Banksmeadow Transfer Terminal | State significant development

MODIFICATION 3

Prepared for Veolia Environmental Services (Australia) Pty Ltd | 10 November 2025

element.

Banksmeadow Transfer Terminal

STATE SIGNIFICANT DEVELOPMENT | MODIFICATION 3

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10 November 2025

PR436

	Prepared by	Reviewed by
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Project Role	Lead EIS Author	Technical Reviewer
Signature		
Date	10 November 2025	10 November 2025

DOCUMENT CONTROL

Revision	Date	Description	Prepared by	Reviewed by
R0	9 October 2025	Final for lodgement with DPHI	Element Environment	Veolia Environmental Services (Australia) Pty Ltd
R1	22 October 2025	Final for lodgement via Major Projects portal	Element Environment	Veolia Environmental Services (Australia) Pty Ltd
R2	10 November 2025	Update applicant name	Element Environment	Veolia Environmental Services (Australia) Pty Ltd

Certification Page

Submission of modification report prepared under Part 4 of the NSW *Environmental Planning and Assessment Act 1979*.

Aspect	Details	
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Project role	Lead author	Technical review
Qualifications	B Environmental Management	BSc (Hons) Environmental Science
Certification		
Address	Element Environment Pty Ltd PO Box 1563, Warriewood, NSW, 2102	
In respect of	Banksmeadow Transfer Terminal, State significant development – Modification 3	
Applicant name	Veolia Environmental Services (Australia) Pty Ltd	
Responsible person/applicant	Veolia Environmental Services (Australia) Pty Ltd	
Responsible person/applicant address	Level 4, 65 Pirrama Road, Pyrmont 2009, NSW	
Proposed development	Modification 3 to Banksmeadow Transfer Terminal State significant development consent.	
Land to be developed	The site addresses are: ▪ Lot A DP 366725 – 34 McPherson Street, Banksmeadow. ▪ Lot B DP 366725 – 36 McPherson Street, Banksmeadow. ▪ Lot 1 DP 435497 – 34 McPherson Street, Banksmeadow. ▪ Lot 20 DP 1231202 – 1 Beauchamp Road, Banksmeadow.	
Proposed development description	Veolia is applying to modify State significant development consent SSD 5855 under Section 4.55(1A) of the NSW *Environmental Planning and Assessment Act 1979* to enable: ▪ an increased proportion of putrescible waste to be received and transferred, within the existing approved total waste limit. ▪ an increase in the amount of food organic and garden organic (FOGO) waste transported by road. ▪ road transport of FOGO and non-putrescible waste to a broader choice of resource recovery facilities.	
Environmental assessment	This modification report addresses all matters in accordance with Section 4.55 of the of the NSW *Environmental Planning & Assessment Act 1979*.	
Preparation	This modification report has been prepared by Element Environment Pty Ltd on behalf of Veolia Environmental Services (Australia) Pty Ltd. In preparing the report, Element Environment has relied upon data, designs and plans and other information provided by Veolia Environmental Services (Australia) Pty Ltd and other individuals and organisations referenced herein.	
Signature		
Name	Mark Terei	Neville Hattingh
Date	10 November 2025	10 November 2025

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CHAPTER 1

INTRODUCTION

1 INTRODUCTION

1.1 Overview

This modification report has been prepared by Element Environment Pty Limited (Element) on behalf of Veolia Environmental Services (Australia) Pty Ltd (Veolia) for submission to the NSW Department of Planning, Housing and Infrastructure (DPHI) to accompany an application to modify (Modification 3 – the modification) State significant development (SSD) consent 5855 (the consent) for the Banksmeadow Transfer Terminal (BTT).

