Aussie Recycling
13 Bellfrog St, Greenacre

Scoping Report for State Significant Development Application

February 2023

4Pillars
ENVIRONMENTAL CONSULTING

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Acknowledgement of Country

4Pillars acknowledges the Traditional Owners of the land on which this site is located, the people of the Eora and Dharug nations. We pay our respects to their Elders past and present.

Disclosure statement

Mr James Hammond, CEO of 4Pillars is engaged, via an EnviroNow services agreement, to provide environmental consulting services to 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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1 Introduction

This scoping report has been prepared to support Aussie Skips Recycling Pty Ltd's (**Aussie Recycling**) application for State Significant Development approval (SSD) for upgrades to their existing waste facility at 13 Bellfrog Street, Greenacre (the Premises), where they propose to increase operations and expand activities.

Under the EP&A Act, the development application (DA) for an SSD project must be accompanied by an EIS that addresses the project-specific Secretary's Environmental Assessment Requirements (SEARs).

To obtain a project-specific SEARs for an SSD project, the applicant must submit a scoping report to the NSW Department of Planning and Environment (**DPE**), which is prepared in accordance with the *State significant development guidelines – Preparing a scoping report* (2021).

Relevant history

Aussie Recycling currently operates the premises under an existing DA (2012/175) (**the DA or the Consent**) (**see Appendix 1**) issued by Strathfield City Council and EPL (EPL 21389) (**see Appendix 2**). These approvals allow the Site to operate as a 'materials handling yard' (as characterised by the DA) and a facility carrying on the scheduled activity of 'Waste Storage' under the EPL.

The DA as issued authorises a scale of activity that is defined by truck movements, rather than by an annual mass or volume limit. Previously, Aussie Recycling and their agents have argued the DA as written theoretically permits more than 500,000 tonnes per annum of waste materials to be received and handled. Despite this, 200,000 t has been used as a reasonable upper limit for the operation of the existing DA, which was issued via a local development pathway. We understand that the NSW EPA are not satisfied that development consent exists for operations above 200,000 t.

Proposed development

Aussie Recycling seek to increase the scale and nature of activities at 13 Bellfrog Street, Greenacre, building on the activities permitted under the existing DA/EPL. The proposed changes are summarised in *Table 1: Summary of site details* below and in further detail in Section 2.

Site details

<table>
<tr><th>Item</th><th>Details</th></tr>
<tr><td>Street Address</td><td>13 Bellfrog Street, Greenacre, 2190, NSW</td></tr>
<tr><td>Lots</td><td>LOT 15 DP1133214</td></tr>
<tr><td>Local Government Area</td><td>Strathfield Council</td></tr>
<tr><td>Zoning</td><td>IN1 – General Industrial (Strathfield Local Environmental Plan 2012)</td></tr>
<tr><td>Existing development consent(s)</td><td>DA2012/175 (Strathfield City Council)</td></tr>
<tr><td>Environment Protection Licence</td><td>21389</td></tr>
<tr><td>Other active approvals</td><td>CDC 210597 (‘Proposed Roof Awning extension and Installation of 2 in ground Weighbridges and inground Wheel Rumble’).</td></tr>
<tr><td>Site operator</td><td>Aussie Skips Recycling Pty Ltd (ABN 23 614 855 506)</td></tr>
<tr><td>Scale of activities
(current authorised)</td><td>Waste Storage: 199,000 tonnes in any 12-month period.
8,000 tonnes at any one time.</td></tr>
<tr><td>Scale of activities (proposed)</td><td>Waste Storage: 350,000 tonnes in any 12-month period and 14,000 tonnes at any one time.
Resource Recovery: Soil handling and processing up to 350,000 t in any 12-month period.
Other:
Receive additional waste types: Soils that meet the description of: GSW, RRO materials, i.e. Excavated Public Road Material.
Changes to operating hours (further detailed in operating hours below).</td></tr>
<tr><td>Current infrastructure on Site</td><td>Warehouse, workshop, awning, waste storage bays, in-ground wheel rumble, four above ground tanks, and dual in-ground weighbridges.</td></tr>
<tr><td>Current operational hours</td><td><table><tr><th>Day</th><th>Time</th></tr><tr><td>Monday - Saturday</td><td>6am – 5pm</td></tr><tr><td>Sunday</td><td>7am – 5pm</td></tr><tr><td>Public holidays</td><td>No operations permitted</td></tr></table></td></tr>
</table>

Table 1: Summary of site details.

1.1 The applicant

The Site operator and applicant is Aussie Skips Recycling Pty Ltd (Aussie Recycling). Aussie Recycling is a waste management company, and their business activities include the operation of a collection infrastructure business (Aussie Skips), a commercial waste collection business (Aussie Commercial) and two resource recovery facilities - one in Strathfield South, NSW (EPL 20885), and the Site subject to this application in Greenacre, NSW.

1.2 Site context

The subject site is 13 Bellfrog Street, Greenacre – Lot 15 DP 1133214 (**the Site**). The Site is located in an area of industrial activity, and is bounded on all sides by industrial sites, including warehouses (to the west and east), a 24-hour concrete batching plant (to the north), and factory units to the south (see Figure 3).

The nearest residential receivers are to the south and west, approximately 80 m and 105 m distance from the site, respectively. The nearest arterial road (dual carriageway) is Punchbowl Road, approximately 130 m to the east. The nearest main road is Juno Parade, approximately 120 m to the south.

The Site is located within land zoned under the Strathfield Local Environment Plan 2012 as IN1: General Industrial. There are three existing licensed monitoring points identified in the current EPL, all of which are for noise monitoring and all are residential receivers to the south, south-west, and west of the Site (Figure 4).

1.3 Existing approvals

DA 2012/175 and EPL 21389

As part of the local development application process in 2012, a Statement of Environmental Effects was prepared by Borg Architects (**the 2012 SOEE**) (Appendix 6). The determination of the application was made by Strathfield Council on the 19th of February 2013, with the approved Consent (2012/175) operating from the 2nd of May 2013. The Consent allows for the "construction of an industrial warehouse building with an associated workshop and use as a materials handling yard". Details about the specifics of the operations to be carried out on the Site were provided in the 2012 SOEE (Appendix 6).

An EPL was granted by the NSW Land and Environment Court in March 2020. The EPL granted approval for Waste Storage, with 160,000 tonnes per annum throughput and a storage limit (authorised amount) of 4,000 tonnes at any one time.

Complying Development Certificate No. 210597

A Complying Development Certificate (CDC) (number 210597) (see Appendix 3) was issued by Northwest Services to Aussie Recycling on the 19th of March 2021. This CDC granted consent to erect a roof awning extension and the installation of 2 in ground weighbridges and an inground wheel rumble grid. At the time of preparing this Scoping Report, the works have been completed; however, Aussie Recycling decided not to go ahead with the awning extension component of the complying development.

EPA Licence 21389 as varied 2020

On the 23rd of July 2020 Aussie Recycling submitted a licence variation application to vary conditions on the EPL (Appendix 7). The variation sought to increase the throughput from 160,000 tonnes per 12-month period to 199,000 tonnes and to increase the 'Authorised Amount' (the amount of waste permitted on the Premises at any one time) from 4,000 tonnes to 8,000 tonnes.

Aussie Recycling was required to produce a Water Quality Impact Assessment, Air Quality Impact Assessment and a Noise Impact Assessment, among other documents (Appendix 7).

The NSW EPA accepted Aussie Recycling's licence variation application on 8 July 2021 via a Notice of Variation (the Notice) (Appendix 8). The Notice included (but not limited to) the following variations to licence No. 21389:

- L2.2 The authorised amount of waste permitted on the Premises cannot exceed 8000 tonnes at any one time.
- L2.3 The quantity of material to be received at the Premises must not exceed 199,000 tonnes in any 12-month period.

Current EPL is attached as Appendix 2.

1.4 External yard and material bays

The external material bays are currently constructed from interlocking concrete blocks. Five material bays are established on site, with each bay designated to a material type. The bay walls are to be upgraded to formed concrete push walls via a separate CDC process. These walls will be approximately 400 mm wide and two additional bays will be added in the north-west corner of the Site.

Capacity of these proposed bays is calculated as follows:

- Bays are approximately 150 m^2.

- Average stockpile height of 6 m.
- Seven material bays in total.
- Estimated 2.0 tonnes per m^3 of material.

Hence, the seven material bays would have a capacity of approximately 12,600 tonnes. Factoring in an additional 10% to account for moisture in materials, estimated capacity of the material storage bays would be 13,860 T.

The proponent wishes to do the material bay wall upgrades via a separate CDC process, so the application is not dependant on the proposed development. Regardless of the outcomes of this proposed development the proponent is to continue operations and hence wishes to gain the additional space benefits that the push walls offer.

1.5 Existing onsite infrastructure

The current site infrastructure consists of:

- Weighbridge;
- Warehouse;
- Workshop;
- Material storage bays;
- Awning (partial covering of material bays;
- Self contained storm water system & four above ground tanks;
- Water cannons;
- In-ground wheel rumble grid; and
- Dual in-ground weighbridges.

Further specifications and information are provided in Table 2, Figure 5, Figure 6 and Figure 7.

Waste management

All wastes received at the Site can be processed. Residual wastes to be disposed of via landfill is only a very minor component and will be stored in a bay or hook lift skip bin(s).

Item	Warehouse	Workshop & Amenities	Material bays	Weighbridge
Location on site	Southeast corner	Northeast corner	Northern border	Southwest corner
Description	Storage of vehicles and misc. equipment	Workshop for Aussie Industries own fleet and equipment. Toilet and showers. Staff lunchroom.	Storage of materials awaiting collection	In ground dual lane weighbridge, with office and wheel wash.
Size	6 m (h) x 31.8 m (l) x 27.6 m (w) Area = 877 m^2	4 m (h) x 16.5 m (l) x 8.5 m (w) Area = 140.25 m^2	Each material bays have an area of approximately 100 m^2 and capacity for approximately 1000 m^3 of material	NA

Features	• Two awnings
	• Two roller doors
	• Office / tool shop
	• Water guns located on the awnings
		• Three awnings
		• Two roller doors
		• Two mechanic pits
		• Shower and toilet
		• Lunchroom
		• Storeroom
			• Storage of:
			  ○ Outgoing RRO material
			  ○ Brick and concrete
			  ○ Mixed soil GSW
				• Weighbridge
				• Weighbridge office
				• Wheel wash

Exterior finishes / material	• Concrete blockwork – split face • Concrete blockwork – polished face • Colourbond metal wall sheeting • Colourbond metal roller door • Aluminum framed window / door • Colourbond metal roof sheeting • Translucent metal sheeting	• Concrete blockwork – split face • Concrete blockwork – polished face • Colourbond metal wall sheeting • Colourbond metal roller door • Aluminum framed window / door • Colourbond metal roof sheeting • Translucent metal sheeting	• Interlocking concrete block – to be upgraded to formed concrete push walls (exempt development).	• NA

Table 2: Onsite infrastructure.

1.6 Current Site Operation

Current Site operation is briefly described below and outlined in Figure 1. During the September 2021 to August 2022 period, approximately 98.5% of the material received at the Site meet the description of 'soils / grit and screenings' with approximately 1% of material accepted at the Site matching the description for 'asphalt and concrete'. Storage and movement of soils is currently Aussie Recycling's core business. This material was seen to come from and be redistributed to a variety of civil and construction locations mostly from the Greater Sydney Region.

Material movement through Site

1. Pre site waste approvals – Potential customers send Waste Classification Reports (WCRs) to Aussie Recycling for review. Aussie's compares the WCR to the EPL. The WCR is either rejected or approved. Rejected reports are retuned to the customer and the rejected loads register is filled out. Approved reports are sent an "Approvals" form with a unique identifying number that is to be given upon arrival at Site.
2. Waste acceptance and rejection – Customers arrive at Site and the unique number from the Approvals form is given.
    - Initial inspection at weighbridge - Initial inspection by the weighbridge officer is completed to ensure material type matches the WCR. Material is either accepted or rejected.
        - Waste accepted – material permitted to enter Site for secondary inspection in the offload.
        - Waste rejected – material refused entry, material transported offsite and rejected loads database updated.
    - Secondary inspection at offload area – Material is spread over hardstand and thoroughly inspected by operators on Site. Material is either accepted or rejected.
        - Waste accepted – Material directed to be unloaded in designated bay (stockpiling).
        - Waste rejected – Material reloaded in vehicle, material transported offsite and rejected loads database updated.
3. Stockpiling - Materials are stockpiled based on waste classification or segregated based on source and visual / chemical assessment. Stockpiles on Site include, but are not limited to:
        - VENM bay;
        - Asphalt bay;
        - Concrete bay;
        - Soils / grit and screenings bay; and
        - Materials that meet RRO/RRE bay(s)
4. Assessment - Materials are then chemically assessed against relevant RROs by a competent person and given a classification.

