

Aussie Skips Recycling (EPL 21389)  
13 Bellfrog St, Greenacre

BDAR Waiver Request

May 2022

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*Prepared for:*

Aussie Skips Recycling Pty Ltd

ABN: 23 614 855 506

A: 13 Bellfrog Street, Greenacre, NSW

P: 1300 11 00 11

*Prepared by:*

4Pillars Environmental Consulting Pty Ltd

ABN: 73 616 670 994

Lead author: Mr James Sonter, Consultant

Report approved by: Mr James Hammond, Director

E: [hello@4Pillars.com.au](mailto:hello@4Pillars.com.au)

P: 02 8060 2609

A: Level 1, 5 George Street, North Strathfield, NSW, 2137

W: [www.4Pillars.com.au](http://www.4Pillars.com.au)

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4Pillars acknowledges the Traditional Owners of the land on which this site is located, the people of the Dharug Nation. We acknowledge their continuing connection to land and sea Country and we pay our respects to their Elders past, present and emerging.

### *Disclosure statement*

Mr James Hammond, Director of 4Pillars is engaged, via an EnviroNow services agreement, to provide environmental consulting services to Aussie Skips Recycling Pty Ltd. Mr Hammond fulfills the role and position of Environmental Manager for Aussie Skips Recycling Pty Ltd.

This document has been prepared by 4Pillars and Mr Hammond in their capacity as independent environmental professionals. The statements and conclusions of this document are based on an objective evaluation of the available facts and data.

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<b>Document Approved by:</b>	James Hammond BSc, MWildMgmt, MEIANZ, CEnvP james@4Pillars.com.au	<b>Signature:</b>	
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## 1 Introduction

Aussie Skips Pty Ltd (Aussie Recycling) is applying for State Significant Development approval (SSD). It is understood that the Biodiversity Conservation Act (2016) (BC Act) requires proponents of SSD and SSI to assess biodiversity impacts on major projects. The BC Act requires that an SSD application be accompanied by a biodiversity development assessment report (BDAR) unless the Planning Agency Head (or delegate) and the environment Agency Head (or delegate) determine that the proposed development is not likely to have any significant impact on biodiversity values. This determination is referred to as a BDAR waiver.

This BDAR waiver request has been prepared to accompany Aussie Recycling's application for State Significant Development approval (SSD) at their existing Waste facility at 13 Bellfrog Street, Greenacre (the Premises), where they propose to increase operations and expand activities.

Lodgement of the BDAR waiver request is recommended to occur simultaneously as the request for SEAR is made. This helps ensure that the proponent is made aware of all relevant biodiversity assessment requirements for the proposed development as early as possible. This BDAR waiver request will be lodged with the Department via the Major Projects Planning Portal.

It is noted that this BDAR waiver request has been prepared with due regard to the biodiversity values defined in the Biodiversity Act 2016 (BC Act) under section 1.5 and clause 1.4 of the Biodiversity Conservation Regulation 2017 (BC Regulation). Additionally all information requirements set out in Tables 1 and 2 of the *Biodiversity development assessment report waiver request information requirements*.

### *Proposed development*

Aussie Recycling look to increase the scale and activities of their current waste handling and transfer facility at 13 Bellfrog Street, Greenacre, and the proposed changes are summarised in *Table 1: Summary of site details* below and in further detail in Section 2.

### *Site details*

Street Address	13 Bellfrog Street, Greenacre, 2190, NSW
Lots	LOT 15 DP1133214
Local Government Area	Strathfield Council
Zoning	IN1 – General Industrial (LEP 2012)
Development consent	DA2012/175
Environment Protection Licence	21389
Site operator	Aussie Skips Recycling Pty Ltd (ABN 23 614 855 506)
Scale of activities (current)	Waste Storage: 199,000 tonnes in any 12-month period. 8,000 tonnes at any one time.
Scale of activities (proposed)	Waste Storage: 300,000 tonnes in any 12-month period and 14,000 tonnes at any one time. Waste Processing: Soil screening and crushing and concrete screening and crushing up to 3000kt in any 12-month period. Receive wastes that meet the description of: GSW>CT1, Brick and Concrete, Asphalt, and Excavated Public Road Material. Changes to operating hours (further detailed in operating hours below)
Current infrastructure on Site	Warehouse, workshop, awning, waste storage bays, in-ground wheel rumble, four above ground tanks, and dual in-ground weighbridges.

