Land & Groundwater Consulting Pty Ltd
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Stockland Fife Kemps Creek Pty Limited

Operational Waste Management Plan
Warehouse Facility
(SSD-85510213 & MOD 6)

Lot E, 200 Aldington Road
Kemps Creek, NSW

22 September 2025

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1. Introduction

1.1 Background

Land & Groundwater Consulting Pty Ltd (LG) has been commissioned by Stockland Fife Kemps Creek Pty Limited (the Applicant) to prepare this Operational Waste Management Plan (OWMP) in response to the Planning Secretary's Environmental Assessment Requirements (SEARs), and in support of State Significant Development (SSD) 85510213 for the proposed operation of a warehouse facility at Lot E, 200 Aldington Road, Kemps Creek, NSW (the site), received on Thursday 12th June 2025 (SSD-85510213).

The site is currently legally described as Lot E approved under State Significant Development (SSD) 10479, with a total area of approximately 68,258 m^2 (6.83 ha). The site location plan and proposed development layout are shown in **Figures 1** and **2**, respectively.

Specifically, this OWMP addresses the following SEARs:

Table 1 – Summary of SEARs

SEARs	Report Reference
Identify, quantify and classify the likely waste streams to be generated during construction and operation.	Section 4.1.
Provide the measures to be implemented to manage, reuse, recycle and safely dispose of waste in accordance with any council waste management requirements.	Sections 5.1, 5.2, 6.1, 6.2 and 6.3.
Identify appropriately sited waste storage areas, collection access paths/roads, and appropriate servicing arrangements for the site.	Sections 5.3 and 5.4.
If buildings are proposed to be demolished or altered, provide a hazardous materials survey.	No buildings are proposed to be demolished.

1.2 Objectives

The objectives of the OWMP are:

- To document the procedures that will be undertaken to manage the wastes generated as part of the development works;
- To provide details of the quantities and classification of waste and wastewater (if any) to be generated onsite;
- To provide details on waste storage, handling and disposal (including the location of waste storage and management facilities); and
- To provide details of the measures that would be implemented to ensure that the development is consistent with the aims, objectives and guidance in the *NSW Waste and Sustainable Materials Strategy 2041*.

2. Project Summary

It is noted that currently there is a known tenant for Warehouse W4B (logistics business in cold-storage) but not for Warehouse W4A. However, a logistics type of business can be anticipated for Warehouse W4A and the waste volumes provided in Section 4.1 have been based on this assumption.

2.1 Proposed Works

The proposed works for the Development Application comprise the following:

- Site preparation works, civil works and augmentation of utilities servicing;
- Construction of 2 warehouses within Lot E, comprising a cold-shell warehouse (W4A) and a temperature-controlled warehouse (W4B);
- Use of the building for warehouse and distribution purposes 24 hours per day, 7 working days per week; and
- Ancillary development including signage, car parking, utility infrastructure, services connection, stormwater management and landscaping.

2.2 Development Areas

The proposed development areas and GFA are as follows (refer **Figure 2**):

- Lot E Site Area: 68,258 m^2.
- Total Building Area of 41,814 m^2, comprising total warehouse area of 40,972 m^2, total office area 698 m^2 and total dock office area 144 m^2, as follows:
    - **Warehouse GFA**
        - Warehouse W4A: 22,774 m^2.
        - Warehouse W4B: 18,198 m^2.
    - **Office GFA**
        - W4A Office (2 Levels): 450 m^2.
        - W4A Dock Office: 64 m^2.
        - W4B Office (2 Levels): 248 m^2.
        - W4B Dock Office: 80 m^2.

- **Car Parking Spaces**
  - W4A Car Parking Spaces: 98 Spaces.
  - W4B Car Parking Spaces: 74 Spaces.

2.3 Project Schedule

All operational waste producing activities such as packaging material, servicing of equipment and employee amenities will be located within warehouse facility. Waste containers will comprise colour coded recycling bins, which will be utilised to dispose off any packaging waste. The recycling bins will be located within a designated waste storage area located within the western portion of the site, adjacent to the rain water treatment plant (refer **Figure 3**), and collected by a regulated waste contractor.

3. Waste Regulatory Framework

3.1 Protection of the Environment Operations Act 1997

Wastes in NSW are classified for disposal or transport into categories. It is the responsibility of those who generate the waste to classify it into groups that pose risks to the environment and human health facilitates their management and appropriate disposal.