Incoming material	Assessment of stockpile	Product
VENM	No assessment	VENM
Asphalt or concrete	Materials are then chemically assessed against relevant RROs by a competent person and given a classification.	Recovered aggregate OR Asphalt or concrete
Soils / grit and screenings	Materials are then chemically assessed against relevant RROs by a competent person and given a classification	GSW soils OR ENM

Materials that meet RRO/RRE	No assessment	Materials that meet RRO/RRE

Table 3: Assessment process for incoming material and end product

5. Dispatch

   - Recycled products distributed as a saleable product or are dispatched to a licenced facility for further processing (where applicable);
   - Non-recyclable residues dispatched to landfill.

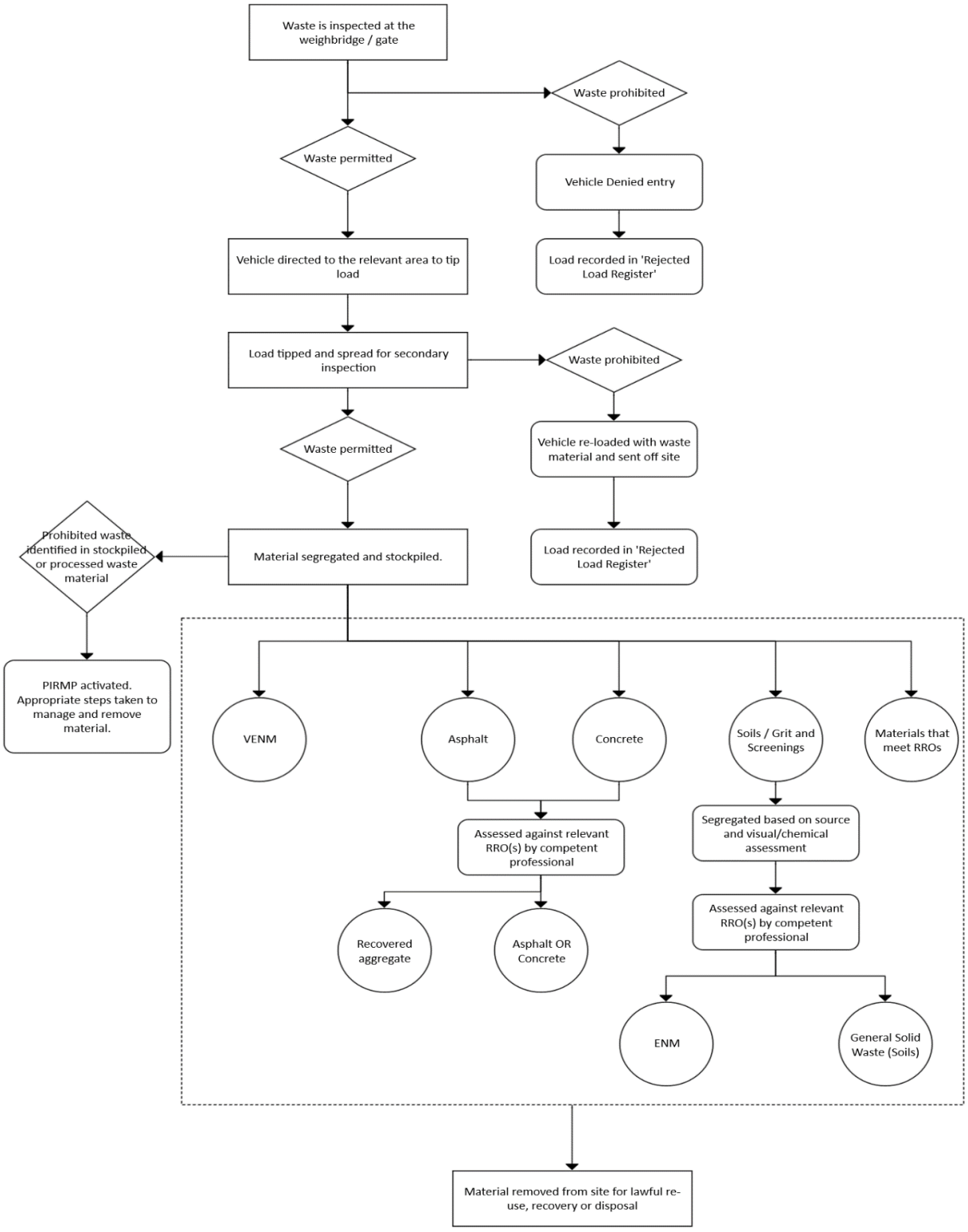

Figure 1: Existing material receipt, storage and export procedure. The proposed flow of material through the Site will differ from this process in several respects.

2 The proposal

2.1 Proposed development

This proposal seeks to increase the scale of activities at the site and permit the construction of fixed waste processing plant. Full details on each element of the proposed development are provided below.

This proposal encompasses all operational activities that the proponent intends to carry out at the site, hence superseding the existing operational consent. The proponent may be willing to surrender the existing Consent, if the terms proposed in this application are granted.

1. Activities proposed

The Site will operate as a Resource Recovery facility for soils and source-segregated building and demolition wastes. The activities to be carried out on the Site are as follows:

- Receipt of waste material via heavy road vehicles (see full details of proposed waste streams later in this document);
- Handling of waste material by mobile plant;
- Processing of waste material by sifting, picking, and screening (trommel screen);
- Storage of waste materials and processed recovered products;
- Export of waste materials by heavy road vehicles; and
- Various ancillary activities such as operation of a workshop, overnight truck parking, general storage of equipment, maintenance, storage of diesel fuel and operation of a self-contained fuel tank, waste sampling and quality assurance etc.

The characterisation of these activities for planning purposes and alignment to Scheduled Activities as defined in the *Protection of the Environment Operations Act 1997* is detailed later in this report.

2. Annual throughput

Increase the permitted annual combined throughput of waste material received at the Premises to 350,000 tonnes in any 12-month period.

3. 'Authorised Amount' (storage or stockpiling limit)

Increase the amount of waste permitted to be stored on the Premises at any one to 14,000 tonnes.

Other proposed changes

- Changes in operation hours (see section 2.4).
- A penstock valve is to be installed on the open discharge port of the water storage system, to ensure that uncontrolled overflow is not possible without manual override.

2.2 Overview of proposed operations

The proposed waste processing operation will differ from current operations in terms of a larger scale of activity and the introduction of processing plant. The proponent also proposes minor changes to the types of waste materials received and processed.

Proposed operations

The key features of proposed operations are as follows (refer to Figure 8 for proposed site layout):

- Annual throughput is to be 350,000 T
- Authorised amount 14,000 T at any one time. This will be stored within the seven material bays on Site (see 1.4 for further explanation).
- Soil waste receipt, processing and storage will occur in the external yard area;
- Material bays are to include

    - Incoming Soil Receival bay (GSW, VENM and other soil waste).
    - Bays specific for RRO material.
    - Concrete and brick.
    - Excavated Natural Material (ENM) (outgoing).
- Storage of other materials that meet the requirements of NSW EPA Resource Recovery Orders[1], such as Excavated Natural Material (ENM) will occur in the external yard area. These materials may be stored and exported without any processing, or they may (where appropriate) be blended with other materials to form recycled products.
- Plant and equipment in the external yard would include a hopper, incline conveyor and rotating trommel screen. This plant would sit above the bays located in the northern section of the yard. The plant would sit under the existing awning.
- The warehouse will be used for storage of equipment and vehicles.

1 https://www.epa.nsw.gov.au/your-environment/recycling-and-reuse/resource-recovery-framework/current-orders-and-exemption

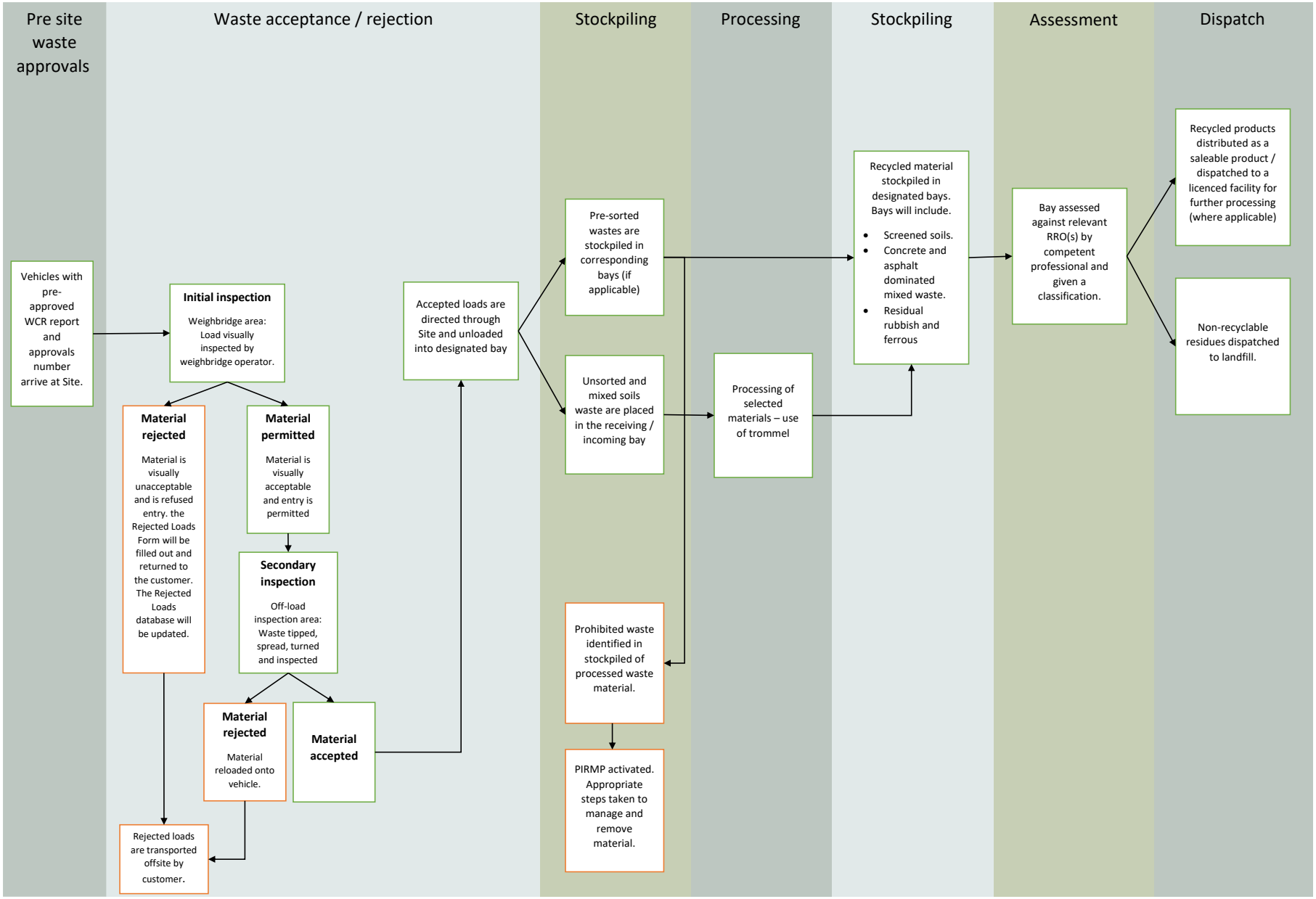

Figure 2: Overview of proposed operations and material movement through the Site.

Current and proposed operations

Table 4 outlines the proposed operations and the current operations on Site.