*Table 1: Summary of site details.*

The proposed works are understood to exceed the 'trigger' above which requires consent issued via a State Significant Development approval pathway, and as such, Aussie Recycling seeks to apply for a new State Significant Development Approval.

The location map showing the proposed development site in the context of surrounding areas and landscape features has been included in Figure 4.

## 2 Impacts on Biodiversity Values

### *Overview of inclusions*

Additionally, impacts on biodiversity values to which the BOS applies must be addressed. These biodiversity values are defined in the BC Act under section 1.5 and clause 1.4 of the BC Regulation and are outlined below.

*BC Act – Section 1.5 (2) For the purpose of this Act, Biodiversity values are the following biodiversity values –*

- a) vegetation integrity—being the degree to which the composition, structure and function of vegetation at a particular site and the surrounding landscape has been altered from a near natural state,
- b) habitat suitability—being the degree to which the habitat needs of threatened species are present at a particular site,
- c) biodiversity values, or biodiversity-related values, prescribed by the regulations.

The BC Regulations – Section 1.4 (referred to above 1.5 (2)(c)) are additional biodiversity values for the purpose of the Act –

- a) threatened species abundance—being the occurrence and abundance of threatened species or threatened ecological communities, or their habitat, at a particular site,
- b) vegetation abundance—being the occurrence and abundance of vegetation at a particular site,
- c) habitat connectivity—being the degree to which a particular site connects different areas of habitat of threatened species to facilitate the movement of those species across their range,
- d) threatened species movement—being the degree to which a particular site contributes to the movement of threatened species to maintain their lifecycle,
- e) flight path integrity—being the degree to which the flight paths of protected animals over a particular site are free from interference,
- f) water sustainability—being the degree to which water quality, water bodies and hydrological processes sustain threatened species and threatened ecological communities at a particular site.

### *Biodiversity – Table 2*

Each biodiversity value listed in Table 2 of the *Biodiversity development assessment report waiver request information requirements* has been addressed below. This requires the following explanations if relevant:

1. Why the value is not relevant to the proposed development, and;
2. Where a biodiversity value may be relevant, an explanation of how impacts have been avoided and identifying the likelihood and extent of any remaining impacts of the proposed development
3. Additional information where biodiversity values are relevant to the Site have been attached, including species sighting maps obtained from BioNet Atlas.

Certain species were considered in detail where the desktop review had suggested a greater chance of presence (e.g. BioNet species data) or where habitat features were present within the footprint of the development. This approach is considered to be adequate to assess the impact of the proposed development on the threatened species.

Table 2 – Biodiversity values listed with reference to Table 2 of the Biodiversity development assessment report waiver request information requirements.

Biodiversity Value	Meaning	Potential impacts
Vegetation abundance 1.4(b) BC Regulation	Occurrence and extent or coverage of vegetation at a particular Site	The proposed development is located at an established <i>brown site</i> , with no additional construction proposed. No existing vegetation or vegetative coverage present on Site. Additionally, the surrounding area consists of hardstand and industrial Sites, which will not be impacted by the proposed development. Accordingly, it is understood that the value is not relevant to the proposed development.
Vegetation Integrity 1.5(2)(a) BC Act	Degree to which the habitat needs of threatened species are present at a particular site	<p>A desktop screening (eSpatial viewer including: Riparian lands and watercourses and environmentally sensitive land) and Site visits has confirmed that no threatened species or ecological communities or their habitat exist on the development Site.</p> <p>Proposed development will not involve construction, excavating or stripping which threatens the following habitats of threatened species or ecological communities:</p> <ol style="list-style-type: none"> <li>1. Karst, caves, crevices, cliffs and other geological features of significant</li> <li>2. rocks</li> <li>3. human-made structures</li> <li>4. non-native vegetation (prescribed under clause 6.1(1)(a) of the BC Regulation)</li> </ol>
Threatened species abundance 1.4(a) BC regulation	Occurrence and abundance of threatened species or threatened ecological communities, or their habitat	See <a href="#">section 3</a>
Habitat connectivity 1.4(c) BC Regulation	Degree to which a particular site connects different areas of habitat of threatened species to facilitate the movement of those species across their range	See <a href="#">section 3</a>