All material to be removed from the site (including associated activities such as classification) will be undertaken in strict accordance with the requirements of the POEO Act 1997. Such requirements include:

- Ensuring waste is classified appropriately and in accordance with relevant guidelines;
- Waste materials are disposed of to appropriately licensed facilities; and
- Other materials are removed to facilities lawfully able to accept such materials.

3.2 Waste Avoidance and Resource Recovery Act 2001

The Waste Avoidance and Resource Recovery (WARR) Act 2001 establishes the waste hierarchy to ensure that resource management options are considered against the following priorities:

1. Avoidance – actions to reduce the amount of waste generated and undertaking activities;
2. Resource Recovery – which includes reuse, reprocessing, recycling and energy recovery, consistent with the most efficient use of the recovered resources; and
3. Disposal – an "end-of-pipe" option that must be carefully undertaken to minimise any negative environmental outcomes.

The objectives of the WARR Act 2001 include:

- To encourage the most efficient use of resources;
- To minimise the consumption of natural resources and the final disposal of waste by encouraging the avoidance of waste and the reuse and recycling of waste;

- To ensure that industry shares with the community the responsibility for reducing; and
- To ensure the efficient funding of waste and resource management planning, programs and service delivery.

3.3 Protection of the Environment Operations (Waste) Regulation 2014

The Regulation encourages the recovery of resources from waste by issuing both general and specific resource recovery exemptions. Where no general exemption is available for the intended use, a specific exemption may be issued after an application is made to the NSW EPA. Specific exemptions are not publicly available.

The Regulation makes requirements relating to non-licensed waste activities and waste transporting. The proposed works on the site will not require to be licensed. Section 48 of the Regulation requires that wastes are stored in an environmentally safe manner. It also stipulates that vehicles used to transport waste must be covered when loaded.

The Regulation exempts certain waste streams from the full waste tracking and record keeping requirements. Waste tracking is required only for industrial and hazardous wastes.

3.4 Better Practice Guidelines 2012

The NSW EPA (2012) *Better Practice Guidelines for Waste Management and Recycling in Commercial and Industrial Facilities 2012* promotes efficient waste minimisation and resource recovery for commercial and industrial facilities and is used as a benchmark document when assessing waste production rates within Australia.

Better practice waste management systems in commercial buildings may incorporate any, or all, of the following:

- Garbage services to manage residual wastes (those not collected by a dedicated recycling or organics collection service).
- Recycling services to manage dry recyclable materials. These materials may vary from building to building, but generally cover recyclable materials generated in a typical business, including office paper, cardboard, plastic film, metals and

recyclable containers.

- Organics services to manage garden and food organics, which may include a bin-based collection system or onsite composting.
- Bulky waste services to manage bulky items, such as furniture and fit-out materials.
- Special waste services for items such as toner cartridges, batteries, fluorescent lights, mobile phones and chemicals.

3.5 NSW Waste and Sustainable Materials Strategy 2041

As well as waste reduction and recycling, Stage 1: 2021-2027 of NSW Waste and Sustainable Materials Strategy 2041, focuses on the environmental benefits and economic opportunities in how we manage our waste.

The main "targets" in the Strategy are as follows:

- Target 1: Reduce total waste generated by 10% per person by 2030 (for assessment of proposed measures refer Section 5.1 of this report).
- Target 2: Have an 80% average recovery rate from all waste streams by 2030 (for assessment of proposed measures refer Section 5.2 of this report).
- Target 3: Significantly increase the use of recycled content by governments and industry (for assessment of proposed measures refer Section 5.1 of this report).
- Target 4: Phase out problematic and unnecessary plastics by 2025 (for assessment of proposed measures refer Section 5.1 of this report).
- Target 5: Halve the amount of organic waste sent to landfill by 2030 (for assessment of proposed measures refer Section 5.2 of this report).

The Strategy also includes the following recycling targets (as relevant to the proposed works at the site)[1]:

- Plastic litter reduction target of 30% by 2025.

[1] *NSW Waste and Sustainable Materials Strategy 2041*, NSW DPIE, June 2021.

- Introduce a new overall litter reduction target of 60% by 2030.