Operation component	Comment	Current operation	Proposed operation
Annual throughput	Proposed change – increase to throughput	Annual throughput is currently 199,000 T	Annual throughput is to be 350,000 T
Authorized amount	Proposed change – increase to authorized amount	Authorized amount 8,000 T at any one time	Authorized amount 14,000 T at any one time.
Material storage and processing location	No change	Soil waste receipt, processing and storage occur in the external yard area	
Waste types received	Proposed change – additional waste types to be received (see Table 5)	Waste types received • Soils that meet GSW <CT1 • Asphalt waste • Concrete, including fully cured concrete from a batch plant • VENM	Waste types received • Soils that meet GSW <CT1 • Asphalt waste • Concrete, including fully cured concrete from a batch plant • VENM • Ceramics and bricks • Resource Recovery Order materials
Activities to occur on Site	Proposed change – additional activity to occur on Site for some waste types	Waste storage	Waste Storage and Resource Recovery (see Table 5)
Material bay layout	Proposed change – via separate CDC process (see Section 1.4)		Material bays are to include: • Incoming Soil Receival bay (GSW, VENM and other soil waste). • Bays specific for RRO material. • Concrete and brick. • Excavated Natural Material (ENM) (outgoing).
Hours of operation	Proposed change – See Section 2.4	Hours of operation (as per Table 1)	Extended operation hours based on activity (as per Table 8).
Processing equipment	Proposed change – Addition of trommel for processing	NA	Processing of waste material by sifting, picking, and screening (trommel screen);

Use of Site as a materials handling facility	No change	Proposed use of the Site will not change from current use except occurring at a larger scale.
Use of warehouse	No change	The warehouse is used for storage of equipment and vehicles
Use of workshop	No change	The workshop is to service Aussie's own fleet of trucks and machinery
Various ancillary activities	No change	Various ancillary activities such as operation of a workshop, overnight truck parking, general storage of equipment, maintenance, storage of diesel fuel and operation of a self-contained fuel tank, waste sampling and quality assurance

Table 4: Current and proposed operations. Yellow cells indicate a change from current operations.

Workshop

The mechanics workshop services Aussie's own fleet of trucks and machinery and is not for public use. No changes are proposed to the type of operation within the workshop; however, operational hours are proposed to change as per the Section 2.4 below.

Waste types

Table 5 provides an overview of the waste types and the corresponding activities that are existing and proposed to be completed at the Site. Note that the waste types specified are based on defined terms under Schedule 1 of the POEO Act, Resource Recovery Orders and relevant statutory guidelines.

Waste type	Permitted under current DA/EPL?	Scheduled Activity – proposed
Sub-categories of General Solid Waste		
Soils that meet the definition of General Solid Waste <CT1 in the *Waste Classification Guidelines 2014* and that also meet the following limits: • Arsenic (60 mg/kg); • Cadmium (2 mg/kg); • Copper (200 mg/kg); • Lead (500 mg/kg); • Mercury (1.5 mg/kg); • Zinc (600 mg/kg); • TRH C6-C9 (150 mg/kg); • TRH C10-C36 (1600 mg/kg); • Benzo(α)pyrene (6 mg/kg); • PAHs (total) (80 mg/kg); • PCBs (1 mg/kg); • No actual or potential acid sulfate soils.	Yes – however, only Soils meeting the CT1 threshold of GSW currently permitted.	Resource Recovery Waste Storage
Asphalt waste (including asphalt resulting from road construction and waterproofing works)	Yes	Waste Storage
Concrete, including fully cured concrete from a batch plant	Yes	Waste Storage
Ceramics and bricks	No	Waste Storage
Virgin Excavated Natural Material (VENM)	Yes	Resource Recovery Waste Storage
Resource Recovery Order Materials		
General Resource Recovery Orders (RROs)	No	Waste Storage
Recovered Fines (Batch) or (Continuous Process)	No	Waste Storage

Waste type	Permitted under current DA/EPL?	Scheduled Activity – proposed
Recovered Aggregate (Batch) or (Continuous Process)	No	Waste Storage
Excavated Natural Material (ENM)	No	Resource Recovery Waste Storage
Tunnel Spoils	No	Resource Recovery Waste Storage
Basalt Fines	No	Resource Recovery Waste Storage
Treated drilling mud	No	Waste Storage

Table 5: Overview of waste accepted and activities at the site. Note that definitions of the waste types should be taken from Schedule 1 of the POEO Act and the NSW EPA Waste Classification Guidelines 2014, unless otherwise stated.

Recycled materials to be exported from the Site under Resource Recovery Orders for direct re-use will include:

- VENM
- Excavated Natural Material (ENM);
- Recovered fines;
- Other General RRO material where RRO material is received, stored and exported without any processing or other treatment;
- Potential Site-Specific Resource Recovery Order material; and
- RRO Blends, where the permitted Resource Recovery Exemptions for the component materials have consistent land application requirements.

End use of these include:

- Engineering fill for civil industrial works and landscaping projects.
- Subgrade fill Under roads (aggregates).

The proponent expects that a high level of recycling will be achieved at the Site (estimated to be around 95 % by weight). Residual wastes that will not meet the standards of a Resource Recovery Order and will, therefore, need to be exported to waste facilities for further processing (Table 6):

Materials to be disposed of offsite	Indicative accepting facility(ies)
Metal (Ferrous and Non-Ferrous)	One Steel Chipping Norton
Concrete, brick, ceramic, asphalt	Benedict Recycling, Concrete Recyclers
Mixed waste (General Solid Waste)	Resource Co Wetherill Park, Benedict Recycling Chipping Norton
Residual (contaminated) soils	Cleanaway landfill, Kemps Creek, Bowral Landfill.

Table 6: Materials to be disposed of offsite and potential receiving sites.

Waste type throughput

Table 7 below outlines the proposed breakdown of the amounts of each type of waste to be received at the Site. It is noted actual operational received waste amounts may differ based on market demand (ie less soils and more concrete may be received due to market conditions). However, the below breakdown provides the forecasted operational scenario as well as the worst-case scenario to be covered.

Category	Waste type	Estimated tonnage per year
Soil waste	Soils that meet the definition of General Solid Waste <CT1 in the *Waste Classification Guidelines 2014* and that also meet the following limits: • Arsenic (60 mg/kg); • Cadmium (2 mg/kg); • Copper (200 mg/kg); • Lead (500 mg/kg); • Mercury (1.5 mg/kg); • Zinc (600 mg/kg); • TRH C6-C9 (150 mg/kg); • TRH C10-C36 (1600 mg/kg); • Benzo(α)pyrene (6 mg/kg); • PAHs (total) (80 mg/kg); • PCBs (1 mg/kg); No actual or potential acid sulfate soils.	343,000 T (98% of yearly throughput)
	Virgin Excavated Natural Material (VENM)	
	General Resource Recovery Orders (RROs)	
	Recovered Fines (Batch) or (Continuous Process)	
	Excavated Natural Material (ENM)	
	Tunnel Spoils	
	Basalt Fines	
	Treated drilling mud	
Brick and concrete mixed waste	Asphalt waste (including asphalt resulting from road construction and waterproofing works)	7,000 T (2% of yearly throughput)
	Concrete, including fully cured concrete from a batch plant	
	Ceramics and bricks	
	Recovered Aggregate (Batch) or (Continuous Process)	
TOTAL		350,000 T

Table 7: Annual amounts of each waste type to be received.

2.3 Building and structural works required

Only minor building and structural works are required in order to facilitate the ongoing activities proposed in this SSD Application. The building work required relates to minor alterations and structural supports for the installation of fixed plant and equipment in the external yard and within the existing warehouse (see section 1.5 for further details on existing infrastructure).

Plant design & Processing

Soils processing in the external yard would occur via a hopper, incline conveyor and rotating trommel screen. This plant would sit above the bays located in the northern section of the yard.

Environmental protection equipment and plant required (engineering controls)

The Site already has a number of engineering controls for environmental protection and no significant new controls are expected to be necessary. All existing controls (ie. Wheel wash, water capture and storage system) etc. will be maintained as they currently are. A penstock valve will be installed on the open discharge port of the water storage system, to ensure that uncontrolled overflow is not possible without manual override.

2.4 Hours of operation

The proposed development seeks to incorporate a number of different activities and processes within the Site. As such, a range of different operating hours are proposed to reflect the level of impact on the surrounding land and receivers. Proposed hours of operation have been outlined below and are summarised in table 1 in section 1.

Transport / handling / tipping / loading

It is expected that activities including transport of material, associated handling, tipping and loading will occur between 5:00 AM to 10:00 PM Monday to Friday, 5:00 AM to 10:00 PM Saturday and 6:00 AM to 6:00 PM Sunday (Table 8).

Processing

Processing operations, which will include the operation of the processing plants in the external yard is expected to produce the highest level of impact to surrounding receivers. Processing is proposed to maintain similar operating hours as currently permitted. The proposed operating hours are 6:00 AM to 6:00 PM Monday to Saturday (Table 8).

Workshop

The on-site workshop, which is located in the north-eastern corner, is expected to have minimal impact to the surrounding environment and nearest sensitive receivers. Due to the nature of works proposed within the workshop, it is suggested that operating hours will be 24 hours a day Monday to Sunday (Table 8).

Other low-impact activities including; material sampling, maintenance of equipment and truck washing

Low-impact activities which are highly unlikely to cause disturbance to the surrounding landscape or nearest sensitive receivers are proposed to operate over a 24-hour period Monday to Sunday (Table 8). These activities include:

- Material sampling.
- Maintenance of equipment.
- Truck washing.
- External yard cleaning and maintenance.

	Monday to Friday	Saturday	Sunday / Public holidays
Processing	6:00 AM - 6:00 PM	6:00 AM - 6:00 PM	No processing to occur
Transport / handling / tipping / loading	5:00 AM - 10:00PM	5:00 AM - 10:00PM	6:00 AM to 6:00 PM
Workshop	24 hr	24 hr	24 hr
Low impact activities	24 hr	24 hr	24 hr

Table 8: Operational hours and activities.

3 Regulatory Context

3.1 Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (**EP&A Act**) sets out the provisions under which planning in NSW takes place. The main parts of the EP&A Act that relate to development assessment and approval are Part 4 and Part 5 of the Act.

Characterisation of the development

Development often involves multiple components that, in isolation may appear to be different 'types' of development. Planning Circular PS 21-008 (**the Planning Circular**) provides guidance in "characterising development for the purpose of determining permissibility".

The Planning Circular refers to the land use definitions specified in the Standard Instrument for Principal Local Environmental Plans (and therefore carried over consistently into Planning Instruments such as the Strathfield LEP and the *Planning Systems SEPP 2021*). We note that in most cases, an applicant is expected to determine the 'best fit' in terms of aligning proposed development to a land use definition (where a suitable definition exists). It is also note that the land use definitions specified in the Standard Instrument LEP are not exhaustive and additional land use definitions may exist in other planning instruments, such as the *Resilience and Hazards SEPP 2021*.

This assists the applicant and the consent authority determine whether the proposed development is permissible, among other things. It is also important for assessing whether the proposed development meets certain 'triggers' for different development pathways (for example, the threshold-based triggers for State Significant Development).

Importantly, the Planning Circular also states (emphasis added):

> *A reference to a type of building or other thing in the Land Use Table is to be interpreted as a reference to **development for the purposes of that** type of building or **other thing**.*

This point leads to the question of the 'purpose' of the development. On this, the Planning Circular states (emphasis added):

> ***Development is** considered to be **for a particular purpose** if that purpose is the **dominant purpose of the development**. This purpose is the reason for which the development is to be undertaken or the end to which the development serves.*

The dominant purpose of the development is the operation of the Site as a 'Resource Recovery Facility', which is a type of 'Waste or Resource Management Facility' as defined in the *Standard Instrument Principal Local Environmental Plan 2006*. The *Standard Instrument Principal Local Environmental Plan 2006* defines a 'Resource Recovery Facility' as:

> resource recovery facility *means a building or **place used for the recovery of resources from waste**, including works or activities such as **separating and sorting, processing or treating the waste**, composting, temporary storage, transfer or sale of recovered resources, energy generation from gases and water treatment, but not including re-manufacture or disposal of the material by landfill or incineration.*

This is the best fit characterisation of the activity which is the dominant purpose of the development.

We note that other activities will be carried on at the Site, such as maintenance, operation of a mechanical workshop, truck parking, etc. It is common for development to involve multiple components (which may be characterised in isolation as different land uses) on the same land. Planning Circular PS 21-008 deals with this concept of 'ancillary development'. The Planning Circular states (emphasis added):

> *An **ancillary use** is a use that **is subordinate or subservient to the dominant purpose**. The concept is important when a development involves multiple components on the same land.*
>
> *To put it simply:*
>
> - *if a component serves the dominant purpose, it is ancillary to that dominant purpose;*
> - *if a component serves its own purpose, it is not a component of the dominant purpose but an independent use on the same land. It is a dominant use in its own right and not an ancillary use. In such circumstances, the development could be described as a mixed use development. Each principal use in a mixed use development must be permitted with consent on the land.*

The other land uses (mechanics workshop, truck parking etc.) all would not occur, were it not for the dominant purpose of the Site operating as a Resource Recovery Facility. Therefore, they are subordinate to the other purpose and the characterisation of the Site as a Resource Recovery Facility is not affected.

