

In reply please quote: 23/27767

Contact: Kerren Ven on (02) 9725 0878

5 November 2025

Industry Assessments
NSW Department of Planning, Industry and Environment
GPO Box 39,
SYDNEY NSW 2000

SSD-62947958 – HALGAN LIQUID WASTE MANGEMENT FACILITY AT 10 DAVIS ROAD, WETHERILL PARK

Dear Ms Ellen Lu,

Reference is made to the request for comments on the proposed increased in processing of material associated with the existing waste resource recovery facility at the above-mentioned premises.

The proposal seeks to increase the processing amount of the existing liquid waste facility to allow 120,000tpa of liquid waste, comprising of 50,000 tpa of grease trap material that is subject to previous approval from Council, with an additional 70,000 tpa of industrial and other liquid waste streams to be processed 24hrs/7days a week.

The issues raised in this submission suggest that the proposed increased tonnage of waste material processed at the facility are beyond the sites capacity. In this respect, Council requests that the NSW EPA (who are the relevant licensing authority under the *NSW Protection of the Environment Operations Act 1997*, apply close scrutiny to the current and proposed increased operations of the facility and advise the Department accordingly.

NEED TO MAINTAIN UNOBSTRUCTED CAR PARK

Aerial imagery suggests that the approved development on the site is not operating in accordance with the existing consent, with these images showing a significant number of drums and storage vessels being located outside designate storage space within areas required to be used as parking spaces, as per condition 38 of development approval issued by Council for DA 286.1/2020.

In this respect, it appears that the activities associated with the current development are not able to be accommodated within the existing processing/storage building. Council considers the proposed substantial increase in waste to be processed at the facility will exacerbate this situation and has the potential to result in undesirable environmental and car parking impacts on the surrounding area. At this stage, it is unclear if the information and documents submitted with the application can be relied on to support the level of intensification in the operations of this facility.

1. TRAFFIC RELATED MATTERS:

- a. A Loading Dock Management Plan is to be provided outlining how deliveries and collections will be managed to minimise conflicts between staff vehicles and delivery vehicles when using the car park and loading area.

The plan should clarify delivery schedules, staff shift timings, overlap between incoming and outgoing staff and pedestrian safety measures during delivery times.

- b. Swept-path diagrams illustrating simultaneous entry and exit movements of a 12.5 m HRV and a B99 vehicle at the Davis Road driveway is to be provided to confirm there is no conflict. Clarification is to be provided if there is potential conflict and how it will be managed/mitigated.
- c. Provide swept-path diagrams for a 12.5 m HRV accessing and manoeuvring within the loading dock bay.
- d. Explain how pedestrians will be managed within the parking area, including safe access between parking spaces, pathways, and building access points.
- e. Confirm if an accessible parking bay has been provided. If not, one should be included nearest to the building access point, designed in accordance with AS 2890.6.
- f. Confirm whether waste collection is managed by a private contractor, and if so, explain how collection vehicles will access and exit the site safely.

2. WASTE MANAGEMENT

A. Integrated on-site waste collection:

The kerbside presentation of waste and recycling streams is not an acceptable solution for integrated on-site waste collection. A detailed swept path analysis supported by scaled architectural plans to be submitted to Council to permit a detailed assessment. The swept path model to:

- Demonstrate compliance with Australian Standards (AS) 2890.2
- The preparation of the swept path models to be in accordance with the Austroads Design Vehicles and Turning Path Templates (latest edition)
- On-street parking to be provided on both sides of the road to demonstrate a business-as-usual model responsive to local traffic and parking availabilities
- Standard waste collection vehicle to:
 - Enter and exit the site in a forward direction
 - Can perform all required access and collection manoeuvres without impeding vehicle, pedestrian, cyclist, and user safety
 - Have unobstructed minimum height clearances, maximum ramp grades, maximum rates of change, and unobstructed operational clearances throughout all required manoeuvres (ingress, egress, loading bay access) to permit safe and efficient scheduled collections
 - A minimum 500mm clearance to be provided from all obstructions throughout all required vehicle manoeuvres to perform scheduled collections
- Applicant to demonstrate the proposed service arrangements can meet the waste and recycling volumes anticipated for the development in accordance with the commercial generation rates in accordance with the EPA Better practice guide for resource recovery in residential developments.

The integrated on-site site loading area to:

- Be fully enclosed, walled and accessed via a restricted opening to provide physical separation from vehicles, pedestrian, cyclists, and other users
- Mechanically ventilated

- Incorporate acoustic attenuation and supporting infrastructure detailed within a report prepared by an acoustic consultant to support use of a heavy rigid collection vehicle at high revs
- Provide a 2000mm unobstructed clearance at the rear of the vehicle to support the collection of Councils waste streams
- The collection of materials to be conducted in accordance with the NSW Environment Protection Authority, Industrial Noise Policy 2000

B. Waste Management Plan:

The Waste Management Plan must be prepared by a suitably qualified consultant experienced in the management of waste and recycling streams to address the following

- Demonstrate waste and recycling streams can be provided and accessible to all users
- Identify the waste streams and anticipated volumes expected to be generated by the development throughout construction and in perpetuity during operation
- Demonstrate integrated on-site loading and supporting infrastructure is provided to permit safe and efficient schedule collections by a standard waste collection vehicle
- Outline how the waste generated on-site will be managed to support unobstructed access to each user and full suite of waste and recycling streams
- Identify the path of travel from disposal point to the designated collection infrastructure to permit scheduled collection/s
- Outline how and where waste will be collected, transported, stored and managed for each component of the development
- Provide detailed architectural plans to demonstrate compliance with the above points