3.6 Waste Classification Guidelines 2014

Soil materials proposed to be disposed offsite (if any) shall be assessed, classified and managed in accordance with the NSW EPA (2014) *Waste Classification Guidelines, Part 1: Classifying Waste*.

3.7 SSD-10479 Development Consent 2023

In accordance with Sections D87 to D91 (Waste Management) of the SSD-10479 Development Consent 2023, the OWMP must describe the handling, storage and disposal of all waste streams generated on site, consistent with the *Protection of the Environment Operations Act 1997, Protection of the Environment Operations (Waste) Regulation 2014 and the Waste Classification Guideline* (Department of Environment, Climate Change and Water, 2009). The SSD-10479 Development Consent came into effect in May 2023.

4. Estimated Waste

4.1 Operational Waste

The estimated weekly operational waste quantities are summarised in **Table 2**.

Table 2 – Estimated Weekly Operational Waste

Type of Waste Generated	Reuse	Recycling	Disposal	Method of on-site reuse, contractor and recycling outlet and /or waste depot to be used
	Estimate Volume (m^3) or Weight (t)	Estimate Volume (m^3) or Weight (t)	Estimate Volume (m^3) or Weight (t)	
Excavated materials	0 m^3	0 m^3	0 m^3	N/A
Green waste	0 m^3	0 m^3	0 m^3	N/A
Bricks/pavers	0 m^3	0 m^3	0 m^3	N/A
Tiles	0 m^3	0 m^3	0 m^3	N/A
Concrete	0 m^3	0 m^3	0 m^3	N/A
Plasterboard	0 m^3	0 m^3	0 m^3	N/A
Asbestos	0 m^3	0 m^3	0 m^3	N/A
Metal – specify	0 m^3	0 m^3	0 m^3	N/A
Timber - specify	0 m^3	0 m^3	0 m^3	N/A
Other waste (paints, PVC, garbage)	0 m^3	0 m^3	<4 m^3 (GSW)	Waste Management Centre
Packaging (used pallets, pallet wrap)	0 m^3	<2 m^3	0 m^3	Recycling Management Centre
Containers (cans, plastic, glass)	0 m^3	<1 m^3	0 m^3	Recycling Management Centre
Paper/cardboard	0 m^3	<2 m^3	0 m^3	Recycling Management Centre
Total	**0 m^3**	**<4.5 m^3**	**<4 m^3**	

5. Operational Waste Reduction Plan

5.1 Targets for Resource Recovery

Targets for the proposed development are expected to contribute to state-specific targets. The *NSW Waste and Sustainable Materials Strategy 2041* (DPIE, 2021) sets a target of 80% average recovery rate from all waste streams by 2030. Analysis by DPIE (2021) indicates that the commercial and industrial waste recovery rate in 2019 was 53%.

It is anticipated that the waste minimisation measures in the following sections will assist the proposed development to meet the state's targets. Waste monitoring, reporting and audits can be used to determine the actual percentage of waste that are being, or have been, recycled during operation.

5.2 Waste Reduction Measures

Waste-type-specific reduction measures will be employed during development operation, with the following specific procedures:

- Provision of take back services to clients to reduce waste further along the supply chain;
- Re-work/re-packaging of products prior to local distribution to reduce waste arising;
- Review of packaging design to reduce waste but maintain 'fit for purpose';
- Investigating leased office equipment and machinery rather than purchase and disposal;
- Establish systems with in-house and with supply chain stakeholders to transport products in re-useable packaging where possible;
- Development of 'buy recycled' purchasing policy;
- Flatten or bale cardboard to reduce number of bin lifts required; and
- Providing recycling collections within each of the offices and tearooms (e.g. plastics, cans and glass).

5.3 Beneficial Reuses

The anticipated beneficial reuses of operational waste are summarised as follows:

- Cardboard, paper, plastic, glass, cans and pallets and containers will be reused/recycled offsite;
- Provision for the collection of batteries, fluorescent tubes and other recyclable resources will be provided on site to enable offsite recycling;
- All waste materials that cannot be reused or recycled will be taken to an appropriate facility for treatment to recover further resources or for disposal to landfill in an approved manner;
- Waste oil (if any) used in equipment maintenance will be recycled or disposed of in an appropriate manner; and
- Opportunities for materials exportation and reuse with other local industrial operations will be investigated. This will have two benefits: minimising energy through reduction of material reprocessing, encouraging material reuse.