Veolia proposes to modify the consent under Section 4.55(1A) of the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) to enable:

- the receipt and transfer of up to 500,000 tpa of putrescible waste and up to 100,000 tpa of non-putrescible waste, such that the combined total of putrescible and non-putrescible waste received does not exceed 500,000 tpa;
- an increase in the amount of food organic and garden organic (FOGO) waste permitted to be transported by road from 12,000 tpa to up to 20,000 tpa (if not transferred by rail to Woodlawn Eco Precinct),
- ability to transport FOGO by road to the TopSoil Organics facility at Forbes, NSW, or alternate resource recovery facilities, and
- ability to transport non-putrescible waste by road to the proposed Veolia Materials Recycling Facility at Camellia, NSW, or alternate resource recovery facilities.

The modification will not require any construction activities and will not impact any built or operational aspects of the BTT. Further, Veolia is not proposing any change to the BTT's existing at any-one-time waste storage limit of 6,225 tonnes.

The environmental assessment of the project subject to the consent (the approved project) is described in detail in Hyder (2014) *Banksmeadow Waste Transfer Terminal – environmental impact statement* (the EIS).

1.2 Applicant

Veolia is the proponent for the project and its company and contact details are in **Table 1.1** .

Table 1.1 Proponent details

Item	Detail
Project contact	Veolia Environmental Services (Australia) Pty Ltd
Postal address	Level 4, 65 Pirrama Road, Pyrmont 2009, NSW
ABN	20 051 316 584
Site owner	Veolia Environmental Services (Australia) Pty Ltd

1.3 Modification history

Development consent 'SSD-5855' has been modified on two separate occasions. The most recent modification (i.e. Modification 2) approved the transport, by road, of up to 12,000 tpa of FOGO to the TopSoil Organics facility at Forbes, in the central west of NSW.

Table 1.2 provides a summary of the previously approved modifications.

Table 1.2 Summary of previously approved modifications

Application No.	Modification description	Type	Determination date
SSD-5855-Mod 1	▪ To allow an additional six months to complete road upgrade works to the intersection of Beauchamp Road and Perry Street; and ▪ To prevent the emission of offensive odours and leachate leaking from waste containers.	s.96(1A)	31 August 2016
SSD-5855-Mod 2	Road transport of 12,000 tpa of FOGO waste received from Inner West Council to the Topsoil Organics facility in Forbes, NSW.	s.4.55(1A)	7 November 2023

1.4 Summary of approved project

General

The Planning Assessment Commission granted consent on 28 April 2015 for BTT to receive and containerise up to 400,000 tonnes per annum (tpa) of putrescible waste for transfer via rail to the Woodlawn Eco Precinct (WEP) (Figure 1.1).

Once the waste has been deposited on the floor of the enclosed building, it is pushed by a front-end loader to one of two chutes that feed waste compactors. A scale with an electric display informs the front-end loader operator when the compactor is approaching maximum capacity.

Once the correct weight is loaded, the waste is compressed into a consolidated bale that is inserted into specially designed shipping containers, which have seals to prevent the release of leachate and carbon filters to prevent the release of odour. Residual waste is removed from around the container door and the container is sealed.

The container is moved outside the terminal building and a container handler lifts it to a waiting train or to a storage area ready for transport on the next train. The compacting and filling process takes approximately 20 minutes per container. There are two compactors, allowing for continuation of operations during regular maintenance of the compactors.

The containers are railed to the Crisps Creek Intermodal Facility near the WEP, where they are lifted onto trucks and transported approximately 8 km to the WEP. The train returns to Sydney with empty containers ready for re-loading at the BTT, with surplus containers stored in the storage area.

The BTT can containerise approximately 189 tonnes of putrescible waste per hour and is approved to receive waste 24 hours a day, seven days a week. The timing of train operations is dependent on availability of train pathways on the main railway line.

