> </ul>				
<b>Current site use</b>	Licensed waste facility, primarily receiving VENM, ENM and GSW <CT1 soils.				
<b>Landowner</b>	Dunmain Pty Ltd				
<b>Site operator</b>	Aussie Skips Recycling Pty Ltd (ABN 23 614 855 506)				
Active Approvals					
<b>Active Development Consent(s)</b>	See over page.				

	<table border="1"> <thead> <tr> <th data-bbox="459 264 655 331">Development consent ID</th> <th data-bbox="663 264 810 331">Date determined</th> <th data-bbox="818 264 1439 331">Purpose</th> </tr> </thead> <tbody> <tr> <td data-bbox="459 342 655 443">DA2012/175 (Strathfield City Council)</td> <td data-bbox="663 342 810 443">19 February 2013</td> <td data-bbox="818 342 1439 443">The Consent allows for the construction of an industrial warehouse building with an associated workshop and use as a <u>material handling yard</u>.</td> </tr> <tr> <td data-bbox="459 454 655 544">CDC 210597</td> <td data-bbox="663 454 810 544">19 March 2020</td> <td data-bbox="818 454 1439 544">Proposed Roof Awning extension and Installation of 2 in ground Weighbridges and inground Wheel Rumble'.</td> </tr> </tbody> </table>	Development consent ID	Date determined	Purpose	DA2012/175 (Strathfield City Council)	19 February 2013	The Consent allows for the construction of an industrial warehouse building with an associated workshop and use as a <u>material handling yard</u> .	CDC 210597	19 March 2020	Proposed Roof Awning extension and Installation of 2 in ground Weighbridges and inground Wheel Rumble'.							
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<b>Environment Protection Licence (EPL)</b>	<p>Environment Protection Licence number: 21389</p> <p>On the 23<sup>rd</sup> of July 2020 Aussie Recycling submitted a licence variation application to vary conditions on the EPL. The variation sought to increase the throughput from 160,000 tonnes per 12-month period to 199,000 tonnes and to increase the 'Authorised Amount' (the amount of waste permitted on the Premises at any one time) from 4,000 tonnes to 8,000 tonnes.</p> <p>The NSW EPA accepted Aussie Recycling's licence variation application on 8 July 2021 via a Notice of Variation. The Notice included (but not limited to) the following variations to licence No. 21389:</p> <table border="1"> <thead> <tr> <th data-bbox="459 880 778 925">Scheduled activities:</th> <th data-bbox="786 880 1439 925">Scale</th> </tr> </thead> <tbody> <tr> <td data-bbox="459 936 778 1137">Waste Storage</td> <td data-bbox="786 936 1439 1137"> <ul style="list-style-type: none"> <li>The authorised amount of waste permitted on the premises cannot exceed <u>8,000 tonnes at any one time</u>.</li> <li>The quantity of material to be received at the Premises must not exceed <u>199,000 tonnes in any 12-month period</u></li> </ul> </td> </tr> </tbody> </table>	Scheduled activities:	Scale	Waste Storage	<ul style="list-style-type: none"> <li>The authorised amount of waste permitted on the premises cannot exceed <u>8,000 tonnes at any one time</u>.</li> <li>The quantity of material to be received at the Premises must not exceed <u>199,000 tonnes in any 12-month period</u></li> </ul>												
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Cured concrete waste from a batch plant	As defined in the POEO Act, as in force from time to time	Waste storage	Polycyclic aromatic hydrocarbons														

	Grit, sediment, litter and gross pollutants collected in, and removed from, stormwater treatment devices or stormwater management systems, that has been dewatered so that it does not contain free liquids	As defined in the POEO Act, as in force from time to time	Waste storage	80mg/kg; Polychlorinated biphenyls (individual) 1mg/kg. No Acid Sulfate Soil or Potential Acid Sulfate Soil is to be received at the Premises. Soil thresholds will be subject to review from time to time.
	Virgin excavated natural material (VENEM)	As defined in the POEO Act, as in force from time to time	Waste storage	
<b>Site features</b>				
<b>Total site area</b>	6560 m <sup>2</sup>			
<b>Infrastructure on site</b>	Warehouse, workshop, awning, waste storage bays, in-ground wheel rumble, four above ground tanks, dual in-ground weighbridges, on site parking, street fronting industrial fence, gate on driveway and concrete hardstand.			
<b>Access</b>	Access is gained to the Site via a driveway on Bellfrog Street.			
<b>Operational hours</b>	<b>Day</b>		<b>Time</b>	
	Monday - Saturday		6am – 5pm	
	Sunday		7am – 5pm	
	Public holidays		No operations permitted	
<b>Site Environmental feature</b>				
<b>Soil landscape</b>	9130xx – Disturbed terrain (eSpade 2013) turfed fill areas commonly capped with up to 40 cm of sandy loam or up to 60 cm of compacted clay over fill or waste materials.			
<b>Underlying geology</b>	Artificial fill. Dredged estuarine sand and mud, demolition rubble, industrial and household waste. Also includes rocks and local soil materials.			
<b>Watercourse(s) present</b>	Cox's Creek (eastern boundary of the Site).			
<b>Topography</b>	Terrain disturbed by human activity. Local relief is usually <2m, but occasionally up to 10 m. Most areas of disturbed ground have been levelled to slopes of <3%.			
<b>Vegetation</b>	Site completely cleared of all native vegetation. Small portion of the north western corner contains a 'grassed swale' area.			
<b>Constraints</b>				
<b>Heritage</b>	No indigenous heritage items identified on Site or within 1 km of the Site. No other heritage items are identified on Site. Few general heritage items (buildings) are located with 1km of the Site.			
<b>Biodiversity Values</b>	No land mapped with Biodiversity values identified on Site. Approximately 530 m to the west of the Site is an area of mapped biodiversity.			
<b>Hazards</b>				
<b>Bushfire prone land</b>	No bushfire prone land identified on Site or within 1 km of the Site.			
<b>Flood prone land</b>	The Site nor the area is considered as flood prone land.			
<b>Landslide risk</b>	The Site is does not have any landslide risk.			
<b>Contaminated land</b>	Not identified on Site or within 1 km of the Site.			



Protection				
Acid sulphate soil	<p>The Site is mapped as Class 5 Acid Sulfate Soils under the Strathfield LEP. The LEP states:  <i>Works within 500 metres of adjacent Class 1, 2, 3 or 4 land that is below 5 metres Australian Height Datum and by which the watertable is likely to be lowered below 1 metre Australian Height Datum on adjacent Class 1, 2, 3 or 4 land.</i></p> <p>If works are proposed to be to a depth of 5 m this condition will be triggered. It is not anticipated that the proposed development will trigger this condition.</p>			
Drinking water catchment	Not identified on Site or within 1 km of the Site.			
Mineral and resource land	Not identified on Site or within 1 km of the Site.			
Scenic land protection	Not identified on Site or within 1 km of the Site.			
Terrestrial biodiversity	Not identified on Site, identified approximately 530 m to the west of the Site.			
Environmentally sensitive land	Not identified on Site or within 1 km of the Site.			
Applicable SEPPs	<p>SEPP (Biodiversity and Conservation) 2021  SEPP (Exempt and Complying Development Codes) 2008  SEPP (Housing) 2021  SEPP (Industry and Employment) 2021  SEPP (Planning Systems) 2021  SEPP (Primary Production) 2021  SEPP (Resilience and Hazards) 2021  SEPP (Resources and Energy) 2021  SEPP (Sustainable Buildings) 2022  SEPP (Transport and Infrastructure) 2021</p>			
Surrounding community				
Nearest receivers	Receiver ID	Address	Approximate distance from the site	Receiver
	C1	18/20 Bellfrog St, Greenacre NSW 2190	15 m	Industrial (Hanson Australia)
	R1	25 Juno Parade, Greenacre NSW 2190	120 m	Residential
	R2	12 Bellfrog St, Greenacre NSW 2190	60 m	Industrial (Sendable Logistics service)
	C2	1-3 Juno Parade, Greenacre NSW 2190	50 m	Industrial (AUSREO – Greenacre)
	R3	42 Wentworth St, Greenacre NSW 2190	120 m	Residential

Table 1: Summary of site details.

## 2.1 The applicant

The Site operator and applicant is Aussie Skips Recycling Pty Ltd (Aussie Recycling or the Proponent). Aussie Recycling is a waste management company, and their business activities include the operation of a collection infrastructure business (Aussie Skips), a commercial waste collection business (Aussie Commercial) and two resource recovery facilities - one in Strathfield South, NSW (EPL 20885), and the Site subject to this application in Greenacre, NSW.

## 2.2 Site context

The subject site is 13 Bellfrog Street, Greenacre – Lot 15 DP 1133214 (**the Site**). The Site is located in an area of industrial activity, and is bounded on all sides by industrial sites, including warehouses (to the west and east), a 24-hour concrete batching plant (to the north), and factory units to the south.

The nearest residential receivers are to the south and west, approximately 80 m and 105 m distance from the site, respectively. The nearest arterial road (dual carriageway) is Punchbowl Road, approximately 130 m to the east. The nearest main road is Juno Parade, approximately 120 m to the south.

The Site is located within land zoned under the Strathfield Local Environment Plan 2012 as IN1: General Industrial. There are three existing licensed monitoring points identified in the current EPL, all of which are for noise monitoring, and all are residential receivers to the south, south-west, and west of the Site (Figure 5).

## 2.3 Site history

### 2.3.1 Previous use as a quarry

The Site was previously a large open quarry, which was filled with imported soil material. This is stated in the Statement of Environmental Effects (SEE) that accompanied the establishment of the industrial Site (DA No. 2012/175 approved 19/2/13 referred to at the 2013 SEE). This is further demonstrated in historical imagery of the Site. The 2013 SEE contains imagery of the former state of the Site and surrounding allotments (Figure 15). Historical aerial imagery further confirms the presence and extent of the quarry (Figure 10, Figure 11, Figure 12, Figure 13 and Figure 14). Quarrying operations began prior to 1943, with quarrying occurring directly under the Sites footprint between 1971 and 1991. Quarrying activities stopped at the Site between 1991 and 1998 and the Site was filled between 1998 and 2005 (range is given for times as historical imagery is not available for each year). The Site was vacant until establishment of the current industrial premises in 2014.

Due to the presence of the quarry and importation of material to fill the void, there is no natural material located on or beneath the Site.

## 2.4 Sensitive receivers

### Current receivers

Sensitive receivers are typically residences, schools, childcares centres, aged-care facilities or hospitals; however, the nearest sensitive receiver can be a neighbouring business. The Approved Methods (NSW EPA, 2022a) denotes a sensitive receptor location to be:

‘A location where people are likely to work or reside; this may include a dwelling, school, hospital, office or public recreational area’.

The Site is located in an area of industrial activity, and is bounded on all sides by industrial sites, including warehouses (to the west and east), a 24-hour concrete batching plant (to the north), and factory units to the south. The nearest residential receivers are to the south and west, approximately 80 m and 105 m distance from the site, respectively (see Figure 5).

In the current EPL, three nearby residential receivers are identified, which are located roughly to the south, south-west, and west of the Site (Figure 5). Between the Site and the southern receivers are two large industrial units. The nearest residences to the South are located on Juno Parade, which is a relatively busy thoroughfare for vehicles.

### Future receivers

The immediate surrounding land is zoned as IN1 General Industry and IN2 Light Industry. It is not expected that there will be any significant increase in residential receivers in the immediate area in the future.

Therefore, the assessment of impacts focuses mainly on the current residential receivers.

## Complaints

The Site has not received any complaints regarding noise, dust or any other environmental matters. No complaints have been received directly and we are not aware of any complaints being made to the EPA or Council. NSW EPA previously stated they had received complaints related to dust emissions from the Greenacre industrial area in general; however, considering the other contributors in the industrial estate (i.e. unsealed container yards, Hanson concrete batching plant, etc.) we have not been able to draw this complaint back to the operation of Aussie Recycling's facility.

## 2.5 Existing approvals

### DA 2012/175 and EPL 21389

As part of the local development application process in 2012, a Statement of Environmental Effects was prepared by Borg Architects (**the 2012 SOEE**) (Appendix 6). The determination of the application was made by Strathfield Council on the 19<sup>th</sup> of February 2013, with the approved Consent (2012/175) operating from the 2<sup>nd</sup> of May 2013. The Consent allows for the "construction of an industrial warehouse building with an associated workshop and use as a materials handling yard". Details about the specifics of the operations to be carried out on the Site were provided in the 2012 SOEE (Appendix 6).

An EPL was granted by the NSW Land and Environment Court in March 2020. The EPL granted approval for Waste Storage, with 160,000 tonnes per annum throughput and a storage limit (authorised amount) of 4,000 tonnes at any one time.

### Complying Development Certificate No. 210597

A Complying Development Certificate (CDC) (number 210597) (see Appendix 3) was issued by Northwest Services to Aussie Recycling on the 19<sup>th</sup> of March 2021. This CDC granted consent to erect a roof awning extension and the installation of 2 in ground weighbridges and an inground wheel rumble grid. At the time of preparing this Scoping Report, the works have been completed; however, Aussie Recycling decided not to go ahead with the awning extension component of the complying development.

### EPA Licence 21389 as varied 2020

On the 23<sup>rd</sup> of July 2020 Aussie Recycling submitted a licence variation application to vary conditions on the EPL (Appendix 7). The variation sought to increase the throughput from 160,000 tonnes per 12-month period to 199,000 tonnes and to increase the 'Authorised Amount' (the amount of waste permitted on the Premises at any one time) from 4,000 tonnes to 8,000 tonnes.

Aussie Recycling was required to produce a Water Quality Impact Assessment, Air Quality Impact Assessment and a Noise Impact Assessment, among other documents (Appendix 7).

The NSW EPA accepted Aussie Recycling's licence variation application on 8 July 2021 via a Notice of Variation (the Notice) (Appendix 8). The Notice included (but not limited to) the following variations to licence No. 21389:

- L2.2 The authorised amount of waste permitted on the Premises cannot exceed 8000 tonnes at any one time.
- L2.3 The quantity of material to be received at the Premises must not exceed 199,000 tonnes in any 12-month period.

Current EPL is attached as Appendix 2.

## 2.6 External yard and material bays

The external material bays are currently constructed from interlocking concrete blocks. Five material bays are established on site, with each bay designated to a material type. The bay walls are to be upgraded to formed concrete push walls via a separate CDC process. These walls will be approximately 400 mm wide and two additional bays will be added in the north-west corner of the Site.

Capacity of these proposed bays is calculated as follows:

- Bays are approximately 150 m<sup>2</sup>.
- Average stockpile height of 6 m.
- Seven material bays in total.
- Estimated 2.0 tonnes per m<sup>3</sup> of material.

Hence, the seven material bays would have a capacity of approximately 12,600 tonnes. Factoring in an additional 10% to account for moisture in materials, estimated capacity of the material storage bays would be 13,860 T.

The Proponent wishes to do the material bay wall upgrades via a separate CDC process, so the application is not dependant on the proposed development. Regardless of the outcomes of this proposed development the proponent is to continue operations and hence wishes to gain the additional space benefits that the push walls offer.

## *2.7 Existing onsite infrastructure*

The current site infrastructure consists of:

- Weighbridge;
- Warehouse;
- Workshop;
- Material storage bays;
- Awning (partial covering of material bays);
- Self contained storm water system & four above ground tanks;
- Water cannons;
- In-ground wheel rumble grid; and
- Dual in-ground weighbridges.

Further specifications and information are provided in Table 2, Figure 6, Figure 7 and Figure 8.

### *Waste management*

All wastes received at the Site can be processed. Residual wastes to be disposed of via landfill is only a very minor component and will be stored in a bay or hook lift skip bin(s).

Item	Warehouse	Workshop & Amenities	Material bays	Weighbridge
<b>Location on site</b>	Southeast corner	Northeast corner	Northern border	Southwest corner
<b>Description</b>	Storage of vehicles and misc. equipment	Workshop for Aussie Industries own fleet and equipment. Toilet and showers. Staff lunchroom.	Storage of materials awaiting collection	In ground dual lane weighbridge, with office and wheel wash.
<b>Size</b>	6 m (h) x 31.8 m (l) x 27.6 m (w) Area = 877 m <sup>2</sup>	4 m (h) x 16.5 m (l) x 8.5 m (w) Area = 140.25 m <sup>2</sup>	Each material bays have an area of approximately 100 m <sup>2</sup> and capacity for approximately 1000 m <sup>3</sup> of material	NA
<b>Features</b>	<ul style="list-style-type: none"> <li>• Two awnings</li> <li>• Two roller doors</li> <li>• Office / tool shop</li> <li>• Water guns located on the awnings</li> </ul>	<ul style="list-style-type: none"> <li>• Three awnings</li> <li>• Two roller doors</li> <li>• Two mechanic pits</li> <li>• Shower and toilet</li> <li>• Lunchroom</li> <li>• Storeroom</li> </ul>	<ul style="list-style-type: none"> <li>• Storage of: <ul style="list-style-type: none"> <li>○ Outgoing RRO material</li> <li>○ Brick and concrete</li> <li>○ Mixed soil GSW</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Weighbridge</li> <li>• Weighbridge office</li> <li>• Wheel wash</li> </ul>
<b>Exterior finishes / material</b>	<ul style="list-style-type: none"> <li>• Concrete blockwork – split face</li> <li>• Concrete blockwork – polished face</li> <li>• Colourbond metal wall sheeting</li> <li>• Colourbond metal roller door</li> <li>• Aluminum framed window / door</li> <li>• Colourbond metal roof sheeting</li> <li>• Translucent metal sheeting</li> </ul>	<ul style="list-style-type: none"> <li>• Concrete blockwork – split face</li> <li>• Concrete blockwork – polished face</li> <li>• Colourbond metal wall sheeting</li> <li>• Colourbond metal roller door</li> <li>• Aluminum framed window / door</li> <li>• Colourbond metal roof sheeting</li> <li>• Translucent metal sheeting</li> </ul>	<ul style="list-style-type: none"> <li>• Interlocking concrete block – to be upgraded to formed concrete push walls (exempt development).</li> </ul>	<ul style="list-style-type: none"> <li>• NA</li> </ul>

Table 2: Onsite infrastructure.

## 2.8 Current Site Operation

Current Site operation is briefly described below and outlined in Figure 1. During the September 2021 to August 2022 period, approximately 98.5% of the material received at the Site meet the description of ‘soils / grit and screenings’ with approximately 1% of material accepted at the Site matching the description for ‘asphalt and concrete’. Storage and movement of soils is currently Aussie Recycling’s core business. This material was seen to come from and be redistributed to a variety of civil and construction locations mostly from the Greater Sydney Region.

### Material movement through Site

1. Pre site waste approvals – Potential customers send Waste Classification Reports (WCRs) to Aussie Recycling for review. Aussie’s compares the WCR to the EPL. The WCR is either rejected or approved. Rejected reports are returned to the customer and the rejected loads register is filled out. Approved reports are sent an “Approvals” form with a unique identifying number that is to be given upon arrival at Site.
2. Waste acceptance and rejection – Customers arrive at Site and the unique number from the Approvals form is given.
  - o Initial inspection at weighbridge - Initial inspection by the weighbridge officer is completed to ensure material type matches the WCR. Material is either accepted or rejected.
    - Waste accepted – material permitted to enter Site for secondary inspection in the offload.
    - Waste rejected – material refused entry, material transported offsite and rejected loads database updated.
  - o Secondary inspection at offload area – Material is spread over hardstand and thoroughly inspected by operators on Site. Material is either accepted or rejected.
    - Waste accepted – Material directed to be unloaded in designated bay (stockpiling).
    - Waste rejected – Material reloaded in vehicle, material transported offsite and rejected loads database updated.
3. Stockpiling - Materials are stockpiled based on waste classification or segregated based on source and visual / chemical assessment. Stockpiles on Site include, but are not limited to:
  - VENM bay;
  - Asphalt bay;
  - Concrete bay;
  - Soils / grit and screenings bay; and
  - Materials that meet RRO/RRE bay(s)
4. Assessment - Materials are then chemically assessed against relevant RROs by a competent person and given a classification as detailed in Table 3.

Incoming material	Assessment of stockpile	Product
VENM	No assessment	VENM
Asphalt or concrete	Materials are then chemically assessed against relevant RROs by a competent person and given a classification.	Recovered aggregate OR Asphalt or concrete
Soils / grit and screenings	Materials are then chemically assessed against relevant RROs by a competent person and given a classification	GSW soils OR ENM
Materials that meet RRO/RRE	No assessment	Materials that meet RRO/RRE

Table 3: Assessment process for incoming material and end product.

5. Dispatch

- Recycled products distributed as a saleable product or are dispatched to a licenced facility for further processing (where applicable);
- Non-recyclable residues dispatched to landfill.