5.4 Waste Storage Locations

A designated waste storage area will be provided outside the dock offices for W4A and W4B, respectively (refer **Figure 3**) where the recycling and garbage skips will be stored prior to collection. Sufficient clearance will be necessary to enable collection vehicles to access the locations of bin storage. Where possible collection times should not coincide with peak operational delivery schedules however the designated area identified will not interfere with operational truck movements.

The construction of locations for garbage storage are to comply with BCA (Building Code of Australia) requirements and Australian Standards, including CoC requirements for screening and fencing.

The waste/recycling storage area will be constructed of an adequate size to accommodate all waste and recycling bins and bales associated with the development. Recycling bins must be accessible to all employees and must be clearly sign posted and colour coded to ensure segregation of waste and recycling is effective.

Sufficient space will be provided for the segregation and storage of varying waste types including provision for the collection of fluorescent tubes, smoke detectors, e-wastes and other recyclable resources.

Sufficient space will also be provided for reuse items such as crates and pallets for occupational safety purposes.

Doors/gates to the waste storage locations will be able to be opened from the outside and wide enough to allow for easy passage of waste/recycling containers.

Waste collection areas should allow for manoeuvring of a rear loading (Medium Rigid Vehicle) MRV of typical sizes between 8.8 m to 9.25 m long x 2.6 m wide truck, and 3.6 m head clearance.

5.5 Waste Collection and Servicing

Onsite collection is the preferred option with a waste truck able to enter and exit the site in a forward direction. Dedicated loading dock areas should be provided for the waste vehicle to prop while collections occur.

Private contractors using up to a 9.25 m rear loading waste MRV should enter the site via the internal access road and reverse into the waste storage area. The contractor should retrieve empty and return bins to/from the bin store at the time of collection then exit the site in a forward direction.

Litter spread is to be managed by ensuring garbage and recycling bins are not overloaded, and lids are always closed.

The private collection contractor's agreement should require their pickup of any waste that spills from the bins during collections.

Estimated waste collection frequency and number of bins are summarised as follows:

- **Collection Frequency:** 1 x Weekly All Waste Streams.
- **Number of Bins:** 2 x 2,000 L General Waste, 2 x 2,000 L Recycling Waste.

5.6 Monitoring, Reporting and Audits

The following activities will be undertaken to inform future onsite waste management and to improve the efficiency in achieving the outcomes of the OWMP:

- Review of waste streams and waste quantities.
- Review the OWMP in light of any changes to operational activities or further information which may alter waste management practices.
- Undertake auditing of waste management across the site as a component of broader environmental site audits.
- Undertake visual inspections to ensure waste management controls are implemented and maintained across site.
- Undertake annual review of the OWMP to ensure information accurately reflects site activities, and to assist future waste management.

Where formal auditing, general inspections or incident reporting identify incorrect storage or disposal procedures, or maintenance or waste management issues, observations will be promptly reported to the Site Manager and recorded. The Site Manager will determine appropriate measures to rectify the issues in a timely manner.

6. Waste Classification and Removal

6.1 Waste Classification

All liquid and non-liquid wastes generated during operational works (if any) shall be classified in accordance with the requirements of NSW EPA (2014) *Waste Classification Guidelines, Part 1: Classifying Waste*.

Samples shall be collected by appropriately trained and experienced personnel from stockpiled or in-situ waste materials by the use of a hand trowel. The hand trowel shall be thoroughly decontaminated using phosphate free detergent and distilled water between each sampling location.

During the collection of soil samples, features such as seepage, discolouration, staining, odours and other indications of contamination should be noted on the field documentation.

Collected soil samples shall be immediately transferred to sample containers of appropriate composition (glass jars). Sample labels shall record job number; sample identification number; and date and time of sampling.

Sample containers shall be transferred to a chilled ice box for sample preservation prior to and during shipment to the testing laboratory. A chain-of-custody form should be completed and forwarded with the samples to the testing laboratory.

Soil samples shall be analysed by both a primary and secondary (independent check) laboratory, both of which shall be NATA accredited for the required analyses. In addition, the laboratories will also be required to meet the environmental consultant's own internal quality assurance requirements.

The analytical data shall be compared against the waste criteria contained in NSW EPA (2014) *Waste Classification Guidelines, Part 1: Classifying Waste* for heavy metals, TRHs, BTEX, PAHs, total pesticides (OCPs and OPPs), PCBs and TCLP in benzo(a)pyrene, lead and nickel. A summary of the criteria is provided in **Table 3**.

