

16 October 2025

Attention: Emma Barnet

NSW Department of Planning, Housing and Infrastructure
4 Parramatta Square
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Dear Emma

Scoping of environmental assessment for SSD 5339 Minto Resource Recovery Facility – Modification 2.

Introduction

Element Environment Pty Ltd (Element) acts on behalf of CR Plus Pty Ltd (CR Plus), who own and operate the Minto Resource Recovery Facility (RRF; the approved development) at 7 Montore Road, Minto NSW 2566 (the site). The Minto RRF operates under State significant development (SSD) consent SSD-5339 (the consent), granted by the Minister for Planning on 17 June 2022.

CR Plus is seeking to modify the consent (modification 2, hereon referred to as the modification) under Section 4.55(2) of the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) to:

- Increase the amount of material received and processed at the site from 450,000 tonnes per annum (tpa) to 600,000 tpa, which is limited to general solid waste (non-putrescible) consisting of concrete, asphalt, sandstone and sand from the building and demolition industry.
- Receive waste materials associated with non-destructive drilling (NDD) at night.
- Introduce the receipt of sands, soils and clays generated through the building and demolition industry, which may include foreign objects such as bricks and cement, but does not include hazardous, restricted or special waste, and is limited to material classified as general solid Waste under the NSW EPA Waste Classification Guidelines (2014).

It is noted that a separate modification (Modification 1) is currently in progress and involves the introduction of NDD waste as a new waste stream to be received and processed at the site. No other modifications have been submitted since the consent was issued.

The site is licensed under Environment Protection Licence (EPL) 21828 which would require variation to reflect the changes proposed under Modification 2.

Section 4.55(2) of the EP&A Act allows a consent authority to modify a development consent if:

- (a) *it is satisfied that the development to which the consent as modified relates is substantially the same development as the development for which the consent was originally granted and before that consent as originally granted was modified (if at all).*

It is considered that the modification will be substantially the same as the development authorised by the existing consent. The proposed modification is therefore within the scope of section 4.55(2) of the EP&A Act.

This scoping letter summarises the site, the approved development, the modification, consent pathway and proposed consultation and assessment approach.

Site context

CR Plus owns and operates the existing RRF at 7 Montore Road, Minto, NSW, 2566, legally defined as Lot 52 DP 618900 (see Figure 1 and Figure 2).

The site is in Minto, a predominantly industrial suburb over 37 kilometres (km) south-west of Sydney's Central Business District (CBD), covering approximately 4,000 square metres (m²) in the Macarthur region of the Campbelltown local government area (LGA).

The site is zoned E4 General Industrial under the Campbelltown Local Environment Plan 2015 (CLEP).

All vehicle access to the site is via a single entry and exit driveway at the north-eastern site boundary off Montore Road.

The site is predominantly sealed with 5% cement stabilised road base, concrete or compact asphalt and contains the following built components (Figure 3):

- Light vehicle carpark.
- Sealed and compacted access roads.
- Weighbridge and site office.
- Wheel wash.
- Maintenance store.
- Water storage tanks.
- Water treatment plant.
- Enclosed sand washing plant.
- Enclosed crushing and screening plant.
- Pugmill.
- Material storage bays and internal push walls.
- Perimeter walls.
- NDD waste recycling plant to be included through Modification 1.

The site is largely surrounded by industrial businesses with an approximately 50 m wide artificial drainage corridor (Bow Bowing Creek) directly to the west, Sydney Cook Islands Seventh-day Adventist to the north, TR Group to the east and Foamco Industries and Speed E-Gas to the south.

The closest residents are approximately 265 m to the west on the site opposite Campbelltown Road. Another industrial property operated by CCA Logistic Solutions is located in between the site and the nearest residents.

Stranraer Reserve represents the closest recreational receiver in the vicinity and is approximately 450 m to the north-west of the site.

The Sydney Cook Islands Seventh-day Adventist Church to the north of the site represents the closest place of worship.