Threatened species movement 1.4(d) BC Regulation	Degree to which a particular site contributes to the movement of threatened species to maintain their lifecycle	See <a href="#">section 3</a>
Flight path integrity 1.4(e) BC Regulation	Degree to which the flight paths of protected animals over a particular site are free from interference	See <a href="#">section 3</a>
Water sustainability 1.4(f) BC Regulation	Degree to which water quality, water bodies and hydrological processes sustain threatened species and threatened ecological communities at a particular site	See <a href="#">section 3</a>



Table 3 Threatened ecological communities identified within a 5km vicinity of the Site.

Species common name	Scientific name	Listing status (NSW)	Listing status (National)	Likelihood of occurrence	Found within 5km of the Site
<b>Mammals</b>					
Grey-headed Flying-fox	<i>Pteropus poliocephalus</i>	Vulnerable	Vulnerable	Species of species habitat likely to occur within the area	YES
Large Bent-winged Bat	<i>Miniopterus orianae oceanensis</i>	Vulnerable	Not listed	Species of species habitat likely to occur within the area	YES
Eastern False Pipistrelle	<i>Falsistrellus tasmaniensis</i>	Vulnerable	Not listed	Species of species habitat likely to occur within the area	YES
Greater Broad-nosed Bat	<i>Scoteanax rueppellii</i>	Vulnerable	Not listed	Species of species habitat likely to occur within the area	YES
Southern Myotis	<i>Myotis macropus</i>	Vulnerable	Not listed	Species of species habitat likely to occur within the area	YES
Eastern Coastal Free-tailed Bat	<i>Micronomus norfolkensis</i>	Vulnerable	Not listed	Species of species habitat likely to occur within the area	YES
Brush-tailed Phascogale	<i>Phascogale tapoatafa</i>	Vulnerable	Not listed	Species of species habitat likely to occur within the area	YES
Yellow-bellied Sheath-tail-bat	<i>Saccolaimus flaviventris</i>	Vulnerable	Not listed	Species of species habitat likely to occur within the area	YES
<b>Amphibians</b>					
Green and Golden Bell Frog	<i>Litoria aurea</i>	Endangered	Vulnerable	Species of species habitat likely to occur within the area	YES
<b>Birds</b>					

Species common name	Scientific name	Listing status (NSW)	Listing status (National)	Likelihood of occurrence	Found within 5km of the Site
Little Eagle	<i>Hieraaetus morphnoides</i>	Vulnerable	Not listed	Species of species habitat likely to occur within the area	YES
Swift Parrot	<i>Lathamus discolor</i>	Endangered	Critically Endangered	Species of species habitat likely to occur within the area	YES
Powerful Owl	<i>Ninox strenua</i>	Vulnerable	Not listed	Species of species habitat likely to occur within the area	YES
Magpie Goose	<i>Anseranas semipalmata</i>	Vulnerable	Not listed	Species of species habitat likely to occur within the area	YES
Flame Robin	<i>Petroica phoenicea</i>	Vulnerable	Not listed	Species of species habitat likely to occur within the area	YES
Regent Honeyeater	<i>Anthochaera phrygia</i>	Critically Endangered	Critically Endangered	Species of species habitat likely to occur within the area	YES
Masked Owl	<i>Tyto novaehollandiae</i>	Vulnerable	Not listed	Species of species habitat likely to occur within the area	YES
Turquoise Parrot	<i>Neophema pulchella</i>	Vulnerable	Not listed	Species of species habitat likely to occur within the area	YES
Little Lorikeet	<i>Glossopsitta pusilla</i>	Vulnerable	Not listed	Species of species habitat likely to occur within the area	YES
Scarlet Robin	<i>Petroica boodang</i>	Vulnerable	Not listed	Species of species habitat likely to occur within the area	YES
<b>Reptiles</b>					
Green turtle	<i>Chelonia mydas</i>	Vulnerable	Vulnerable	Species of species habitat likely to occur within the area	YES