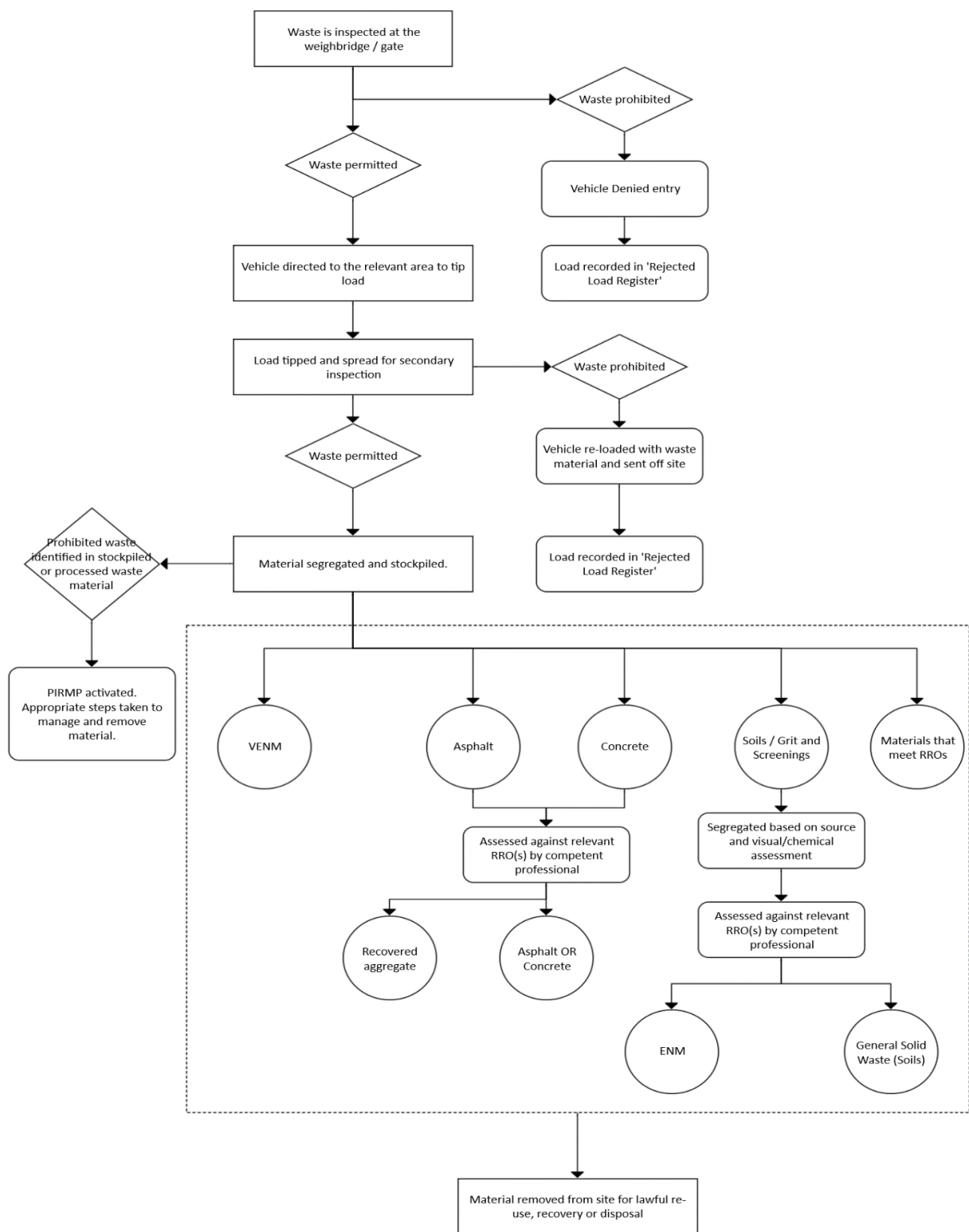


Figure 1: Existing material receipt, storage, and export procedure. The proposed flow of material through the Site will differ from this process in several respects.



## 3. The proposal

### 3.1 *Relevant history*

During the period of 2021-2023 an SSD application for Site upgrades was being prepared. Based on several factors this application was subsequently withdrawn.

#### 3.1.1 *Reasons for withdrawal*

- From several rounds of consultation with the community, DPE and the EPA it was made clear to the Proponent that certain aspects of the proposal were not suitable at the Site. Notably, the agencies expressed concerns around the scale of the proposed operations (at the time it was proposed for 350,000 tonnes per year) to which the Proponent took the feedback on board and decided to decrease annual throughput down to 250,000 tonnes per year.
- Numerous market changes occurred between 2021-2023 due to covid and other infrastructure developments. With a clearer strategy to deal with market fluctuations, the Proponent has decided to increase the range of materials accepted on Site.
- Due to the range of the changes, the Proponent decided to withdraw the application to start afresh. This will allow for the SEARs to be targeted to the new scope of works and create a better flow of consultation by providing the agencies with a new scoping report.

#### 3.1.2 *Works completed to date*

- Scoping Report
- SEARS (SSD-55663210) (not relevant to new application)
- EIS (draft) including specialists' assessments consisting of traffic impact assessment, noise and vibration impact assessment, air quality impact assessment, soils and contamination assessment, water quality and hydrology (including flooding) impact assessment, social impact assessment.
- Consultation with key agency and residential stakeholders

#### 3.1.3 *Key findings*

- From consultation with the EPA, they affirmed it was their "best practice mitigation policy" for the environmental impact from waste facilities to be equivalent to those impacts that enclosing the facility would achieve.
- 4Pillars modelled the expected environmental impact from the operation of the Site with the enclosure and without the enclosure (including a suite of additional mitigation measures) it was determined that air and noise quality was only marginally improved with the enclosure.
  - The main contributor to noise and air quality was seen to be existing background levels.
  - There was no discernible impact to overall air quality or noise criteria including:
    - Annual average TSP or dust deposition
    - 24—hour average PM10 and PM20 concentrations at each sensitive receptor location
    - Operational noise
    - Sleep disturbance
    - Operational road noise

#### 3.1.4 *Relevance of completed materials*

The feedback obtained during community and agency consultation sessions will be considered as part of this new proposal. Although under a new application, consultation with these parties will be a continuation of the previous and the feedback provided during the previous application incorporated into this project.

Draft impact assessment report(s) will also be utilised and the results incorporated into the project design. A list of utilised impact assessments is provided below.

- Air quality impact assessment report
- Noise and vibration impact assessment report
- Water quality report
- Soils and contamination assessment
- Traffic impact assessment report
- Social impact assessment report

### *3.2 Proposed development*

This proposal seeks to increase the scale of activities at the site and permit the construction of fixed waste processing plant. Full details on each element of the proposed development are provided below.

This proposal encompasses all operational activities that the proponent intends to carry out at the site, hence superseding the existing operational consent. The proponent may be willing to surrender the existing Consent, if the terms proposed in this application are granted.

#### *1. Activities proposed*

The Site will operate as a Resource Recovery facility for soils and source-segregated building and demolition wastes. The activities to be carried out on the Site are as follows:

- Receipt of waste material via heavy road vehicles (see full details of proposed waste streams later in this document);
  - Waste materials to be accepted on Site are outlined in Section 3.3.4 and Table 5.
- Handling of waste material by mobile plant;
- Processing of waste material by sifting, picking, blending (pugmill), and screening (trommel screen);
- Storage of waste materials and processed recovered products;
- Export of waste materials by heavy road vehicles; and
- Various ancillary activities such as operation of a workshop, overnight truck parking, general storage of equipment, maintenance, storage of diesel fuel and operation of a self-contained fuel tank, waste sampling and quality assurance etc.

The characterisation of these activities for planning purposes and alignment to Scheduled Activities as defined in the *Protection of the Environment Operations Act 1997* is detailed later in this report.

#### *2. Annual throughput*

Increase the permitted annual combined throughput of waste material received at the Premises to 250,000 tonnes in any 12-month period.

#### *3. 'Authorised Amount' (storage or stockpiling limit)*

Increase the amount of waste permitted to be stored on the Premises at any one to 14,000 tonnes.

#### *4. Changes to the waste type and activities permitted on Site*

Waste materials and activities to be accepted on Site are outlined in Section 3.3.4 and Table 5.

#### *5. Hours of operation*

Changes in operation hours (see section 3.5).

#### *6. Mitigation measures incorporated into project design*

#### Awning extension

As part of a previous CDC application an extension to the existing awning was approved. This aspect has not been constructed. As part of the suite of mitigation measures associated with this SSD project, the awning will be constructed to aid in noise and dust suppression. Works associated with the construction of the awning are not considered within this application as it has already been approved.

#### Installation of penstock valve

A penstock valve is to be installed on the open discharge port of the water storage system, to ensure that uncontrolled overflow is not possible without manual override. A small amount of works will be required to install the valve and connect to the existing network.

#### Other measures

Additional bunding, storage and other mitigation measures have been detailed in the report (see section 8).

### *3.3 Overview of proposed operations*

The proposed waste processing operation will differ from current operations in terms of a larger scale of activity and the introduction of processing plant. The proponent also proposes changes to the types of waste materials received and processed.

#### *3.3.1 Proposed operations*

The key features of proposed operations are as follows (refer to Figure 9 for proposed site layout):

- Annual throughput is to be 250,000 T.
- Authorised amount 14,000 T at any one time. This will be stored within the material bays on Site (see 2.6 for further explanation).
- Soil waste receipt (except concrete, PASS/AASS), processing and storage will occur in the external yard area;
- Concrete, ASS/PASS processing and storage will occur in the internal warehouse.
- Material bays are to include:
  - Incoming Soil Reveal bay (GSW, VENM and other soil waste).
  - Bays specific for RRO material.
  - Concrete and brick.
  - Excavated Natural Material (ENM) (outgoing).
  - Untreated GSW PASS/AASS
  - Treated GSW PASS/AASS
  - Crushed concrete and concrete fines
- Storage of other materials that meet the requirements of NSW EPA Resource Recovery Orders<sup>1</sup>, such as Excavated Natural Material (**ENM**) will occur in the external yard area. These materials may be stored and exported without any processing, or they may (where appropriate) be blended with other materials to form recycled products.
- EXTERNAL: Plant and equipment in the external yard would include a hopper, incline conveyor and rotating trommel screen. This plant would sit above the bays located in the northern section of the yard. The plant would be located under the existing awning.
- INTERNAL: The warehouse will be used interchangeably for the storage and processing of concrete or ASS/PASS.
  - The fixed primary use of the warehouse would be for concrete processing and stockpiling of the processed material. Within the warehouse would be a fixed processing plant consisting of a concrete crusher, incline conveyor and a rotating trommel screen for processing concrete material.
  - Where an incoming batch of pre-classified PASS/AASS is being received, a mobile processing plant (specifically a pugmill) would be setup in the warehouse for the treatment of ASS/PASS soils.

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<sup>1</sup> <https://www.epa.nsw.gov.au/your-environment/recycling-and-reuse/resource-recovery-framework/current-orders-and-exemption>

### 3.3.2 *Overview of acceptance, treatment, storage and off-site transport of PASS & AASS*

- As part of this development, the proponent will seek an application for a Site-specific Resource Recovery Order for Treated AASS/PASS as a soil amendment and for the land application of waste materials as fill. This application will be lodged to the EPA as per the Guidelines on resource recovery Orders and Exemptions.
- The receipt of appropriate criteria AASS/PASS soil material that is capable of amendment, using lime, and then repurposed for an appropriately approved and/or licenced reuse that is covered by a site-specific EPA waste reuse exemption or a Site Specific RRO.
- Receipt of approximately 30,000-40,000 tonnes per annum (tpa) of General Solid Waste (non-putrescible) Actual Acid Sulfate Soils/ Potential Acid Sulfate Soils (GSW AASS/PASS) material, treatment with lime and export using a dedicated section of the existing warehouse on the Site.
- All GSW AASS/PASS activities will occur inside the existing warehouse.
- Only GSW AASS/PASS that can satisfy the classification requirements as General Solid Waste will be accepted.
- The GSW AASS/PASS material will be kept damp prior to blending to avoid any oxidation.
- The entire GSW AASS/PASS shed area will be bunded with either a 150mm curb or 150mm rollover curb.
- All excess water from the GSW AASS/PASS warehouse is to be captured in the bunded area and disposed of appropriately or discharged via an approved trade waste disposal connection.
- GSW AASS/PASS materials will be subject to testing, Development Consent and Management plans produced by the waste generator.

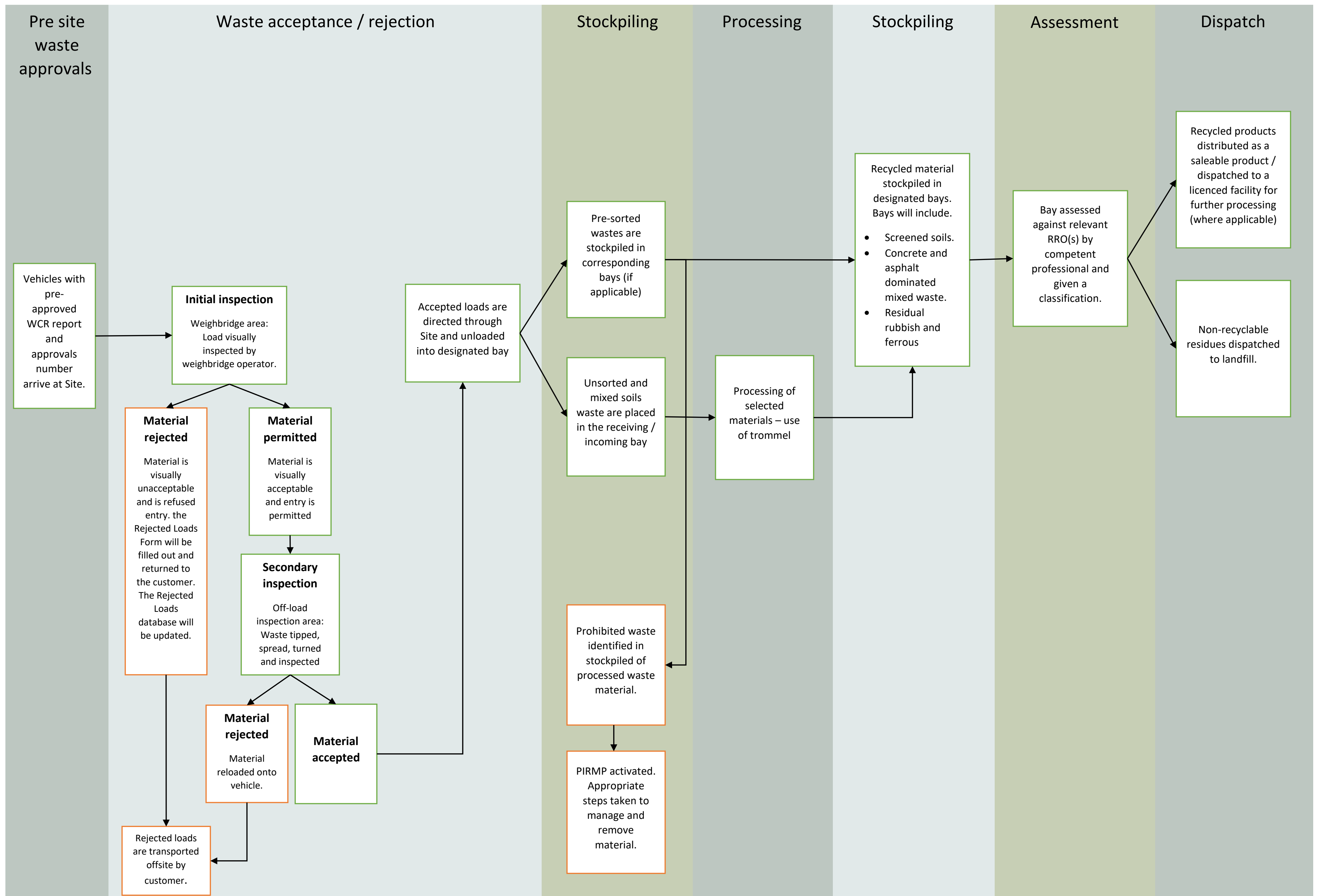
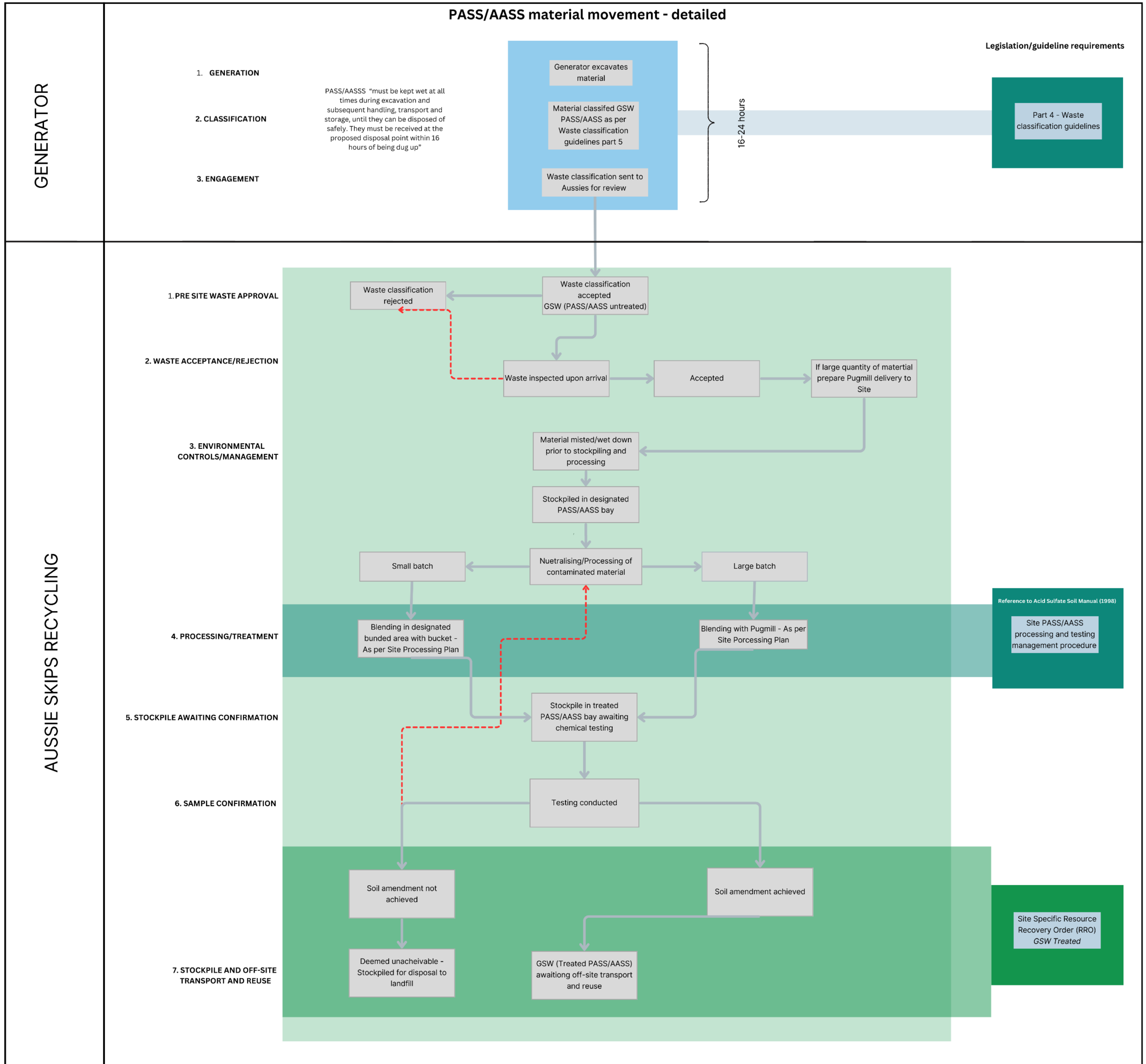


Figure 2: Overview of material movement through Site



3.3.3 Current and proposed operations

Table 4 outlines the proposed operations and the current operations on Site.