3.2 State Significant Development

The proposed development is defined as State Significant Development under clause 4.36(2) of the *Environmental Planning and Assessment Act 1979*.

Division 4.7, Clause 4.36(2)

A State environmental planning policy may declare any development, or any class or description of development, to be State significant development.

State Environmental Planning Policy (Planning Systems) 2021

Certain types of development that are considered State Significant Development include certain mining and extraction operations, chemical and other manufacturing, energy generating facilities and certain waste management facilities.

For a development proposal to be considered or identified as an SSD it will generally be:

- Over a certain size;
- Located in a sensitive area, or
- Will exceed a specific capital investment value or a mixture of the above.

This development is considered "State Significant Development" as per Clause 23(3) of Schedule 1 the SEPP (Planning System) 2021:

(3) Development for the purpose of resource recovery or recycling facilities that handle more than 100,000 tonnes per year of waste.

As the proposed development seeks to handle up to 350,000 tonnes of waste per year, the development is State Significant Development as per the throughput threshold specified in the SEPP.

3.3 Integrated development

Division 4.8 *Integrated Development* Clause 4.46 (1) *What is "integrated development?"* defines integrated development as:

Division 4.7, Clause 4.36(2)

*"Integrated development is development (**not being State significant development** or complying development) that, in order for it to be carried out, requires development consent and one or more of the following approvals – "*

While the proposed development will require concurrent assessment and later approval under the *Protection of the Environment Operations Act 1997*, because it is characterised as a State Significant Development, it cannot be characterised as Integrated development.

Permissibility

The proposed site for the development is zoned as IN1 (General Industrial) under the *Strathfield LEP 2012*. The Land Use Table in the Strathfield LEP does not specify that 'Waste or Resource Management Facility' is permitted with consent. The Land Use Table also states that 'any development not specified' as permitted with consent is prohibited. Therefore, the proposed land use as a Resource Recovery Facility is not permissible under the LEP.

State Environmental Planning Policy (Transport and Infrastructure) 2021

The *State Environmental Planning Policy* (SEPP) *(Transport and Infrastructure) 2021,* is relevant to this development, as it encompasses permissibility of Waste or Resource Management Facilities.

The proposed development is permitted with consent on the land under Clause 2.152 of Division 23, Part 3, of *the State Environmental Planning Policy* (SEPP) *(Transport and Infrastructure) 2021*, as described below.

Clause 2.152 (1) describes ***Development for the purpose of a waste or resource management facilities,*** *other than development referred to in subclause (2) (note: Clause 2 relates to Waste or Resource Transfer Stations), may be carried out by any person with consent on land in a* ***prescribed zone****.*

The 'prescribed zones' are defined in clause 2.152 as the following:

(a) RU1 Primary Production,
(b) RU2 Rural Landscape,
(c) IN1 General Industrial,
(d) IN3 Heavy Industrial,
(e) SP1 Special Activities,
(f) SP2 Infrastructure.

As this development is characterised as a Waste or Resource Management Facility, that is proposed in a prescribed zone, **the development is permissible with consent, on the basis of this SEPP.**

3.4 Other relevant State Environmental Planning Policies

State Environmental Planning (Resilience and Hazards) 2021

As the proposal is characterised as a Waste Facility, it is necessary to consider whether the proposal is considered a *potentially hazardous industry* or a *potentially offensive industry.* Chapter 3 of the Resilience and Hazards SEPP will apply if a proposal for an industrial development requires consent, and it is either potentially hazardous industry or potentially offensive industry.

Section 3.6 Clause 3.11 requires a preliminary hazard analysis in accordance with the current circulars or guidelines published by the Department of Planning and Environment to be submitted with the development application. DPE has developed a checklist and a risk screening procedure to assist in determining whether the development proposal falls within these categories.

The proposal will be assessed against a Hazardous and Offensive screening criteria to define whether the development constitutes 'potentially hazardous industry' or 'hazardous storage establishment'. As the proposed development primarily concerns an increase in total scale, and no new introduction of hazardous materials or activities, the proposed development is unlikely to be considered hazardous or offensive development under this SEP. This will be further addressed in the EIS.

Chapter 4 – Remediation of Land (Resilience and Hazards SEPP continued)

As no construction or excavation of the Premises is proposed and the development is primarily concerned with increasing scale and processes, it is highly unlikely that Chapter 4 - Remediation of Land will be applicable to this development.

Precincts SEPPs

Sites which were previously within the *State Environmental Planning Policy (State Significant Precincts) 2005* have now been split across the 4 individual precinct specific SEPPS, these being; Eastern Harbour City 2021, Central River City 2021, Western Parkland City 2021, Regional 2021.

The proposed development does not fall within any of the four Precinct specific SEPPs and as such, the Precincts SEPPs do not apply.

3.5 Protection of the Environment Operations Act, 1997

Part 1 in Schedule 1 of the *Protection of the Environment Operations Act 1997* (POEO Act) lists activities that are declared to be 'Scheduled activities' by which a licence is required for the Premises at which the activity is carried out.

The proposed development involves an increase in the annual throughput and an additional scheduled activity to be included in the existing EPL. Schedule 1, clause 34 - Resource Recovery is proposed to be added to the licence. This is the best characterisation in accordance with clause 1 and 3bi, as the it will involve the receiving of wastes from off site and its processing, otherwise than for the recovery of energy as well as less than 50% by weight of the waste received in any year requires disposal after processing.

3.6 Biodiversity Conservation Act 2016

The purpose of this Act is to "maintain a healthy, productive and resilient environment for the greatest well-being of the community, now and into the future, consistent with the principles of ecologically sustainable development (described in section 6(2) of the *Protection of the Environment Administration Act 1991*)".

This Act specifically relates to the proposed development, as division 2 Section 7.9 of the Biodiversity Conservation Act 2016 (BC Act) requires that a SSD or SSI application must be accompanied by a biodiversity development assessment report (BDAR) and must assess any significant impacts on biodiversity values of the proposed development.

It is noted that, in the case that the Planning Agency Head and the Environment Agency head determine that the proposed development is not likely to have any significant impact on biodiversity, that the BDAR may not be required. In such cases, a BDAR Waiver must accompany a Request for SEARs. A BDAR waiver request is attached as Appendix 4.

4 Strategic context – Market conditions, demand and justification

Waste Management

Reuse and recycling are the focus of the Australian Government and NSW EPA's policies on waste management. Improved recycling rates and diversion of waste from landfill is essential to achieve the targets specified in the NSW *Waste Avoidance and Resource Recovery Strategy 2014-21 (WARR)*. The applicant shares this view and has therefore invested heavily into their operations, both at the subject Site and across Sydney. The strengths of this State Significant Development application are primarily related to the role of the Site for import and processing of material that is produced from infrastructure projects across Sydney. The Site's excellent, centralised location makes it desirable and efficient for waste generators, reducing the distance required for transporting material, which in turn ensures short turn-around times for delivery vehicles. Greenhouse gas and air quality benefits are expected from reduced transport requirements.

The proposed development seeks to increase total throughput at the Premises by around 50% and also seeks approval for processing activities including the screening of soils. This significant increase in annual throughput and processing supports the 2014-2021 WARR strategy targets of increasing recycling rates for Construction and Demolition waste and will contribute to further diversion of waste from landfills or other facilities that have a higher impact on the environment and their surrounding community.

The Premises is currently operating efficiently, with existing control measures and procedures implemented and proving to be successful. The proponent has a proven business model and a stable organisation that has the financial and human capital to make the necessary investments in environmental controls needed to offset the impacts of this proposal

The alternative to this proposal would be to increase throughput at a different facility or to construct an entirely new facility. This which would take time, be costly, and pose new challenges or issues to environmental management, whereas this facility is already in place and operating with minimal disruption to nearby residential and commercial receivers.

Industry and growth in Sydney

The *Greater Cities Commission – Eastern City District Plan 2018* is a 20-year plan to manage growth in the context of economic, social and environmental matters to achieve the 40-year vision for Greater Sydney. It sets out planning priorities and actions for improving the quality of life for residents as the District grows and changes. Planning Priority E12 relates to the Retaining and managing industrial and urban services land.

The plan states:

Urban services include activities such as motor vehicle services, printing, waste management, courier services and concrete batching plants. These activities serve local communities and businesses and require adequate access to industrial land across the District. Demand for this land will increase commensurate with population growth. Good local access to these services reduces the need to travel to other areas, minimising congestion on the transport system.

The proposed development is categorised as a waste management facility and the management concepts within this chapter apply.

The plan outlines the need for retention and management of existing industrial services. The management of these lands should accommodate evolving business practices and changes in needs for urban services from the surrounding community. The proposed development is an expansion of an existing facility with the main objectives to be to increasing material amount and recycling efficiency. This type of development is favoured within the plan as it in a central location, within existing industrial land and is a development that serves the community.

The proposed development is seen to algin with the concepts and approaches outlined in the *Greater Cities Commission – Eastern City District Plan 2018.*

5 Assessment of impacts

5.1 Sensitive receivers

Current receivers

The Site is located in an area of industrial activity, and is bounded on all sides by industrial sites, including warehouses (to the west and east), a 24-hour concrete batching plant (to the north), and factory units (currently under construction and nearly completed) to the south. The nearest residential receivers are to the south and west, approximately 80 m and 105 m distance from the site, respectively (see Figure 4).

In the current EPL, three nearby residential receivers are identified, which are located roughly to the south, south-west, and west of the Site (Figure 4). Between the Site and the southern receivers are two large industrial units. The nearest residences to the South are located on Juno Parade, which is a relatively busy thoroughfare for vehicles.

Future receivers

The immediate surrounding land is zoned as IN1 General Industry and IN2 Light Industry (Figure 3). It is not expected that there will be any significant increase in residential receivers in the immediate area in the future.

Therefore, the assessment of impacts focuses mainly on the current residential receivers.

Complaints

The Site has not received any complaints regarding noise, dust or any other environmental matters. No complaints have been received directly and we are not aware of any complaints being made to the EPA or Council. NSW EPA previously stated they had received complaints related to dust emissions from the Greenacre industrial area in general; however, considering the other contributors in the industrial estate (i.e. unsealed container yards, Hanson concrete batching plant, etc.) we have not been able to draw this complaint back to the operation of Aussie Recycling's facility.

5.2 Scoping potential environmental impacts

As this proposal is a modification in scale of current activities, rather than a new development or change of use, many of the environmental impacts expected from activities undertaken following the variation are already present and are actively mitigated and monitored under current approvals and internal frameworks.

The proposal includes a modification in the scale of current activities by more than 50% and also includes a change of use to include processing. There is no significant construction work proposed and many of the environmental impacts expected from the activities proposed are already present and are thus actively mitigated and monitored under current approvals and internal frameworks.

However, due to the significant increase in scale of operations it important that all potential impacts are assessed thoroughly.

This section of the report aims to identify the matters requiring further assessment in the EIS and the proposed approach to assessing each of these matters, having regard to key findings in each section of the scoping report and the guidance from the *SSD Preparing a scoping report* guideline.

Due to Aussie Recycling having already operated at a similar scale, that a number of environmental investigations including SEE's, Surface Water Characterisation assessments, noise assessments and traffic assessments, that the site's environmental impact is well understood and that a number of management and mitigatory practices have been implemented to ensure minimal to no impact on the surrounding environment.

The key environmental aspects which the proposed development may introduce are likely to be as follows:

- Additional dust generation from screening & crushing activities in the yard.
- Additional traffic and truck movements due to the proposed increase in total waste material handled on the site being increased by more than 50%.
- Additional noise impact introduced from processing machinery an increase in truck movements.
- Introduction of Soils and materials with higher contaminant thresholds (including soils >CT1).

Other previous environmental investigations which were concerned with surface water quality, soil contamination and ground water, pollution incidents, and visual amenity are considered to be assessed and well understood and will have significantly less assessment time triggered from the proposed development.

The following section provides detailed information on each potential impact. Where those impacts are adequately addressed through existing controls, those controls are re-affirmed. Where potential impacts are new or different, commitments are given to additional avoidance/mitigation measures, to ensure they are effectively controlled.