### 3 Test of significance / risk assessment

Table 2 above provides a high level overview of threatened species which have been sited within a 5km radius of the Site, and uploaded to the Bionet database. Due to the size of the proposed development, and the minimal impact expected to the surrounding environment (no construction works or associated tasks related to the development, or threatened ecological communities located on the Site) it is considered appropriate that a test of significance / risk assessment targeting threatened species within a 1km radius of the Site is most appropriate. (See tables below)

Amphibia species identified within a 1 km radius of the site					
Scientific name	Common name	Habitat	Diet	Habitat or diet features located on site?	Habitat or diet features within the development footprint?
<i>Litoria aurea</i>	Green and Golden Bell Frog	Inhabit marshes, dams and stream-sides, particularly those containing bullrushes or spikerushes. Optimum habitat includes water-bodies that are unshaded, free of predatory fish and have grassy areas nearby and diurnal sheltering sites available.	Typically consists of beetles, ants, spiders, crickets and smaller frogs, including the young of their own species.	No	No

<i>Amphibia</i>
<p><b>1.</b> The following is to be taken into account for the purposes of determining whether a proposed development or activity is likely to significantly affect threatened species or ecological communities, or their habitats—</p> <p><b>a.</b> in the case of a threatened species, whether the proposed development or activity is likely to have an adverse effect on the life cycle of the species such that a viable local population of the species is likely to be placed at risk of extinction,</p> <p>The desktop study revealed that the Green and Golden Bell frog has been Sited within both 1km of the Site and 5km of the Site. It is noted that while one sighting of the Green and Golden Bell frog on Site was uploaded to Bionet database on 15 August 1999, there has since been no known or sited occurrence of the Green and Golden Bell frog since.</p> <p>No vegetation is present on Site nor is it proposed that any construction work will alter the current physical state of the Site or its surrounding landscape. No habitat or diet will be impacted by the proposed development. The nearest waterbody which can be considered a habitat for the Green and Golden Bell frog is Cox's Creek, approximately 100m from the Site. The Site currently does not discharge to this waterbody, and the proposed development does not expect to discharge here either. As such, it is not expected that any additional disturbance or impact will occur with the proposed development.</p> <p><b>b.</b> in the case of an endangered ecological community or critically endangered ecological community, whether the proposed development or activity—</p>