Table 3 – Summary of Waste Classification Criteria

Contaminant	General [1]	Restricted [1]	General [2]	Restricted [2]	General [3]	Restricted [3]
	CT1	CT2	SCC1	SCC2	TCLP1	TCLP2
	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(µg/L)	(µg/L)
Heavy metals						
Arsenic	100	400	500	2000	5.0	20
Cadmium	20	80	100	400	1.0	4
Lead	100	400	1500	6000	5	20
Mercury	4	16	50	200	0.2	0.8
Nickel	40	160	1050	4200	2	8
BTEX						
Benzene	10	40	18	72	0.5	2
Toluene	288	1152	518	2073	14.4	57.6
Ethylbenzene	600	2400	1080	4320	30	120
Xylenes (total)	1000	4000	1800	7200	50	200
Petroleum Hydrocarbons						
C_6-C_9	N/A	N/A	650	2600	N/A	N/A
C_{10}-C_{36}	N/A	N/A	10000	40000	N/A	N/A
PAHs						
Benzo(a)pyrene	0.8	3.2	10	23	0.04	0.16
PAHs (total)	N/A	N/A	200	800	N/A	N/A
Pesticides (total)	N/A	N/A	250	1000	N/A	N/A
PCBs (total)	N/A	N/A	<50	<50	N/A	N/A

Notes:

1. Contaminant threshold values for classifying waste by chemical assessment without the leaching (TCLP) test (Table 1) – NSW EPA (2014) *Waste Classification Guidelines, Part 1: Classifying Waste*.

2. Specific contaminant concentration (SCC) values for classifying waste by chemical assessment (Table 2) – NSW EPA (2014) *Waste Classification Guidelines, Part 1: Classifying Waste*.

3. Leachable concentration (TCLP) values for classifying waste by chemical assessment (Table 2) – NSW EPA (2014) *Waste Classification Guidelines, Part 1: Classifying Waste*.

6.2 Waste Transporting

All wastes removed from the site shall be transported in accordance with relevant road and transportation regulatory requirements. Where required (depending on the classification of the wastes), appropriately licensed transport contractors shall be used.

The appointed transporters shall be responsible for ensuring they are appropriately licensed to:

- Carry the particular type of waste; and
- Transport the materials to an appropriately licensed facility.

Where the waste is classified as Restricted Waste or Hazardous Waste, the transporter is required to carry (subject to a number of exceptions) appropriately completed waste data forms with each load, and provide a copy to the waste facility to which the waste is taken.

6.3 Waste Receipts

Stockland Fife Kemps Creek Pty Limited shall ensure that a permanent record of receipts, for the removal of both liquid and solid waste from the subject site, be kept and maintained up to date at all times. Such records would be made available to authorised person upon request.

7. Conclusions

Based on the assessment and findings of this OWMP the following conclusions are provided:

- It is considered that this OWMP provides adequate guidance for waste management during site operational works;
- The details of the quantities and classification of waste to be generated onsite are provided in Section 4.1 of this OWMP;
- The details on waste storage, handling and disposal (including the location of waste storage and management facilities) are provided in Sections 5.4, 5.5, 6.1, 6.2 and 6.3 of this OWMP; and
- The details of the measures that would be implemented to ensure that the development is consistent with the aims, objectives and guidance in the *NSW Waste and Sustainable Materials Strategy 2041* are provided in Sections 5.1, 5.2, 5.3 and 5.6 of this OWMP.

8. Limitation Statement

This report has been prepared for use by Stockland Fife Kemps Creek Pty Limited who commissioned the works in accordance with the project brief only and has been based in part on information obtained from other parties. The advice herein relates only to this project and all information provided should be reviewed by a competent person with experience in environmental investigations, before being used for any other purpose. Additionally, this report has been based on data documented by other parties in previous reports.