6 Social Impact and Community Consultation

6.1 Social impact

As part of the EIS a complete Social Impact Assessment (SIA) in accordance with the *Social Impact Assessment Guidelines 2021 for State Significant Projects* will be completed for the project. As part of the scoping phase of the project and to aid the community consultation plan, an initial SIA was completed. This initial SIA focused on determining the social locality and baseline for the area and identifying key stakeholders.

Vulnerable community groups

The term 'vulnerable communities' refers to a group's capacity to adapt to or cope with changes to their social environment (Cutter et al., 2008). An understanding of vulnerable community groups within the vicinity of the proposed development is important as they are likely to experience the negative impacts of the proposed development greater.

There are certain demographics and social characteristics that make some groups more vulnerable than others. In general, social indicators associated with vulnerability include:

- Age, such as very young (<14 years old) and elderly (>65 years old) who are likely to require aid and care;
- Low socio- economic status or unemployed persons;
- People who require assistance in self-care, mobility and communication or experience long-term health conditions; and
- Culturally and linguistically diverse population, such as those people who do not speak English as primary language.

Key community characteristics

A summary of the local resident and worker population within the Greenacre is outlined in this section. For the purposes of this analysis, demographic data has been sourced from the Australian Bureau of Statistics (ABS) 2016 and 2021 Census of Population and Housing. Resident and worker population forecasts have been estimated considering data sourced from the ABS and the NSW Government. A summary of the local resident and worker profile is detailed in the following sections.

Community profile

Project Site

The Site is located in the suburb of Greenacre and the Strathfield Municipality. The Site is in an area of industrial activity and is bounded on all sides by industrial land users, including warehouses (to the west and east), a 24-hour concrete batching plant (to the north), and factory units to the site. The nearest residential receivers are to the south and west, approximately 80 m and 105 m distance from the site, respectively (Figure 4)..

In the current EPL, nearby residential receivers are identified, which are located roughly to the south, southwest and west of the Site (Figure 4). Between the Site and the southern receivers are two larger industrial units. The nearest residences to the south are located on Juno Parade, which is a relatively busy throughfare for vehicles.

Greenacre

The suburb of Greenacre falls under both Canterbury Bankstown City and Strathfield local government areas (LGAs). The footprint of the proposed development falls under the Strathfield LGA.

Greenacre is a suburb that comprises both industrial areas and residential areas. The area of the proposed development is largely industrial with surrounding residential receivers approximately 200 m away. The Socio-Demographic baseline data provided from ABS for the suburb is considered typical of the community surrounding the proposed development. Greenacre's demographic data has been used for the initial SIA during the scoping report.

Strathfield LGA

Strathfield Council is located in Sydney's Inner West and comprises approximately 14 square kilometres. This local government area comprises of Belfield, Flemington, Greenacre, Homebush, Homebush West, Strathfield, and Strathfield South.

Strathfield Community Strategic Plan 2035 sets out a vision and priorities for the area and was developed with substantial input from the community. The plan sets out take on the challenges related with environment and emission reductions by improved recycling and support of circular economy (Strathfield Community Strategic Plan, 2022).

Resident profile

A detailed assessment of the key community characteristics is provided in and is based on results from the 2016 and 2021 ABS Census of Population and Housing. The following key demographic characteristics of local residents in the vicinity of the proposed development have been benchmarked against Greater Sydney (where relevant) and are identified below.

<table>
<tr><th>Social aspect</th><th>Demographic of people surrounding the facility</th><th>Explanation</th></tr>
<tr><td>Population</td><td>26,316 people in Greenacre
49.83% M : 50.17% F</td><td>In 2021, Greenacre had an estimated residential population of 26,316. Moderately equal proportion of males to females within the area.</td></tr>
<tr><td>Age</td><td>24,368 persons surveyed
<table><tr><td>Age groups:</td><td>Percentage</td></tr><tr><td>0-4 years</td><td>7.06%</td></tr><tr><td>5-14 years</td><td>16.83%</td></tr><tr><td>15-19 years</td><td>8.06%</td></tr><tr><td>20-24 years</td><td>7.02%</td></tr><tr><td>25-34 years</td><td>12.19%</td></tr><tr><td>35-44 years</td><td>12.72%</td></tr><tr><td>45-54 years</td><td>11.62%</td></tr><tr><td>55-64 years</td><td>10.58%</td></tr><tr><td>65-74 years</td><td>7.75%</td></tr><tr><td>75-84 years</td><td>4.31%</td></tr><tr><td>85 years and over</td><td>1.86%</td></tr></table></td><td>In 2021, Greenacre was seen to have a large share of young persons aged 5-14 years old and middled aged persons 25-54 years old. As a result, Greenacre is likely to comprise of a large proportion of family households.
Persons aged 14 years or younger account for 23% of the population.
Persons aged 65 years old account for 13.92% of the population.
Hence, approximately 36.92% of the population of Greenacre is considered vulnerable.</td></tr>
<tr><td>Household composition</td><td><table><tr><th>Household composition</th><th>Percentage (%)</th></tr><tr><td>Family household</td><td>79.7%</td></tr><tr><td>Single person households</td><td>18.7%</td></tr><tr><td>Group house holds</td><td>1.5%</td></tr><tr><td>Total respondents</td><td>6,762</td></tr></table></td><td>Greenacre is considered an attractive place for families to reside, with 79% of households comprising of family households. This is greater than the Australian percentage of 68.8%. Residents living in single person households account for 18.7% of total household types</td></tr>
<tr><td>Family composition</td><td><table><tr><th>Family composition</th><th>Percentage (%)</th></tr><tr><td>Couple family without children</td><td>19.7</td></tr><tr><td>Couple family with children</td><td>59.4</td></tr><tr><td>One parent family</td><td>19.0</td></tr><tr><td>Other family</td><td>1.9</td></tr><tr><td>Total respondents</td><td>5,759</td></tr></table></td><td>Of the families in Greenacre, 59.4% were couple families with children, 19.7% were couple families without children and 19.0% were one parent families.</td></tr>
<tr><td>Income</td><td>20,028 persons surveyed in Greenacre
60.17% of persons earn <$799
74.03% of persons earn <$1250
16.71% of persons earn >$1250</td><td>Greenacre residents are typically lower income households. Hence, approximately 74.03% of the population is considered vulnerable.</td></tr>
</table>

<table>
<tr><td>Occupation</td><td>8,031 persons surveyed
Professional
Technicians and trade workers
Managers
Clerical and administration workers
Sales workers</td><td>The most common occupations in Greenacre included Professionals 17.6%, Technicians and Trades Workers 15.3%, Clerical and Administrative Workers 15.1%, Sales Workers 11.2%, Labourers 9.9%, Managers 9.8%, Community and Personal Service Workers 9.6% and Machinery Operators and Drivers 9.2%.</td></tr>
<tr><td>Health</td><td>26,319 persons surveyed
No long term health conditions 64%
Not stated 10.5%
Diabetes 6.4%
Arthritis 6.2%
Asthma 5.7%</td><td>Generally, the population of Greenacre are considered in good health, with 64% of persons stating they have no long term health conditions. 39.7% of persons were seen to have long term health conditions with diabetes, arthritis and asthma the leading health conditions.</td></tr>
<tr><td>Education</td><td>18,811 persons surveyed
Year 12 or equivalent 58%
Year 10 or equivalent 14.9%
<Year 9 or equivalent 10.28%
Did not go to school 3.98%</td><td>Generally, most people in the area are well educated. Only a small proportion of Greenacre did not go to go school 3.98% or have a education level of less than year 9 or equivalent 10.28%.</td></tr>
<tr><td>Housing</td><td>7,104 persons surveyed
Separate housing 63.1%
Semi detached, row or townhouse 29.3%
Flat or apartment 7%</td><td>Separate houses are the primary housing typology within Greenacre, accounting for 63.1% of all households. Semi-detached, row or townhouses make up 29.3% of all dwellings and only 7% are apartments or flats. The high share of separate dwellings reflects the local context of the Greenacre being an established residential area and suburban area.</td></tr>
<tr><td>Tenure</td><td>7,121 persons surveyed
Owned outright 30%
Owned with a mortgage 33.1%
Rented 32.4%</td><td>Approximately 2/3 of persons in Greenacre own their own home and approximately 1/3 rent within the area. Impacts from the proposed development need to be assessed to ensure the property market is not negatively impacted</td></tr>
<tr><td>Employment</td><td><table><tr><th>Employment</th><th>Percentage</th></tr><tr><td>Worked full time</td><td>53.1%</td></tr><tr><td>Worked part time</td><td>31.7%</td></tr><tr><td>Away from work</td><td>6.4%</td></tr><tr><td>Unemployed</td><td>8.8%</td></tr><tr><td>Total persons surveyed</td><td>9,027</td></tr></table></td><td>There were 9,027 people who reported being in the labour force in the week before Census night in Greenacre. Of these 53.1% were employed full time, 31.7% were employed part-time and 8.8% were unemployed.</td></tr>
<tr><td>Linguistic</td><td><table><tr><th></th><th>Language</th><th>Percentage</th></tr><tr><td>1</td><td>Arabic</td><td>38.7%</td></tr><tr><td>2</td><td>English</td><td>26.7%</td></tr><tr><td>3</td><td>Urdu</td><td>2.6%</td></tr><tr><td>4</td><td>Vietnamese</td><td>2.8%</td></tr></table></td><td>Arabic is the preferred language spoken at home, followed by English. Most people in the area are considered to speak at a level greater than well (77.11%). Approximately 22% of people in the area do not speak English or do not speak English well.

Hence, approximately 22% of people in the area are considered vulnerable.</td></tr>
</table>

	5	Greek	2.7%
	6	Bengali	2.6%
	Persons surveyed		**13,113**

Proficiency in spoken English	**Number of Individuals**	**Percentage (%)**
Speaks English only	2104	10.03%
Uses other language and speaks English:		
Very well or well	14072	67.08%
Not well or not at all	4656	22.19%
Proficiency in English not stated	25	0.12%
Language and proficiency in English not stated	121	0.58%
Total persons surveyed	**20978**	

Travel to work		
	Mode of transportation	**Percentage (%)**
	People who travel to work by public transport	12.2%
	People who travelled to work by car as driver or passenger	74.3%
	Total persons surveyed	**7,119**

Approximately, 74.3% of people in Greenacre were seen to travel to work via car. Traffic increases caused by the proposed development will need to be adequately assessed.

Table 9: Demographic of Greenacre statistics. All statistical information obtained from the Australian Bureau of Statistics [2].

Categories of social impact

Project activity (without mitigation)	Impacted population	Social impact categories	Elements of impact
Increased traffic movement.	• Residents within vicinity of the proposed development • Greenacre residents	Way of life Access Health and wellbeing	Duration – life time of project Intensity – moderate
Impact on acoustic amenity	• Residents within vicinity of the proposed development	Way of life Access Health and wellbeing	
Impact on air quality	• Residents within vicinity of the proposed development • Residents that experience long term health conditions	Way of life Access Health and wellbeing	

[2] https://www.abs.gov.au/census/find-census-data/quickstats/2016/SSC11757

Impact on visual amenity	• Residents within vicinity of the proposed development • Industrial neighbors • Greenacre residents	Way of life Access Health and wellbeing	

Table 10: Categories of social impact

6.2 Engagement

It is understood that a proposed development of this nature includes a broad range of parties who are required to be engaged. These may include key groups or individuals within the community that may have an interest in the project (e.g. councils, government agencies and special interest groups). Community groups that have been identified to be engaged include:

- Strathfield City Council
- NSW Environmental Protection Agency
- Residents of the immediate surrounds
- Residents of Greenacre suburb
- Surrounding industrial residents

Engagement is to be carried out with due regard to the Department's *Undertaking Engagement Guidelines for State Significant Projects*.

As part of the development of this Scoping Report, the local residential community was consulted. This is outlined in 6.3.

6.3 Community consultation

The following community consultation has been completed as part of this Scoping Report.

1. Letterbox drop to all surrounding streets (these include both residential and commercial areas) – The leaflet included details explaining the proposed development and included an email address for feedback, a link to a dedicated website for further comments, and details on the community consultation session.
2. A community consultation session – Proposed to be conducted via a teleconference or Zoom meeting format. Attendance will be required via RSVPs.
3. These feedback channels were open for 30 days from the date of the letterbox drop.

Initial community consultation results

There was very minimal response from the community to the proposed development. One resident contacted 4Pillars and expressed a current complaint around noise and lighting of the area during the night period. As Aussie's does not operate during this time period and the location of the complainant in relation to Aussie's, it was determined to be another industrial premise responsible for this activity.