Operation component	Comment	Current operation	Proposed operation
Annual throughput	Proposed change – increase to throughput	199,000 t in any 12-month period.	250,000 t in any 12-month period.
Authorised amount	Proposed change – increase to authorized amount	Authorised amount 8,000 t at any one time.	Authorised amount 14,000 t at any one time.
Material storage and processing location	Proposed change	Soil waste receipt, processing and storage occur in the external yard area	<ul style="list-style-type: none"> <li>• Soil waste receipt, processing and storage with occur in the external yard area (under the awning)</li> <li>• Concrete will be stored and processed within the warehouse.</li> <li>• PASS / AASS will be stored and processed in the warehouse</li> </ul>
Material processing equipment	Proposed changed	Currently no material processing equipment is located on Site.	<p><u>Installation of Soil Processing plant</u></p> <p>A fixed processing plant consisting of a hopper, incline conveyor and</p>

			<p>rotating trommel screen, will be installed above the material storage bays in the northern section of the yard.</p> <p><u>Installation of concrete processing plant</u></p> <p>A fixed concrete processing plant will be installed within the existing warehouse.</p> <p><u>Acid sulphate soils processing</u></p> <p>No permanent processing equipment will be installed for the intention of treatment of acid sulphate soils, however temporary mobile equipment (pugmill) will be hired for lime blending, when this material is expected to be accepted on the Site.</p>
<b>Material processing</b>	Proposed change	Soil is not processed on Site. Soils are currently placed in a shake bucket to remove oversize material and then stockpiled, chemically tested and transported off Site	<ul style="list-style-type: none"> <li>• Some soils will be processed via the soils processing plant (trommel) to be separated based on size.</li> <li>• Concrete and brick will be crushed into smaller fractions via the concrete crushing plant.</li> </ul>



			<ul style="list-style-type: none"> <li>PASS / AASS soils will be stored in a 'treated' and 'untreated' bay. Untreated ASS/PASS will be processed via the pugmill and stockpiled in the 'treated' bay awaiting sampling confirmation and transport off Site.</li> </ul>
<b>Waste types received</b>	Proposed change – additional waste types to be received (see Table 5)	<p>Waste types received</p> <ul style="list-style-type: none"> <li>Soils that meet GSW &lt;CT1 and other limits</li> <li>Asphalt waste</li> <li>Concrete, including fully cured concrete from a batch plant</li> <li>VENM</li> </ul>	<p>Waste types received</p> <ul style="list-style-type: none"> <li>Soils that meet GSW &lt;CT1 and new other limits.</li> <li>Asphalt waste</li> <li>Concrete, including fully cured concrete from a batch plant</li> <li>VENM</li> <li>Ceramics and bricks</li> <li>Resource Recovery Order materials (where third party processing is identified in the RRO/RRE).</li> <li>GSW PASS / AASS</li> </ul>
<b>Waste type quantities</b>	Proposed change	<p>Current receipt consists of an approximate breakdown of:</p> <p>98% Soils</p> <p>2% brick and concrete</p>	<p>Proposed waste received are expected to be:</p> <ul style="list-style-type: none"> <li>65% soils</li> </ul>

			<ul style="list-style-type: none"> <li>• 15% GSW PASS / AASS</li> <li>• 20% concrete and brick</li> </ul> <p>Likely to be variable due to market conditions</p>
<b>Activities to occur on Site</b>	Proposed change – additional activity to occur on Site for some waste types	Waste storage	<p>Waste Storage</p> <p>Resource Recovery</p> <p>Contaminated soil treatment</p>
<b>Material bay layout</b>	Proposed change – via separate CDC process (see Section 2.6)	<p>Material bays are to include:</p> <ul style="list-style-type: none"> <li>• Incoming Soil</li> <li>• 3 x Outgoing ENM bays</li> <li>• 1 x Concrete and Brick.</li> </ul>	<p>Material bays in the external area are to include:</p> <ul style="list-style-type: none"> <li>• Incoming Soil Reveal bay (GSW, VENM and other soil waste).</li> <li>• Concrete and brick.</li> <li>• 3 RRO material (outgoing).</li> </ul> <p>Material bays in the warehouse are to include:</p> <ul style="list-style-type: none"> <li>• Three material bays. Note – these bays will be interchangeable between storage of</li> </ul>

			concrete and brick and PASS / ASS. <ul style="list-style-type: none"> <li>Dedicated bay for lime storage</li> </ul>																																					
<b>Hours of operation</b>	Proposed change	Standard hours of operation (as per <table border="1" data-bbox="526 406 1729 1394"> <thead> <tr> <th colspan="3">Site and Existing Development overview</th> </tr> <tr> <th></th> <th>Lot / DP</th> <th>Street address</th> </tr> </thead> <tbody> <tr> <td></td> <td>LOT 15 DP1133214</td> <td>13 Bellfrog Street, Greenacre, 2190, NSW</td> </tr> <tr> <td><b>Local Government Area</b></td> <td colspan="2">Strathfield</td> </tr> <tr> <td><b>Zoning</b></td> <td colspan="2">E4 – General Industrial (<i>Strathfield Local Environmental Plan 2012</i>)</td> </tr> <tr> <td><b>Local Environmental Plan and Development Control Plan</b></td> <td colspan="2"> <ul style="list-style-type: none"> <li>Strathfield Local Environmental Plan 2012 (LEP)</li> <li>Strathfield Consolidated Development Control Plan 2005 (DCP)</li> </ul> </td> </tr> <tr> <td><b>Current site use</b></td> <td colspan="2">Licensed waste facility, primarily receiving VENM, ENM and GSW &lt;CT1 soils.</td> </tr> <tr> <td><b>Landowner</b></td> <td colspan="2">Dunmain Pty Ltd</td> </tr> <tr> <td><b>Site operator</b></td> <td colspan="2">Aussie Skips Recycling Pty Ltd (ABN 23 614 855 506)</td> </tr> <tr> <th colspan="3">Active Approvals</th> </tr> <tr> <td><b>Active Development Consent(s)</b></td> <td colspan="2">See over page.</td> </tr> <tr> <td></td> <td>Development consent ID</td> <td>Date determined</td> <td>Purpose</td> </tr> </tbody> </table>	Site and Existing Development overview				Lot / DP	Street address		LOT 15 DP1133214	13 Bellfrog Street, Greenacre, 2190, NSW	<b>Local Government Area</b>	Strathfield		<b>Zoning</b>	E4 – General Industrial ( <i>Strathfield Local Environmental Plan 2012</i> )		<b>Local Environmental Plan and Development Control Plan</b>	<ul style="list-style-type: none"> <li>Strathfield Local Environmental Plan 2012 (LEP)</li> <li>Strathfield Consolidated Development Control Plan 2005 (DCP)</li> </ul>		<b>Current site use</b>	Licensed waste facility, primarily receiving VENM, ENM and GSW <CT1 soils.		<b>Landowner</b>	Dunmain Pty Ltd		<b>Site operator</b>	Aussie Skips Recycling Pty Ltd (ABN 23 614 855 506)		Active Approvals			<b>Active Development Consent(s)</b>	See over page.			Development consent ID	Date determined	Purpose	Extended operation hours based on activity (as per Table 7).
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		DA2012/175 (Strathfield City Council)	19 February 2013	The Consent allows for the construction of an industrial warehouse building with an associated workshop and use as a <u>material handling yard</u> .									
		CDC 210597	19 March 2020	Proposed Roof Awning extension and Installation of 2 in ground Weighbridges and inground Wheel Rumble'.									
		<p>Environment Protection Licence number: 21389</p> <p>On the 23<sup>rd</sup> of July 2020 Aussie Recycling submitted a licence variation application to vary conditions on the EPL. The variation sought to increase the throughput from 160,000 tonnes per 12-month period to 199,000 tonnes and to increase the 'Authorised Amount' (the amount of waste permitted on the Premises at any one time) from 4,000 tonnes to 8,000 tonnes.</p> <p>The NSW EPA accepted Aussie Recycling's licence variation application on 8 July 2021 via a Notice of Variation. The Notice included (but not limited to) the following variations to licence No. 21389:</p>											
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			threshold values for contaminants specified in the 'Other Limits' column.		600mg/kg; Petroleum Hydrocarbons C6-C9 150mg/kg; Petroleum Hydrocarbons C10-C36 1600mg/kg; Polycyclic aromatic hydrocarbons 80mg/kg; Polychlorinated biphenyls (individual) 1mg/kg. No Acid Sulfate Soil or Potential Acid Sulfate Soil is to be received at the Premises. Soil thresholds will be subject to review from time to time.
		Asphalt waste (including asphalt resulting from road construction and waterproofing works)	As defined in the POEO Act, as in force from time to time	Waste storage	
		Cured concrete waste from a batch plant	As defined in the POEO Act, as in force from time to time	Waste storage	
		Grit, sediment, litter and gross pollutants collected in, and removed from, stormwater treatment devices or stormwater management systems, that has been dewatered so that it does not contain free liquids	As defined in the POEO Act, as in force from time to time	Waste storage	
		Virgin excavated natural material (VENEM)	As defined in the POEO Act, as in force from time to time	Waste storage	
<b>Site features</b>					
	<b>Total site area</b>	6560 m <sup>2</sup>			
	<b>Infrastructure on site</b>	Warehouse, workshop, awning, waste storage bays, in-ground wheel rumble, four above ground tanks, dual in-ground weighbridges, on site parking, street fronting industrial fence, gate on driveway and concrete hardstand.			
	<b>Access</b>	Access is gained to the Site via a driveway on Bellfrog Street.			
	<b>Operational hours</b>	<b>Day</b>		<b>Time</b>	
		Monday - Saturday		6am – 5pm	
		Sunday		7am – 5pm	

		Public holidays	No operations permitted	
<b>Site Environmental feature</b>				
<b>Soil landscape</b>	9130xx – Disturbed terrain (eSpade 2013) turfed fill areas commonly capped with up to 40 cm of sandy loam or up to 60 cm of compacted clay over fill or waste materials.			
<b>Underlying geology</b>	Artificial fill. Dredged estuarine sand and mud, demolition rubble, industrial and household waste. Also includes rocks and local soil materials.			
<b>Watercourse(s) present</b>	Cox's Creek (eastern boundary of the Site).			
<b>Topography</b>	Terrain disturbed by human activity. Local relief is usually <2m, but occasionally up to 10 m. Most areas of disturbed ground have been levelled to slopes of <3%.			
<b>Vegetation</b>	Site completely cleared of all native vegetation. Small portion of the north western corner contains a 'grassed swale' area.			
<b>Constraints</b>				
<b>Heritage</b>	No indigenous heritage items identified on Site or within 1 km of the Site. No other heritage items are identified on Site. Few general heritage items (buildings) are located with 1km of the Site.			
<b>Biodiversity Values</b>	No land mapped with Biodiversity values identified on Site. Approximately 530 m to the west of the Site is an area of mapped biodiversity.			
<b>Hazards</b>				
<b>Bushfire prone land</b>	No bushfire prone land identified on Site or within 1 km of the Site.			
<b>Flood prone land</b>	The Site nor the area is considered as flood prone land.			
<b>Landslide risk</b>	The Site is does not have any landslide risk.			
<b>Contaminated land</b>	Not identified on Site or within 1 km of the Site.			
<b>Protection</b>				
<b>Acid sulphate soil</b>	The Site is mapped as Class 5 Acid Sulfate Soils under the Strathfield LEP. The LEP states: <i>Works within 500 metres of adjacent Class 1, 2, 3 or 4 land that is below 5 metres Australian Height Datum and by which the watertable is likely to be lowered below 1 metre Australian Height Datum on adjacent Class 1, 2, 3 or 4 land.</i>			

		If works are proposed to be to a depth of 5 m this condition will be triggered. It is not anticipated that the proposed development will trigger this condition.			
	<b>Drinking water catchment</b>	Not identified on Site or within 1 km of the Site.			
	<b>Mineral and resource land</b>	Not identified on Site or within 1 km of the Site.			
	<b>Scenic land protection</b>	Not identified on Site or within 1 km of the Site.			
	<b>Terrestrial biodiversity</b>	Not identified on Site, identified approximately 530 m to the west of the Site.			
	<b>Environmentally sensitive land</b>	Not identified on Site or within 1 km of the Site.			
	<b>Applicable SEPPS</b>	SEPP (Biodiversity and Conservation) 2021 SEPP (Exempt and Complying Development Codes) 2008 SEPP (Housing) 2021 SEPP (Industry and Employment) 2021 SEPP (Planning Systems) 2021 SEPP (Primary Production) 2021 SEPP (Resilience and Hazards) 2021 SEPP (Resources and Energy) 2021 SEPP (Sustainable Buildings) 2022 SEPP (Transport and Infrastructure) 2021			
	<b>Surrounding community</b>				
	<b>Nearest receivers</b>	<b>Receiver ID</b>	<b>Address</b>	<b>Approximate distance from the site</b>	<b>Receiver</b>
		C1	18/20 Bellfrog St, Greenacre NSW 2190	15 m	Industrial (Hanson Australia)

			<table border="1"> <tr> <td><b>R1</b></td> <td>25 Juno Parade, Greenacre NSW 2190</td> <td>120 m</td> <td>Residential</td> </tr> <tr> <td><b>R2</b></td> <td>12 Bellfrog St, Greenacre NSW 2190</td> <td>60 m</td> <td>Industrial (Sendable Logistics service)</td> </tr> <tr> <td><b>C2</b></td> <td>1-3 Juno Parade, Greenacre NSW 2190</td> <td>50 m</td> <td>Industrial (AUSREO – Greenacre)</td> </tr> <tr> <td><b>R3</b></td> <td>42 Wentworth St, Greenacre NSW 2190</td> <td>120 m</td> <td>Residential</td> </tr> </table>	<b>R1</b>	25 Juno Parade, Greenacre NSW 2190	120 m	Residential	<b>R2</b>	12 Bellfrog St, Greenacre NSW 2190	60 m	Industrial (Sendable Logistics service)	<b>C2</b>	1-3 Juno Parade, Greenacre NSW 2190	50 m	Industrial (AUSREO – Greenacre)	<b>R3</b>	42 Wentworth St, Greenacre NSW 2190	120 m	Residential	
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<b>R3</b>	42 Wentworth St, Greenacre NSW 2190	120 m	Residential																	
		Table 1)																		
<b>Primary purpose of the development</b>	No change	Waste Facility (referred to as a ‘materials handling facility’ in the current consent).																		
<b>Use of warehouse</b>	Proposed change	The warehouse is used for storage of equipment and vehicles		<p>The warehouse will be used for the storage and processing of concrete and brick and GSW PASS / AASS.</p> <p>Vehicle and equipment storage will occur on another suitable site operated by the Proponent.</p>																
<b>Use of workshop</b>	No change	The mechanics workshop services Aussie’s own fleet of trucks and machinery and is not for public use. No changes are proposed to the type of operation within the workshop; however, operational hours are proposed to change as per the Section 3.5 below.																		
	Proposed change – operation hours	Hours that the workshop operates is proposed to be changed to 24 hours per day.																		



<b>Various ancillary activities</b>	No change	Various ancillary activities such as operation of a workshop, overnight truck parking, general storage of equipment, maintenance, storage of diesel fuel and operation of a self-contained fuel tank, waste sampling and material testing.
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*Table 4: Current and proposed operations. Green cells indicate a change from current operations.*

### 3.3.4 Waste types

Table 5 provides an overview of the waste types and the corresponding activities that are existing and proposed to be completed at the Site. Note that the waste types specified are based on defined terms under Schedule 1 of the POEO Act, Resource Recovery Orders and relevant statutory guidelines.

Material type	Waste type category	Waste name	Accepted under existing approvals	Proposed activity	Estimated Quantity
Soil waste	Sub category of GSW	Soils that meet the definition of General Solid Waste <CT1 in the Waste Classification Guidelines 2014 and that also meet the following limits: <b>Arsenic (60 mg/kg);</b> Cadmium (2 mg/kg); Copper (200 mg/kg); <b>Lead (500 mg/kg);</b> Mercury (1.5 mg/kg); Zinc (600 mg/kg); TRH C6-C9 (150 mg/kg); TRH C10-C36 (1600 mg/kg); <b>Benzo(α)pyrene (6 mg/kg);</b> PAHs (total) (80 mg/kg); PCBs (1 mg/kg);  Note: Contaminants highlighted in red above are higher thresholds than current contaminant limits. Text in black indicates the proposed maximum contaminant level is unchanged from current approvals.	Yes – however, only Soils meeting the CT1 threshold of GSW currently permitted. The current limits for contaminants highlighted red in column 1 of this table are: <b>Arsenic (40 mg/kg);</b> <b>Lead (100 mg/kg);</b> <b>Benzo(α)pyrene (0.8 mg/kg);</b>	Resource Recovery Waste Storage	162,500
Soil waste	Sub category of GSW	Virgin Excavated Natural Material (VENM)	Yes	Resource Recovery Waste Storage	
Soil waste	RRO	General Resource Recovery Orders (RROs)	No	Waste Storage	
Soil waste	RRO	Recovered Fines (Batch) or (Continuous Process)	No	Waste Storage	
Soil waste	RRO	Excavated Natural Material (ENM)	No	Resource Recovery Waste Storage	
Soil waste	RRO	Tunnel Spoils	No	Resource Recovery Waste Storage	
Soil waste	RRO	Basalt Fines	No	Resource Recovery Waste Storage	
Soil waste	RRO	Treated drilling mud	No	Waste Storage	

Soil waste	Application for Site Specific RRO - Sub category of GSW	GSW (AAS/PASS treated)	No	Contaminated soil treatment Waste storage	37,500
Brick and concrete mixed waste	Sub category of GSW	Asphalt waste (including asphalt resulting from road construction and waterproofing works)	Yes	Waste Storage	50,000
Brick and concrete mixed waste	Sub category of GSW	Concrete, including fully cured concrete from a batch plant	Yes	Waste Storage	
Brick and concrete mixed waste	Sub category of GSW	Ceramics and bricks	No	Waste Storage	
Brick and concrete mixed waste	RRO	Recovered Aggregate (Batch) or (Continuous Process)	No	Waste Storage	

*Table 5: Overview of waste accepted and activities at the site. Note that definitions of the waste types should be taken from Schedule 1 of the POEO Act and the NSW EPA Waste Classification Guidelines 2014, unless otherwise stated.*

Recycled materials to be exported from the Site under Resource Recovery Orders for direct re-use will include:

- VENM
- Excavated Natural Material (ENM);
- Recovered fines;
- Other General RRO material where RRO material is received, stored and exported without any processing or other treatment;
- Potential Site-Specific Resource Recovery Order material; and
- RRO Blends, where the permitted Resource Recovery Exemptions for the component materials have consistent land application requirements.
- GSW (treated AASS/PASS) that meet the definition of General Solid Waste <CT1 in the Waste Classification Guidelines 2014.

End use of these include:

- Engineering fill for civil industrial works and landscaping projects.
- Subgrade fill Under roads (aggregates).

The proponent expects that a high level of recycling will be achieved at the Site (estimated to be around 95 % by weight). Residual wastes that will not meet the standards of a Resource Recovery Order and will, therefore, need to be exported to waste facilities for further processing (Table 6):

Materials to be disposed of offsite	Indicative accepting facility(ies)
Metal (Ferrous and Non-Ferrous)	One Steel Chipping Norton
Residual concrete, brick, ceramic, asphalt	Benedict Recycling, Concrete Recyclers
Mixed waste (General Solid Waste)	Resource Co Wetherill Park, Benedict Recycling Chipping Norton
Residual (contaminated) soils	Cleanaway landfill, Kemps Creek, Bowral Landfill.

Table 6: Materials to be disposed of offsite and potential receiving sites.

### 3.4 Building and structural works required

Only minor building and structural works are required in order to facilitate the ongoing activities proposed in this SSD Application. The building work required relates to minor alterations and structural supports for the installation of fixed plant and equipment in the external yard and within the existing warehouse (see section 2.7 for further details on existing infrastructure).

#### 3.4.1 Operational equipment

- Installation of fixed soils processing in the external yard. This would include a hopper, incline conveyor and rotating trommel screen. This plant would sit above the bays located in the northern section of the yard.
- Installation of awning extension (as approved via CDC)
- Installation of fixed concrete crushing plant in the existing warehouse – A fixed plant would be installed at the rear of the existing warehouse consisting of a concrete crusher, conveyor and screen to sort the processed concrete into different sizes.
- Installation of material bays within the existing warehouse. These bays will be interchangeable between storage of concrete and brick and GSW PASS/AASS material.
- Installation of dedicated storage container/smaller bay for the storage of lime.

### 3.4.2 Environmental protection equipment (engineering controls)

The Site already has a number of engineering controls for environmental protection and no significant new controls are expected to be necessary. All existing controls (ie. Wheel wash, water capture and storage system) etc. will be maintained as they currently are. Relevant engineering controls have been listed below for their respective internal activities (Warehouse) and external activities (the Yard).

#### Warehouse

- Misting system over the tipping off bay to keep material damp prior to neutralisation.
- Sprinkler/wetting system for dust suppression and wetting application to PASS/AASS.
- 150mm bunding at the perimeter of the warehouse
- Dedicated sump/holding tank for excess surface waters used during the storage and treatment of PASS/AASS soils.
- Pending outcomes of relevant impact assessments, retro fitting of the warehouse may be required for additional noise and air quality treatment.

#### Yard

- Installation of the penstock valve
- Installation of relevant mitigation measures such as sprinklers, monitoring equipment and roll over bunds.
  - Note: pending the outcome of the relevant technical assessments further mitigation measures may be required, these will also be established in the construction phase.

### 3.5 Hours of operation

The proposed development seeks to incorporate a number of different activities and processes within the Site. As such, a range of different operating hours are proposed to reflect the level of impact on the surrounding land and receivers. Proposed hours of operation have been outlined below and are summarised in Table 7.

#### **Transport / handling / tipping / loading**

It is expected that activities including transport of material, associated handling, tipping, and loading will occur between 5:00 AM to 10:00 PM Monday to Friday, 5:00 AM to 10:00 PM Saturday and 6:00 AM to 6:00 PM Sunday (Table 7).

#### **Processing**

Processing operations, which will include the operation of the processing plants both in the external yard and the warehouse and is expected to produce the highest level of impact to surrounding receivers. Processing is proposed to maintain similar operating hours as currently permitted. The proposed operating hours are 6:00 AM to 6:00 PM Monday to Saturday (Table 7).

#### **Workshop**

The on-site workshop, which is located in the north-eastern corner, is expected to have minimal impact to the surrounding environment and nearest sensitive receivers. Due to the nature of works proposed within the workshop, it is suggested that operating hours will be 24 hours a day Monday to Sunday (Table 7).

#### **Other low-impact activities including; material sampling, maintenance of equipment and truck washing**

Low-impact activities which are highly unlikely to cause disturbance to the surrounding landscape or nearest sensitive receivers are proposed to operate over a 24-hour period Monday to Sunday (Table 7). These activities include:

- Material sampling.
- Maintenance of equipment.
- Truck washing.
- External yard cleaning and maintenance.

