



Your ref: SSD-67497708
Our ref: DOC25/974290

Emma Barnet
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Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
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19 December 2025

Subject: Request for advice on Environmental Impact Statement – Aussie Skips Recycling – Bellfrog Street Site Upgrades (SSD-67497708) (Strathfield Council)

Dear Emma,

Thank you for your referral received 13 November 2025 seeking comments from the Conservation Programs, Heritage and Regulation (CPHR) Group of the NSW Department of Climate Change, Energy, the Environment and Water regarding the Environmental Impact Statement (EIS) for the above State significant development application (SSD).

CPHR has reviewed the *Environmental Impact Statement* (prepared by 4Pillars Environmental Consulting, 3 November 2025) (EIS) and supporting studies and provides detailed flooding and biodiversity comments at **Attachment A**.

Should you have any queries regarding this matter, please contact Rithy Ang, Senior Conservation Planning Officer via rithy.ang@dcceew.nsw.gov.au.

Yours sincerely

Sarah Burke

**A/Director
Regional Delivery - Greater Sydney Branch
Conservation Programs, Heritage and Regulation Group**

CPHR comments on EIS - Aussie Skips Recycling – Bellfrog Street Site Upgrades (SSD- 67497708) (Strathfield Council)

Documents Reviewed

CPHR has reviewed the following documents and provides comments below:

- *Environmental Impact Statement – Aussie Skips Recycling – Bellfrog Street Site Upgrades* (4Pillars, 3 November 2025) (EIS)
- Appendix 6 – Biodiversity Development Assessment Report (EMM, 24 October 2025)
- Appendix 13 – Water, Soils and Flooding Report (Tooker and Associates, October 2025).

Flooding

1.	Emergency Management	The Water, Soils and Flooding Report prepared by Tooker Associates dated 28 October 2025 has not assessed the suitability of shelter-in-place as an emergency response strategy against the considerations of the NSW Shelter-in-Place Guideline for Flash Flooding and EM01 Support for Emergency Management Planning. Key considerations that have not been addressed include: • Duration of Isolation: The report does not estimate the likely duration of isolation during a probable maximum flood (PMF) event. EM01 (Section D4) and the Shelter-in-Place Guideline both emphasise that there is no known safe period of isolation and recommend that any shelter-in-place strategy should only be considered where isolation is short, generally less than 12 hours, and risks such as fire or medical emergencies can be managed. • Hazard of Surrounding Roadways: The guidelines recommend that surrounding roadways should not be subject to high-hazard flooding. However, the Cooks River and Coxs Creek Flood Study indicates that the site is surrounded by high-hazard floodwaters. Recommended action Assess the emergency management strategy against the considerations listed in the NSW Shelter-in-Place Guideline for Flash Flooding and EM01 Support for Emergency Management Planning.
	<i>Extent and Timing</i>	Prior to determination

Biodiversity

2.	BDAR Mitigation Measures	CPHR has reviewed the EIS and the BDAR prepared by EMM, dated 24 October 2025 and notes that the site has potential to provide transient habitat for the Green and Golden Bell Frog (GGBF). The submitted BDAR assesses the potential impacts to the GGBF and includes a species-specific expert report prepared in accordance with Section 5.3 of the Biodiversity Assessment Method 2020 (BAM). CPHR supports the mitigation measures proposed in the BDAR. However, several measures, including those in Section 4.2 of Appendix A, are ambiguously worded and lack sufficient details. It is recommended that the measures be imposed as conditions of consent and be clearly worded. For example, indicative or discretionary language such as “could” or “might” is not considered appropriate.
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		Recommended action • Revise all 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 Appendix A, Section 4.2 of the BDAR 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. • Additionally, provide greater detail and specification for the following mitigation measures:						
		<table><tr><th>Mitigation Measure</th><th>CPHR Comment (where applicable)</th></tr><tr><td><i>“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 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></td><td>Provide details on whether adjoining landowner support has been obtained and who will lead and fund this proposed action.</td></tr><tr><td><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></td><td>Detail the ‘trigger management actions’.</td></tr></table>	Mitigation Measure	CPHR Comment (where applicable)	<i>“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 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>	Provide details on whether adjoining landowner support has been obtained 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’.
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		<i>"A monitoring regime that identifies and reports any GGBF activity and communicates this information regarding 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>	Prior to determination	

3.	BDAR Digital Files	CPHR did not have access to the digital files associated with BDAR. Recommended action The ecological consultant is to submit all applicable digital files as per Appendix L of the BAM 2020.
	<i>Extent and Timing</i>	Prior to determination

End of Submission