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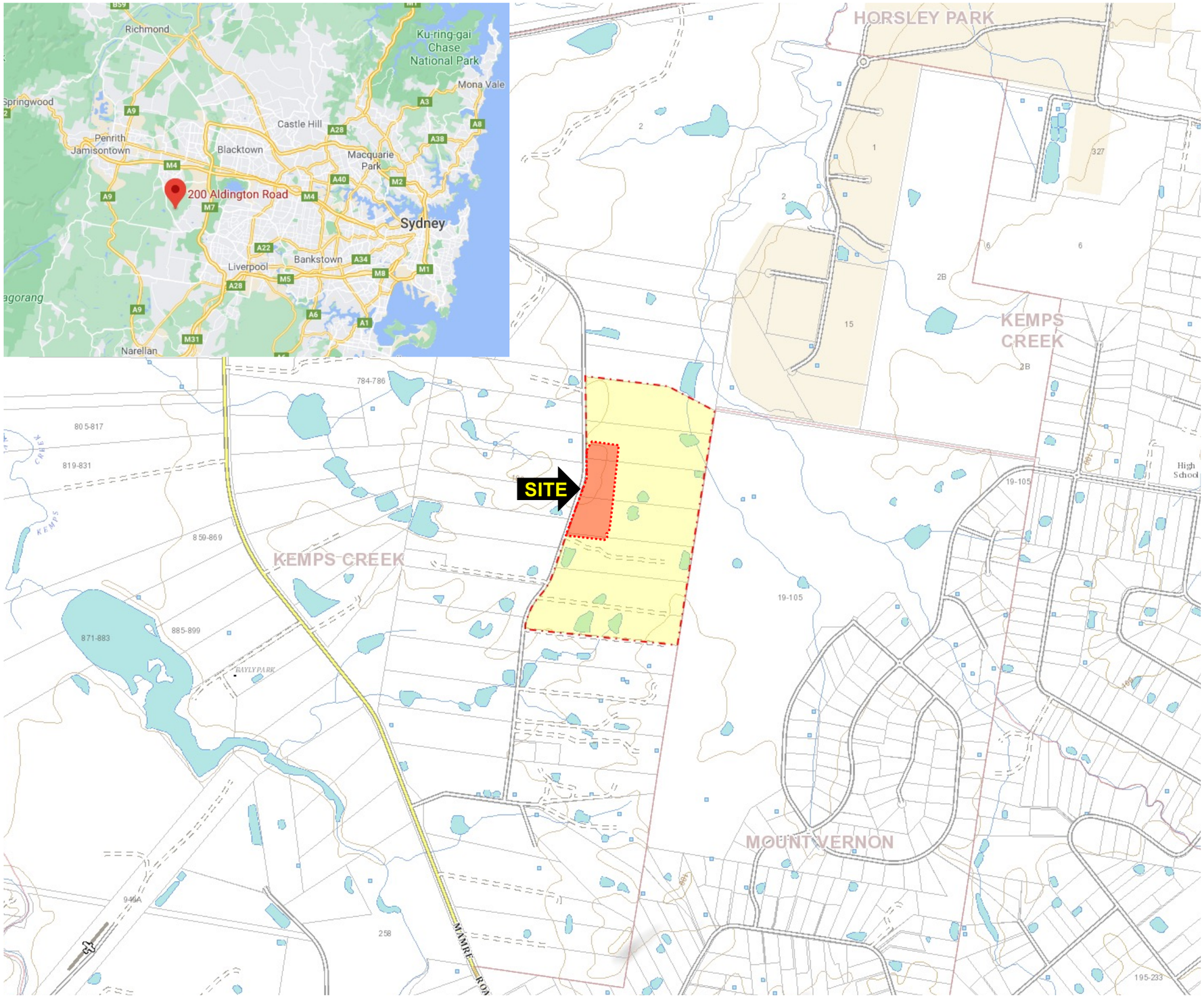
Waste quantities and sources are based on documents made available to LG consult by Stockland Fife Kemps Creek Pty Limited.

This report does not provide a complete assessment of the environmental status of the site, and it is limited to the scope defined herein.