	Monday to Friday	Saturday	Sunday / Public holidays
Processing	6:00 AM - 6:00 PM	6:00 AM - 6:00 PM	No processing to occur
Transport / handling / tipping / loading	5:00 AM - 10:00PM	5:00 AM - 10:00PM	6:00 AM to 6:00 PM
Workshop	24 hr	24 hr	24 hr
Low impact activities	24 hr	24 hr	24 hr

*Table 7: Operational hours and activities.*

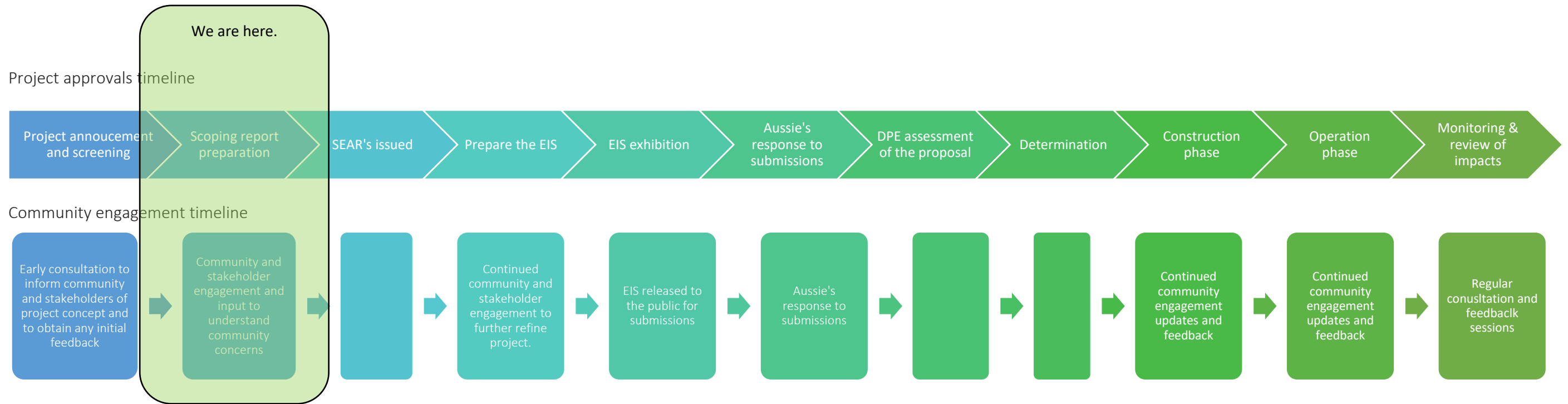
3.6 Expected phasing of the project

3.6.1 Construction phase

The activities proposed as part of the construction phase are outlined in Section 3.4.

3.6.2 Operation phase

The activities proposed as part of the construction phase are outlined in Section 3.2.



## 4. Regulatory Context

### 4.1 Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) sets out the provisions under which planning in NSW takes place. The main parts of the EP&A Act that relate to development assessment and approval are Part 4 and Part 5 of the Act.

#### *Characterisation of the development*

Development often involves multiple components that, in isolation may appear to be different ‘types’ of development. Planning Circular PS 21-008 (the **Planning Circular**) provides guidance in “characterising development for the purpose of determining permissibility”.

The Planning Circular refers to the land use definitions specified in the Standard Instrument for Principal Local Environmental Plans (and therefore carried over consistently into Planning Instruments such as the Strathfield LEP and the *Planning Systems SEPP 2021*). We note that in most cases, an applicant is expected to determine the ‘best fit’ in terms of aligning proposed development to a land use definition (where a suitable definition exists). It is also note that the land use definitions specified in the Standard Instrument LEP are not exhaustive and additional land use definitions may exist in other planning instruments, such as the *Resilience and Hazards SEPP 2021*.

This assists the applicant and the consent authority determine whether the proposed development is permissible, among other things. It is also important for assessing whether the proposed development meets certain ‘triggers’ for different development pathways (for example, the threshold-based triggers for State Significant Development).

Importantly, the Planning Circular also states (emphasis added):

***A reference to a type of building or other thing in the Land Use Table is to be interpreted as a reference to **development for the purposes of that type of building or other thing.*****

This point leads to the question of the ‘purpose’ of the development. On this, the Planning Circular states (emphasis added):

***Development is considered to be **for a particular purpose** if that purpose is the **dominant purpose of the development.** This purpose is the reason for which the development is to be undertaken or the end to which the development serves.***

The dominant purpose of the development is the operation of the Site as a ‘Resource Recovery Facility’, which is a type of ‘Waste or Resource Management Facility’ as defined in the *Standard Instrument Principal Local Environmental Plan 2006*. The *Standard Instrument Principal Local Environmental Plan 2006* defines a ‘Resource Recovery Facility’ as:

***resource recovery facility means a building or **place used for the recovery of resources from waste**, including works or activities such as **separating and sorting, processing or treating the waste**, composting, temporary storage, transfer or sale of recovered resources, energy generation from gases and water treatment, but not including re-manufacture or disposal of the material by landfill or incineration.***

This is the best fit characterisation of the activity which is the dominant purpose of the development.

We note that other activities will be carried on at the Site, such as maintenance, operation of a mechanical workshop, truck parking, etc. It is common for development to involve multiple components (which may be characterised in isolation as different land uses) on the same land. Planning Circular PS 21-008 deals with this concept of ‘ancillary development’. The Planning Circular states (emphasis added):

***An **ancillary use** is a use that **is subordinate or subservient to the dominant purpose.** The concept is important when a development involves multiple components on the same land.***

To put it simply:

- *if a component serves the dominant purpose, it is ancillary to that dominant purpose;*
- *if a component serves its own purpose, it is not a component of the dominant purpose but an independent use on the same land. It is a dominant use in its own right and not an ancillary use. In such circumstances, the development could be described as a mixed use development. Each principal use in a mixed use development must be permitted with consent on the land.*



The other land uses (mechanics workshop, truck parking etc.) all would not occur, were it not for the dominant purpose of the Site operating as a Resource Recovery Facility. Therefore, they are subordinate to the other purpose and the characterisation of the Site as a Resource Recovery Facility is not affected.

## 4.2 State Significant Development

The proposed development is defined as State Significant Development under clause 4.36(2) of the *Environmental Planning and Assessment Act 1979*.

*Division 4.7, Clause 4.36(2)*

*A State environmental planning policy may declare any development, or any class or description of development, to be State significant development.*

*State Environmental Planning Policy (Planning Systems) 2021*

Certain types of development that are considered State Significant Development include certain mining and extraction operations, chemical and other manufacturing, energy generating facilities and certain waste management facilities.

For a development proposal to be considered or identified as an SSD it will generally be:

- Over a certain size;
- Located in a sensitive area, or
- Will exceed a specific capital investment value or a mixture of the above.

This development is considered “State Significant Development” as per Clause 23(3) of Schedule 1 the SEPP (Planning System) 2021:

*(3) Development for the purpose of resource recovery or recycling facilities that handle more than 100,000 tonnes per year of waste.*

As the proposed development seeks to handle up to 250,000 tonnes of waste per year, the development is State Significant Development as per the throughput threshold specified in the SEPP.

## 4.3 Integrated development

Division 4.8 *Integrated Development* Clause 4.46 (1) *What is “integrated development?”* defines integrated development as:

*Division 4.7, Clause 4.36(2)*

*“Integrated development is development (**not being State significant development** or complying development) that, in order for it to be carried out, requires development consent and one or more of the following approvals – “*

While the proposed development will require concurrent assessment and later approval under the *Protection of the Environment Operations Act 1997*, because it is characterised as a State Significant Development, it cannot be characterised as Integrated development.

### Permissibility

The proposed site for the development is zoned as E4 (General Industrial) under the *Strathfield LEP 2012*. The Land Use Table in the Strathfield LEP does not specify that ‘Waste or Resource Management Facility’ is permitted with consent. The Land Use Table also states that ‘any development not specified’ as permitted with consent is prohibited. Therefore, the proposed land use as a Resource Recovery Facility is not permissible under the LEP.

*State Environmental Planning Policy (Transport and Infrastructure) 2021*

The *State Environmental Planning Policy (SEPP) (Transport and Infrastructure) 2021*, is relevant to this development, as it encompasses permissibility of Waste or Resource Management Facilities.

The proposed development is permitted with consent on the land under Clause 2.152 of Division 23, Part 3, of the *State Environmental Planning Policy (SEPP) (Transport and Infrastructure) 2021*, as described below.

Clause 2.152 (1) describes **Development for the purpose of a waste or resource management facilities, other than development referred to in subclause (2) (note: Clause 2 relates to Waste or Resource Transfer Stations), may be carried out by any person with consent on land in a prescribed zone.**

The 'prescribed zones' are defined in clause 2.152 as the following:

- (a) RU1 Primary Production,
- (b) RU2 Rural Landscape,
- (b1) E4 General Industrial,**
- (b2) E5 Heavy Industrial,
- (c) IN1 General Industrial,
- (d) IN3 Heavy Industrial,
- (e) SP1 Special Activities,
- (f) SP2 Infrastructure.

As this development is characterised as a Waste or Resource Management Facility, that is proposed in a prescribed zone, **the development is permissible with consent, on the basis of this SEPP.**

#### 4.4 Other relevant State Environmental Planning Policies

##### *State Environmental Planning (Resilience and Hazards) 2021*

As the proposal is characterised as a Waste Facility, it is necessary to consider whether the proposal is considered a *potentially hazardous industry* or a *potentially offensive industry*. Chapter 3 of the Resilience and Hazards SEPP will apply if a proposal for an industrial development requires consent, and it is either potentially hazardous industry or potentially offensive industry.

Section 3.6 Clause 3.11 requires a preliminary hazard analysis in accordance with the current circulars or guidelines published by the Department of Planning and Environment to be submitted with the development application. DPE has developed a checklist and a risk screening procedure to assist in determining whether the development proposal falls within these categories.

The proposal will be assessed against a Hazardous and Offensive screening criteria to define whether the development constitutes 'potentially hazardous industry' or 'hazardous storage establishment'. As the proposed development primarily concerns an increase in total scale, and no new introduction of hazardous materials or activities, the proposed development is unlikely to be considered hazardous or offensive development under this SEP. This will be further addressed in the EIS.

#### **Chapter 4 – Remediation of Land (Resilience and Hazards SEPP continued)**

As no construction or excavation of the Premises is proposed and the development is primarily concerned with increasing scale and processes, it is highly unlikely that Chapter 4 - Remediation of Land will be applicable to this development.

#### Precincts SEPPs

Sites which were previously within the *State Environmental Planning Policy (State Significant Precincts) 2005* have now been split across the 4 individual precinct specific SEPPs, these being; Eastern Harbour City 2021, Central River City 2021, Western Parkland City 2021, Regional 2021.

The proposed development does not fall within any of the four Precinct specific SEPPs and as such, the Precincts SEPPs do not apply.

#### 4.5 Protection of the Environment Operations Act, 1997

Part 1 in Schedule 1 of the *Protection of the Environment Operations Act 1997* (POEO Act) lists activities that are declared to be 'Scheduled activities' by which a licence is required for the Premises at which the activity is carried out.

The proposed development involves an increase in the annual throughput and two additional scheduled activities to be included in the existing EPL. Schedule 1, clause 34 - *Resource Recovery* is proposed to be added to the licence. This is the best characterisation in accordance with clause 1 and 3bi, as it will involve the receiving of wastes from off site and its processing, otherwise than for the recovery of energy as well as less than 50% by weight of the waste received in any year requires disposal after processing.

The second scheduled activity will include accepting and processing GSW AASS and PASSA which are considered contaminated soils. Schedule 1, clause 15 – *Contaminated Soil Treatment* is proposed to be added to the license, whereby the Site will have the capacity to treat more than 1,000 cubic metres per year of contaminated soil received from off site.

These additional scheduled activities that are sought to be added to the existing EPL have been tabulated below in Table 8:

Scheduled Activity	POEO Act reference (1997)
Resource Recovery	Schedule 1, Clause 34
Contaminated Soil Treatment	Schedule 1, Clause 15

Table 8: Scheduled activities.

#### 4.5.1 Site Specific Resource Recovery Order/Exemption:

As part of this development, the proponent will seek an application for a Site-specific Resource Recovery Order for Treated GSW AASS/PASS for application of waste material as a soil amendment and for the land application of waste materials as fill. This application will be lodged to the EPA as per the Guidelines on resource recovery Orders and Exemptions.

#### 4.6 Biodiversity Conservation Act 2016

The purpose of this Act is to “maintain a healthy, productive and resilient environment for the greatest well-being of the community, now and into the future, consistent with the principles of ecologically sustainable development (described in section 6(2) of the *Protection of the Environment Administration Act 1991*)”.

This Act specifically relates to the proposed development, as division 2 Section 7.9 of the Biodiversity Conservation Act 2016 (BC Act) requires that an SSD or SSI application **must be accompanied by a biodiversity development assessment report (BDAR) and must assess any significant impacts on biodiversity values of the proposed development.**

It is noted that, in the case that the Planning Agency Head and the Environment Agency head determine that the proposed development is not likely to have any significant impact on biodiversity, that the BDAR may not be required. In such cases, a BDAR Waiver must accompany a Request for SEARs. A BDAR waiver request is attached as Appendix 4.

## 5. Strategic context – Market conditions, demand and justification

### Waste Management

Reuse and recycling are the focus of the Australian Government and NSW EPA's policies on waste management. Improved recycling rates and diversion of waste from landfill is essential to achieve the targets specified in the NSW *Waste Avoidance and Resource Recovery Strategy 2014-21 (WARR)*. The applicant shares this view and has therefore invested heavily into their operations, both at the subject Site and across Sydney. The strengths of this State Significant Development application are primarily related to the role of the Site for import and processing of material that is produced from infrastructure projects across Sydney. The Site's excellent, centralised location makes it desirable and efficient for waste generators, reducing the distance required for transporting material, which in turn ensures short turn-around times for delivery vehicles. Greenhouse gas and air quality benefits are expected from reduced transport requirements.

The proposed development seeks to increase total throughput at the Premises by around 25% and also seeks approval for processing activities including, resource recovery and contaminated soil treatment. This significant increase in annual throughput and processing supports the 2014-2021 WARR strategy targets of increasing recycling rates for Construction and Demolition waste and will contribute to further diversion of waste from landfills or other facilities that have a higher impact on the environment and their surrounding community.

The Premises is currently operating efficiently, with existing control measures and procedures implemented and proving to be successful. The proponent has a proven business model and a stable organisation that has the financial and human capital to make the necessary investments in environmental controls needed to offset the impacts of this proposal.

The alternative to this proposal would be to increase throughput at a different facility or to construct an entirely new facility. This which would take time, be costly, and pose new challenges or issues to environmental management, whereas this facility is already in place and operating with minimal disruption to nearby residential and commercial receivers.

### Treatment of Actual Acid Sulfate Soils/ Potential Acid Sulfate Soils

The proponent has received a significant increase in enquiries for the treatment of AASS/PASS contaminated material. Currently, Part 4 of the Waste Classification Guidelines require off-site disposal to landfill for AASS/PASS which cannot be managed on-site. Currently, where ASS/PASS is treated, it is still required that this material is disposed of at a landfill. This means that the majority of excavated AASS/PASS cannot be reused or diverted from landfill. Inherently, AASS/PASS is generally virgin material and if adequately treated and neutralised, there is strong argument for its re-use and application to land where appropriate.

The Mayfield West Recycling Facility received approval for an SSD modification for development to permit actual or potential acid sulfate soils to be received and processed onsite in June 2023. It is also understood that the Site's EPL also includes a Site-Specific Resource Recovery Order and Exemption for reuse of the treated AASS/PASS for land application. While this does not set a precedent for approval, it is considered a step in the right direction for better understanding the applicability of treated AASS/PASS and opportunity to increase diversion from landfill and increase material reuse in NSW. The inclusion AASS/PASS treatment on Site is a good opportunity to satisfy this market demand and also increase diversion of waste from landfills.

### Industry and growth in Sydney

The *Greater Cities Commission – Eastern City District Plan 2018* is a 20-year plan to manage growth in the context of economic, social and environmental matters to achieve the 40-year vision for Greater Sydney. It sets out planning priorities and actions for improving the quality of life for residents as the District grows and changes. Planning Priority E12 relates to the Retaining and managing industrial and urban services land.

The plan states:

*Urban services include activities such as motor vehicle services, printing, waste management, courier services and concrete batching plants. These activities serve local communities and businesses and require adequate access to industrial land across the District. Demand for this land will increase commensurate with population growth. Good local access to these services reduces the need to travel to other areas, minimising congestion on the transport system.*

The proposed development is categorised as a waste management facility and the management concepts within this chapter apply.

The plan outlines the need for retention and management of existing industrial services. The management of these lands should accommodate evolving business practices and changes in needs for urban services from the surrounding community. The proposed development is an expansion of an existing facility with the main objectives to be to increasing material amount and recycling efficiency. This type of development is favoured within the plan as it is in a central location, within existing industrial land and is a development that serves the community.

The proposed development is seen to align with the concepts and approaches outlined in the *Greater Cities Commission – Eastern City District Plan 2018*.

## 5.1 *Ecologically Sustainable Development*

The EP&A Regulation lists 4 principles of ecologically sustainable development to be considered in assessing a project. They are:

- The precautionary principle;
- Intergenerational equity;
- Conservation of biological diversity and ecological integrity; and
- Improved valuation and pricing of environmental resources.

A preliminary analysis of these principles follows.

### 5.1.1 *Precautionary Principle*

The precautionary principle is utilised when uncertainty exists about potential environmental impacts. It provides that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. The precautionary principle requires careful evaluation of potential environmental impacts in order to avoid, wherever practicable, serious or irreversible damage to the environment. This Scoping Report has not identified any serious threat of irreversible damage to the environment and therefore the precautionary principle is not relevant to the Proposed Development and will be assessed further during the EIS.

### 5.1.2 *Intergenerational Equity*

Inter-generational equity is concerned with ensuring that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations. The Proposal has been designed to benefit both the existing and future generations by:

- providing a modern resource recovery facility to maximise the long term recovery of Sydney's C&D and C&I waste;
- Minimising impacts to surrounding ecological communities and residential communities through the careful management of surface, groundwater, contamination, dust, noise and biodiversity impacts.

The proposal has integrated short and long-term social, financial and environmental considerations so that any foreseeable impacts are not left to be addressed by future generations. Issues with potential long term implications such as waste disposal would be avoided and/or minimised through construction planning and the application of safeguards and management measures detailed in the coming EIS and the relevant technical reports.

### 5.1.3 *Conservation of biological diversity and ecological integrity*

The principle of biological diversity upholds that the conservation of biological diversity and ecological integrity should be a fundamental consideration. The Proposal would not have any significant negative effect on the biological diversity and ecological integrity of the area.

### 5.1.4 *Improved valuation, pricing and incentive mechanisms*

The principles of improved valuation and pricing of environmental resources requires consideration of all environmental resources which may be affected by a proposal, including air, water, land and living things. Mitigation measures for avoiding, reusing, recycling and managing waste during construction and operation would be implemented to ensure

resources are used responsibly in the first instance. Additional measures will be implemented to ensure no environmental resources in the locality are adversely impacted during the construction or operational phases.

#### *5.1.5 Assessment level required during the EIS*

The principles of ESG will be further assessed during the EIS and a description of how the proposal incorporates these principles in the design, construction and operation of the development will be outlined.

## 6. Stakeholder and Community Engagement

### 6.1 Objective

A Stakeholder and Community Engagement Strategy will be prepared for the project and included in the EIS. The key objectives of the Stakeholder and Community Engagement Strategy will be to:

- Identify key stakeholders and community members who have an interest in or may be impacted by the Proposal;
- Initiate and maintain open and transparent communications with identified stakeholders and community members;
- Provide an understanding of the regulatory approval process for the Proposal;
- Provide information about the Proposed Development to create awareness and help the local community understand the Proposal and predicted environmental and social impacts; and
- Actively engage with stakeholders and seek feedback on the Proposal by providing opportunities for stakeholders to identify key issues for consideration and provide feedback on the Proposed Development and mitigation measures.

### 6.2 Approach

The approach to community engagement outlined utilises the relevant guidelines such as DPEs “Undertaking Engagement Guidelines for State Signification Projects” 2021 and *IAP2 Public Participation Spectrum*. The approach is as follows:

The approach to community engagement outlines in the Community Engagement Strategy (Appendix 9) which follows the following process

1. Identify - distinguishing those affected by the Proposal;
2. Identify
3. Analyse and Prioritise - assesses sensitivity and impact, guiding the level of engagement. Prioritisation categorises stakeholders into 'low,' 'medium,' and 'high' priority, dictating communication methods.
4. Analyse and Prioritise
5. Engage – Engage with the stakeholders and community.
6. Engage
7. Report -

Beginning with stakeholder identification, distinguishing contributors and those affected by the project. Stakeholder analysis, aligned with the *IAP2 Public Participation Spectrum*, assesses sensitivity and impact, guiding the level of engagement. Prioritization categorizes stakeholders into 'low,' 'medium,' and 'high' priority, dictating communication methods. The EIS report will extensively document engagement methods, raised issues, responses, impact assessments, and proposed strategies. Ongoing monitoring, facilitated by an issue register, ensures adaptability to stakeholder sentiment, allowing adjustments to engagement methods and stakeholder prioritization as needed. Stakeholders will have opportunities to evaluate engagement activities, and a complaints mechanism will address concerns, fostering a comprehensive and responsive community engagement process.

### 6.3 Preliminarily Identified Stakeholders

Table 9 lists the key stakeholders identified for communication and engagement during the preparation of this Scoping Report. Table 9 lists the key stakeholders identified for communication and engagement during the preparation of this Scoping Report. Other stakeholders may be identified during the implementation of the community and engagement strategy and will be engaged with as appropriate.