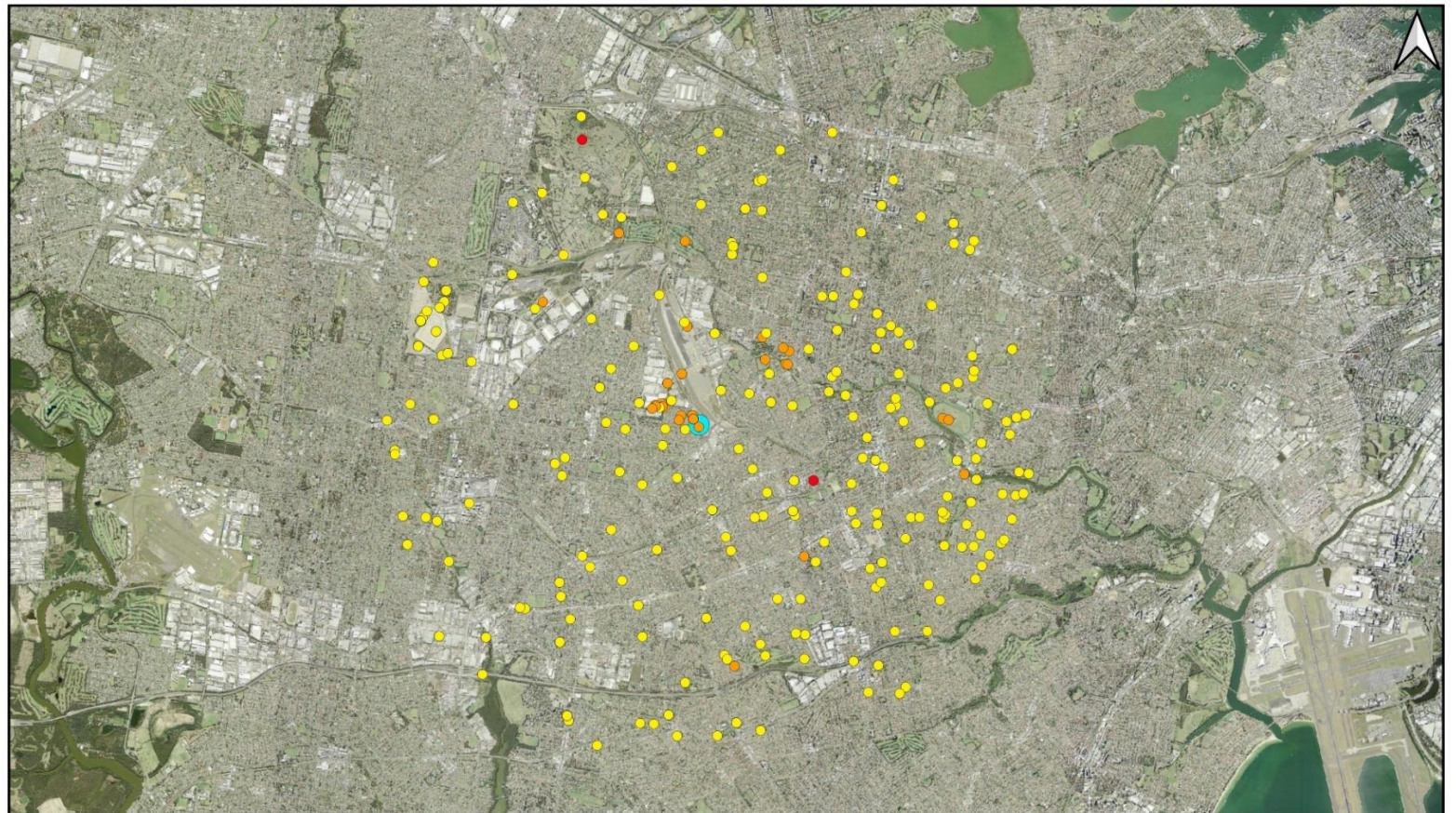
<i>Not applicable</i>	
<i>c. in relation to the habitat of a threatened species or ecological community—</i>	
<i>i. the extent to which habitat is likely to be removed or modified as a result of the proposed development or activity, and</i>	No threatened Amphibia species habitat is proposed to be removed
<i>ii. whether an area of habitat is likely to become fragmented or isolated from other areas of habitat as a result of the proposed development or activity, and</i>	No habitat exists on Site or within the development footprint. The nearest habitat is Cox's creek which has been engineered into a concrete stormwater channel. This is the nearest waterbody which could be considered a habitat, and it is not expected that the proposed development will impact on this water body as no uncontrolled discharge is proposed to occur.
<i>iii. the importance of the habitat to be removed, modified, fragmented or isolated to the long-term survival of the species or ecological community in the locality,</i>	As above

