

18 December 2025

Emma Barnett
NSW Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Mr Flynn,

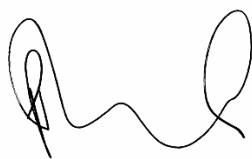
**Cover Letter to Draft Submission - State Significant Development
(SSD-67497708) – Aussie Skips Recycling – 13 Bellfrog St Site upgrades**

Thank you for the opportunity to provide comments on the proposed amended SSD – Aussie Skips Recycling – 13 Bellfrog St Site Upgrades. Council staff have reviewed the amended proposal and prepared a draft submission which is attached below.

Please note that this draft submission has not yet been endorsed by Council. A final submission will be provided upon endorsement by the Council in February 2026.

Please contact Apoorva Chikkerur – Executive Planner on 9748 9923 or apoorva.chikkerur@strathfield.nsw.gov.au for any further correspondence or to discuss Councils input.

Regards,



Paul Reid
Director Planning & Environment

Strathfield Council Draft Submission to State Significant Development (SSD-67497708) – Aussie Skips Recycling – 13 Bellfrog St Site upgrades

Strathfield Council provided a submission regarding the original scheme in March 2023 and appreciates the opportunity to provide comments on the amended application for SSD – Aussie Skips Recycling – Bellfrog St Site upgrades, which includes:

- Minor demolition
- Alterations to existing site components
- Installation of a fixed waste processing plant and site infrastructure
- Construction of environmental conservation measures, and
- the ongoing operation of the Resource Recovery Facility (RRF).

The RRF will have two main buildings, a Waste Reveal Building and a Waste Processing Building. These will be connected by an enclosed conveyor. There will be an open yard between these buildings, to allow truck access for delivery of waste and dispatch of recovered products and residual waste. All waste storage, handling and processing will be within the buildings and conveyor. No waste will be stored, handled or processed outside.

It is noted that the amended application ameliorates some of Council's original concerns. However, some concerns remain regarding biodiversity, contamination and waste as outlined below.

Test of Significance under Biodiversity Conservation Act 2016

Council had previously raised concerns regarding the Biodiversity Development Assessment Report (BDAR) Waiver Request based on the close proximity to Green and Golden Bell Frog (*Litoria aurea*) habitat. In particular, the Waiver Request has not addressed the nearby habitat at 23 Bellfrog Street, which is less than 100m downstream from the site. To properly assess this a full BDAR is required in this instance.

There were 19 site visits by the Frog & Tadpole Study Group NSW between August 2024 to July 2025 during the year comprising 8 survey visits, 9 working bees and two Open Days.

Adult Green and Golden Bell frogs were detected on 9 of the site visits, while juveniles (metamorphs) were detected on 14 visits to the site. Tadpoles of the Green and Golden Bell frog were present on 15 occasions; tadpoles that were present in April and May of 2024 remained as tadpoles over winter and did not metamorphose until the next springtime. Only one spawn masses were located this season, it was found on 10th November 2024.

The significant operational expansion at the site may be detrimental to the Frog's movement across the landscape for an array of reasons, including the extension of hours into nighttime periods. Also of particular concern is the processing of concrete on site, with resulting particles affecting the air quality and settling in adjacent creek, which would affect water quality for the frogs.

It is noted that a biodiversity development assessment report (BDAR) waiver request has been submitted by the applicant which is currently under assessment by BCS. Until a waiver is granted, Council maintains that a BDAR to be prepared as part of the EIS.

Historical Compliance and Cumulative Impacts

The EIS states *"The existing Waste Material Handling Yard has a demonstrated history of operations that do not impact on the surrounding community."*

Council has received numerous complaints about Aussie Skips over many years, and directed many more to the NSW EPA, including noise, air pollution including dust and odour etc. Consideration needs to be given how these impacts will be addressed in a Plan of Management.

Contamination

Methane monitoring should be undertaken in accordance with the DSI recommendation: biannually for at least 12 months, using a 1% v/v action threshold consistent with EPA guidelines. Exceedances should trigger further assessment.

No intrusive works (e.g., excavation, dewatering) are to be undertaken unless further assessment is completed to address potential acid sulfate soils or subsurface contamination.

Any changes to the development footprint involving soil disturbance or substructure modifications should be referred for further environmental health review.

Ongoing regulation of subsurface gas monitoring and management will be the responsibility of the EPA under the site's Environment Protection Licence (EPL).

Waste Management

The proposed development addresses past issues raised by Council in the past regarding waste handling. Council would like to see a standalone waste management plan that describes how the C&D waste from this project will be handled along with an operational waste management plan. A litter management plan must be included in the WMP and outline that the occupant must take all practicable steps to ensure that the area of public footpath or public area adjacent to the premises within a 50m radius is maintained in a clean and tidy condition – free of litter and illegal dumping.

Conclusion

Thank you again for the opportunity to provide feedback on the amended SSD. As addressed above, Council have remaining concerns over biodiversity of the green and golden bell frog, contamination and waste management.