Government Agency	Community or Other Stakeholder Group
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<ul style="list-style-type: none"> <li>• NSW Department of Planning and Environment</li> <li>• NSW Environment Protection Authority</li> <li>• Department of Planning and Environment: Water</li> <li>• Sydney Water</li> <li>• Transport NSW</li> <li>• NSW Fire and Rescue</li> <li>• Strathfield City Council</li> <li>• WaterNSW</li> </ul>	<ul style="list-style-type: none"> <li>• Neighboring landowners and tenants</li> <li>• Neighboring business owners</li> <li>• Surrounding industries</li> </ul>
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Table 9: Preliminary stakeholder identification.

## 6.4 Consultation to Date

Although apart of the previous application, the consultation completed has been incorporated into the project design of this application. Hence, we consider the consultation to be a relevant and is included here.

### 6.4.1 Consultation with the EPA

In November 2022, the Scoping Report (ref: 20211030AUS-BFS-Scoping Report\_V4) was submitted through DPE’s Major Projects Portal. In November 2022, the previous application’s Scoping Report (ref: 20211030AUS-BFS-Scoping Report\_V4) was submitted through DPE’s Major Projects Portal. During initial review and discussions with DPE, it was requested that consultation with the EPA be completed to discuss any preliminary comments or concerns.

A meeting between 4Pillars and EPA representatives was held in January 2023. In the meeting held on January 25, 2023, several key outcomes were obtained and subsequently endorsed by the attendees.

The EPA's best practice recommendation for new waste facilities and those undergoing modifications is to enclose processing/operating areas. This enclosure aims to minimise the impact of dust, water, and noise pollution on sensitive receiving environments, particularly residential areas. The EPA discourages deferring mitigation commitments to Environmental Management Plans (EMPs) and encourages the implementation of engineering controls for dust suppression to reduce human error. Proposals for alternative measures to enclosure should demonstrate equivalent performance.

The EPA adopts a cautious approach to approving soil waste above CT1 levels, primarily due to concerns about human health and priority contaminants. The end use of blended reuse products is a crucial factor, and Resource Recovery Orders (RROs) with specific intended end uses are considered helpful.

In response to concerns about blending waste types to reduce chemical contaminants in end products, Aussies Skips is obtaining Site-specific RROs with identified specific end uses, addressing all EPA comments and concerns.

Following this, further discussions and investigation into the feasibility of enclosing the site led to the conclusion that enclosure is uneconomical and would hinder the project's progress. A paper prepared by 4Pillars assessing the regulatory framework of the EPA's enclosure expectation was submitted to the DPE and the EPA.

The constructive outcomes of this meeting, focusing on the legislative, regulatory, and merit basis for enclosure, were integrated into the environmental impact assessment and reflected in the draft EIS document.

### 6.4.2 Consultation with DPE (biodiversity)

As part of the previous application, a BDAR waiver request was submitted to the Department for review. It was subsequently rejected due to the inability to determine without doubt that there was no impact to threatened species (specifically the Green and Golden Bellfrog (GGBF) and microbats) and a BDAR would be required.

Further liaison and consultation between 4Pillars and the Environment Heritage Group (EHG) was completed. The outcomes confirmed that an alternative approach to a BDAR would be considered acceptable if it was found there that is not likely to be any direct or indirect impacts on fauna or other biodiversity values.



This alternative approach included:

- The GGBF survey and assessment undertaken by a suitably qualified and experienced herpetologist and in accordance with *NSW Survey Guide for Threatened Frogs*.
- The GGBF survey and assessment to include offsite areas that contain potential GGBF habitats that may be indirectly impacted by the proposal through, for example, noise, dust, impacts to water quality and potentially by restricting movement.
- A microbat survey and assessment undertaken by a suitably qualified ecologist.
- A report on the fauna survey and assessment to accompany any future BDAR waiver request.

The fauna survey and preliminary biodiversity assessment will accompany the application for a BDAR waiver as part of this development application.

#### 6.4.3 Consultation with the community

Several rounds of letter box drops (in English and Arabic), and community consultation sessions was completed as part of the previous application. Very few responses were obtained during this time. Based on the responses, there were concerns in the residential community regarding the air and noise impacts and within the industrial neighbours there were concerns regarding the traffic increase.

#### 6.5 Community Consultation Workshop

The following community consultation has been completed as part of this Scoping Report.

1. Letterbox drop to all surrounding streets (these include both residential and commercial areas) – The leaflet included details explaining the proposed development and included an email address for feedback, a QR code linked to a dedicated website for further comments, and details on the community consultation session. The letter drop took place on 29 November 2023.
  - a. The website has ability for the user to select from multiple languages.
  - b. The website has multiple language selection capacity
2. A community consultation session – Conducted via a teleconference (teams) on 8 December 2023.
3. These feedback channels were open for the whole period of the project life time.

#### 6.6 Community Consultation Workshop results

The community response to the proposed development was notably limited, with only one resident reaching out to 4Pillars, expressing an interest in participating in the community consultation workshop held on December 8, 2023. The insights gained from this resident's feedback and the workshop are detailed in Section 5.1 of the *Community Consultation Plan*. Additionally, a singular feedback response was received from a commercial area surrounding the site.

#### 6.7 Proposed future consultation

##### *Initial community consultation evaluation and recommendations for future consultation*

Initial consultation was done prior to the completion of the initial SIA and CEP. Considering the social context of the Site, it is apparent that this consultation is not adequate for the community. The following recommendations are below:

- All consultation material is to be in English and Arabic. Other languages should be available upon request.
- Consultation mediums should be both physical (letters and flyers) as well as electronic to adequately reach all persons in the community.
- Multiple sessions and attempts should be made to engage key stakeholders and residents
- Consideration to different methods to motivate engagement e.g. sausage sizzle events, set up location at local markets and prize incentivisation for respondents.

As part of the EIS investigations, detailed stakeholder and community consultation will be performed to ensure the proposed upgrades are executed in a manner that protects both the environment and human health while also achieving key goals of the circular economy and NSW waste strategies. Key stakeholders identified include adjoining businesses and residents.

In addition, and as part of the development approval process and the preparation of an EIS, the Proponent would seek to consult with the relevant government agencies and stakeholders, including:

- NSW Department of Planning and Environment;
- NSW Fire and Rescue;
- Sydney Water (if relevant);
- Water NSW (if relevant); and
- Transport for NSW (if relevant).

### *Consultation strategy*

As part of the EIS development, a Social Impact Assessment (SIA) is to be completed, this will further guide the establishment of a Community Engagement Strategy (CES). As part of the SIA and CES, detailed research on the key environmental and community groups in the area will be carried out. This will include an assessment of factors such as age, demographic and culture, which will ultimately determine the frequency, medias and language used within the engagement material.

A range of communication and engagement activities will occur during preparation of the EIS in accordance with the CEP. Community and stakeholder engagement is thought to include:

- Establishment and maintenance of a website to enable the community and stakeholders to contact the project team;
- Community consultation sessions;
- Project updates in the form of flyers and emails; and
- Notification letters to nearby surrounding residents.

These mediums would be provided in English, and Arabic. Other languages would be made available upon request. Delivery mediums would be both physical and electronic.

Once the EIS is completed, the EIS will be placed on public exhibition in accordance with Department of Planning and Environment statutory timeframes and all stakeholders will be notified on where to find the EIS for review. During the exhibition period any stakeholder can make a formal submission on the proposed development. Submissions will be collated into a report and will be considered in the assessment of the EIS and further development of the proposed development.

Following the exhibition period, Aussie Recycling will respond to submissions received and undertake further engagement if required.

If the proposed development receives planning approval, Aussie Recycling will continue to engage with the stakeholders and the community during the construction phase in accordance with the CEP.

## 7. Scoping Environmental Impacts

### 7.1 Overview

The Proposal includes a intensification in the scale of current activities by approximately 25%, a change of use to include processing activities, additional waste types and increase to operational hours for certain activities. There is no significant construction work proposed and many of the environmental impacts expected from the activities proposed are already present and are thus actively mitigated and monitored under current approvals and internal frameworks.

However, due to the increase in scale of operations it is important that all potential impacts are assessed thoroughly.

This section of the report aims to identify the matters requiring further assessment in the EIS and the proposed approach to assessing each of these matters.

This section provides an overview on each potential impact. Where those impacts are adequately addressed through existing controls, those controls are re-affirmed. Where potential impacts are new or different, commitments are given to additional avoidance/mitigation measures, to ensure they are effectively controlled.

Additionally, Table 10 summarises the identified environmental impact aspects requiring assessment during the EIS and their respective level of assessment.

#### 7.1.1 Relevance of existing environmental impact assessments

Due to Aussie Recycling having already operated at a similar scale, a number of environmental investigations including SEE's, Surface Water Characterisation assessments, noise assessments and traffic assessments that the Site's environmental impact is well understood and that a number of management and mitigatory practices have been implemented to ensure minimal to no impact on the surrounding environment.

The existing SOEE (the 2012 SOEE) was prepared by Borg Architects as part of the original development application process in 2012 for the use of the Site as a materials handling yard, as well as the construction of an industrial warehouse building with an associated workshop.

However, in addition to the 2012 SOEE, several additional studies and assessments have since been undertaken to ensure that potential environmental impacts are managed effectively.

The Class 1 EPL appeal process in 2019-2020 resulted in a number of detailed environmental assessments being completed for the Site. These assessments were all done on the basis of an annual throughput of 200,000 tonnes per annum. As such, the conclusions made within these reports have aided the scoping of potential impacts for this report. These assessments are referenced in this document as appropriate.

#### 2020 SOEE – EPL Variation

In July 2020, Aussie Recycling requested a variation to their EPL (No. 21389) to increase total tonnes of waste material received per 12-month period and also to increase total waste permitted on site at any one time. The EPA requested that further environmental assessment was conducted prior to granting the EPL Variation. As such, a Statement of Environmental Effects (SEE) was produced to assess the proposed variation and any potential environmental impacts. The approval of this variation also required additional mitigation measures implemented at the Site.

#### 2023 SSD application – withdrawn

During the period of 2021-2023 an SSD application for Site upgrades was being prepared. However, in November 2023, this application was withdrawn. Several of the technical assessments were completed as part of this and findings of these assessments have been incorporated into the project design of this proposed development. Notably incorporated assessments include air, noise, traffic, soil and water contamination and soil and water quality. These assessments were all completed based on an annual throughput of 350,000 tpa and impacts determined within these reports are expected to be worse than the impacts associated with the proposed development.

7.1.2 Summary table

Environmental impact aspect	Level of assessment required during EIS	Relevant technical assessment during the EIS	Engagement	Relevant section in Scoping Report
Air quality	Detailed	Air quality impact assessment	General - Local community, EPA, DPE, Strathfield Council Specific - For residents identified within impact areas	7.2
Noise quality	Detailed	Noise and vibration impact assessment	General - Local community, EPA, DPE, Strathfield Council Specific - For residents identified within impact areas	7.3
Traffic and transport	Standard	Traffic impact assessment	General - Local community, Transport for NSW, DPE Specific - For residents identified within impact areas	7.4
Heritage	No further assessment required during the EIS	None	Specific – identified and engagement with Indigenous groups	7.9
Biodiversity	No further assessment required during the EIS	None – BDAR waiver to be applied for with submission of Scoping Report	Specific – DPE (EHG)	7.10
Soil and water quality (including flooding)	Standard	Soil and water quality impact assessment (including flooding risk)	General - Local community, EPA, DPE (water group)	7.5
Visual amenity	Standard	Visual Impact Assessment	Specific - Local community	7.8
Social impact	Detailed	Social impact assessment	General - Local community, EPA, DPE, Strathfield Council Specific - For residents identified within impact areas	7.11
Cumulative impact	Detailed	Cumulative impact assessment	General - Local community, EPA, DPE, Strathfield Council Specific - For residents identified within impact areas	

Pollution incidence	Standard	PIRMP	Specific – EPA, Local community	7.13
Waste Management	Standard	WMP	General	
Site operation and management plans	Standard	Various	Specific	Various
Hazards and risk (including fire)	Standard	Fire risk advisory letter Contaminant threshold risk assessment	General - Fire & Rescue NSW	7.13
Greenhouse gas and energy efficiency	Standard	Greenhouse gas and energy efficiency advisory letter	General	7.12
Contamination	Standard	Preliminary Site Investigation / Detailed Site Investigation	General	7.13.3
Ecologically sustainable development	Standard	Ecologically sustainable development advisory letter	General	5.1

*Table 10: Overview of assessments to be completed in the EIS.*

## 7.2 Air quality (incl. odour)

### 7.2.1 Current operation

The Site currently operates with a suite of mitigation measures and is compliant with relevant air quality criteria.

Mitigation measures include:

- carrying out operations on a solid concrete slab surface
- three water cannons
- a wheel wash system at the Site entrance
- storage of material within bays consisting of concrete block side walls
- a rear shed wall and an overhead steel awning, as well as further water misting sprays built into the awning.
- Implementation of POM requirements included stop work on windy days.

### 7.2.2 Potential impacts associated with the proposed development (if unmitigated)

- Dust emissions from construction activities on the Site.
- Potential increase in dust emissions due to the quantity of waste soils on Site and addition of processing activities.
- Potential for cumulative impacts with the surrounding industrial community

### 7.2.3 Preliminary proposed mitigation identification (incorporated into project design)

- Continuation of all current mitigation measures
- Awning extension (approved via CDC)
- Installation of real time air monitors with live feedback notification (including SMS and emails) these will trigger the use of other mitigation measures such as sprinklers or stop work notices.
- Location of concrete crushing within the warehouse to prevent dust emissions

### 7.2.4 Incorporation of community and stakeholder feedback

- The EPA have affirmed it is their “best practice mitigation” policy for the environmental impact from waste facilities to be equivalent to those impacts that enclosing the facility would achieve. Therefore, the effectiveness of the suite of alternative mitigation measures proposed as part of this development will need to be compared to the effectiveness of enclosing the facility.
- Community concerns regarding air quality impacts to properties.

### 7.2.5 Expected Engagement

- General - Local community, EPA, DPE, Strathfield Council
- Specific - For residents identified within impact areas
  - This will include regular updates that have a focus on the expected air quality environment.

### 7.2.6 Assessment level required during EIS

The proposed development will be assessed to a detailed level during the EIS, it is proposed an air quality impact assessment (AQIA) consistent with NSW statutory guidelines, is conducted.

This assessment will model the comparison of the enclosure and the proposed mitigation measures to determine if equivalent protection is achieved. The assessment will also determine the potential air quality, dust and odour impacts associated with the construction and operation on surrounding sensitive receptors as well as cumulative impacts associated with the surrounding environment.

A rigorous live monitoring and feedback system will be development and implemented on the Site.

## 7.3 Noise and Vibration

### 7.3.1 Current context

The Site is surrounded by industrial receivers with the noise environment characteristic of an urban environment. While heavy vehicles from nearby Site operations dominate the local ambient noise environment, distant background noise levels are typically controlled by road traffic noise on Juno Parade to the south and Punchbowl Road to the east. The Site currently conducts noise monitoring in accordance with its EPL 21389 and operates with a suite of mitigation measures and is compliant with relevant noise quality criteria. The potential contingency measures implemented at the Site include behavioural, mechanical, and administrative measures. These are detailed below:

- Regular maintenance of machines and operational activities are limited to the specified hours of operation
- Ensuring machines and heavy vehicles are not running unnecessarily.
- When loading and unloading materials, lowering, and dropping the materials within a specified height only.
- Usage of noise reduction technology whenever feasible (squawkers rather than reversing beepers).
- Regular site noise monitoring as specified in EPL.
- Handling of noise complaints through proper procedure within an adequate period of time and manner.
- Implementation of POM requirements.

### 7.3.2 Potential impacts associated with the proposed development

- Potential increase to the noise environment by addition of processing activities.
- Potential increase to the noise environment from extended operating hours.
- Potential for cumulative impacts with the surrounding industrial community.

### 7.3.3 Preliminary mitigation identification (incorporated into project design)

- Continuation of all current mitigation measures.
- Awning extension (approved via CDC).
- Location of concrete crushing within the warehouse to minimise noise emissions.

### 7.3.4 Incorporation of community and stakeholder feedback

- The EPA have affirmed it is their “best practice mitigation” policy for the environmental impact from waste facilities to be equivalent to those impacts that enclosing the facility would achieve. Therefore, the effectiveness of the suite of alternative mitigation measures proposed as part of this development will need to be compared to the effectiveness of enclosing the facility.
- Community concerns regarding noise and vibration impacts to residential properties.

### 7.3.5 Expected Engagement

- General - Local community, EPA, DPE, Strathfield Council
- Specific - For residents identified within impact areas
  - This will include regular updates that have a focus on the expected noise quality environment.

### 7.3.6 Assessment level required during EIS

The proposed development will be assessed to a detailed level during the EIS. Noise associated with processing of soils and concrete and the increase in truck movements will be addressed in the EIS via a Noise and Vibration Impact Assessment consistent with NSW statutory guidelines. A specialistic acoustic consultant will be engaged to assess the noise emissions and potential impacts associated with the proposed development.

This assessment will model the comparison of the enclosure and the proposed mitigation measures to determine if equivalent protection is achieved. The assessment will also model the background noise levels, inventory of noise sources and ‘worst case’ noise emission scenarios. The assessment will further determine the potential noise and

vibration impacts associated with the construction, site emissions and noise generated by traffic on surrounding sensitive receivers as well as detailed sleep disturbance assessment and cumulative impacts associated with the surrounding environment.

## 7.4 Traffic and transport

### 7.4.1 Current operation

The Site is accessible via a driveway off Bellfrog Street. Current vehicle routes utilise Roberts Road, Wentworth St and Bellfrog St to access the Site. From review of the weighbridge data for the Site, it is clear that “heavy truck and dog combination” are the most utilised vehicles at the Site (Table 11).

Vehicle type	Average net tonnage	Percentage of vehicle movements
Heavy truck and dog combination	36.35 T	51.9%
Tipping semi-trailer	11.68 T	18.1%
Walking floor trailer	17.68 T	14.2%
Truck and dog	25.80 T	12.6%
Mix of single bogie truck / hook life bin truck, skip bin truck and small open truck	0 – 6 T	3.2%

Table 11: Summary of weighbridge data from 09/21-08/22.

Previous traffic engineering advice provided by McLaren Traffic Engineering (MTE) reported that the Site has the physical capacity to receive the maximum number of vehicles as outlined within DA2012/175, even during the “worse-case scenario” of all hourly truck movements occurring simultaneously. MTE calculated that the Site has an annual capacity in accordance with DA2012/175 of 539,274 tonnes per annum.

### 7.4.2 Potential impacts associated with the proposed development (if unmitigated)

- Potential increase to traffic along Bellfrog street, Wentworth and Roberts Rd during construction and operation of the development.
- Cumulative impacts associated with increasing vehicles movements in context of the existing industrial areas.
- Potential increase in noise cause by additional vehicle movements (discussed in the noise impact section)

### 7.4.3 Preliminary proposed mitigation identification (incorporated into project design)

- App based vehicle tracking and scheduling (to be developed).
- Site layout to allow for queuing on Site (upto six vehicles on Site at any one time).

### 7.4.4 Incorporation of community and stakeholder feedback

- Industrial neighbours have expressed concerns around increasing traffic movements along Bellfrog and Wentworth St
- Agency feedback indicates most of the concern is focused around the noise associated with heavy vehicular movements

### 7.4.5 Assessment level required during EIS

The proposed development will be assessed to a standard level during the EIS, it is proposed a traffic impact assessment (TIA) consistent with NSW statutory guidelines, is conducted.

The assessment will model the daily peak traffic volumes likely to be generated during the construction and operation of the Site, including access points, haul routes, vehicle types and potential queuing impacts. The proposed development



will also be assessment in context of the area to determine the potential cumulative impact on nearby roads and intersections. A detailed review of the Sites internal routes, manoeuvring (swept paths), onsite parking, pedestrian and cycle access will also be assessed as part of the TIA.

The noise associated with the heavy vehicle movements will be addressed as part of the Noise Impact Assessment. The noise and traffic technicians will work closely together to ensure cohesion between the two reports and relevant information is available for assessment.

## *7.5 Surface water quality*

The potential impacts of the operations of the Site on surface water quality are managed via several existing controls. The Site currently captures and stores all water on Site, either for re-use or disposal as liquid waste to a licensed contractor.

While the proposed development proposes to store and process additional waste types including Soils (>CT1) and AASS/PASS, it is understood that no additional risks to surface water quality are likely, as the current and proposed measures ensure that water is not discharged from the Site.

Surface water on the Site is managed to a high standard, and that risks to the surrounding environment are significantly reduced. The potential contingency measures implemented at the Site include engineering, elimination, procedural, isolation, and administrative measures. These are detailed below:

### *7.5.1 Procedural & Administrative measures*

- The site currently operates with a Plan of Environmental Management (POM), which provides a number of options to be considered if water monitoring indicates recurring exceedances of the limits in the current EPL.
- Site Plan of Management – titled ‘Surface Water Management Procedure’. This document details the mechanisms which are to be enacted procedurally to ensure correct operation of the water management system on site.
- Pollution Incident Response Management Plan (PIRMP) – in the unlikely occurrence of an uncontrolled spill or overflow.