Mammalia species identified within a 1 km radius of the site					
Scientific name	Common name	Habitat	Diet	Habitat or diet features located on site?	Habitat or diet features within the development footprint?
<i>Pteropus poliocephalus</i>	Grey-headed Flying-fox	Occur in subtropical and temperate rainforests, tall sclerophyll forests and woodlands, heaths and swamps as well as urban gardens and cultivated fruit crops.	Feed on the nectar and pollen of native trees, in particular Eucalyptus, Melaleuca and Banksia, and fruits of rainforest trees and vines.	No	No
<i>Miniopterus orianae oceanensis</i>	Large Bent-winged Bat	Caves are the primary roosting habitat of the Large Bent-winged bat, however derelict mines, storm-water tunnels, buildings and other man-made structures can also be inhabited.	Often hunting in forest areas and catching moths and other flying insects above the tree tops.	No	No
Mammalia					
2. The following is to be taken into account for the purposes of determining whether a proposed development or activity is likely to significantly affect threatened species or ecological communities, or their habitats—					
d. in the case of a threatened species, whether the proposed development or activity is likely to have an adverse effect on the life cycle of the species such that a viable local population of the species is likely to be placed at risk of extinction,					
The desktop study revealed few mammalian species are likely to be present within 1km of the Site, these include both the Grey-headed Flying-fox and the Large Bent-winged bat. There is currently no vegetation present on Site. Additionally, no siting's of the Large Bent-winged Bat or Flying-fox roosting on Site have been recorded. It is understood that these Mammalia do not Roost on Site, and if they did, the proposed development does not impact any current structures or existing landscapes features.					
e. in the case of an endangered ecological community or critically endangered ecological community, whether the proposed development or activity—					
Not applicable					
f. in relation to the habitat of a threatened species or ecological community—					

iv.	the extent to which habitat is likely to be removed or modified as a result of the proposed development or activity, and	<i>No threatened Mammalia species habitat is proposed to be removed.</i>
v.	whether an area of habitat is likely to become fragmented or isolated from other areas of habitat as a result of the proposed development or activity, and	<i>Any current or existing Mammalia habitat are highly unlikely to become fragmented or impacted, due to no structural or landscape feature changes being proposed with this development</i>
vi.	the importance of the habitat to be removed, modified, fragmented or isolated to the long-term survival of the species or ecological community in the locality,	<i>No vegetation or habitat is present, nor is It proposed to be removed.</i>