There were no RSVPs to the community consultation session.

Initial community consultation evaluation and recommendations for future consultation

Initial consultation was done prior to the completion of the initial SIA. Considering the social context of the Site, it is apparent that this consultation is not adequate for the community. The following recommendations are below:

- All consultation material is to be in English and Arabic. Other languages should be available upon request.
- Consultation mediums should be both physical (letters and flyers) as well as electronic to adequately reach all persons in the community.
- Multiple sessions and attempts should be made to engage key stakeholders and residents

6.4 Proposed future consultation

As part of the EIS investigations, detailed stakeholder and community consultation will be performed to ensure the proposed upgrades are executed in a manner that protects both the environment and human health while also achieving key goals of the circular economy and NSW waste strategies. Key stakeholders identified include adjoining businesses and residents.

In addition, and as part of the development approval process and the preparation of an EIS, the Proponent would seek to consult with the relevant government agencies and stakeholders, including:

- NSW Department of Planning and Environment;
- NSW Fire and Rescue;

- Sydney Water (if relevant);
- Water NSW (if relevant); and
- Transport for NSW (if relevant).

Consultation strategy

As part of the EIS development, a Social Impact Assessment (SIA) is to be completed, this will further guide the establishment of a Community Engagement Plan (CEP). As part of the SIA and CEP, detailed research on the key environmental and community groups in the area will be carried out. This will include an assessment of factors such as age, demographic and culture, which will ultimately determine the frequency, medias and language used within the engagement material.

Once the CEP is established, the proponent will engage, inform and involve the identified stakeholders and the community about the proposed development and provide opportunities for feedback. Issues raised during the engagement process will be provided to the project team to inform project development, environmental assessment and the preparation of the EIS.

A range of communication and engagement activities will occur during preparation of the EIS in accordance with the CEP. Community and stakeholder engagement is thought to include:

- Establishment and maintenance of a website to enable the community and stakeholders to contact the project team;
- Community consultation sessions;
- Project updates in the form of flyers and emails; and
- Notification letters to nearby surrounding residents.

These mediums would be provided in English, and Arabic. Other languages would be made available upon request. Delivery mediums would be both physical and electronic.

Once the EIS is completed, the EIS will be placed on public exhibition in accordance with Department of Planning and Environment statutory timeframes and all stakeholders will be notified on where to find the EIS for review. During the exhibition period any stakeholder can make a formal submission on the proposed development. Submissions will be collated into a report and will be considered in the assessment of the EIS and further development of the proposed development.

Following the exhibition period, Aussie Recycling will respond to submissions received and undertake further engagement if required.

If the proposed development receives planning approval, Aussie Recycling will continue to engage with the stakeholders and the community during the construction phase in accordance with the CEP.

6.5 Post lodgement consultation with stakeholders

In November 2023, the Scoping Report (ref: 20211030AUS-BFS-Scoping Report_V4) was submitted through DPE's Major Projects Portal. During initial review and discussions with DPE, it was requested that consultation with the EPA be completed to discuss any preliminary comments or concerns.

A meeting between 4Pillars and EPA representatives was then organised. Meeting attendees are outlined in Table 11.

Name of attendee	Company / Position	Role
Ruth Owler	EPA / Unit Head – Regulatory Operations Metro West	NA
Rashad Danoun	EPA / Senior Operations Officer	NA
Fiona Gainsford	Gainsford Environmental Consulting / Principal Environmental Consultant	REAP Certifier
James Hammond	4Pillars Environmental Consulting / CEO	Proposed development environmental consultant
Satish Maharjan	4Pillars Environmental Consulting / Senior Consultant	Proposed development environmental consultant
Sophia Burke	4Pillars Environmental Consulting / Consultant	Proposed development environmental consultant

Table 11: Meeting attendees

During this meeting (conducted 25 January 2023) the following outcomes were obtained (note: these notes have been circulated and endorsed by meeting attendees and are included in Appendix 5).

- The EPA's best practice recommendation for all new waste facilities and waste facilities that are being modified is to enclose the processing / operating areas.
    - The purpose of enclosure is to minimise the impact of dust, water and noise pollution on sensitive receiving environments eg residential areas.
    - The implementation of Environmental Management Plans (EMPs) has been ineffective, in practice, at many sites. Therefore, the EPA does not generally support 'deferring' mitigation commitments to EMPs rather than addressing them during assessment/conditioning.
    - Engineering controls (i.e. automation of dust suppression) is encouraged to remove human error.
    - If alternative measures to enclosure are proposed, the EPA expects the proponent to demonstrate equivalent performance of those alternative measures.
- EPA takes a very cautious approach to approving soil waste above CT1 levels (from the Waste Classification Guidelines a 2014). Any such proposal needs robust justification.
    - The EPA's key concern is around human health, particular lead and other priority contaminants.
    - End use is important for blended reuse products (see below).
    - RROs with specific intended end uses are helpful (eg. industrial purposes or a specific application).

In response to the point above regarding the end use for blended reuse products the EPA provided further clarification, to their concerns around the blending of waste types (specifically wastes that exceed CT1 limits) in order to reduce chemical contaminants in end products. Aussies Skips intends to apply for a Site specific RRO with intended specific end uses identified, which the EPA have noted to be a better outcome (see Appendix 5).

All EPA comments and concerns will be incorporated into the proposed development and will be fully addressed in the EIS.

Next steps

Based on the outcomes of the consultation, further review and analysis of the proposed development design and impact will be required. The consultation has guided the review steps and the approach is summarised below:

1. Review of proposed development design
2. Modelling potential impacts

3. Analysis of mitigation options
4. Option determination

This approach will ensure the maximum level of environmental protection is incorporated into the proposed development design while still achieving economic and industrial outcomes.

Review of proposed development design

4Pillars intends to incorporate the advice from the EPA during the finalisation of the proposed development design and establishment of the EIS. Discussions with the client will be completed to determine the feasibility of enclosing the facility, this will be reviewed through both cost benefit analysis and further modelling of environmental protection outcomes.

Modelling potential impacts

Multiple models for each environmental impact aspect will be created by the specialists which explore:

- The impact level of the proposed development with an enclosure, and;
- The impact level of the proposed development with alternative mitigation measures (preference given to engineering controls).

Analysis of mitigation options

After the models are created, the mitigation options will be compared and analysed. If an alternative mitigation measure is shown to offer an equivalent level of environmental protection performance (when compared to the enclosing option), it will be explored further, and cost benefit analysis will be completed for this measure.

Option determination

The option(s) that achieve the best environmental protection, or the option that achieves an equivalent level of protection will be put forward to the EPA for further consideration.

7 Impact assessment

7.1 Relevance of existing environmental impact assessments

The existing SOEE (the 2012 SOEE) was prepared by Borg Architects as part of the original development application process in 2012 for the use of the Site as a materials handling yard, as well as the construction of an industrial warehouse building with an associated workshop.

However, in addition to the 2012 SOEE, several additional studies and assessments have since been undertaken to ensure that potential environmental impacts are managed effectively.

The Class 1 EPL appeal process in 2019-2020 resulted in a number of detailed environmental assessments being completed for the Site. These assessments were all done on the basis of an annual throughput of 200,000 tonnes per annum. As such, the conclusions made within these reports have aided the scoping of potential impacts for this report. These assessments are referenced in this document as appropriate.

2020 SOEE – EPL Variation

In July 2020, Aussie Recycling requested a variation to their EPL (No. 21389) to increase total tonnes of waste material received per 12 month period and also to increase total waste permitted on site at any one time. The EPA requested that further environmental assessment was conducted prior to granting the EPL Variation. As such, a Statement of Environmental Effects (SEE) was produced to assess the proposed variation and any potential environmental impacts. The approval of this variation also required additional mitigation measures implemented at the Site.

7.2 Surface water quality

The potential impacts of the operations of the Site on surface water quality are managed via several existing controls. The Site currently captures and stores all water on Site, either for re-use or disposal as liquid waste to a licensed contractor.

While the proposed development proposes to store and process additional waste types including Soils (>CT1), it is understood that no additional risks to surface water quality are likely, as the current and proposed measures ensure that water is not discharged from the Site.

Surface water on the Site is managed to a high standard, and that risks to the surrounding environment are significantly reduced. The potential contingency measures implemented at the site include engineering, elimination, procedural, isolation, and administrative measures. These are detailed below:

Procedural & Administrative measures

- The site currently operates with a Plan of Environmental Management (POM), which provides a number of options to be considered if water monitoring indicates recurring exceedances of the limits in the current EPL.
- Site Plan of Management – titled 'Wet Weather Surface Water Management Procedure'. This document details the mechanisms which are to be enacted procedurally to ensure correct operation of the water management system on site.
- Pollution Incident Response Management Plan (PIRMP) – in the unlikely occurrence of an uncontrolled spill or overflow.

Existing and proposed Engineering measures

- Existing: Complete On Site Detention (OSD) system that captures all water that encounters the Site (Figure 6);
- Existing: Three (3) 50,000L reuse water tanks which provide a total of 282 kL of volume of on-site water storage and 175% of the volume required to capture a 5 day 90th percentile rainfall event for the Site, significantly improving the ability to store and treat water on Site, and to avoid uncontrollable discharges;
- Existing: Rumble grid and drive through wheel wash;
- Existing: Two (2) 5,000L slimline water tanks to supply water to the wheel wash and receive water pumped from the weighbridge pit;

- Existing: Roof extension to cover part of the concrete hardstand with revised pipework to deliver runoff in a pipeline along the boundary wall to the three (3) 50,000L reuse water tanks in the north-eastern corner of the Site; and
- Existing: Pump and pipeline from water treatment pit to the 5,000L tanks next to the weighbridge.
- Proposed: Penstock valve ensuring outlets are closed at all times, unless purposefully released/opened.

An elimination approach has been followed at this Site – the proponent has sought to prevent discharges and therefore eliminate any risk of impact on local waterways and aquatic ecosystems. The proponent may consider a trade waste discharge arrangement for emergency discharges in extreme wet weather events. This will be assessed to a standard level during the EIS.

7.3 Air quality (incl. odour)

The site currently operates with mitigation measures including carrying out operations on a solid concrete slab surface, three water cannons, a wheel wash system at the Site entrance, storage of material within bays consisting of concrete block side walls, a rear shed wall and an overhead steel waning, as well as further water misting sprays built into the awning. Previous Air Quality Assessment were completed based on 200,000 tonnes per annum of waste throughput and operational equipment which does not include the proposed crushing and screening mobile plants.

The proposed development will be assessed to a standard level during the EIS, it is proposed an updated air quality modelling assessment consistent with NSW statutory guidelines, is included.

7.4 Soil contamination and groundwater

The area of the Site which is used for materials storage and handling is sealed with a thick concrete slab, and the materials handling bays are covered by a large metal awning, to reduce the exposure of waste stockpiles to rainfall.

Proposed increased contaminant limits are proposed to be accepted at the Site. However, these limits are to be only slightly higher than the EPA's *Waste Classification Guidelines*, CT1 limits. Therefore, there is little risk of contamination of land or groundwater due to leaching through the hardstand into underlying soils and water table(s). Although an increase in the authorised amount is proposed, which would permit a larger quantity of material to be on Site at any one time, this is not expected to increase the potential for the contamination of soil and groundwater, particularly as the residence time of material at the site is in the order of days, following which bays are emptied and cleaned. The proposed increase in annual throughput will also not increase the potential for contamination. This will be assessed to a standard level during the EIS.

Acid sulfate soils

The Site is identified as being located with an Acid Sulfate Soil (ASS) Class 5 Land. According to section 6.1 (2) of the Strathfield Local Environmental Plan (2012), development consent is required for Class 5 area where:

Works within 500 metres of adjacent Class 1, 2, 3 or 4 land that is below 5 metres Australian Height Datum and by which the watertable is likely to be lowered below 1 metre Australian Height Datum on adjacent Class 1, 2, 3 or 4 land.

The Site is located at approximately 16 m AHD and is classified as Class 5 Land. Class 4 Land are located approximately 400 m to the northeast of the Site and Class 1 Land is located approximately 1540 m to the northeast. The proposed development does not have the capacity to affect the water table in the Class 5 area due to the excavation required (none). A further assessment of Acid Sulfate Soils (ASS) at the Site is not considered necessary.