### *7.5.2 Existing and proposed Engineering measures*

- Existing: Complete On-Site Detention (OSD) system that captures all water that encounters the Site (Figure 7);
- Existing: Three (3) 50,000L reuse water tanks which provide a total of 282 kL of volume of on-site water storage and 175% of the volume required to capture a 5 day 90<sup>th</sup> percentile rainfall event for the Site, significantly improving the ability to store and treat water on Site, and to avoid uncontrollable discharges;
- Existing: Rumble grid and drive through wheel wash;
- Existing: Two (2) 5,000L slimline water tanks to supply water to the wheel wash and receive water pumped from the weighbridge pit;
- Existing: Roof extension to cover part of the concrete hardstand with revised pipework to deliver runoff in a pipeline along the boundary wall to the three (3) 50,000L reuse water tanks in the north-eastern corner of the Site; and
- Existing: Pump and pipeline from water treatment pit to the 5,000L tanks next to the weighbridge.
- Existing: treatment of the water in the reuse tanks with a flocculant/coagulant to maximise settling of pollutants.
- Proposed: Pump and pipeline from the water treatment to the proposed rainwater reuse tanks in the northeastern area.
- Proposed: Penstock valve ensuring outlets are closed at all times, unless purposefully released/opened.
- Proposed: Bunding around the perimeter of the AASS/PASS treatment area.

An elimination approach has been followed at this Site – the proponent has sought to prevent discharges and therefore eliminate any risk of impact on local waterways and aquatic ecosystems. The proponent may consider a trade waste discharge arrangement for emergency discharges in extreme wet weather events. The proposed works do not introduce additional impervious area and as such, there is no increase in the runoff volume and flow rate from the site resulting in no additional need for detention storage on the Site.

### 7.5.3 Assessment level required during EIS

The proposed development will be assessed to a standard level during the EIS. This assessment will detail the potential surface and groundwater impacts associated with the development, including potential impacts on watercourses, riparian areas, and groundwater and the mitigation measures to minimise water use and impacts on the surrounding environment. This assessment will also assess the flooding impact to a standard level as the site is above the 100yr ARI flood level and the hardstand with its saw tooth surface is theoretically within the flood planning area.

### 7.6 Soil contamination and groundwater

The area of the Site which is used for materials storage and handling is sealed with a thick concrete slab, and the materials handling bays are covered by a large metal awning, to reduce the exposure of waste stockpiles to rainfall.

Proposed increased contaminant limits are proposed to be accepted at the Site. However, these limits are to be only slightly higher than the EPA's *Waste Classification Guidelines*, CT1 limits. Therefore, there is little risk of contamination of land or groundwater due to leaching through the hardstand into underlying soils and water table(s). Although an increase in the authorised amount is proposed, which would permit a larger quantity of material to be on Site at any one time, this is not expected to increase the potential for the contamination of soil and groundwater, particularly as the residence time of material at the site is in the order of days, following which bays are emptied and cleaned. The proposed increase in annual throughput will also not increase the potential for contamination. This will be assessed to a standard level during the EIS.

#### 7.6.1 Acid Sulfate soils

The Site is identified as being located with an Acid Sulfate Soil (ASS) Class 5 Land. According to section 6.1 (2) of the Strathfield Local Environmental Plan (2012), development consent is required for Class 5 area where:

*Works within 500 metres of adjacent Class 1, 2, 3 or 4 land that is below 5 metres Australian Height Datum and by which the watertable is likely to be lowered below 1 metre Australian Height Datum on adjacent Class 1, 2, 3 or 4 land.*

The Site is located at approximately 16 m AHD and is classified as Class 5 Land. Class 4 Land are located approximately 400 m to the northeast of the Site and Class 1 Land is located approximately 1540 m to the northeast. The proposed development does not have the capacity to affect the water table in the Class 5 area due to the excavation required (none). A further assessment of Acid Sulfate Soils (ASS) at the Site is not considered necessary.

### 7.7 Contaminated and non-permitted material

The proposed development looks to increase the amount of material and waste types that are currently permitted and received on Site and additional processing activities including crushing, screening, and sorting and in particular.

It is thought that the additional annual throughput and processing will not increase the risk of contamination and non-permitted material entering the Site, any further than what has already been accounted for in the existing procedures which aim to mitigate this risk.

With regard to contamination, it is noted that the treatment of contaminated materials (namely ASS/PASS) is proposed to be processed and stockpiled and as such clearly outlined stockpile labelling/storage is to be implemented to avoid accidental cross contamination/unintentional blending of stockpiles.

All else considered, the main hazards on the Site which have been identified as likely to cause a pollution incident are contaminated water storages, hydrocarbons, chemicals and illegal wastes. Management of these incidents will continue to be managed under the Site's Pollution Incident Response Management Plan (PIRMP) and accompanying Pollution Incident Response Procedure (PIRP).

It will be important that the Site's POM and PIRMP are revisited and updated accordingly. This will be assessed at a standard level during the EIS.

### 7.8 Visual amenity

Activities on Site are obscured from outside view by the high walls around the Site, as well as the warehouse in the south-east of the Site. The majority of activities carried out on the Site are related to the management and handling of material, with other activities including truck parking, and storage of empty (only) skip bins. Material handling is carried out close to or within handling/storage bays or bunkers, which are open at the front and have sides constructed of large concrete blocks. These bays are located handled along the northern and north-western boundary of the Site, which is quite a distance from the entrance gate. A large metal wall and awning covers the bays to the rear and from above,

further obscuring them from outside view. Following the proposed development, material will continue to be handled within the storage bays, which have adequate capacity to accommodate for the increase in material. Therefore, the proposed development is not expected to change the external visual appearance of the Site, or its impacts on the visual amenity of the area. This will be assessed to a standard level during the EIS.

## *7.9 Heritage*

### *7.9.1 Land use*

#### *Historical use of the Site*

The Site and surrounding area was formerly a large open quarry, which was filled with imported soil material. This is stated in the Statement of Environmental Effects (SEE) that accompanied the establishment of the industrial Site (DA No. 2012/175 approved 19/2/13 referred to at the 2013 SEE). This is further seen in historical imagery of the Site. The 2013 SEE contains imagery of the former state of the Site and surrounding allotments (Figure 15). Historical aerial imagery further confirms the presence and extent of the quarry (Figure 10, Figure 11, Figure 12, Figure 13 and Figure 14). Quarrying operations began prior to 1943, with quarrying occurring directly under the Sites footprint between 1971 and 1991. Quarrying activities stopped at the Site between 1991 and 1998 and the Site was filled between 1998 and 2005 (range is given for times as historical imagery is not yearly). The Site sat vacant until establishment as an industrial premise in 2014.

Due to the presence of the quarry and importation of material to fill the void, there is no natural material located on Site. It is almost impossible for Aboriginal artifacts or built heritage items to be present on the surface or subsurface of the Site.

#### *Current and future Site use*

Current Site and area use is industrial facilities, future use is not anticipated to change.

### *7.9.2 Heritage context of the area*

#### *European and built heritage*

Specific information on the historical use of the Site (prior to 1940) is difficult to obtain from public records. A review of the general area determined the area surrounding the Site was mostly part of the large logistical and industrial area surrounding Enfield Marshalling Yards, with a small residential area. This area was incorporated into Enfield Council in 1889, and transferred to Strathfield Council in 1949 along with the western ward of Enfield Council (most of which is now Strathfield South).

#### *Indigenous heritage*

The Aboriginal groups of the entire Sydney region were part of the Australian south-east coast cultural group. It is believed that the Darug (specifically the Wangal Clan) and Eora people were the original inhabitants of the area surrounding the Site, for many thousands of years before European settlement. The Darug is the largest Aboriginal language group in the LGA.

These societies lived in a close symbiotic relationship with their environment. The land provided kangaroo, emu, possum, wild honey, plants and roots. Botany Bay, the Cooks River and Georges River provided fish and shellfish. Signs of occupation are found in rock shelters, which were used as cooking and camping places, and middens, made up of shells discarded from shellfish meals over hundreds of years.

### *7.9.3 Heritage mapping*

A search of relevant publicly available databases did not identify any items or areas of Aboriginal heritage or non-Aboriginal heritage significance within or in close proximity to the Site.

### *7.9.4 Key aspects of the proposed development*

As part of the proposed development there will be no excavation to the soils below the hardstand. A small amount of works on the hardstand will be required to install the stationary plant equipment and penstock valve. However, these are not anticipated to extend into the subsurface. As construction activities will not extend into the subsurface, there is no pathway for the proposed works to contact subsoils and subsequently impact potential artifact items.

### *7.9.5 Archaeological predictions*

Where present, Aboriginal sites will generally be located in proximity to major water resources (generally within 200 metres). Although located within 200 m of the water course, the Sites long history of clearing, quarrying and backfilling would have destroyed any potential Indigenous artifact. Residential and industrial/commercial development, roads and urban infrastructure have likely impacted the integrity of potential Aboriginal sites within the area aswell.

#### *7.9.6 Consistency with other developments*

We reference other developments within the Strathfield and Canterbury-Bankstown LGAs where the context and merits of the developments are similar to Aussies and have reviewed the assessment decisions that were made there in order to guide our expectation of the requirements.

Project name	Location	LGA	Distance from Aussies	Status	Similarities to Aussies	Heritage requirements in the SEARs
Strathfield South Material Recycling Facility	40 Madeline Street, Strathfield South NSW 2136	Strathfield	2.0 km NE	Prepare EIS (SEARs received 29 March 2023)	<ul style="list-style-type: none"> <li>• Located in existing industrial estate</li> <li>• Most of site covered in hardstand</li> <li>• No sub surface works proposed</li> <li>• No previously identified Aboriginal Sites or artifacts on site.</li> </ul>	None listed in the SEARs.
Chullora Resource Processing Facility	21 Muir Road, Chullora NSW 2190	Canterbury-Bankstown	5.6 km NW	Prepare EIS (SEARs received 15 April 2020)	<ul style="list-style-type: none"> <li>• Located in existing industrial estate</li> <li>• Difference – Chullora Resource Facility has large areas of landscaped and vegetated areas as well as Cookes River stormwater canal within the Site.</li> <li>• No sub surface works proposed</li> <li>• No previously identified Aboriginal Sites or artifacts on site.</li> </ul>	Including a detailed assessment of Aboriginal cultural heritage. If no ground disturbing works are required for the proposed resource processing facility, an assessment prepared for earlier stages of the proposed resource recovery park may be provided.

Table 12: Similar projects to Aussies and their heritage requirements.

### 7.9.7 Consultation

Aboriginal community consultation acknowledges the right of Aboriginal people to be involved, through direct participation, on matters that directly affect their heritage. Involving Aboriginal people in all facets of the assessment process ensures that they are given adequate opportunity to share information about cultural values, and to actively participate in the development of appropriate management and/or mitigation measures. The successful identification, assessment and management of Aboriginal cultural heritage values are dependent on an inclusive and transparent consultation process.

Consultation with indigenous groups will be conducted with reference to *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW, 2010) and will be further discussed in the social impact and community engagement sections.

### 7.9.8 Preliminary identified of Indigenous groups

The names of Aboriginal people and/or organisations that may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places within the study area will be identified by writing to the following agencies and organisations:

- Wangal Clan,
- Metropolitan Land Council,
- Local Land Services Council,
- Strathfield Council,
- Canterbury-Bankstown Council (although the Site is not within this LGA, proximity is close enough to warrant consultation with this LGA aswell)
- Native Title Services
- OEH
- DPC;
- Office of the Registrar
- Aboriginal Land Rights Act 1983;
- National Native Title Tribunal;
- Native Title Services Corporation Limited (NTSCORP Limited);

### 7.9.9 Assessment level required during EIS

The Proposal would utilise existing approved infrastructure developed for the previous stages of the Chullora RRP and no ground disturbance would be required for either construction or operation. Therefore, an ACHAR is not considered necessary for the Proposal. The Proposal would not alter the Proposal site footprint, would not disturb the ground surface and is not a declared Aboriginal place. As noted above, no Aboriginal cultural heritage values have been identified within the Proposal site or immediate surrounds.

The proposed development does not breach any items mentioned in the *NSW Heritage Act 1977*. This matter requires no further detailed assessment in the EIS, consultation with indigenous groups will be completed.

## 7.10 Biodiversity

### 7.10.1 Relevant legislation and statutory context

Division 2 Section 7.9 of the Biodiversity Conservation Act 2016 (BC Act) requires that a **SSD** or SSI application must be accompanied by a biodiversity development assessment report (BDAR) and must assess any significant impacts on biodiversity values of the proposed development.

A BDAR report serves as a consistent method for the assessment of biodiversity, including assessing certain impacts on threatened species and threatened ecological communities, their habitats, and impacts on biodiversity values.

BDAR Waivers can be issued by the Department of Planning and Environment (the Department) when it is demonstrated that the SSD is not likely to have a significant impact on biodiversity values.

A proposed development is considered unlikely to have any significant impact on biodiversity if it:

- Will not clear or remove native vegetation other than: a few single trees with no native understorey in an urban context.
- Planted native vegetation that is not consistent with a Plant Community Type (PCT) known to occur in the same Interim Biogeographic Regionalisation of Australia (IBRA) subregion (e.g. street trees, trees in carparks, landscaping).
- Will have negligible adverse impacts on threatened species or ecological communities, considering habitat suitability, abundance and occurrence, habitat connectivity, movement and water sustainability including consideration of any non-natural features, non-native vegetation and human-built structures.
- Will have negligible adverse impacts on protected animals because of impacts to flight path integrity.

#### *7.10.2 Species present on Site*

Several species were identified as being present within a 5km radius of the Site. Review of Bionet Species Sightings determined there was three threatened species identified within 1 km of the Site:

- Green and Golden Bellfrog.
- Grey Headed Flying Fox.
- Large Bent-Winget Bat.

Species scientific name, conservation status, habitat requirements, diet requirements and assessment of likelihood of presence on Site is provided in Table 13.

Class	Species name	Common Name	NSW Conservation Status (Biodiversity Conservation Act 2016)	National Conservation Status (EPBC Act)	Habitat	Diet	Habitat or diet features located on site? (Y/N)	Habitat or diet features located adjacent / nearby the Site	Likelihood of presence on Site
Amphibia	<i>Litoria aurea</i>	Green and Golden Bell Frog	E	V	Inhabits marshes, dams and stream-sides, particularly those containing bullrushes ( <i>Typha</i> spp.) or spikerushes ( <i>Eleocharis</i> spp.). Optimum habitat includes waterbodies that are unshaded, free of predatory fish such as Plague Minnow ( <i>Gambusia holbrooki</i> ), have a grassy area nearby and diurnal sheltering sites available. Some sites, particularly in the Greater Sydney region occur in highly disturbed areas.	Tadpoles feed on algae and other plant-matter; adults eat mainly insects, but also other frogs.	Y - vegetated swale area	Y - Creek	Moderate
Mammalia	<i>Miniopterus orianae oceanensis</i>	Large Bent-winged Bat	NL	NL	Caves are the primary roosting habitat, but also use derelict mines, storm-water tunnels, buildings and other man-made structures.	NA	Y - buildings present	Y	Moderate
	<i>Pteropus poliocephalus</i>	Grey-headed Flying-fox	NL	V	Occur in subtropical and temperate rainforests, tall sclerophyll forests and woodlands, heaths and swamps as well as urban gardens and cultivated fruit crops. Roosting camps are generally located within 20 km of a regular food source and are commonly found in gullies, close to water, in vegetation with a dense canopy.	Feed on the nectar and pollen of native trees, in particular Eucalyptus, Melaleuca and Banksia, and fruits of rainforest trees and vines. Also forage in cultivated gardens and fruit crops	N	N	Low

Table 13: Threatened species location within 1 km of the Site. E = Endangered, V = Vulnerable, NL = Not listed.



### 7.10.3 Habitat in the surrounding area

#### Historical clearing

The Site and the area have been cleared of almost all-remnant native vegetation prior to 1943.

#### Vegetation on Site

Almost the entire Site is covered in concrete hardstand and there is no native vegetation located on Site. There is a vegetated swale area in the north eastern corner of the Site, this contains a non native grass species only. This could provide habitat for amphibian species.

#### Vegetation within the surrounding area

The area is highly developed, with both a dense presence of residential and industrial premises. Vegetation in the area is limited to residential gardens, isolated parks and nature reserves, vegetation along banks of the creek and the trainline.

#### Waterway

Cox's Creek flows in a northerly directly adjacent to the Site where it eventually joins Cooks River 1 km to the north of the Site.

This section of the creek has been anthropogenically engineered with a concrete canal for the creek bank and bed. Anecdotally there is minimal water that flows.

### 7.10.4 Connectivity within the area

The general area has very minimal vegetation. The vegetation along the creek provides a bit of connectivity for amphibian species.

### 7.10.5 Barriers to connectivity within the area

Species type	Barriers
Amphibian	<ul style="list-style-type: none"><li>• Train line</li><li>• Fences</li><li>• Major roads (Punchbowl road)</li></ul>
Arboreal mammals	<ul style="list-style-type: none"><li>• Isolated vegetation</li><li>• Distance from food sources</li><li>• Fences and building structures</li></ul>

Table 14: Barriers to connectivity.

### 7.10.6 Applying for BDAR Waiver

The Biodiversity Conservation Act 2016 (BC Act) requires that a **SSD** or SSI application must be accompanied by a biodiversity development assessment report (BDAR), it is understood that the proposed development is occurring on a brownfield site and it is anticipated there will be no impact threatened species habitat, or vegetation.

Based on the advice received during the previous application, targeted surveys and a preliminary biodiversity report will accompany the BDAR waiver request (prepared by a suitable qualified ecologist). The surveys were completed in December of 2023 and the accompanying reports are currently being developed.

The BDAR waiver request and preliminary biodiversity report will be lodged after the submission of the Scoping Report and before the submission of the EIS, through the Major Projects portal.

This matter requires no further assessment in the EIS.

### 7.10.7 Mitigation and benefits

Other mitigation measures included in the project design include:

- No potentially contaminated water to be discharged from the Site into surrounding environment.
- Almost complete covering of the Site in a concrete hardstand to prevent potential contamination into the soils and groundwater.
- All lights to face the Site and not the surrounding environment.
- Regular checks for fauna on the Site to be incorporated into regular monitoring checklist.

## 7.11 Social impact

### 7.11.1 Overview

The Proposal provides GSW, AASS/PASS and C&D waste to be recovered and prevent it from going to a landfill. It promotes reduced travel distance and provide overall improved efficiencies of waste operations.

The Proposal would support employment of a workshop across the 24 hours a day, & days per week for low impact operations (detailed in Table 7).

As part of the EIS a complete Social Impact Assessment (SIA) in accordance with the *Social Impact Assessment Guidelines 2021 for State Significant Projects* will be completed for the project. As part of the scoping phase of the project and to aid the community consultation plan, an initial SIA was completed. This initial SIA focuses on determining the social locality and baseline for the area, identifying key stakeholders and appropriate methods for initial engagement.

Due to the nature of environmental impact assessment, the SIA occurs across three phases:

- First phase – SIA scoping
- Second phase – SIA report
- Third phase – Social impact management (post approval)

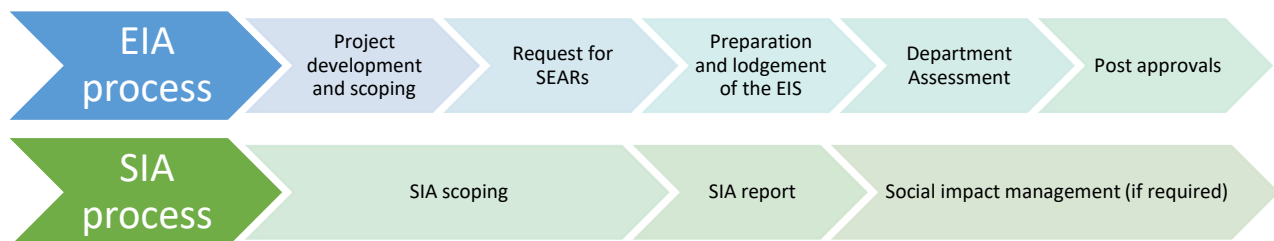


Figure 3: SIA development aligned with the EIA process.

### 7.11.2 SIA Scoping

As part of the scoping report and application for SEARs the “first phase” of the SIA was completed, which involves:

- Identifying the project’s social locality
- Initial analysis of social baseline
- Initial evaluation of social impacts
- Considering and articulating project refinement
- Review of surrounding land uses
- Initial scoping of impacts
- Initial community engagement

### 7.11.3 Background of the community

#### Key community characteristics

A summary of the local resident and worker population within the Greenacre is outlined in this section. For the purposes of this analysis, demographic data has been sourced from the Australian Bureau of Statistics (ABS) 2016 and 2021 Census

of Population and Housing. Resident and worker population forecasts have been estimated considering data sourced from the ABS and the NSW Government. A summary of the local resident is detailed in the following sections.

### Community profile

#### Project Site

The Site is located in the suburb of Greenacre and the Strathfield Municipality. The Site is in an area of industrial activity and is bounded on all sides by industrial land users, including warehouses (to the west and east), a 24-hour concrete batching plant (to the north), and factory units to the site. The nearest residential receivers are to the south and west, approximately 80 m and 105 m distance from the site, respectively (Figure 5).

In the current EPL, nearby residential receivers are identified, which are located roughly to the south, southwest and west of the Site (Figure 5). Between the Site and the southern receivers are two larger industrial units. The nearest residences to the south are located on Juno Parade, which is a relatively busy throughfare for vehicles.

