

5 August 2026

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

Dear Mr Ansen,

**Cover Letter to Submission - State Significant Development
(SSD-94439711) – Enfield Material Recovery Facility Expansion
40-42 Madeline Street, Strathfield South**

Thank you for the opportunity to provide comments on the proposed SSD-9443971 by Re.Cycle Operations Pty Ltd (Re.Cycle) to increase the site's total co-mingled waste throughput by 100,100tpa, bringing the total approved capacity from 99,900tpa to 200,000tpa. The proposal also seeks consent to increase in storage limits to 8,000t at any one time (consistent with the temporary DA) and to extend the existing approved hours of operation to allow the additional materials to be received at the MRF from 4.30am to 6pm, Monday to Saturday.

Council staff have reviewed the proposal and prepared a submission which is attached below. In summary the major unresolved aspects are:

- Community – concerns regarding community complaints
- Acoustics – insufficient information provided to demonstrate appropriate prevention and management of noise impacts
- Air Quality and Odours – insufficient information provided to demonstrate appropriate prevention and management of noise impacts
- Traffic and Parking – Misalignment between the modification application currently before the Council and this subject SSD in both the site layout and proposed changes in parking.
- Impact of increased heavy vehicle movements on Council's assets and cost burden on Council to upgrade or replace these assets

Please contact Louise Gibson – Senior Planner on 9748 9999 or louise.gibson@strathfield.nsw.gov.au for any further correspondence or to discuss Council's input.

Regards,



Paul Reid
Director Planning & Environment

Strathfield Council Draft Submission to State Significant Development (SSD-94439711) – Enfield Material Recovery Facility Expansion – July 2026

Strathfield Council welcomes the opportunity to provide comments on the application for SSD – Enfield Material Recovery Facility. It is understood that the proposed works include:

- In addition to the approved throughput of 30,000 tpa of paper and cardboard (PCR), increasing the mixed metals, glass, mixed paper and mixed plastics (MRF) throughput from 69,900 tpa to 170,000 tpa, bringing the total maximum processing capacity of the site to 200,000 tpa. No changes are sought to PCR facility;
- Change to hours of operation to allow material to be received at the MRF from 4.30am to 6pm, Monday to Saturday. Currently, receipt of materials at the MRF must only take place between the hours of 4.30am and 3pm;
- 58 additional truck movements per day associated with delivering additional materials to the site (29 in, 29 out) and 13 truck movements per days associated with collection and transport of processed materials off site (7 in, 6 out)
- Increase in the total amount of waste materials permitted on the premises at any one time from 4,200 tonnes to 8,000 tonnes; and
- Employment of 6 additional full-time staff

Note: No physical changes are sought.

Council has now reviewed the Environmental Impact Statement (EIS) and other supporting documentation. The following comments are provided for consideration by the Department of Planning, Housing and Infrastructure.

Community Impacts

The proposal will have an impact on air quality, odour and noise.

The proposed modification has the potential to impact surrounding sensitive receivers through changes to air quality, odour and noise emissions. Given the nature of the industrial operations undertaken on the site and the proposed increase in operational activity, it is important that these potential environmental impacts are comprehensively assessed.

A review of Council's records indicates that noise and odour complaints relating to the site continue to be received from the surrounding community, with the most recent complaint lodged on 5 June 2026. As the site is regulated by the NSW Environment Protection Authority (EPA) under the applicable environmental protection legislation, Council is unable to verify whether these complaints were investigated or substantiated, or whether any compliance action has been undertaken.

Given the relevance of the EPA's regulatory role and any findings arising from its investigations, Council requests that it be re-consulted following receipt of the NSW EPA's response to the proposal. This will enable Council to review any additional information, compliance history or assessment outcomes provided by the EPA and to consider whether further measures are required to appropriately manage the potential impacts of the proposed modification on the surrounding community.

Acoustics

The submitted Acoustic Report prepared by Waves Consulting is unsatisfactory and not supported for the following reasons:

- The report relies upon outdated noise monitoring data from August 2022.
- The report proposes alternate noise mitigation measures. The proposed alternate noise mitigation strategy is to remove noise control measures required by a previous consent, this is not an alternative noise control measure but rather a noise control elimination strategy.