Figures



SCALE: DRAWN TO SCALE AS SHOWN

Not To Scale

NORTH

LEGEND:

SSD Boundary

Site Boundary

Image courtesy of Google & Six Maps

REV:	A
DATE:	22/09/25
DRAWN:	GP
APPROVED:	GP
STATUS:	Final
DWG NO:	

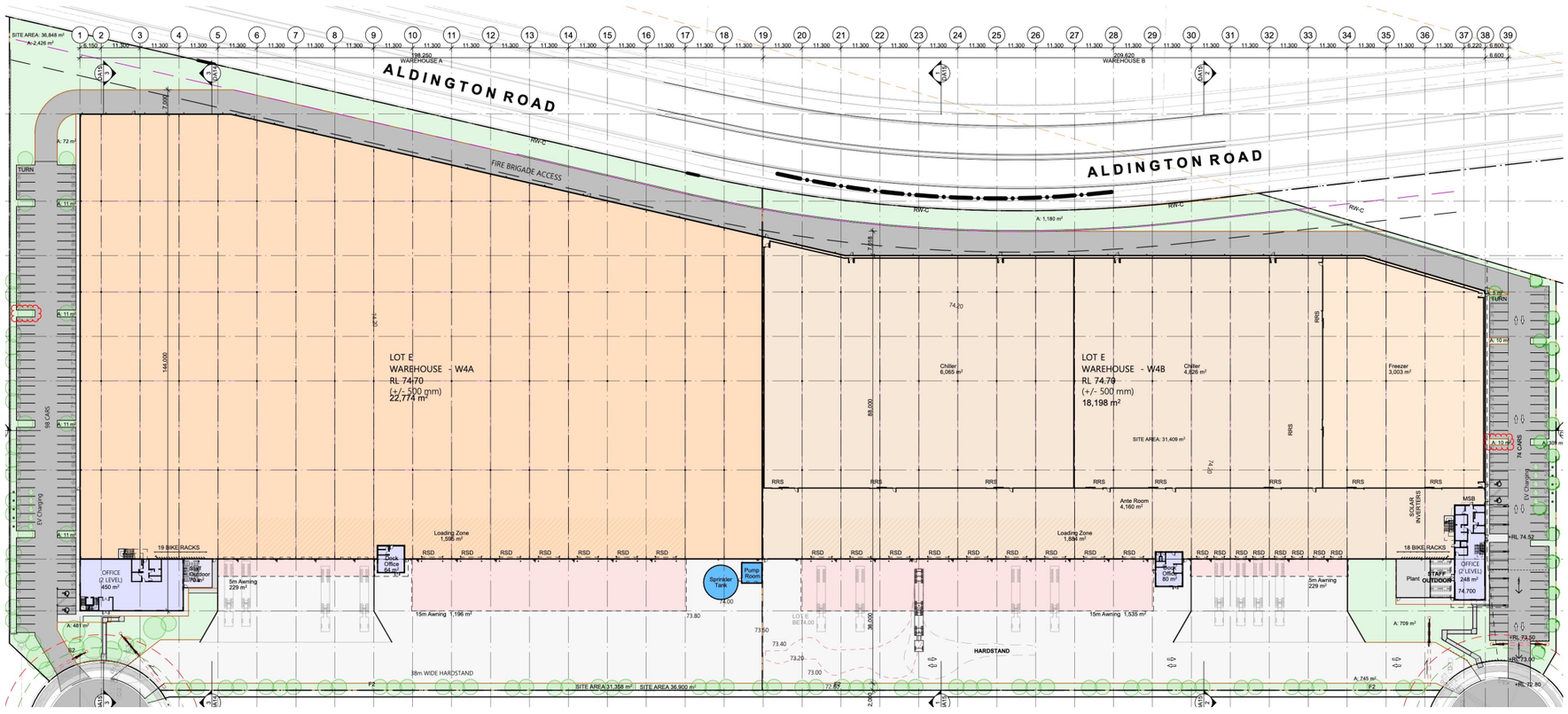
CLIENT: **Stockland Fife Kemps Creek**

PROJECT: **Lot E, 200 Aldington Road Kemps Creek, NSW**

PROJECT NUMBER: LG2530.2

TITLE: **Site Location Plan**

FIGURE: **1** A4



SCALE: **DRAWN TO SCALE AS SHOWN**

Not To Scale

N

LEGEND:

Site Boundary

Image courtesy of DTA Architects

REV:	**A**
DATE:	**22/09/25**
DRAWN:	**GP**
APPROVED:	**GP**
STATUS:	**Final**
DWG NO:	