#### Greenacre

The suburb of Greenacre falls under both Canterbury Bankstown City and Strathfield local government areas (LGAs). The footprint of the proposed development falls under the Strathfield LGA.

Greenacre is a suburb that comprises both industrial areas and residential areas. The area of the proposed development is largely industrial with surrounding residential receivers approximately 200 m away. The Socio-Demographic baseline data provided from ABS for the suburb is considered typical of the community surrounding the proposed development. Greenacre's demographic data has been used for the initial SIA during the scoping report.

#### Strathfield LGA

Strathfield Council is located in Sydney's Inner West and comprises approximately 14 square kilometres. This local government area comprises of Belfield, Flemington, Greenacre, Homebush, Homebush West, Strathfield, and Strathfield South.

Strathfield Community Strategic Plan 2035 sets out a vision and priorities for the area and was developed with substantial input from the community. The plan sets out take on the challenges related with environment and emission reductions by improved recycling and support of circular economy (Strathfield Community Strategic Plan, 2022).

### Resident profile

A detailed assessment of the key community characteristics is provided in and is based on results from the 2016 and 2021 ABS Census of Population and Housing. The following key demographic characteristics of local residents in the vicinity of the proposed development have been benchmarked against Greater Sydney (where relevant) and are identified in Table 15 below.

Social aspect	Demographic of people surrounding the facility	Explanation																						
<b>Population</b>	26,316 people in Greenacre 49.83% M : 50.17% F	In 2021, Greenacre had an estimated residential population of 26,316. Moderately equal proportion of males to females within the area.																						
<b>Age</b>	24,368 persons surveyed <table border="1" data-bbox="359 1601 901 2040"> <thead> <tr> <th>Age groups:</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>0-4 years</td> <td>7.06%</td> </tr> <tr> <td>5-14 years</td> <td>16.83%</td> </tr> <tr> <td>15-19 years</td> <td>8.06%</td> </tr> <tr> <td>20-24 years</td> <td>7.02%</td> </tr> <tr> <td>25-34 years</td> <td>12.19%</td> </tr> <tr> <td>35-44 years</td> <td>12.72%</td> </tr> <tr> <td>45-54 years</td> <td>11.62%</td> </tr> <tr> <td>55-64 years</td> <td>10.58%</td> </tr> <tr> <td>65-74 years</td> <td>7.75%</td> </tr> <tr> <td>75-84 years</td> <td>4.31%</td> </tr> </tbody> </table>	Age groups:	Percentage	0-4 years	7.06%	5-14 years	16.83%	15-19 years	8.06%	20-24 years	7.02%	25-34 years	12.19%	35-44 years	12.72%	45-54 years	11.62%	55-64 years	10.58%	65-74 years	7.75%	75-84 years	4.31%	<p>In 2021, Greenacre was seen to have a large share of young persons aged 5-14 years old and middle aged persons 25-54 years old. As a result, Greenacre is likely to comprise of a large proportion of family households.</p> <p>Persons aged 14 years or younger account for 23% of the population.</p> <p>Persons aged 65 years old account for 13.92% of the population.</p> <p>Hence, approximately 36.92% of the population of Greenacre is considered vulnerable.</p>
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<b>Household composition</b>	<table border="1"> <thead> <tr> <th>Household composition</th> <th>Percentage (%)</th> </tr> </thead> <tbody> <tr> <td>Family household</td> <td>79.7%</td> </tr> <tr> <td>Single person households</td> <td>18.7%</td> </tr> <tr> <td>Group house holds</td> <td>1.5%</td> </tr> <tr> <td><b>Total respondents</b></td> <td><b>6,762</b></td> </tr> </tbody> </table>		Household composition	Percentage (%)	Family household	79.7%	Single person households	18.7%	Group house holds	1.5%	<b>Total respondents</b>	<b>6,762</b>	Greenacre is considered an attractive place for families to reside, with 79% of households comprising of family households. This is greater than the Australian percentage of 68.8%. Residents living in single person households account for 18.7% of total household types
Household composition	Percentage (%)												
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<b>Family composition</b>	<b>Family composition</b>	<b>Percentage (%)</b>	Of the families in Greenacre, 59.4% were couple families with children, 19.7% were couple families without children and 19.0% were one parent families.
	Couple family without children	19.7	
	Couple family with children	59.4	
	One parent family	19.0	
	Other family	1.9	
	<b>Total respondents</b>	<b>5,759</b>	
<b>Income</b>	20,028 persons surveyed in Greenacre 60.17% of persons earn <\$799 74.03% of persons earn <\$1250 16.71% of persons earn >\$1250		Greenacre residents are typically lower income households. Hence, approximately 74.03% of the population is considered vulnerable.
<b>Occupation</b>	8,031 persons surveyed 1. Professional 2. Technicians and trade workers 3. Managers 4. Clerical and administration workers 5. Sales workers		The most common occupations in Greenacre included Professionals 17.6%, Technicians and Trades Workers 15.3%, Clerical and Administrative Workers 15.1%, Sales Workers 11.2%, Labourers 9.9%, Managers 9.8%, Community and Personal Service Workers 9.6% and Machinery Operators and Drivers 9.2%.
<b>Health</b>	26,319 persons surveyed 1. No long term health conditions 64% 2. Not stated 10.5% 3. Diabetes 6.4% 4. Arthritis 6.2% 5. Asthma 5.7%		Generally, the population of Greenacre are considered in good health, with 64% of persons stating they have no long term health conditions. 39.7% of persons were seen to have long term health conditions with diabetes, arthritis and asthma the leading health conditions.
<b>Education</b>	18,811 persons surveyed 1. Year 12 or equivalent 58% 2. Year 10 or equivalent 14.9% 3. <Year 9 or equivalent 10.28% 4. Did not go to school 3.98%		Generally, most people in the area are well educated. Only a small proportion of Greenacre did not go to go school 3.98% or have a education level of less than year 9 or equivalent 10.28%.
<b>Housing</b>	7,104 persons surveyed 1. Separate housing 63.1% 2. Semi detached, row or townhouse 29.3% 3. Flat or apartment 7%		Separate houses are the primary housing typology within Greenacre, accounting for 63.1% of all households. Semi-detached, row or townhouses make up 29.3% of all dwellings and only 7% are apartments or flats. The high share of separate dwellings reflects the local context of the Greenacre being an established residential area and suburban area.
<b>Tenure</b>	7,121 persons surveyed 1. Owned outright 30% 2. Owned with a mortgage 33.1% 3. Rented 32.4%		Approximately 2/3 of persons in Greenacre own their own home and approximately 1/3 rent within the area. Impacts from the proposed development need to be assessed to ensure the property market is not negatively impacted
<b>Employment</b>	<b>Employment</b>	<b>Percentage</b>	There were 9,027 people who reported being in the labour force in the week before Census night in Greenacre. Of these 53.1% were employed full time,
	Worked full time	53.1%	

	<table border="1"> <tr> <td>Worked part time</td> <td>31.7%</td> </tr> <tr> <td>Away from work</td> <td>6.4%</td> </tr> <tr> <td>Unemployed</td> <td>8.8%</td> </tr> <tr> <td><b>Total persons surveyed</b></td> <td><b>9,027</b></td> </tr> </table>	Worked part time	31.7%	Away from work	6.4%	Unemployed	8.8%	<b>Total persons surveyed</b>	<b>9,027</b>	31.7% were employed part-time and 8.8% were unemployed.																																								
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3	Urdu	2.6%																																																
4	Vietnamese	2.8%																																																
5	Greek	2.7%																																																
6	Bengali	2.6%																																																
<b>Persons surveyed</b>		<b>13,113</b>																																																
Proficiency in spoken English	Number of Individuals	Percentage (%)																																																
Speaks English only	2104	10.03%																																																
<b>Uses other language and speaks English:</b>																																																		
<i>Very well or well</i>	14072	67.08%																																																
<i>Not well or not at all</i>	4656	22.19%																																																
<i>Proficiency in English not stated</i>	25	0.12%																																																
Language and proficiency in English not stated	121	0.58%																																																
<b>Total persons surveyed</b>	<b>20978</b>																																																	
<b>Travel to work</b>	<table border="1"> <thead> <tr> <th>Mode of transportation</th> <th>Percentage (%)</th> </tr> </thead> <tbody> <tr> <td>People who travel to work by public transport</td> <td>12.2%</td> </tr> <tr> <td>People who travelled to work by car as driver or passenger</td> <td>74.3%</td> </tr> <tr> <td><b>Total persons surveyed</b></td> <td><b>7,119</b></td> </tr> </tbody> </table>	Mode of transportation	Percentage (%)	People who travel to work by public transport	12.2%	People who travelled to work by car as driver or passenger	74.3%	<b>Total persons surveyed</b>	<b>7,119</b>	Approximately, 74.3% of people in Greenacre were seen to travel to work via car. Traffic increases caused by the proposed development will need to be adequately assessed.																																								
Mode of transportation	Percentage (%)																																																	
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<b>Total persons surveyed</b>	<b>7,119</b>																																																	

Table 15: Demographic of Greenacre statistics. All statistical information obtained from the Australian Bureau of Statistics <sup>2</sup>.

<sup>2</sup> <https://www.abs.gov.au/census/find-census-data/quickstats/2016/SSC11757>

#### 7.11.4 Summary of social impact

Potential impacts on social wellbeing may occur due to traffic, noise, air and visual amenity impacts. The proposal has the potential to provide positive impacts through generation of employment opportunities and provision of resource recovery and waste management infrastructure. In addition, transport and traffic improvements are likely in the wider area as a result of proximity to the CBD.

7.11.5 Scoping of social impacts

Project activities	Social impact category	Potential impact description	Positive or negative impact	Elements of impact					Relevant technical assessments	Potential for cumulative impacts (if yes identify which other impacts and/ or projects)	Initial risk assessment (without mitigation measures)		
				Extent	Duration	Intensity	Sensitivity or importance	Level of concern / interest			Likelihood	Magnitude	Impact rating
Increase in truck movements	<ul style="list-style-type: none"> <li>Access</li> <li>way of life</li> </ul>	Increase in traffic along Bellfrog street and other road networks	Negative	Industrial neighbors on BFS	Operation phase	Moderate	Moderate	Moderate	Traffic impact assessment	Yes - Other neighboring industrial facilities	likely	Moderate	High
Construction of plant equipment	<ul style="list-style-type: none"> <li>Health and well</li> <li>Access</li> </ul>	Potential increase to noise, air and traffic	Negative	Industrial neighbours on BFS, residential neighbours	Construction phase	Minor	Minor	Minor	Traffic impact assessment Noise impact assessment	Yes - Other neighboring industrial facilities normal operations	Likely	Minimal	Low
Additional of stationary plant equipment	<ul style="list-style-type: none"> <li>Surroundings</li> <li>way of life</li> <li>Health and well being</li> </ul>	Increase in noise emissions	Negative	Industrial neighbors, Residential neighbors	Operation phase	Minor	Moderate	Moderate	Noise impact assessment	Yes - Other neighboring industrial facilities	Likely	Moderate	High
Addition of processing plant equipment / increase in scale of processing activities	<ul style="list-style-type: none"> <li>Surroundings</li> <li>way of life</li> <li>Health and well being</li> </ul>	Increase in dust and particulate matter emissions	Negative	Industrial neighbors, Residential neighbors	Operation phase	Minor	Minor	Minor	Air quality impact assessment	Yes - Other neighboring industrial facilities	Likely	Moderate	High
Increase local employment opportunities	<ul style="list-style-type: none"> <li>Livelihood</li> </ul>	Increase employment in the local area	Positive	Local area	Operation phase	Minor	Moderate	To be determined	NA	Yes - Other neighboring industrial facilities	Possible	Minor	Medium
Increase to recycling capacity in the Sydney Region	<ul style="list-style-type: none"> <li>Surroundings</li> <li>Livelihoods</li> </ul>	Increase ability for soil recycling in the Sydney region	Positive	Sydney region	Operation phase	Moderate	Moderate	Moderate	NA	Yes – will cumulative increase the recycling capacity of the Sydney region	Likely	Major	High
Use of the Site as an industrial facility	<ul style="list-style-type: none"> <li>Culture</li> </ul>	Use of the Site as an industrial area potentially impacting Aboriginal Cultural sites	Negative	Local area	Lifetime	Minor	pending results of ACHAR	pending results of ACHAR	ACHAR with specific consultation	Yes - Other established industrial and residential use of the area	Unlikely	Minor / moderate	Low – medium
Use of the Site as an waste facility	<ul style="list-style-type: none"> <li>Community</li> </ul>	Potential impacts to character of the area and subsequent land values	Negative	Local area	Operation phase	Minor	Moderate	Moderate	NA	Cumulative impacts relating to Site operation discussed above	Unlikely	Minimal	Low
Increased access to resource recovery facilities	<ul style="list-style-type: none"> <li>Access</li> </ul>	Increased access to resource recovery facilities	Positive	Sydney region	Operation phase	Moderate	Moderate	Minor	NA		Likely	Moderate	High
Establishment of “industrial group”	<ul style="list-style-type: none"> <li>Community</li> <li>Decision making systems</li> </ul>	Industrial group will work together to improve the environment around the residential interface	Positive	Industrial neighbors, Residential neighbors	Operation phase	Moderate	Moderate	Moderate	NA		Possible	Moderate	Medium



Frog sanctuary	<ul style="list-style-type: none"> <li>Surroundings</li> </ul>	Improved habitat in an area that is highly degraded	Positive	Local area	Operation phase	Moderate	Moderate	Moderate	Preliminary biodiversity assessment and management plan		Possible	Moderate	Medium
Use of the Site as an waste facility	<ul style="list-style-type: none"> <li>Surroundings</li> </ul>	Potential negative visual amenity as a result	Negative	Local area	Operation phase	Minor	Minor	Minor	VIA section of EIS	No	Very unlikely	Minimal	Low
Increase to operational hours	<ul style="list-style-type: none"> <li>Health and well being</li> <li>Surroundings</li> </ul>	Potential impacts associated with extended noise operation and light nuisance to surrounding residents	Negative	Industrial neighbors, Residential neighbors	Operation phase	Minor	Moderate	Moderate		No	Possible	Moderate	Medium

Table 16: Potential social impact scoping (when unmitigated).

### 7.11.6 Assessment level required during EIS

The potential social and economic impact associated with the Proposal have been preliminarily identified in Table 16. Detailed assessments will be completed for those potential impacts identified as “high” in Table 16. All other impacts will be assessed to a moderate level during the Social Impact Assessment. Results from relevant technical impact assessments will be incorporated into the social impact and community engagement mediums. Further feedback from community and stakeholder consultation and engagement activities will be required to inform the mitigation strategies implemented for the Proposal.

## 7.12 Greenhouse Gas Emissions and Climate Change

### 7.12.1 Potential impacts and benefits

Aspects	Benefit / impact	Description
Increase to Sydney’s recycling infrastructure capacity	Positive	Increasing Sydney’s recycling infrastructure allowing great recovery of resources.
Avoidance of unnecessary material going to landfill by ability to recycle a greater contaminant threshold range	Positive	Recycling concrete and other higher contaminate limit soils reduces the amount of waste sent to landfills, which can emit methane—a potent greenhouse gas—as organic materials decompose.
Transportation emissions	Negative	Increasing in transportation may increase greenhouse gas emissions from vehicles
Transportation emission	Positive	The Sites locality in the Sydney region is likely to be closer to the source and disposal sites of this material, potentially decreasing transportation times and emissions.
Use of onsite plant equipment (fuel based)	Negative	Energy usage to run machinery and emissions associated with machinery.
Use of onsite plant equipment (electricity based)	Negative	Electricity use to operate lighting, weighbridge, machinery etc
Material saving	Positive	Concrete production involves significant emissions of carbon dioxide (CO <sub>2</sub> ). Recycling concrete reduces the need for new aggregate material, leading to lower CO <sub>2</sub> emissions associated with quarrying and processing natural aggregates.
Preservation of natural resources	Positive	By reusing concrete aggregates, and soils it helps conserve natural resources such as VENM gravel, sand and soil.
Pollution from operation	Negative	Dust emissions associated with processing activities

Table 17: Outline of potential positive and negative impacts on greenhouse gas emissions as part of the proposed development.

### 7.12.2 Assessment level required during EIS

A GHG assessment will be conducted with general accordance with

- Technical Guidelines for the Estimation of Greenhouse Gas Emissions by Facilities in Australia (DoE, 2017); and
- National Greenhouse Accounts Factors (DoE, 2019)

This assessment will identify the sources of greenhouse gas emissions associated with the Proposal and propose all reasonable and feasible measures that would minimise emissions (reflecting the Government’s goal of net zero emissions by 2050).

### 7.13 Hazards and Risks

#### 7.13.1 Hazardous and offensive development

A preliminary risk screening will be carried out in accordance with State Environmental Planning Policy No. 33 – Hazardous and Offensive Development and Applying SEPP 33 (DoP, 2011), providing a clear indication of class, quantity and location of all dangerous goods and hazardous materials associated with the development. Should the preliminary screening indicate that the project is "potentially hazardous", a Preliminary Hazard Analysis (PHA) must be prepared in accordance with Hazardous Industry Planning Advisory Paper No. 6 - Guidelines for Hazard Analysis (DoP, 2011) and Multi-Level Risk Assessment (DoP, 2011).

#### 7.13.2 Fire

The materials currently received and stockpiled at the facility are predominantly soil waste making up to 98% of the materials received and this is considered to be non-combustible. The remaining material (approximately 2% of the estimated 250,000 tonnes per year) is a mixture of non-combustible material but will also include asphalt which can be considered as combustible.

A fire safety study for the development will be conducted in consideration with the consistency with NSW Fire & Rescue Fire Safety Guideline – Fire Safety in Waste Facilities (February 2020). The purpose of FRNSW’s guideline for fire safety in waste facilities is “to provide guidance on fire safety in waste facilities that receive combustible waste material”. Further, investigation on the fire risk imposed by waste materials containing asphalt will be conducted along with consultation with FRNSW and condition of the facility’s EPL. This will be assessed at a standard level during EIS.

#### 7.13.3 Contaminated Land

The Site was a block of land that was part of a commercial quarry in the past. The quarry had been filled with sometime between 1998 and 2008, which was developed into an industrial business park as it stands today. Table 18 details the environmental constraints related to contaminated land.

Environmental constraint	Description
Acid Sulfate soils	Class 5 Acid Sulfate Soils Class Risk zone. The LEP states: <i>Works within 500 meters of adjacent Class 1, 2, 3 or 4 land that is below 5 metres Australian Height Datum and by which the water table is likely to be lowered below 1 metre Australian Height Datum on adjacent Class 1, 2, 3, or 4 land.</i> Considering that the proposed development does not include substantial soil disturbances, an assessment of Acid Sulfate Soils was not considered necessary.
Flood Risk Area	No
Heritage items	No items listed in the Strathfield LEP. The proposed development exists on a brownfield site, containing no items of environmental heritage within the Site or within the immediate vicinity of the site. As such, the proposed development does not breach any items mentioned in the NSW Heritage Act 1977.
Contaminated land register	Five sites are listed on the NSW EPA Contaminated sites database within Greenacre. These sites are considered unlikely to pose a risk of contaminant migration to the Site due to lack of proximity and pathways.

Table 18: Environmental constraints related to contaminated land.

As no excavation of the Premises is proposed during construction phase and the development is primarily concerned with increasing scale and processes, it is highly unlikely that Chapter 4 - Remediation of Land will be applicable to this development. But the management of contaminated soil will be discussed in the plan of management during EIS.

#### 7.13.4 Waste

Wastes will be generated by Site’s construction and operational activities and will be managed in accordance with a Construction Environmental Management Plan for the Site. The proposed development also provides positive outcomes in terms of waste management by increasing and expanding recycling infrastructure in Strathfield area and the broader Greater Sydney Region and will make an important as well as increased recycling to help meet waste targets. The proposed development will help address these critical infrastructure gaps and drive progress towards meeting NSW’s waste and materials management targets as set by the NSW Government in the NSW Waste and Sustainable Materials Strategy 2041.

Waste management on Site occurs through Plan of Management (POM) and the POM is updated and revised yearly to reflect the Site’s current operation. The POM will be revised and updated to support the EIS and will assesses how the waste generated during construction and received during operation will be dealt with in the most environmentally sustainable way. The POM will provide:

- A description of the waste streams that would be accepted at the Site and the maximum size for stockpile;
- Details of how waste would be stored (including the maximum daily waste storage capacity of the site) and handled on site, and transported to and from the Site, including details of how the receipt of non-conforming waste would be dealt with;
- Details of the waste tracking system for incoming and outgoing waste; and
- Details of the waste management strategy for construction and ongoing operational waste generated;

## 8. Preliminary mitigation identification (incorporated into project design)

Mitigation measure	Aspect
Extending the awning	Decrease in dust and noise emissions
Installation of a penstock valve	Creates a manual decision point. Will prevent the Site from accidental discharge
Installation of real-time air monitors	Air quality – creates a live point that can trigger the use of other mitigation such as sprinklers or stop work notices
Additional treatment of the warehouse	Will decrease noise and dust emissions. Specific treatment to be based on the advice of relevant technical specialists
Installation of digital bay signage	Allows for easy viewing of bay identification and live editing abilities to reflect a changing site
All waste to be stored within the warehouse / under awning	This will diminish any ability for these materials to get rained on and potentially “run off” the Site
Roll over bund on warehouse	Prevention of water leaving the internal warehouse
Bundling and specific tank for PASS / ASS treatment	Prevention of potentially contaminated materials leaving designated sections

Table 19: Mitigation measures.