Figure 1
Regional context

Minto Resource Recovery Facility - Modification 2
Scoping report

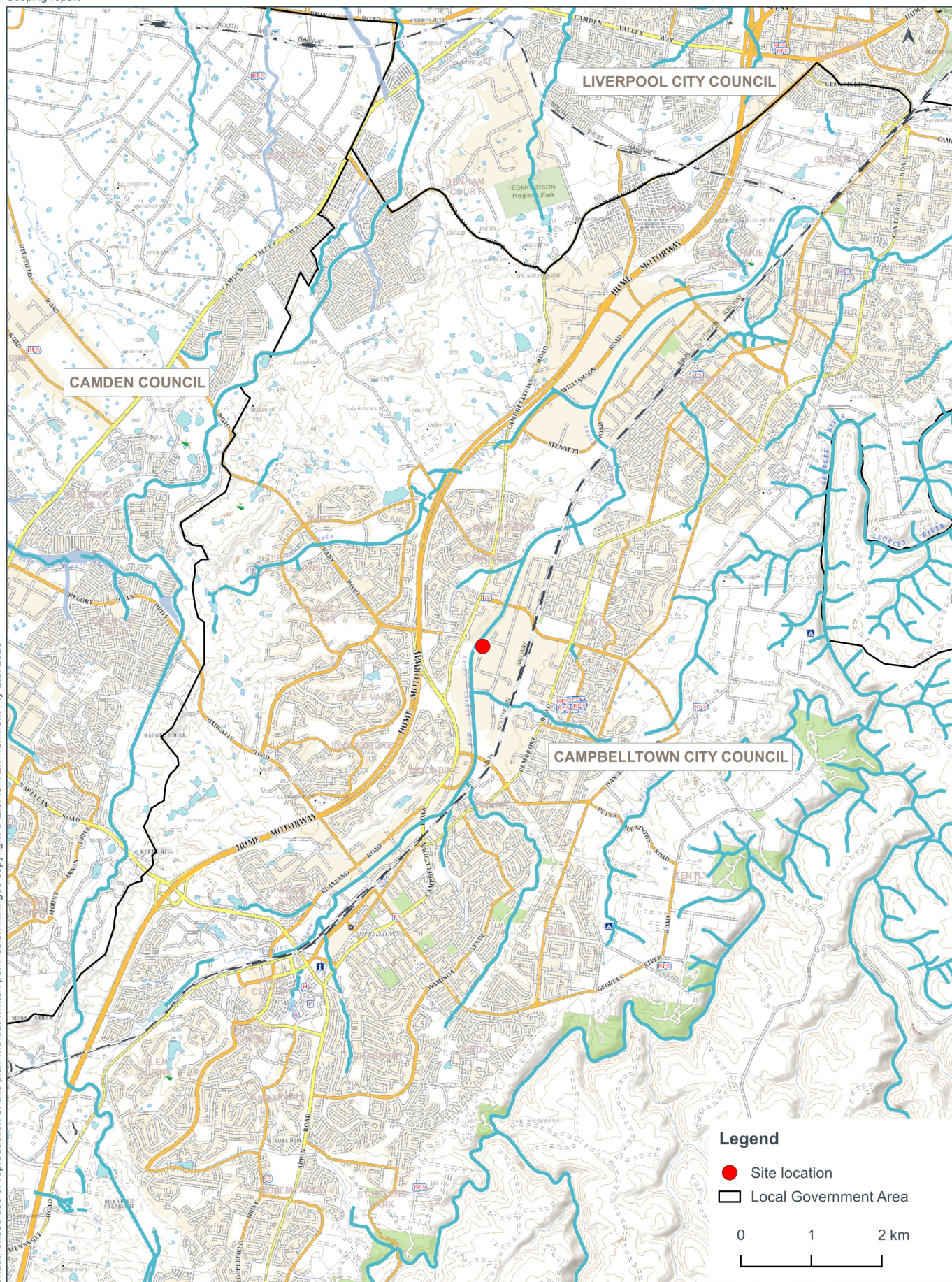


Figure 2
Local context

Minto Resource Recovery Facility - Modification 2
Scoping report



Figure 3
Site layout

Minto Resource Recovery Facility - Modification 2
Scoping report



The approved project

The RRF is approved to receive and process up to 450,000 tpa of non-putrescible general solid waste (bricks, concrete, asphalt, sandstone and sand) from the building and demolition industry, and store up to 50,000 tonnes of unprocessed waste and 22,000 tonnes of processed waste (product) at any one time.

The RRF utilises a sand washing plant, pugmill and concrete and brick processing plant to produce the following products:

- Road base.
- 20mm aggregate.
- 10mm aggregate.
- Brick sand.
- Washed excavation sand.

Waste is typically delivered to the site via trucks with an average capacity of 16 tonnes, whilst product is transported from the site in vehicles with an average capacity of 20 tonnes.

The RRF operates under environment protection licence (EPL) 21828 which reflects the limits specified in the consent.

Hours of operation

The RRF is approved to operate during the following hours:

Truck deliveries and pick-ups:

- Monday to Friday 6 am - 7 pm;
- Saturday 7 am - 4 pm; and
- No work is to be undertaken on Sunday and public holidays.

Operation (including crushing, screening, pugmill and sand washing):

- Monday to Friday 7 am - 6 pm;
- Saturday 7 am - 4 pm; and
- No work is to be undertaken on Sunday and public holidays.

Operational process

Covered trucks enter the site via the north-eastern driveway and pass over a weighbridge where the weighbridge operator records the vehicle weight and registration. Load covers are retracted and the load is visually inspected by weighbridge personnel and via overhead cameras. Loads suspected to contain unauthorised or contaminated materials will be rejected and directed to circulate and exit the site without unloading. Accepted loads are directed to slowly move through the overhead load-wetting gantry to increase the materials moisture content and reduce potential dust emissions during tipping.

