

5 February 2026

Our Ref: SSD-5855-Mod-3
Our Contact: Fiona Prodromou – 9562 1672

David Ansen
Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear David,

**RE: Request for Advice – Mod 3 [SSD-5855]
Changes to various waste limits and transport**

Address: 34-36 McPherson Street and 1 Beachamp Road Banksmeadow

Thank you for the opportunity to provide feedback on the proposed modification application at the Banksmeadow Transfer Terminal at the abovementioned site.

Council has holistically reviewed the modification report prepared by Element Environment Pty Limited (Element) on behalf of Veolia Environmental Services (Australia) Pty Ltd (Veolia) dated 10 November 2025.

The Proposal

Outlined within the Modification Report lodged to the Department of Planning, Housing and Infrastructure (DPHI), Council understands the modification application (in principle) includes the following:

- 1. the receipt and transfer of up to 500,000 tpa of putrescible waste and up to 100,000 tpa of non-putrescible waste, such that the combined total of putrescible and non-putrescible waste received does not exceed 500,000 tpa;*
- 2. an increase in the amount of food organic and garden organic (FOGO) waste permitted to be transported by road from 12,000 tpa to up to 20,000 tpa (if not transferred by rail to Woodlawn Eco Precinct),*
- 3. ability to transport FOGO by road to the TopSoil Organics facility at Forbes, NSW, or alternate resource recovery facilities, and*
- 4. ability to transport non-putrescible waste by road to the proposed Veolia Materials Recycling Facility at Camellia, NSW, or alternate resource recovery facilities.*

Postal address

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The modification will not require any construction activities and will not impact any built or operational aspects of the BTT. Further, Veolia is not proposing any change to the BTT's existing at any-one-time waste storage limit of 6,225 tonnes.

Bayside Council General Comments

Council requests that the following matters are addressed as part of this proposal:

1. Planning

The modified proposal must demonstrate consistency with all relevant planning strategies, plans and Environmental Planning Instruments, including:

- *Environmental Planning & Assessment Act 1979;*
- *Environmental Planning & Assessment Regulations 2021;*
- *State Environmental Planning Policy (Planning Systems) 2021 – State Significant Development;*
- *State Environmental Planning Policy (Industry and Employment) 2021;*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021.*

The following matters are specifically referenced:

State Environmental Planning Policy (Planning Systems) 2021 – State Significant Development

The provisions of Schedule 1, Clause 23 (*Waste and Resource Management Facilities*) confirm that the proposal necessitates a State Significant Development application, as has been sought.

State Environmental Planning Policy (Industry and Employment) 2021

Where advertising signage constitutes part of any modification application, the relevant provisions of Chapter 3 – Advertising and Signage must be addressed.

State Environmental Planning Policy (Transport and Infrastructure) 2021

The site is situated within the Three Ports precinct and is subject to the provisions outlined in Chapter 5 -Three Ports (Port Botany, Port Kembla, and Port of Newcastle) of the SEPP.

2. Operational

Plan of Management

A comprehensive Plan of Management (POM) should be prepared (revised where currently in operation) for the site consistent with L&E Court Planning Principle in '*NSWLEC 315, Renaldo Plus 3 Pty Ltd v Hurstville City Council*'.

The POM is to list all details relevant to the operation of the waste transfer station including modifications sought as part of Mod 3 [SSD-5855]. The POM is to ensure all relevant operations of the use are understood and their impacts appropriately managed having regard to context of the premise and its surrounds.

As a minimum the following must be included:

- i. Title;
- ii. Objectives;
- iii. Operational details;
- iv. Hours of operation;
- v. Acoustic management
- vi. Traffic / car parking / deliveries / loading and unloading management
- vii. Fire / Emergency evacuation
- viii. Waste management
- ix. Safety and Security measures
- x. Staffing details;
- xi. Guidelines for staff for using the site facilities and equipment;
- xii. Managing customers;
- xiii. Complaint recording and handling process;
- xiv. The review process to continuously improve the POM.

3. Waste Management

Council recommends that the Department liaise with the Environment Protection Authority (EPA) to ensure that any proposed increase in processing capacity, or other changes to site operations, are thoroughly reviewed and formally approved in accordance with the existing site licensing framework.

This is necessary to confirm that all operational changes remain compliant with the conditions of the EPA licence and do not give rise to unacceptable environmental or amenity impacts.

4. Environmental Health

Councils Environmental Health Officer has reviewed the submitted document and notes that due consideration shall be given to the following matters as part of any comprehensive assessment of the subject modification application.

a) Odour and Air Quality Management

The proposed increased proportion of putrescible/FOGO waste is likely to elevate odour risk, particularly given nearby industrial uses and residential receivers.

The subject application relies on an existing EIS and historical complaint trends, with no new odour modelling undertaken.

Existing ventilation and filtration systems must be confirmed as adequate in order to be capable of sufficiently managing a higher putrescible load. Additionally consideration should be given to the preparation of an Odour Management Plan to address increased odour generation risk.

b) Leachate, Litter and Biosecurity Risk

FOGO has higher moisture content, increasing leachate and odour risks during transport, particularly for long-distance haulage. Additional safeguards are warranted to ensure vehicles are fit for purpose and leak free, specifically if new

receiving facilities are used. Appropriate conditions can mitigate the aforementioned.

c) Compliance

Enhanced tracking, reporting and enforcement mechanisms are required to ensure new limits are not exceeded.

Overall, environmental health risks are likely to be manageable, subject to the implementation of strengthened operational controls and monitoring requirements. It is recommended that amended consent conditions be imposed to address odour management, leachate control and compliance.

We trust that the Department will consider Council's input in finalising this modification application. If you require any further information please do not hesitate to contact Fiona Prodromou - Senior Assessment Planner title on (02) 9562 1672 or via email: fiona.prodromou@bayside.nsw.gov.au

Yours sincerely,



Carine Elias
Manager Development Services