The proposed items to be removed are identified in the report as MM05, acoustic lining to a building, and MM09, acoustic lining to another building (refer to Figure 1 below for more details). The supporting justification to remove approved noise control measures is based on flawed reasoning that is not supported.

- The justification for removal is based on the structures at the neighbouring site, 84 Madeline Street, currently occupied by Aussie Skips. The applicant is not in control of those noise walls/barriers & their maintenance currently in place at Aussie Skips.
- The noise modelling did not include the impacts of the loss of the shielding structures.
- Mitigation measures must be based on the applicant's ability to control them as compliance will depend on third party structures remaining indefinitely and being maintained indefinitely.
- The report has not demonstrated that compliance can still be achieved if the adjacent site changes ownership, operations or building configuration.

MM05	compressors to 80%. Install a minimum of 1500 sqm of acoustic material on the inside of the building, to line the walls and the upper part of the walls. The lining should provide an NRC of not less than 0.75.	No longer required as noise emissions from the site have been reduced due to the changes at the adjacent Aussie Skips site. Not required
MM09	Install a minimum of 1000 sqm of acoustic material on the inside of the building, to line the walls and the upper part of the walls. The lining should provide an NRC of not less than 0.75. Review and repair all facade and roof	No longer required as noise emissions from the site have been reduced due to the changes at the adjacent Aussie Skips site. Not required

Figure 1, proposed noise control measures to be removed from the site, MM05 & MM09.

- The removal of internal lining is again based on external factors that the applicant does not control rather than reducing the noise source.
- The noise modelling done for mobile noise sources at 100% load for 50% of the time on average is not necessarily a conservative approach. Data should replicate a worst-case scenario where trucks are queuing for periods of time.
- The report fails to show whether peak hour was included in the assessment.
- The report does not clearly explain what noise sources are fixed and mobile.

Council is not satisfied that the Noise Impact Assessment (NIA) provides a sufficiently robust or contemporary assessment of the potential noise impacts associated with the proposed modification.

The report relies on noise monitoring and modelling based on historical data, including traffic data collected in 2015 and 2023. This information is not considered representative of current 2026 operating conditions and does not provide an appropriate basis for assessing the noise impacts of the proposed increase in the daily traffic baseline. Updated traffic data and documented traffic growth assumptions should be incorporated into revised noise modelling to ensure the assessment reflects existing and future operational conditions.

Council also notes that the original noise monitoring was undertaken prior to the construction of the noise shielding structures at the adjoining Aussie Skips site. Given the applicant's reliance on these structures as contributing to noise attenuation, it is appropriate that revised acoustic modelling be undertaken to quantify the extent of any noise mitigation they provide under current site conditions.

Further, while the report concludes that the proposal would result in negligible noise impacts and recommends the removal of certain noise control measures, Council remains concerned that it has continued to receive noise complaints relating to the operation of the site. Although Council acknowledges that the site is regulated by the NSW Environment Protection Authority and cannot confirm whether individual complaints have been substantiated, the ongoing nature of these complaints is inconsistent with the report's conclusion that operational noise impacts are insignificant.

Accordingly, Council recommends that the applicant prepare and submit an amended Noise Impact Assessment that addresses the matters outlined above, including updated baseline monitoring, contemporary traffic data, revised acoustic modelling and an assessment of the effectiveness of the existing noise shielding structures. The revised assessment should also reconsider the appropriateness of removing any existing noise management or monitoring requirements.

Air Quality & Odours

The air quality report is unsatisfactory. The report erroneously claims that there have been no complaints quoting outdated reports prepared by SLR dated July 2022 and Nov 2022 "*There have been no odour complaints since commencement on 7 July 2021, and the results of odour surveys indicate that no odours from the site were detectable at the nearest sensitive receptor locations on the day of the audit.*"

Notwithstanding, the report claims that during operation the site can achieve all relevant air quality criteria. The report also notes that the background is already exceeding the criteria for PM2.5.

The report highlights that there are already suitable mitigation measures in place:

- Keeping building doors closed when possible, to reduce the egress of uncontrolled emissions;
- Ensuring the dust capture system and baghouses are operating effectively and are maintained to reduce emissions associated with the glass beneficiation process;
- Storing baled product and glass cullet in enclosed areas; and
- Limiting vehicle speeds on site to 5 km·hr⁻¹.