### Bionet Species Sightings within 5 km of the Site



**Legend:**

- Bionet Species Sightings
- Critically Endangered
  - Endangered
  - Vulnerable

● Site

Base Maps  
NSW Six Map

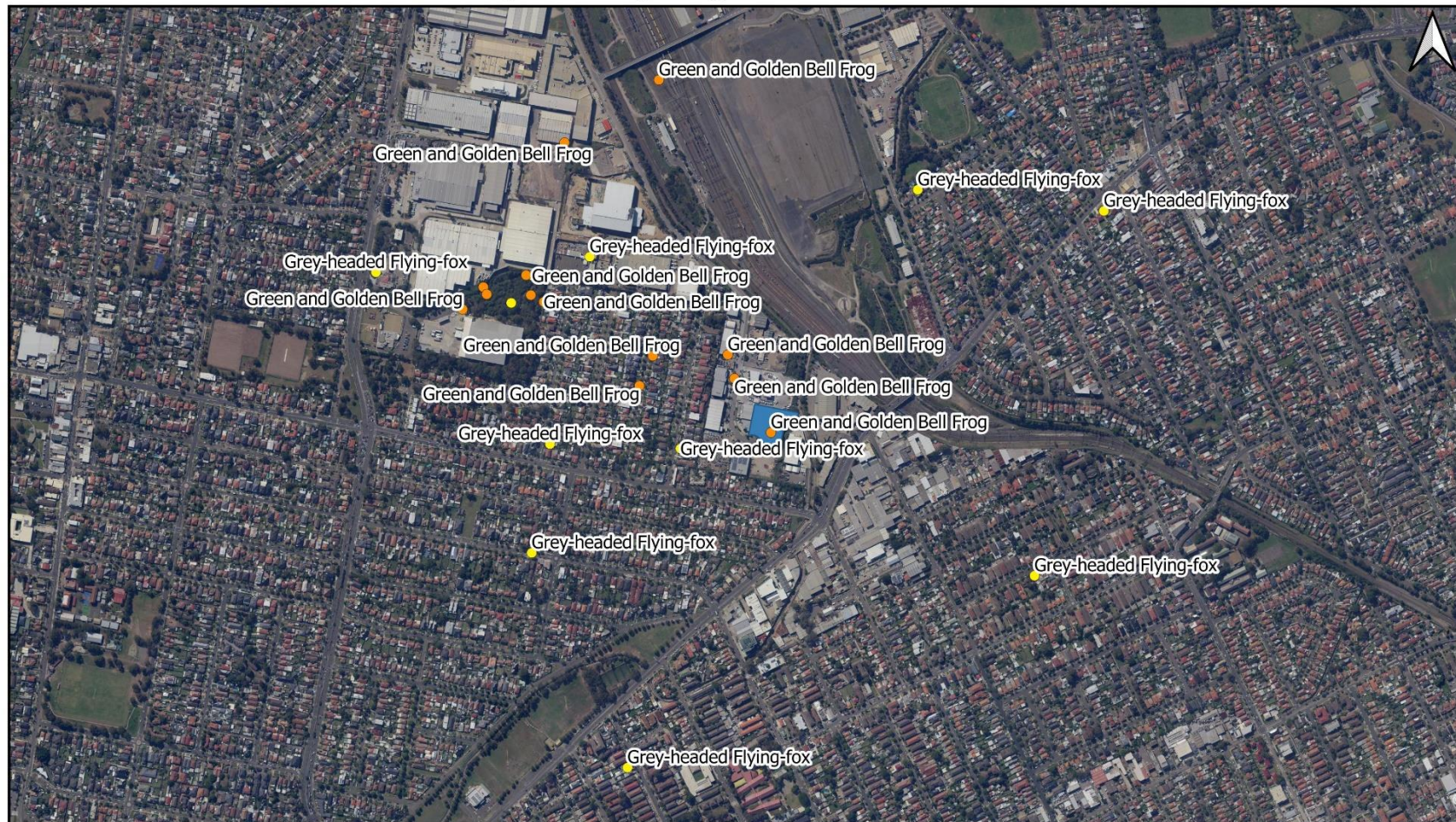
0 1,000 2,000 m

Date produced: 16/05/2022  
CRS: EPSG:3857  
Basemap imagery: NSW Six Map  
Drawn by: Sophie Burke