All vehicle movements within the site follow the designated circulation routes prepared for the approved development.

Concrete and brick processing

Trucks delivering concrete and bricks are be directed to the receival area and tipped onto the designated hardstand and spread out with front end loader for inspection prior to acceptance. Any material identified as unsuitable at this stage are reloaded and transported off-site for appropriate disposal. Accepted materials are processed as follows:

- An excavator fitted with a hydraulic hammer or jaw crusher breaks oversized concrete pieces into smaller fragments to facilitate safe handling and ensure the material is appropriately sized for feeding into the crusher.
- A front end loader then loads the size-reduced concrete and bricks into the feed hopper. A vibrating grizzly feeder separates fine material (≤ 75 mm) and transfers it directly to the conveyor, bypassing the crusher and reducing energy consumption.
- The remaining material is fed into a fixed jaw crusher, which reduces oversized concrete and brick into a nominal 0–100 mm product.
- Crushed material is then transferred via conveyor past an overband magnet, which removes steel from the material. Recovered steel is then stockpiled and transported off-site for recycling by a licensed contractor.
- Crushed material passes through a vibrating screen with multiple decks to separate it into fractions (e.g. sand, 10 mm aggregate, 20 mm aggregate). Oversize material is directed to a secondary cone crusher for further size reduction before being re-screened in a closed-loop process until the desired product size is achieved.
- Processed materials (e.g. road base, sand, aggregates) are discharged from conveyors into storage bays, with stockpile heights not exceeding 8 m. Material is transferred from the bays to loading stockpiles by front-end loader as required.

Dust is managed through the use of conveyor hoods, water sprays, high pressure water misting systems and a baghouse dust extraction system, which captures dust at transfer points and returns it to the product stream. All hardstand areas are graded to direct stormwater runoff to the site's stormwater management system for treatment and reuse.