7.5 Noise and Vibration

The previous Noise Impact Assessments were based on 200,000 tonnes per annum of waste throughput and a set of operational equipment which does not include the proposed processing plants. Therefore, a detailed acoustic and vibration assessment, consistent with the *Noise Policy for Industry 2017*, will be undertaken.

The proposed development will be assessed to a standard level during the EIS. Noise associated with processing of soils and the increase in truck movements will be addressed in the EIS via a Noise and Vibration Impact Assessment.

7.6 Contaminated and non-permitted material

The proposed development looks to increase the amount of material that is currently permitted and received on Site, additional processing activities including crushing, screening and sorting and in particular, an increase in the waste types permitted on Site

The main hazards on the Site which have been identified as likely to cause a pollution incident are contaminated water storages, hydrocarbons, chemicals and illegal wastes. Management of these incidents will continue to be managed under the Site's Pollution Incident Response Management Plan (PIRMP) and accompanying Pollution Incident Response Procedure (PIRP).

It will be important that the Site's POM and PIRMP are revisited and updated accordingly. This will be assessed at a standard level during the EIS.

7.7 Traffic

Previous traffic engineering advice provided by McLaren Traffic Engineering (MTE) reported that the Site has the physical capacity to receive the maximum number of vehicles as outlined within DA2012/175, even during the "worse-case scenario" of all hourly truck movements occurring simultaneously. MTE calculated that the Site has an annual capacity in accordance with DA2012/175 of 539,274 tonnes per annum.

While it is not expected that the proposed works will exceed the Site's capacity for maximum number of vehicle movements, due to the significant increase in proposed annual throughput, this will be assessed at a standard level during the EIS process. Traffic and Transport modelling report, including internal swept path analysis, is provided to accompany the EIS submission.

7.8 Visual amenity

Activities on Site are obscured from outside view by the high walls around the Site, as well as the warehouse in the south-east of the Site. The majority of activities carried out on the Site are related to the management and handling of material, with other activities including truck parking, and storage of empty (only) skip bins. Material handling is carried out close to or within handling/storage bays or bunkers, which are open at the front and have sides constructed of large concrete blocks. These bays are located handled along the northern and north-western boundary of the Site, which is quite a distance from the entrance gate. A large metal wall and awning covers the bays to the rear and from above, further obscuring them from outside view. Following the proposed development, material will continue to be handled within the storage bays, which have adequate capacity to accommodate for the increase in material. Therefore, the proposed development is not expected to change the external visual appearance of the Site, or its impacts on the visual amenity of the area. This matter requires no further assessment in the EIS.

7.9 Heritage

The proposed development exists on a brownfield site, containing no items of environmental heritage within the Site or within the immediate vicinity of the site. As such, the proposed development does not breach any items mentioned in the *NSW Heritage Act 1977*. This matter requires no further assessment in the EIS.

7.10 Biodiversity (Flora and Fauna)

Division 2 Section 7.9 of the Biodiversity Conservation Act 2016 (BC Act) requires that a SSD or SSI application must be accompanied by a biodiversity development assessment report (BDAR) and must assess any significant impacts on biodiversity values of the proposed development.

A BDAR report serves as a consistent method for the assessment of biodiversity, including assessing certain impacts on threatened species and threatened ecological communities, their habitats, and impacts on biodiversity values.

BDAR Waivers can be issued by the Department of Planning and Environment (the Department) when it is demonstrated that the SSD is not likely to have a significant impact on biodiversity values.
A proposed development is considered unlikely to have any significant impact on biodiversity if it:

- Will not clear or remove native vegetation other than: a few single trees with no native understorey in an urban context.
- Planted native vegetation that is not consistent with a Plant Community Type (PCT) known to occur in the same Interim Biogeographic Regionalisation of Australia (IBRA) subregion (e.g. street trees, trees in carparks, landscaping).
- Will have negligible adverse impacts on threatened species or ecological communities, considering habitat suitability, abundance and occurrence, habitat connectivity, movement and water sustainability including consideration of any non-natural features, non-native vegetation and human-built structures.
- Will have negligible adverse impacts on protected animals because of impacts to flight path integrity.

Applying for BDAR Waiver

The Biodiversity Conservation Act 2016 (BC Act) requires than a SSD or SSI application must be accompanied by a biodiversity development assessment report (BDAR), it is understood that the proposed development is occurring on a brownfield site with no impact threatened species habitat, or vegetation. As such, a BDAR waiver request will be lodged along with the SSD application through the Major Projects portal (please see Appendix 4).

This matter requires no further assessment in the EIS.

8 Closing statement

The proposal detailed in this Scoping Report is the result of careful consideration of the environmental assessments prepared by various experts, a review of current and previous Site operations.

We have worked closely with the applicant to develop a balanced proposal, which allows for positive economic outcomes for the business, while ensuring that the potential for an increase in environmental risk is minimised.

We look forward to receiving the SEARS and proceeding with the EIA.

9 List of appendices

Appendix 1. DA 2012/175.

Appendix 2. EPL 21389.

Appendix 3. Complying Development Certificate 210597 and its attachments.

Appendix 4. BDAR Waiver.

Appendix 5. EPA Consultation.

Appendix 6. 2012 SOEE

Appendix 7. 2020 EPL licence variation application

Appendix 8. 2020 EPL licence variation notice (dated 08/07/21)

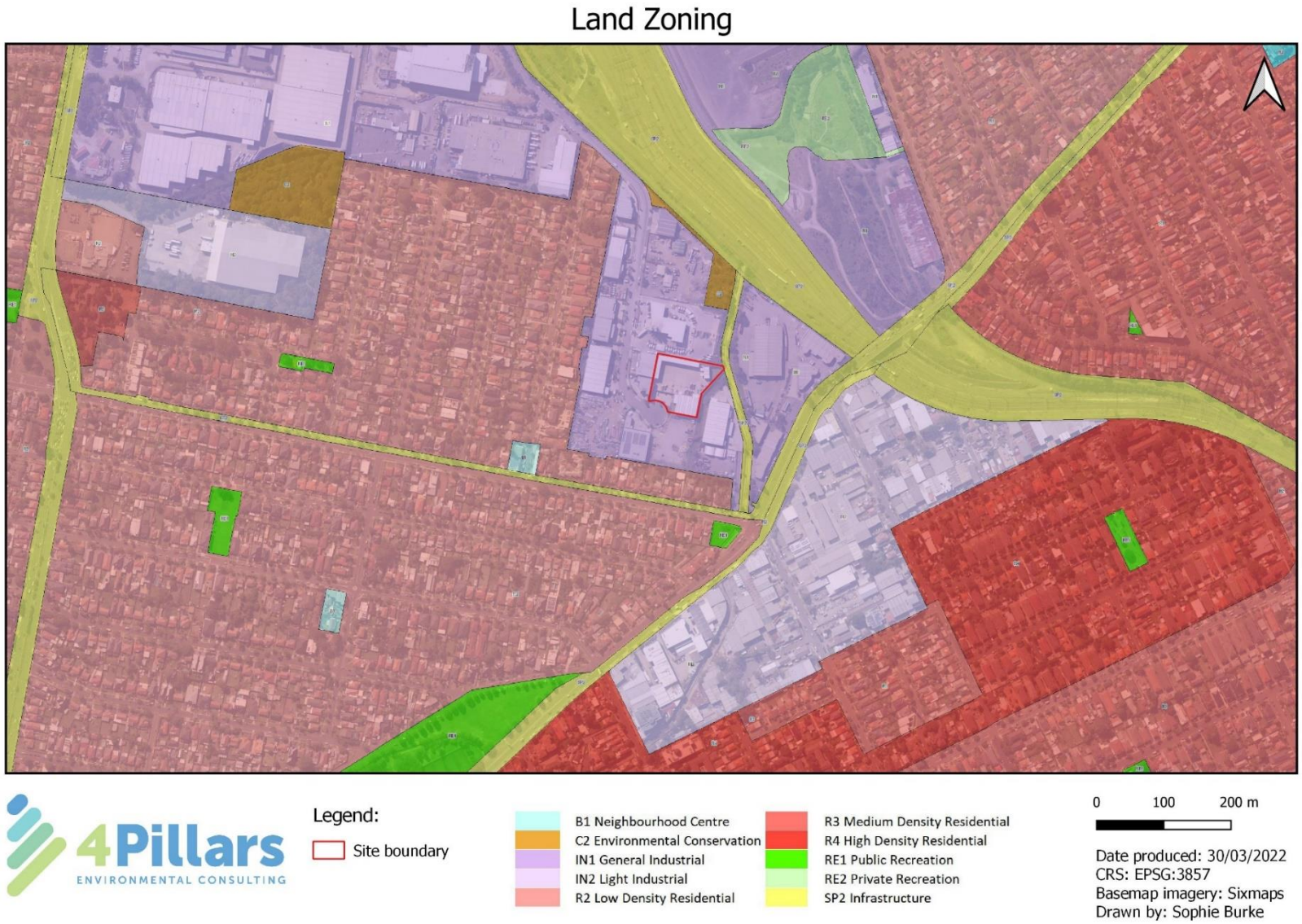

Figure 3: Land zoning.

Figure 4: Sensitive receiver locations and current EPL points.

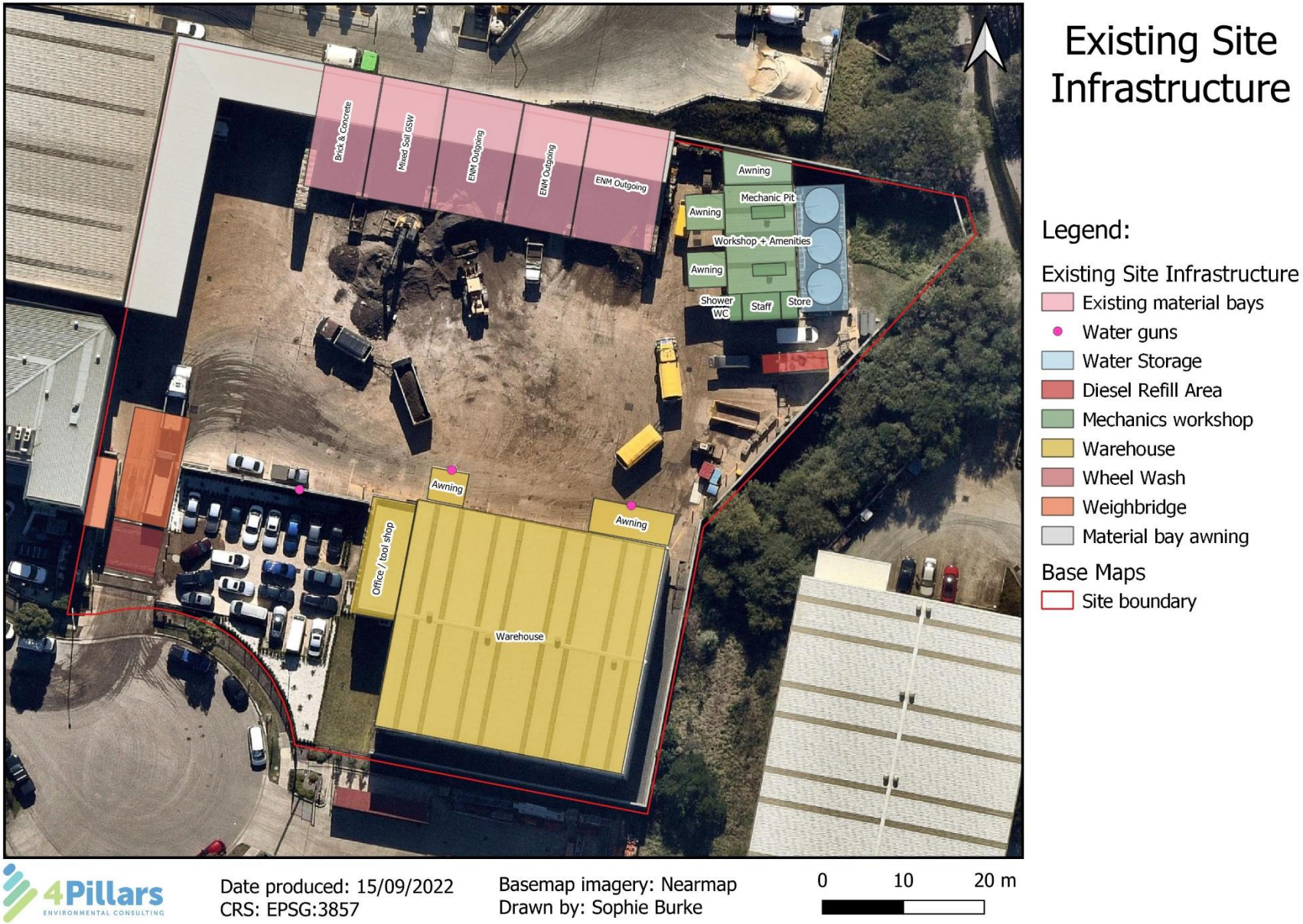

Figure 5: Existing site infrastructure.