Figure 1: Bionet species sightings within 5 km of the Site



## Bionet Species Sightings within 1 km of the Site



### Legend:

Bionet Species Sightings 1 km

- Endangered
- Vulnerable

■ Site boundary

Base Maps

NSW Six Map

0 200 400 m



Date produced: 16/05/2022

CRS: EPSG:3857

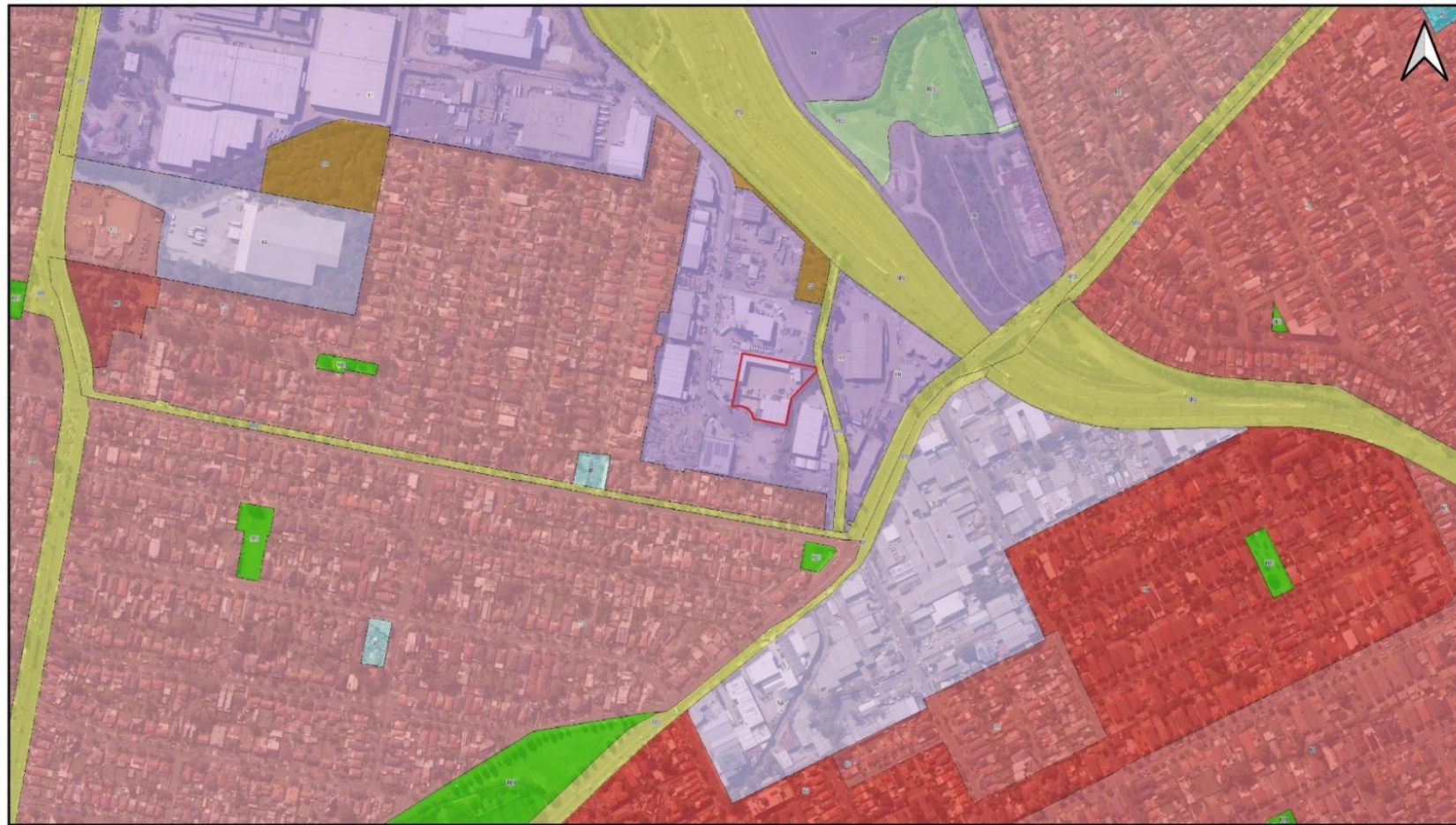
Basemap imagery: NSW Six Map

Drawn by: Sophie Burke

Figure 2: Bionet species sightings within 1 km of the Site



## Land Zoning



### Legend:

Site boundary

B1 Neighbourhood Centre	R3 Medium Density Residential
C2 Environmental Conservation	R4 High Density Residential
IN1 General Industrial	RE1 Public Recreation
IN2 Light Industrial	RE2 Private Recreation
R2 Low Density Residential	SP2 Infrastructure

0 100 200 m

Date produced: 30/03/2022  
CRS: EPSG:3857  
Basemap imagery: Sixmaps  
Drawn by: Sophie Burke

Figure 3: Surrounding land zoning and Site location



## Proposed Site layout



### Legend:

Proposed Site Layout

Mobile Plant

Potential - Material Conveyor

Internal Material Storage Bays

Awning

Material bays

Existing Site infrastructure

Diesel Refill Area

Mechanics workshop

Warehouse

Wheel Wash

Weighbridge

Drains

0 10 20 m



Date produced: 16/05/2022

CRS: EPSG:3857

Basemap imagery: NearMap

Drawn by: Sophie Burke

Figure 4: Site layout of proposed development