Trucks are loaded with processed products using a front-end loader and exit the facility in a forward direction. Trucks pass through a wheel wash and are weighed on the site weighbridge before departing the facility.

Sand washing

Excavated sand is delivered to the sand washing plant and tipped within the receival area before processing. The sand washing process produces washed, free-draining sand and aggregates as follows:

- A front-end loader loads sand into the feed hopper, which discharges material via conveyor to the wet screen. As material travels across the screen media, it is sprayed with high-pressure water to clean and grade the material. The screen separates two aggregate fractions which are stockpiled adjacent to the plant for transfer to the crushing plant for further processing. The slurry and wash water passing through the screen flow into a sump, which acts as the header tank for the next stage of washing.
- Slurry from the sump is pumped under pressure into a hydrocyclone. Inside the cyclone, centrifugal forces separate coarse particles, which discharge via the underflow to a dewatering screen for final moisture removal. The overflow, containing fine silt, is returned to the sump for further washing and silt removal.
- Water containing suspended silt (approximately 5% solids) flows over the weir in the sump and is pumped to a high-rate thickener. A Coagulant & flocculant is added to allow solids to rapidly settle at the bottom of the thickener, where mechanical rakes gather the silt for removal. Clarified water from the thickener is transferred to holding tanks for reuse within the washing process. Thickened silt is pumped to the concrete & brick processing plant and used on watering sprays fitted on the discharge conveyor.
- The sand washing plant operates as a closed-loop system, with all process water collected, clarified, and returned for reuse. Make-up water is only required to replace moisture lost in the final products, silt cake, and through evaporation. Site water storage tanks with a total capacity of 500 kL are maintained and topped up with mains water as required.

Although sand washing is a predominantly wet process, dust is controlled by minimising drop heights when loading hoppers and stockpiles, and by keeping processing areas damp. The closed water recycling system ensures efficient water use and prevents sediment-laden runoff from leaving the site.

Washed sand and aggregates are loaded into trucks using a wheeled loader. Trucks pass through a wheel wash and are weighed on the site weighbridge before departing the facility.

Pug mill mixing

The pug mill is used to mix processed sand or road base with cement binder and/or water to produce stabilised materials for construction use.

- A wheel loader or excavator feeds sand or road base into the receiving hopper. Cement is stored in a 40-tonne silo above the unit and metered into the mixing chamber via a calibrated drum conveyor. Water is added at this stage to condition the material and minimise dust generation.
- Dual counter-rotating shafts with pitched paddles knead and fold the material, ensuring thorough mixing of all components.
- Mixed product is discharged via a conveyor onto the stockpile located adjacent to the pug mill. Material is then loaded into trucks with a wheel loader for dispatch.

The cement silo is fitted with a baghouse filter system to control dust emissions during loading and mixing. Water addition during mixing further suppresses dust and ensures the product meets the required moisture content.

Trucks pass through a wheel wash and are weighed on the site weighbridge before departing the facility.

Need and justification

The modification is necessary to ensure the Minto RRF can continue to meet increasing demand from the building and demolition industry, particularly within the rapidly developing south-west Sydney region. The facility is uniquely positioned to support growth by providing a local and sustainable resource recovery facility for construction and demolition waste and NDD waste streams, reducing the need for landfilling or transport to more distant facilities.

CR Plus currently operates a NDD waste receipt service at Camellia, however the Minto site will expand this service offering into the south-west, where there is a growing customer base. While the introduction of NDD waste is subject to a separate modification (Modification 1), the proposed increase in processing capacity under Modification 2 will enable the facility to accommodate the natural growth of both C&D and NDD waste streams. This includes being able to receive NDD waste at night, which is increasingly required to service major infrastructure projects that operate outside standard hours.