## 9. Closing statement

The proposal detailed in this Scoping Report is the result of careful consideration of the environmental assessments prepared by various experts, a review of current and previous Site operations.

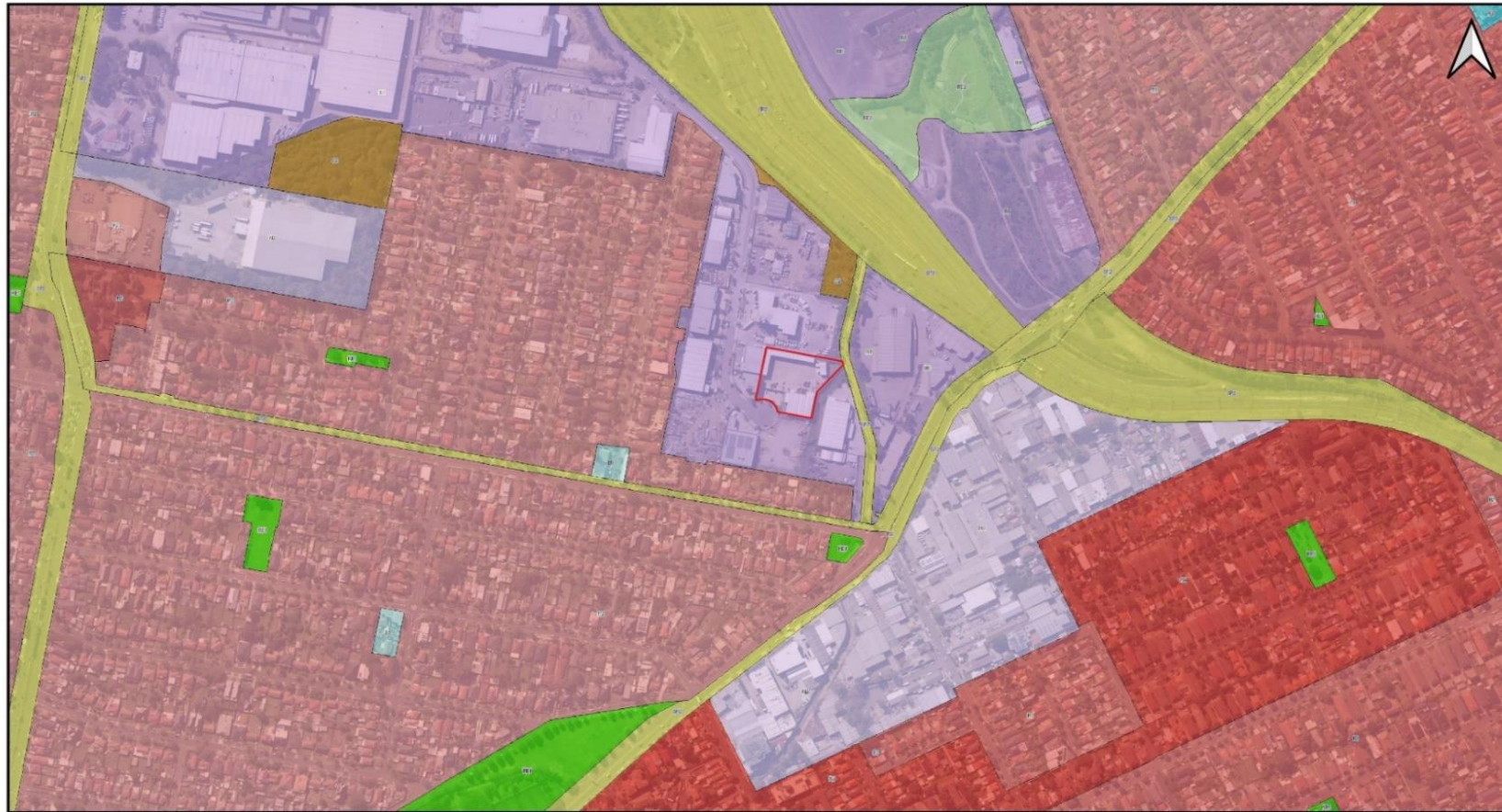
We have worked closely with the applicant to develop a balanced proposal, which allows for positive economic outcomes for the business, while ensuring that the potential for an increase in environmental risk is minimised.

We look forward to receiving the SEARS and proceeding with the EIA.



## 10. List of appendices


- Appendix 1. DA 2012/175.
- Appendix 2. EPL 21389.
- Appendix 3. Complying Development Certificate 210597 and its attachments.
- Appendix 4. Blank.
- Appendix 5. EPA Consultation.
- Appendix 6. 2012 SOEE
- Appendix 7. 2020 EPL licence variation application
- Appendix 8. 2020 EPL licence variation notice (dated 08/07/21)
- Appendix 9. Community Engagement Strategy

### Land Zoning



Legend:  
Site boundary

- |  |   |
|--|---|
|  B1 Neighbourhood Centre       |  R3 Medium Density Residential |
|  C2 Environmental Conservation |  R4 High Density Residential   |
|  IN1 General Industrial        |  RE1 Public Recreation         |
|  IN2 Light Industrial          |  RE2 Private Recreation        |
|  R2 Low Density Residential    |  SP2 Infrastructure            |

0 100 200 m  


Date produced: 30/03/2022  
CRS: EPSG:3857  
Basemap imagery: Sixmaps  
Drawn by: Sophie Burke

Figure 4: Land zoning



# Sensitive Receivers



### Legend:

Receivers  
● EPL points

↔ Distance from site  
■ Sensitive Receiver



Date produced: 16/05/2022  
CRS: EPSG:3857  
Basemap imagery: NSW SixMap  
Drawn by: Sophie Burke

Figure 5: Sensitive receiver locations and current EPL points.





# Existing Site Infrastructure

## Legend:

### Existing Site Infrastructure

- Existing material bays
- Water guns
- Water Storage
- Diesel Refill Area
- Mechanics workshop
- Warehouse
- Wheel Wash
- Weighbridge
- Material bay awning

### Base Maps

- Site boundary



Date produced: 15/09/2022  
CRS: EPSG:3857

Basemap imagery: Nearmap  
Drawn by: Sophie Burke

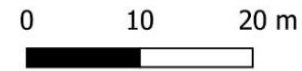
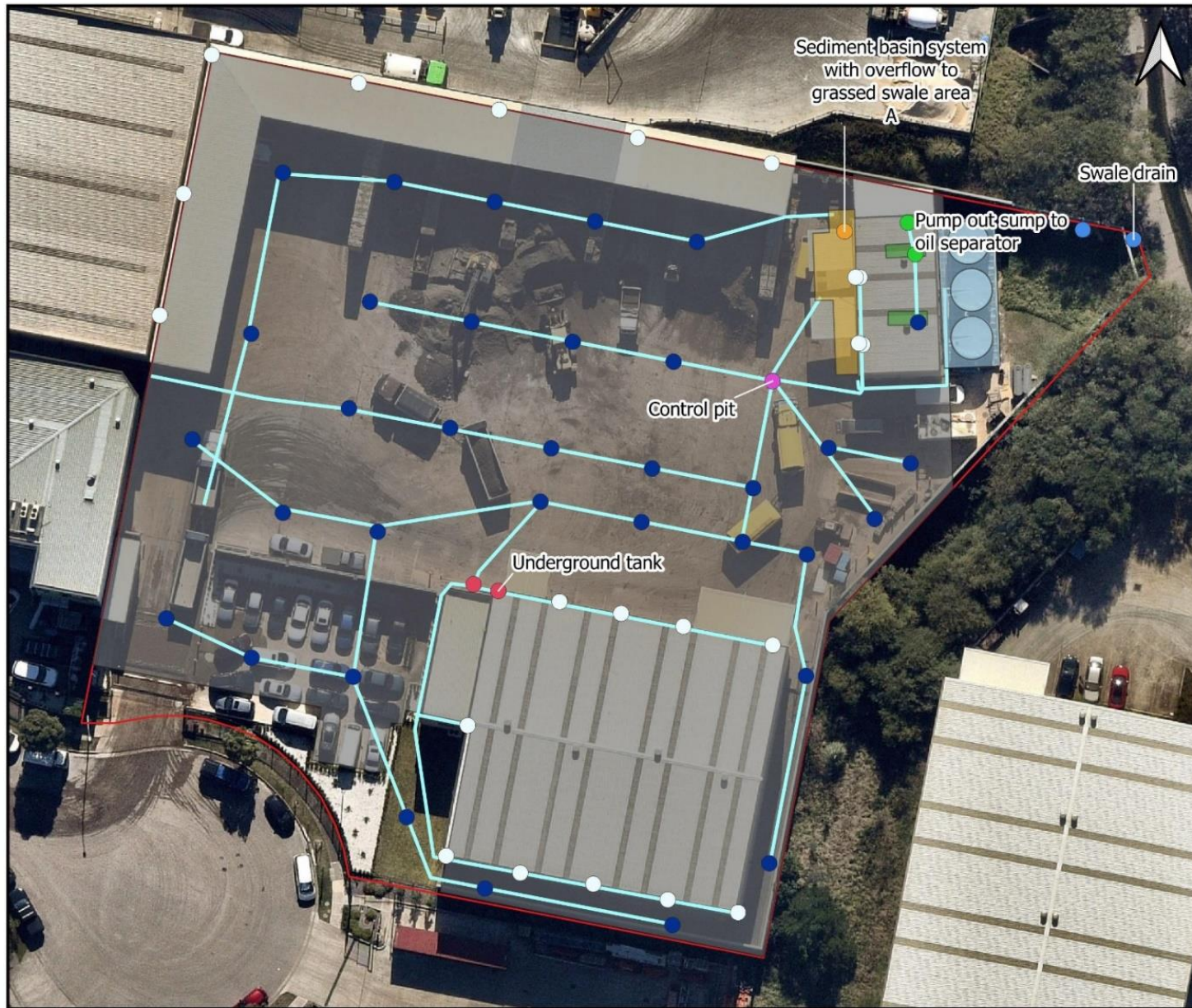


Figure 6: Existing site infrastructure.





# Existing Stormwater Infrastructure

## Legend:

### Existing Site Infrastructure

- Water Storage
- Drains**
- Downpipe
- Control pit
- Oil Separator
- Sediment Basin
- Swale drain
- Underground tank
- Drain
- First flush system
- Drain lines
- Mechanic pits
- OSD Catchment Area

### Base Maps

- Site boundary



Date produced: 15/09/2022  
CRS: EPSG:3857

Basemap imagery: Nearmap  
Drawn by: Sophie Burke

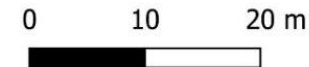


Figure 7: Existing stormwater infrastructure.





# Existing Stormwater Infrastructure

## Legend:

### Existing Site Infrastructure

- Water Storage
- Drain lines

### Drains

- Downpipe
- Control pit
- Oil Separator
- Sediment Basin
- Swale drain
- Drain

- OSD Catchment Area
- First flush system

### Base Maps

- Site boundary



Date produced: 15/09/2022  
CRS: EPSG:3857

Basemap imagery: Nearmap  
Drawn by: Sophie Burke

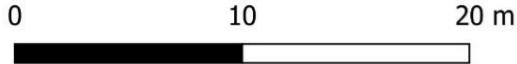


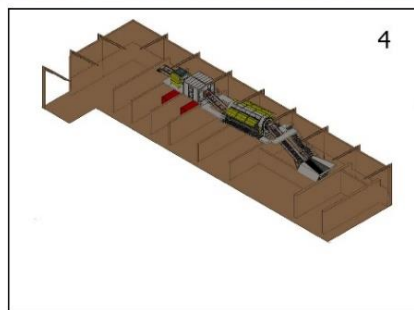
Figure 8: Zoomed in view of existing stormwater infrastructure.



## Proposed development site layout and operational overview

Material movement through the Site

1. Weighbridge + waste acceptance and rejection.  
Waste classification documents are reviewed and weighbridge operator informs truck of where to go on Site.
2. Trucks containing segregated concrete and brick OR PASS/ASS material enter the warehouse (see 8 for next step)
3. Trucks containing soil waste is directed to the "incoming" or specific segregated soil bay.
4. Soils are placed through the soil processing plant and separated based on size.
5. These soils are then assessed against relevant criteria and will await disposal offsite.
6. This material is removed from Site for further processing at other facilities
7. Concrete and brick material are transported to the warehouse for further processing
8. Concrete and brick material is placed into the incoming bay and loaded into the concrete processing plant
9. PASS/ ASS undergoes treatment in accordance with Waste Classification guidelines. Onsite treatment will be completed with an excavator bucket for small quantities of material or a pugmill for large quantities.



### Legend:

- |                                   |                        |                    |
|-----------------------------------|------------------------|--------------------|
| Site boundary                     | Penstock valve         | Wheel Wash         |
| Proposed Site layout              | Awning Extension       | Weighbridge        |
| Material storage bays (pushwalls) | Current infrastructure | Mechanic pits      |
| Concrete processing               | Vegetated Swale        | OSD Catchment Area |
| Internal Material Storage Bays    | Water Storage          | Warehouse          |
| Vehicle movement                  | Diesel Refill Area     |                    |
| Soil Processing Plant             | Mechanics workshop     |                    |

Figure 9: Proposed site layout for the proposed development.



Figure 10: Historical aerial imagery 1975, showing Site use as a quarry.





Figure 11: Historical aerial imagery 1986, showing Site use as a quarry.

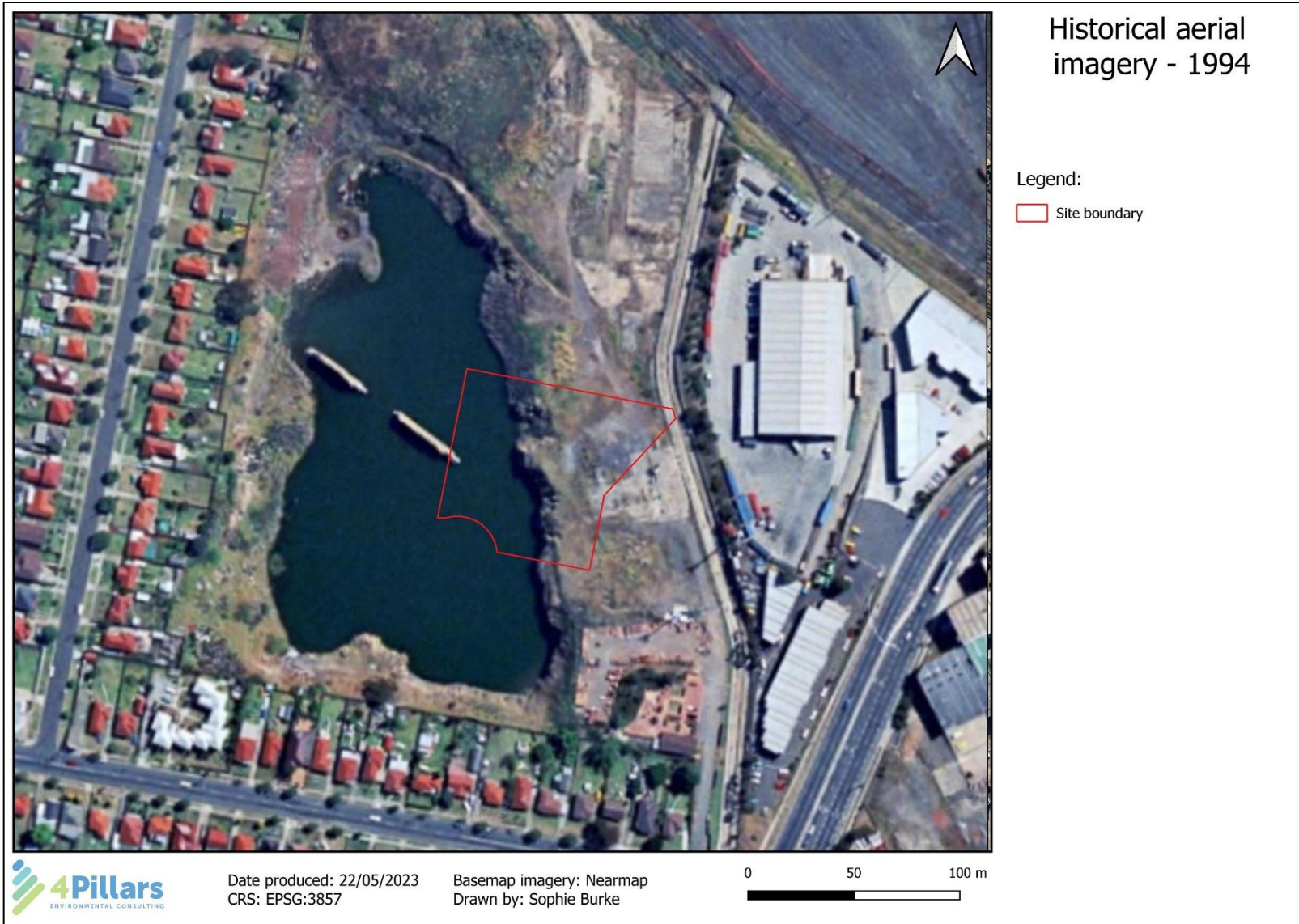


Figure 12: Historical aerial imagery 1994, showing completion of quarrying activities.





Figure 13: Historical aerial imagery 2004, showing the quarry void being filled with soil materials.

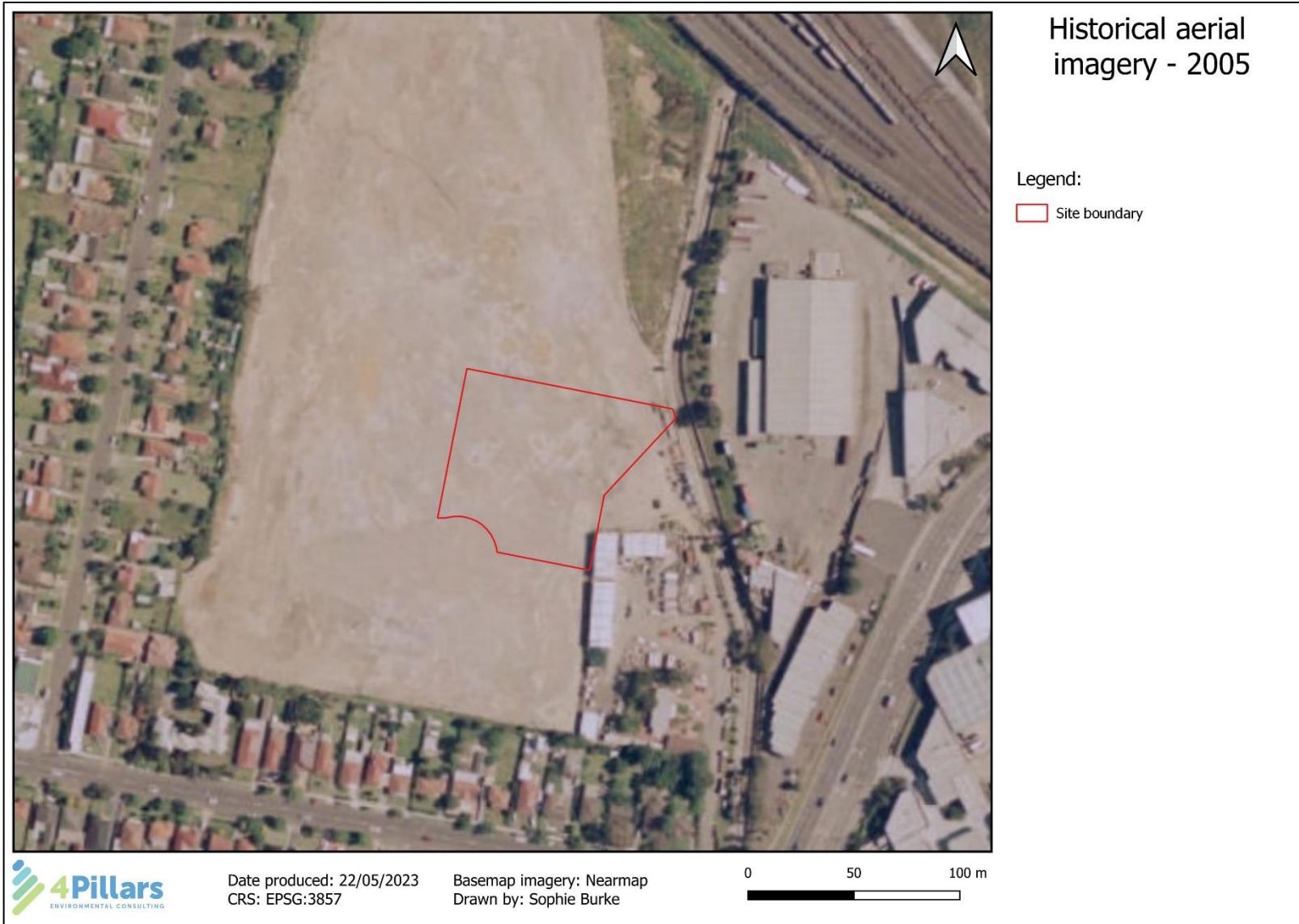


Figure 14: Historical aerial imagery 2005, showing completion of void filling activities.





*Figure 15: Image of the Site prior to establishment of industrial area (use as a quarry). Source: SEE 2013, unknown date.*



















