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Parramatta NSW 2150

24 March 2026

Subject: Response to Submissions – Aussie Skips Recycling - Bellfrog St Site upgrades (SSD-67497708)

Dear Emma,

Thank you for your referral received 7 March 2026 requesting advice from the Conservation Programs Heritage and Regulation (CPHR) Group on the Response to Submissions (RTS) for this State significant development located at 13 Bellfrog Street, Greenacre.

CPHR has reviewed the *Aussie Skips Recycling Bellfrog St Site Upgrades (SSD-67497708) Submissions Report* (EMM, 27 February 2026) and supporting documentation and provides comments and recommendations at Attachment A. In summary:

- **Biodiversity** – CPHR's request for additional information, as outlined in its advice on the Environmental Impact Statement (EIS) dated 19 December 2025, has not been adequately addressed. The proponent has indicated that some items can be addressed through a condition of consent. However, the 'BDAR Mitigation Measures' should be updated and addressed prior to determination, to enable proper review and ensure their adequacy. Additionally, relevant digital files are yet to be received.
- **Flooding** – The RTS does not adequately address emergency management requirements, noting that the site faces high flash flood risks and that relevant NSW guidelines do not support or endorse site specific Flood Emergency Response Plans (FERPs) as mitigation. It is recommended that the emergency management strategy be reassessed against the considerations outlined in the relevant NSW guidelines.

Should you have any queries regarding this matter, please contact Senior Conservation Planning Officer at peter.braga@dcceew.nsw.gov.au.

Yours sincerely,

Susan Harrison
**Senior Team Leader, Central Metropolitan
Conservation Planning and Assessment
Conservation Programs, Heritage and Regulation Group**

CPHR advice on RTS - Aussie Skips Recycling - Bellfrog St Site upgrades located at 13 Bellfrog Street, Greenacre.

In preparing this advice, CPHR has reviewed the following documents:

- *Aussie Skips Recycling Bellfrog St Site Upgrades (SSD-67497708) Submissions Report* (EMM, 27 February 2026) (Submissions Report)
- *Appendix 6 – Biodiversity Development Assessment Report* (EMM, 24 October 2025) (BDAR)
- *Appendix 13 – Water, Soils and Flooding Report* (Tooker and Associates, 28 October 2025).

Biodiversity

Key Assessment Issues

1

BDAR mitigation measures

CPHR requests that the mitigation measures outlined in the BDAR be updated prior to determination to allow for adequate review, rather than deferring this matter to a condition of consent. Accordingly, the recommended actions detailed within the CPHR’s advice dated 19 December 2025 remain valid, as outlined below.

Recommended actions:

- Revise all Green and Golden Bell Frog (GGBF) mitigation measures so they are expressed as clear, enforceable specifications rather than recommendations or options.
- Present the mitigation measures in a table format including, at a minimum, the following headings:
 - Mitigation measure number
 - Action
 - Timing
 - Responsibility
 - Certification / sign-off.
- Include a requirement that the creation of habitat and installation of frog fencing be supervised and certified by a suitably qualified ecologist, with all such works completed prior to the commencement of construction.
- Update Section 4.2 of Appendix A to include detailed and specific measures to prevent light spill and light pollution impacts on the identified conservation area.
- Include a mitigation measure that clearly sets out vegetation management requirements, noting that mowing and similar activities have the potential to injure GGBF individuals that may utilise the site.
- In addition, provide greater detail and specification for the following mitigation measures:

Mitigation Measure	CPHR Comment (where applicable)
Maintain all existing boundary barrier fence ‘perforations’ or create additional ones as necessary to facilitate GGBF movements to and from the proposed GGBF habitat node	Provide details on whether adjoining landowner support has been obtained

	<i>offset area. This should ideally include the maintenance (or enhancement) of connective links with the Cox's Creek culvert (NE corner), the vegetated easement along the SE boundary with AUSREO Metal Fabricators (that also borders Coxs Creek), and the north adjoining Heidelberg Materials Concrete plant with its partly vegetated area bordering Cox's Creek and its stormwater culvert and detention structure.</i>	and who will lead and fund this proposed action.
	<i>Establish a landscape management regime within the proposed GGBF habitat node area and identify/appoint an accountable person(s) with roles and responsibilities to evaluate trigger management actions. This might require induction of the delegated personnel and the preparation of a simple management manual/guide."</i>	Detail the 'trigger management actions'.
	<i>A monitoring regime that identifies and reports any GGBF activity and communicates this information re GGBF internally to other staff and visitors should be established. This might include such things as erecting GGBF Frog ID posters, preparing awareness raising items for any internal newsletters/flyers/online and perhaps for even wider advertising of the company environmental operational ethos.</i>	Provide greater detail and specification.
	<i>Monitoring should be undertaken to determine the efficacy of the conservation measures and to adaptively adjust/maintain the habitat features as necessary. A functional evaluation and associated adaptive management of the GGBF habitat area should be undertaken for 5 years. This is ideally envisaged as being undertaken by a suitably upskilled Aussie Skips employee who has been provided basic training (see above). This might be further supported by affiliation and perhaps through provision of basic support to the FATs group already undertaking GGBF related conservation initiatives in the immediate locality.</i>	Provide greater detail and specification.
	<i>Develop a communications strategy to liaise with and maintain communications with other stakeholders/neighbours and participate in and/or provide for dissemination of information to and/or from other stakeholders with GGBF population elements locally at Greenacre (but specifically including FATs, Strathfield Council and the Departments GGBF accountable officer).</i>	Provide greater detail and specification.

	<i>Extent and timing</i>	Pre-determination
2	<i>BDAR Digital Files</i>	CPHR previously requested the provision of the digital files associated with the BDAR in its advice dated 19 December 2025. While the Submissions Report states that these files have already been provided to CPHR, they have not yet been received. Recommended action: The ecological consultant submit all relevant digital files in accordance with Appendix L of the Biodiversity Assessment Method
	<i>Extent and timing</i>	Pre-determination

Flooding

Key Assessment Issues

1	<i>Emergency management</i>	The RTS does not adequately address the SEARs or CPHR's advice on the EIS dated 19 December 2025. During the probable maximum flood, the site is subject to flash flooding with depths of up to 1.5m and an H4 flood hazard category, which is unsafe for vehicles and people. The Submissions Report states that a FERP will be prepared at the Construction Certificate stage "in line with NSW guidelines." However, NSW has no endorsed guideline for preparing a site-specific FERP. In addition, the Support for Emergency Management Planning Flood Risk Management Guideline EM01 (NSW DPE, 30 June 2023) advises that NSW SES does not support, assess, or endorse site-specific FERPs and that such plans must not be relied upon as a mitigation measure or imposed as a condition of consent. <i>Support for Emergency Management Planning Flood Risk Management Guideline EM01</i> further notes that reliance on a private FERP shifts unacceptable emergency-management risk onto future occupants and the broader community. Recommended action: Assess the emergency management strategy against the considerations listed in the Shelter in Place Guideline for Flash Flooding (NSW DPHI, January 2025) and <i>Support for Emergency Management Planning Flood Risk Management Guideline EM01</i>.
	<i>Extent and timing</i>	Pre-determination

End of Submission