The proposed modification also seeks to introduce the receipt of general solid waste (non-putrescible) consisting of sands, soils and clays generated through the building and demolition industry. These materials are in high and consistent supply across the region and CR Plus' clients have expressed a strong demand for recycling solutions for these waste streams. The materials are closely aligned in composition to existing approved inputs (such as sand and sandstone), with only minor inclusions of rubble such as bricks and cement, and can be effectively processed using the existing plant and equipment on site. By diverting these materials from landfill, the Minto RRF will improve recycling rates, recover usable construction materials, and provide additional high-quality recycled products to the market.

The proposed increase in throughput is also a proactive measure to ensure that the site can continue to operate efficiently during times of peak demand. The C&D waste industry is known for its cyclical nature, with periods of high construction activity placing pressure on existing facilities. Increasing the capacity of the Minto RRF ensures that it remains resilient and responsive to these market fluctuations, providing continued support for regional infrastructure development.

Proposed Section 4.55(2) modification

CR Plus are seeking to modify the following two conditions of the consent to provide operational flexibility and ensure the facility continues to meet demand from the C&D sector across Greater Sydney, especially in the south-west region.

Condition A6 - Waste

Condition A6 (a) of the consent allows the RRF to receive and process a maximum of 450,000 tpa of general solid waste (non-putrescible), which is limited to bricks, concrete, asphalt, sandstone, and sand from the building and demolition industry.

CR Plus seek to amend this condition to allow the receipt and processing of up to 600,000 tpa of general solid waste (non-putrescible), including:

- The materials already approved under the original consent;
- Sands, soils and clays generated through the building and demolition industry (which may include incidental rubble such as bricks and cement); and
- New materials proposed under Modification 1 (i.e. NDD waste streams).

The sands, soils and clays proposed to be introduced under this modification are closely aligned in composition to the existing approved waste streams and can be received, stored and processed using the same on-site methodologies and equipment.

The existing plant and equipment is currently underutilised and is capable of processing a far greater volume of material than permitted under the consent, with the crusher plant alone capable of processing a maximum volume of 800,000 tpa of material, or 16,000 tonnes per week.

Given the above, no site upgrades or additional equipment, plant or infrastructure are required to facilitate the increased processing volumes or the processing of new materials. Sands, soils and clays proposed under this modification will be processed as per the existing operational process for concrete and bricks (see “the approved project” above).

The increased volume of material received and processed at the site will result in additional traffic movements to transport the material to and from the site, and additional material storage bays will be established and designated for the unloading and storage of unprocessed sands, soils and clays.

No change is proposed to Condition A6 (b), which limits storage to 50,000 tonnes of unprocessed waste and 22,000 tonnes of processed waste (product) at any one time.

Condition B25 – Hours of work

Condition B25 (Table 1) currently limits truck deliveries and pick-ups to:

- 6:00 am to 7:00 pm Monday to Friday.
- 7:00 am to 4:00 pm on Saturdays.
- No deliveries on Sundays or public holidays.

CR Plus seek to amend this condition to allow the receipt of waste materials associated with NDD activities during night-time hours. No processing is proposed to occur outside the currently approved operating hours. All waste delivered at night would be stored and only processed during normal hours the following day.

NDD excavation is an increasingly common construction method due to its ability to protect underground services and infrastructure. NDD waste is typically generated during night works on local and major infrastructure projects to minimise impacts to road users and pedestrians. Currently, there are limited disposal options in the Macarthur region, resulting in longer transportation distances and associated impacts on roads and vehicle emissions.

This proposed change aligns with CR Plus’ intent to provide a strategically located facility capable of servicing night-time construction operations without altering processing hours or increasing local noise impacts during sensitive periods.

Qualification as a modification

Section 4.55(2) of the EP&A Act allows for a modification of a development where the consent authority is

...satisfied that the development to which the consent as modified relates is substantially the same development as the development for which consent was originally granted and before that consent as originally granted was modified (if at all).