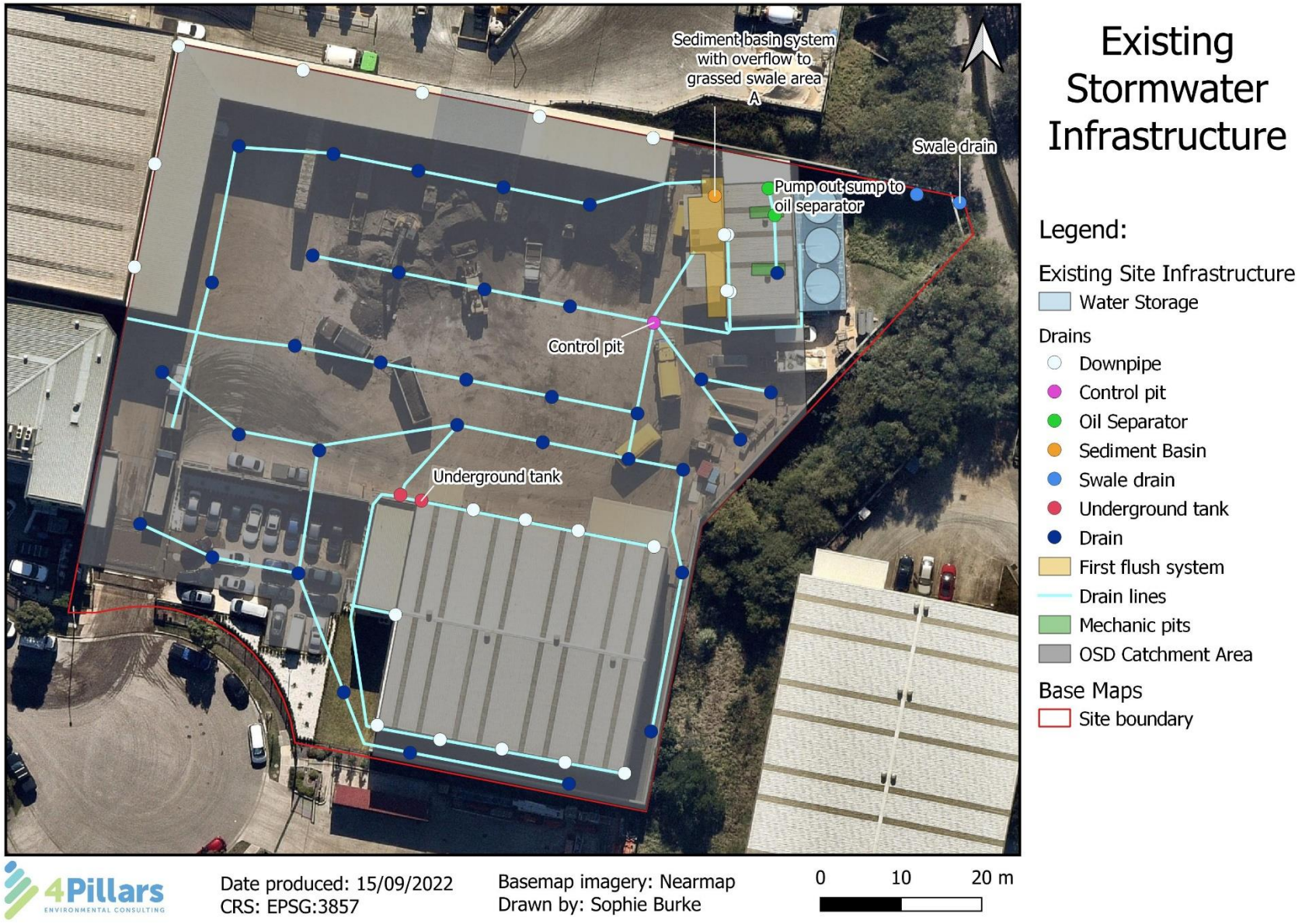

Figure 6: Existing stormwater infrastructure.

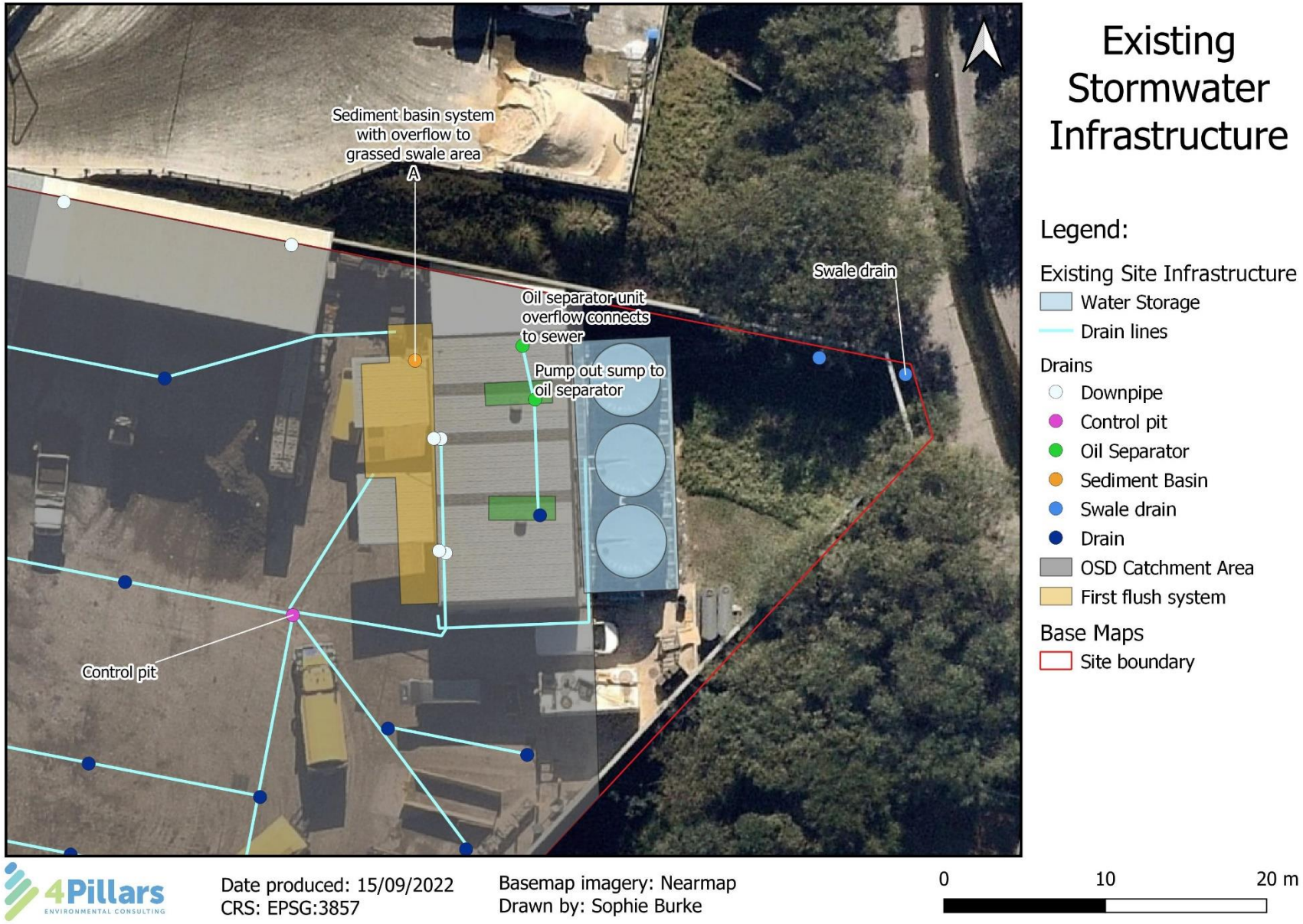

Figure 7: Zoomed in view of existing stormwater infrastructure.

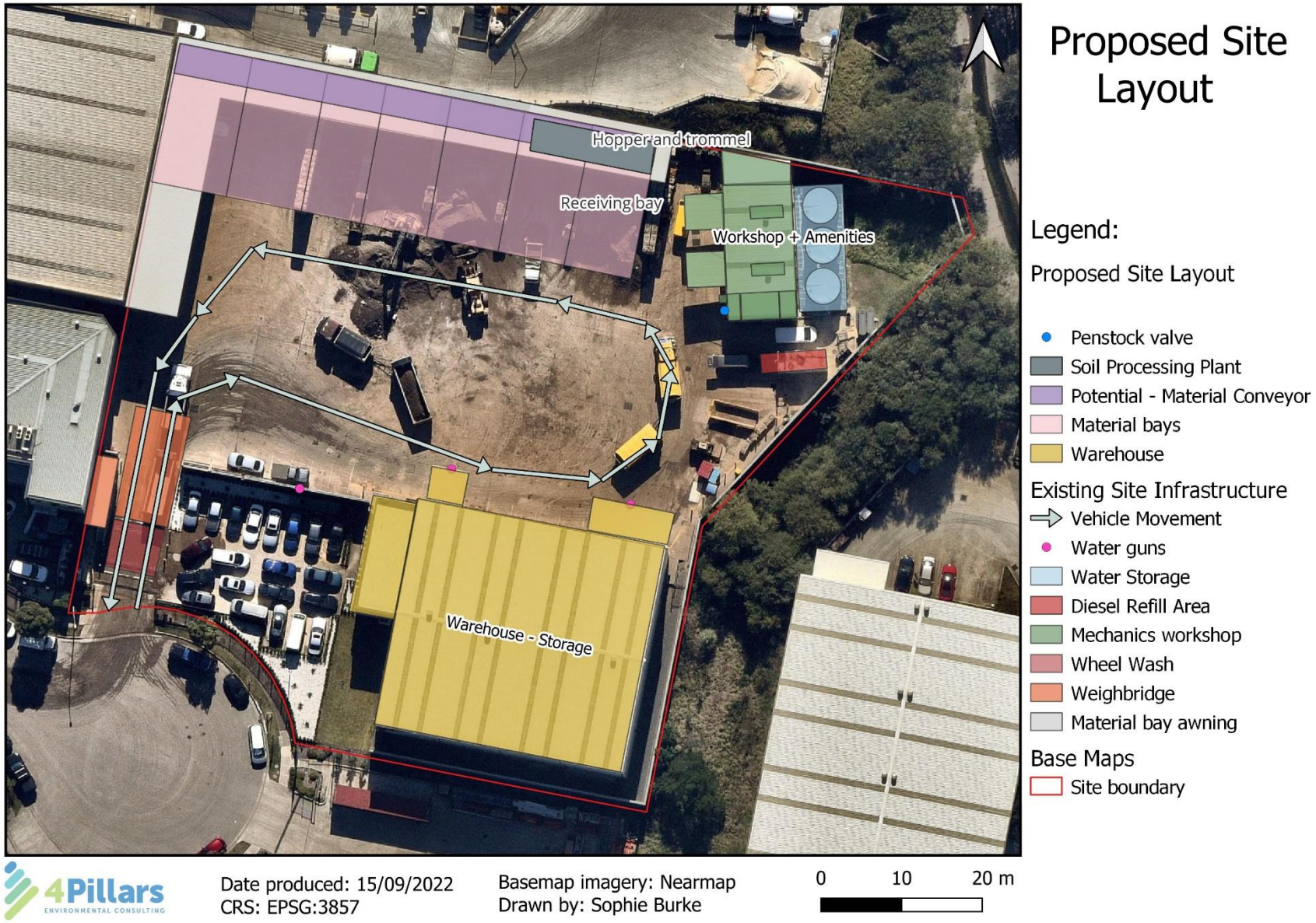

Figure 8: Proposed site layout for operation of scenario 1.

Appendix 1 – Strathfield Council DA

Appendix 2 – EPL 21389

Appendix 3 - CDC

Appendix 4 – BDAR Waiver

Appendix 5 – EPA consultation

Appendix 6 – 2012 SOEE

Appendix 7 – EPL Variation 2020

Appendix 8 - 2020 EPL licence variation notice (dated 08/07/21)