CLIENT: **Stockland Fife Kemps Creek**

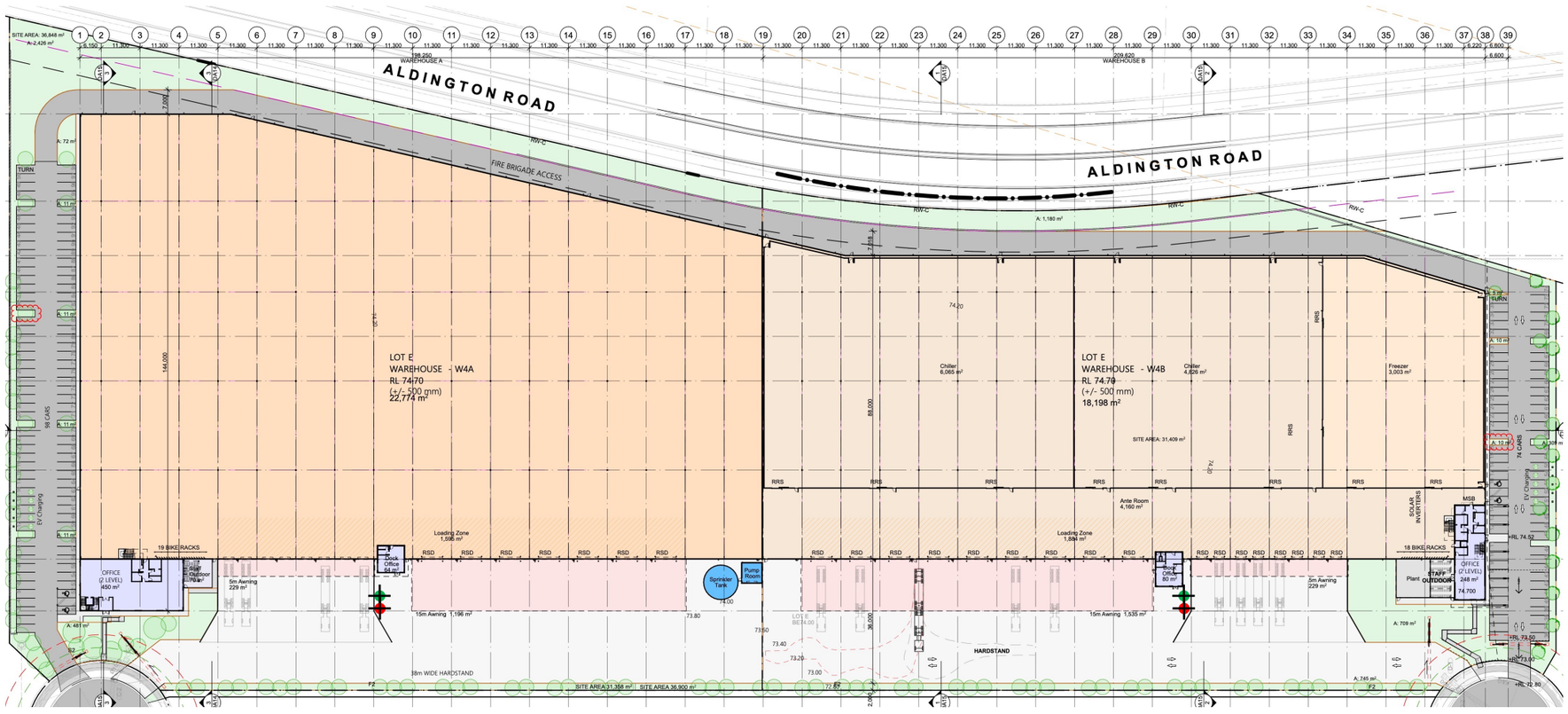
PROJECT: **Lot E, 200 Aldington Road Kemps Creek, NSW**

PROJECT NUMBER: LG2530.2

TITLE: **Proposed Development Layout**

FIGURE: **2**

A4



SCALE: **DRAWN TO SCALE AS SHOWN**

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N

LEGEND:

- Site Boundary
- 2000 L Mobile Garbage Bin (MGB) for General Garbage
- 2000 L MGB for Recycling

Image courtesy of DTA Architects

LG CONSULT

REV:	**A**
DATE:	**22/09/25**
DRAWN:	**GP**
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STATUS:	**Final**
DWG NO:	

CLIENT: **Stockland Fife Kemps Creek**

PROJECT: **Lot E, 200 Aldington Road Kemps Creek, NSW**

PROJECT NUMBER: LG2530.2

TITLE: **Operational Waste Bin Plan**

FIGURE: **3**

A4