CR Plus believes that the development, as proposed to be modified, will be substantially and materially the same development and will not result in a radical transformation from what has already been approved under the consent (SSD-5339) for the following reasons:

- The land use and core function of the site as a resource recovery facility will remain unchanged.
- The proposed increase in processing capacity (from 450,000 tpa to 600,000 tpa) is proportionate and consistent with the approved development, representing a 33% increase to

accommodate market growth and ensure sufficient capacity in the building and demolition waste recycling industry.

- The types of waste to be processed remain within the scope of general solid waste (non-putrescible), including the addition sands, soils and clays.
- The proposed night-time receipt of NDD waste will not alter operational hours for processing activities and will not involve any new or intensified uses beyond those already permitted.
- The existing on-site plant and equipment will be utilised to receive and process the waste. No additional plant or equipment will be required.
- The modification will not alter the existing approved site layout or physical infrastructure on the site.
- The modification will not alter the nature of the processes carried out on-site or approved method of operations.
- The modification will not involve any further disturbance outside of the already approved disturbed areas.

As such, the modification does not result in any significant departure from the approved use, scale, or environmental impact profile of the original development. The modification is appropriately considered under section 4.55(2) of the EP&A Act.

Planning framework

Consent history

The RRF was determined by the Minister for Planning on 17 June 2022. There have been no approved modifications to the consent since determination, however Modification 1 is currently being prepared.

NSW Environmental Planning and Assessment Act 1979

CR Plus is seeking to modify the consent under Section 4.55(2) of the EP&A Act.

As required by Section 4.55(3) of the EP&A Act, in determining an application for modification of a development consent, the consent authority is to take into account those matters listed under section 4.15(1) of the EP&A Act as they are relevant to the proposed modification.

Section 4.15(1)(b) of the EP&A Act requires the consent authority to consider the following when granting approval of a development application: *The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality.*

A modification report will be prepared to consider the likely impacts of the proposed modification, including environmental impacts on both the natural and built environments, and social and economic impacts on the locality, in accordance with Section 4.15(1)(b) of the EP&A Act.

Environmental Planning and Assessment Regulation 2021

Under Part 5, Division 1, Section 99 of the NSW Environmental Planning and Assessment Regulation 2021 (EP&A Reg), a modification application for SSD must be prepared having regard to the relevant SSD Guidelines prepared by the Planning Secretary.

Section 100(1) of the EP&A Reg specifies the information that must be included in a modification application.

The modification report will be prepared having regard to the *State Significant Guidelines – Preparing a Modification Report* (DPE, 2022) and will address the specific information requirements set out in Section 100(1) of the EP&A Reg.

Other NSW legislation

In addition to the requirements under Section 4.55 of the EP&A Act, the proposed modification may require additional approvals, licences and/or authorisation under various other pieces of NSW legislation.

All relevant NSW legislation will be considered against the proposed modification and any specific requirements of the respective piece of legislation will be addressed in the modification report.

Environmental planning instruments

Environmental planning instruments (EPIs) such as State environmental planning policies, regional environmental plans and local environmental plans are legal documents that regulate land use and establish requirements for development consent in NSW.

All relevant EPIs will be considered and specific requirements in relation to the modification will be addressed in the modification report.

Consultation

The nearest residential receivers are approximately 265 m west of the site. All heavy vehicle movements associated with the modification will adhere to the approved haulage routes under the existing operational management plan and driver code of conduct which avoid residential areas where possible.

Should the detailed noise assessment (described below) indicate that the modification will generate a noticeable increase in noise levels at these residential receivers, consultation with affected residents will be undertaken. Conversely, if the assessment finds the noise increase to be negligible or imperceptible to these receivers, no direct consultation with residents is proposed.

Neighbouring commercial and industrial properties will be notified of the modification application and invited to comment.

CR Plus propose to consult the EPA as the proposed changes will necessitate variations to the EPL.

CR Plus will also consult with Campbelltown City Council and Transport for NSW as the additional truck movements will be on local and State roads.