C. Waste Collection Area:

Plans to illustrate the designated waste storage and collection room to be provided and located within close proximity to the integrated on-site waste loading bay. The room/s to accommodate the following infrastructure:

- Of sufficient size to accommodate the entire bin allocation responsive to the volumes of the anticipated waste and recycling streams
- Accommodate the infrastructure and area requirements to support a maximum service frequency of two times weekly
- Accessed via dual, 180-degree, outwards opening, self-closing sealed doors with a minimum opening of 1800mm
- 200mm clearances to be provided between bins for manoeuvrability
- Room enclosed, walled, and not permit through access to other on-site infrastructure

D. Bulky storage and collection area:

The bulky waste storage and collection room to be located within close proximity to the integrated on-site waste loading bay. The room to accommodate the following infrastructure:

- Minimum unobstructed internal area based on the following:
 - 2m² for developments up to 100m²
 - 4m² for developments up to 1000m²
 - 8m² for developments over 1000m²

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- Accessed via dual, 180-degree, outwards opening, self-closing sealed doors with a minimum opening of 1800mm
 - Minimum internal width of 1800mm
 - Room enclosed, walled, and not permit through access to other on-site infrastructure

E. Integrate on-site waste and recycling storage and collection infrastructure:

All integrated on-site waste and recycling storage and collection infrastructure are to incorporate the following infrastructure, including but not limited to:

- Integrated wholly within the developments-built form to support an enhanced urban design outcome
- Room to be free from internal pylons, obstructions and other external services
- Permit safe, efficient, and unobstructed work practices for assigned uses and waste collection staff whilst restricting unauthorised access
- Mechanical ventilation
- Automated lighting
- Hot and cold-water taps
- Bunded wash bays
- Drainage connected to the sewer
- Minimum unobstructed internal height clearance of 2700mm
- Water proofing through all intersections and extend 1200mm high on walls
- Doors locked through a restricted key arrangement

3. Operational Environmental Management

A. Construction Environmental Management Plan

Prior to the commencement of installation and commissioning of new plant, equipment and controls, a Construction Environmental Management Plan is to be prepared setting out all necessary measures and approvals, including but not limited to:

- Securing an amendment to EPL# 21629, and compliance with any EPA requirements from the General Terms of Approval. Continued monitoring and reporting requirements to EPA.
- Seeking an amendment to Trade Waste Agreement, and compliance with any Sydney Water requirements. Continued monitoring and reporting requirements to Sydney Water.
- Site inspection with Fire & Rescue NSW, design/installation of upgraded fire safety controls as required, completion of updated management plans, continued annual certification of Fire Protection systems and processes.
- Updating all management plans and systems, certification, training, implementation and monitoring. BCA/NCC certification; Certification as required for occupancy and compliance with consent conditions.
- Continuing to implement all mitigation measures from public health and safety (as summarised in Section 6.9 of this EIS and the mitigation measures within Appendix B of the EIS to be included and implemented within the facility's management plans.

B. Environmental Reports Certification

Prior to the issue of an Occupation Certificate, written certification from a suitably qualified person(s) shall be submitted to the consent authority, stating that all works/methods/procedures/control safeguard measures/recommendations of the following report have been completed:

- a) Air Quality Assessment, prepared by Halgan Pty Ltd, dated 16 October 2024, Ref: 247401.0001.R02V02
- b) Noise Impact Assessment, prepared by Trinity Consultants Australia, dated 30 January 2025, Ref: 247401.0001.R01V03.

C. Odour Audit

The Applicant shall carry out an Odour Audit of the Development no later than six months after the commencement of expanded operations of the Development. The audit shall:

- a) be carried out by a suitably qualified, experienced and independent person(s)
- b) audit the Development in full operation.
- c) include a summary of odour complaints and any actions that were carried out to address the complaints.
- d) validate the Development against odour impact predictions in the Air Quality Assessment, prepared by Halgan Pty Ltd, dated 16 October 2024, Ref: 247401.0001.R02V02
- e) review the design and management practices in the Development against industry best practice for odour management.
- f) identify suitable odour mitigation options and controls, including but limited to:
 - i. mechanical ventilation.
 - ii. operation of the building under negative pressure to minimise fugitive emissions; and
 - iii. odour capture and control options.
- g) include an action plan that identifies and prioritises any odour mitigation measures that may be necessary to reduce odour emissions.

Within two months of commissioning of the Odour Audit, the Applicant shall submit a copy of the Odour Audit report to the satisfaction of the NSW EPA, together with the Applicant's response to any recommendations contained in the Odour Audit report.

Note: The Odour Audit shall be prepared so that it addresses the requirements of this consent and the Environment Protection Licence for this Development.

D. NSW Protection of the Environment Operations Act 1997

The use of the premises shall operate in accordance with the *Protection of the Environment Operations Act (POEO) 1997*. All activities and operations carried out shall not give rise to air pollution (including odour), offensive noise or pollution of land and/or water as defined under the *Protection of the Environment Operations Act 1997*.

If you have any questions regarding the above matters raised in this letter, please contact Kerren Ven on (02) 9725 0878.

Yours faithfully,



Andrew Mooney
EXECUTIVE PLANNER
CITY STRATEGIC PLANNING