The report does not propose any air quality monitoring.

Council notes the submitted social impact assessment prepared by bd infrastructure (dated 2/12/2025, referenced Re.Cycle SIA_V1-4_251121_Final) included odour concerns raised by the community.

Notwithstanding the report's conclusion that odour impacts are expected to be low and that the proposed development will not adversely affect surrounding sensitive receivers, Council is not satisfied that these conclusions are supported by the existing evidence. Council records indicate a history of ongoing odour complaints relating to the site, which raises concerns that the assessment does not adequately reflect existing operating conditions or the potential cumulative impacts associated with the proposed modification.

Accordingly, Council considers the Air Quality Impact Assessment to be unsatisfactory and recommends that an amended assessment be prepared. The revised assessment should respond to the history of ongoing odour complaints, incorporate current operational conditions, and demonstrate, through updated analysis and modelling where appropriate, that the proposed modification will not result in unacceptable odour impacts on surrounding residential receivers.

Traffic and Parking

The existing Notice of Determination for the site requires 29 parking spaces to be provided, noting that there is a maximum of 24 staff to be on site at any given time. As per the Traffic Impact Assessment, an additional 6 staff are proposed to be on site at any given time such that a maximum of 21 staff will be on site at any given time.

Council is concerned that the proposed development will require an additional three (3) car parking spaces to accommodate the increased staff numbers beyond those currently provided on the site.

However, there is a significant inconsistency between the development application modification currently before Council and the subject State Significant Development (SSD) application, particularly in relation to the proposed site layout and on-site parking arrangements.

The modification application proposes substantial changes to the site layout, including the relocation of existing parking spaces to accommodate an increased building footprint, the relocation of on-site amenities, and the provision of two (2) additional parking spaces. In contrast, the SSD application retains the existing site layout and does not propose any additional on-site parking. The plans submitted with the SSD also indicate that there is insufficient space along the northern boundary of the site to accommodate the relocated parking shown in the modification application.

These inconsistencies create uncertainty regarding the ultimate site configuration and whether the required parking provision can be maintained. Council therefore recommends that the SSD application and the concurrent modification application be reconciled to ensure they are consistent and accurately reflect the intended final development outcome. At a minimum, each application should acknowledge the existence of the other and clearly explain how the two proposals interact. Failure to resolve these discrepancies may result in a final site layout that is incapable of accommodating the required 29 on-site parking spaces, resulting in non-compliance with the relevant conditions of consent.

Impact on Council Infrastructure

While the Traffic Impact Assessment concludes that the surrounding road network has sufficient capacity to accommodate the proposed increase in traffic volumes, Council notes that the assessment is limited to operational network performance and does not adequately consider the long-term impacts on Council-owned infrastructure.

The proposal would facilitate an additional 71 heavy vehicle movements per day associated with the delivery and collection of materials. While these movements may not result in immediate capacity constraints, they have the potential to significantly accelerate the deterioration of local roads, pavements, intersections, kerb and gutter, drainage infrastructure and other transport assets under Council's ownership and management.

The cumulative effect of increased heavy vehicle loading is likely to result in more frequent inspections, maintenance and earlier asset renewal, imposing additional financial costs on Council that are ultimately borne by the local community through ratepayer funding. These lifecycle costs have not been assessed or quantified within the submitted documentation.

Accordingly, Council requests that the Department give due consideration to the long-term asset management and financial implications arising from the proposed increase in heavy vehicle movements on Council-owned infrastructure as part of its assessment of the application. Council further requests that consideration be given to the imposition of an appropriate condition of consent requiring the applicant to be responsible for the costs associated with any increased wear, damage or deterioration of Council infrastructure attributable to the development. This will ensure that the financial burden of maintaining, repairing and renewing affected infrastructure is appropriately borne by the development and is not transferred to Council or the broader community.

Conclusion

As outlined above, Council's outstanding concerns relate to the assessment of environmental impacts and the adequacy and consistency of the proposed on-site parking arrangements. Council requests that amended plans and supporting documentation be submitted to address the matters raised in this submission, enabling Council to undertake a further review prior to the determination of the application.