Environmental assessment approach

Element used the Department of Planning, Housing and Infrastructure's (the Department) scoping worksheet to determine the environmental matters requiring detailed or standard assessment in the modification report, and those matters which will not require further assessment. The following environmental aspects were determined to be key matters requiring detailed assessment in the modification report.

Other lower-risk environmental aspects will be assessed qualitatively in the modification report.

Noise

A noise and vibration impact assessment (NVIA) will be prepared to assess potential noise generation from:

- increased truck movements and truck movements at night; and,
- tipping of the new NDD waste stream into storage bays during night periods.

Operational noise will be assessed using a quantitative method in accordance with:

- EPA's (2017) NSW Noise Policy for Industry (NPI).
- EPA's (2011) NSW Road Noise Policy.
- EPA's (2009) Interim Construction Noise Guideline.

The NVIA will generally comprise:

- Characterisation of background noise using existing and measured monitoring data.
- Assessment of prevailing weather conditions using historical weather data from the nearest BoM weather station over a minimum period of 12 months to derive meteorological parameters for prediction of noise during calm and noise enhancing weather.
- Identification of noise-sensitive receivers surrounding the site.
- Determination of plant and equipment sound power levels.
- Use of Environmental Noise Model software or equivalent to predict noise levels for day, evening and night and determine compliance with relevant noise criteria.
- Road transportation noise impacts would be assessed using existing traffic with proposal truck and employee vehicle movements.

Air quality

An air quality and greenhouse gas assessment (AQGHGA) will be prepared to assess potential pollutants including particulates or potential emissions from:

- increased processing capacity; and
- additional truck movements.

The AQGHGA will adopt a quantitative method to assess air quality impacts, using air dispersion modelling in accordance with EPA's (2016) *Approved methods for the modelling and assessment of air pollutants in NSW*, generally comprising:

- Review of existing air quality monitoring data to characterise site meteorology and background dust levels and to determine criteria and potential constraints for the proposal.
- Characterisation of air quality and odour in the regional air shed considering approved and foreseeable projects based on publicly available information.
- Identification of the proposal and neighbouring sources of air emissions and odour.
- Development of an air dispersion model to determine the extent and severity of operational air quality and odour impacts.
- Quantitative analysis and assessment of operational air quality and odour, including reference to measured background levels which include the emissions from other activities.
- Quantitative analysis and assessment of greenhouse gas generation.
- Description of pollution control equipment and processes to be employed at the site to suppress or minimise emissions.

Traffic

A traffic impact assessment (TIA) will be prepared to assess potential impacts on the road network from:

- additional truck movements; and
- truck movements during nighttime periods.

Traffic and transport impacts will be assessed in accordance with RMS's (2002) *Guide to Traffic Generating Development* addressing the key heads of consideration for traffic generation and impacts, transport issues, road safety, parking and internal circulation.

The assessment will generally involve:

- Examination of the road network near the site and the roads that form the transport routes including principal intersections.
- Traffic volume and vehicle classification counts as well as intersection counts as required to establish base line traffic conditions.
- Assessment of the proposal in relation to background traffic growth in the region.
- Assessment of the existing road network comprising road widths, intersection treatments, compliance with current standards, existing traffic volumes and vehicle classifications, road safety and identified deficiencies.
- Assessment of the traffic and transport impacts of operating the proposal comprising level of service, physical condition of the roads, road safety issues and potential cumulative impacts from other approved projects in the area.
- Recommendations for improving intersection performance and road safety, if required.

Water balance

A water management system review will be carried out to assess any changes to the site water balance from the additional material throughput at the site.

Closing

I trust this correspondence provides the Department with the necessary information on the proposed environmental assessment approach to the proposed modification.

If the Department agrees to the proposed approach to the modification application, it would be appreciated if you could confirm in writing so that the modification report can be finalised and submitted for the Department's review and consideration.

Kind Regards



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