The consent does not limit truck or train numbers but the environmental impact statement (EIS) states (in summary):

- *The BTT can receive up to 400,000 tpa of putrescible material by truck.*
- *The BTT can process/containerise up to 400,000 tpa of putrescible material and transport it via rail to the WEP.*
- *The BTT can receive up to 100,000 tpa of non-putrescible material by truck.*
- *The BTT can consolidate 100,000 tpa of non-putrescible material into semi-trailers in the transfer building for transfer (via truck) to resource recovery facilities, such as the proposed Camellia Recycling Centre, for recovery of recyclables prior to re-processing.*
- *Once operating at full capacity the BTT will generate up to:*
  - *215 trucks per day for the delivery of putrescible waste to the BTT; and*

- *140 trucks per day for the delivery of non-putrescible waste to the BTT.*

The transfer of putrescible waste from the facility would be via rail, requiring one train per day, and the transfer of non-putrescible waste from the facility would be via road, requiring up to 16 trucks per day.

Condition 2 of Schedule 2 of SSD 5855 requires Veolia to carry out the development in accordance with (amongst other things) 'the EIS'.

Despite the above approvals, minimal quantities of non-putrescible waste are received at BTT. Veolia does not intend to increase acceptance of non-putrescible waste in the future. Therefore, there is an approved capacity of 16 trucks per day that is not being utilised.

FOGO

The NSW EPA's *Waste Classification Guidelines – Part 1: Classifying waste* (2014) (the Waste Classification Guidelines) separately classify food organics (FO) as 'general solid waste (putrescible) and garden organics (GO) as 'general sold waste (non-putrescible). However, as FOGO is a combination of both FO and GO, the Waste Classification Guidelines state that FOGO is classified as 'general solid waste (putrescible)'.

Veolia transports approximately 16,000-17,000 tpa of FOGO waste from Randwick and Woollahra councils to the Woodlawn Mechanical Biological Treatment Facility (MBT) inside the WEP by train, as approved under Condition 5 of the consent (dated 28 April 2015 and modified 7 November 2023) and licenced under Condition L3.1 of Environment Protection Licence 20581 (the EPL – current version dated 4 January 2023). This equates to an annual average of 68 tonnes per day (tpd). Exact daily tonnes cannot be estimated as these fluctuate due to seasonality and council waste collection days.

The tipping floor in the BTT facility has three dedicated waste tipping areas, one for FOGO and two for putrescible waste. These areas are clearly signposted and are separated by clear space in-front of the two waste compactor chutes, which must be kept clear so that the front-end loader has a route to push waste into the compactor chutes. Trucks are directed by staff to the tipping areas via two-way radio and waste specific placards.

A further 12,000 tpa of FOGO is received at BTT from Inner West Council, which is transported by road to TopSoil Organic's facility at Forbes in the central west of NSW. This equates to an annual average of 48 tpd, also subject to fluctuation due to seasonality and council waste collection days. The Forbes facility processes FOGO waste into topsoil for reuse in agricultural and landscaping application. This road transport of FOGO was the subject of Modification 2 since Inner West Council needs to demonstrate that it is ensuring FOGO is being recycled and not being landfilled. It is approved under Condition 5A of the consolidated consent (dated 7 November 2023) and licenced under Condition L3.1 of the EPL.

The FOGO area is divided into a WEP bound section and a Forbes bound section by a wall. The WEP bound section is adjacent to the south-western chute so that the front-end loader has easy access to the chute. FOGO from Randwick and Woollahra councils is tipped in this area for loading onto trains and transport to WEP. FOGO from Inner West Council is tipped in the Forbes bound section for loading onto trucks and transport to Forbes.

The separation of FOGO from source councils also enables Veolia to monitor contamination rates so that the respective councils can be kept aware of the effectiveness of their education and collection services.

Figure 1.1 Approved project

1.5 Compliance review

A review of the Annual Environmental Management Reports (AEMR) for Banksmeadow Transfer Terminal 2023-2024 and 2024-2025 (Veolia, 2024 and 2025) shows only one non-compliance against the SSD-5855 conditions of consent during the 2024-2025 reporting period:

- **Schedule 2, Condition 5A:** BTT received more than 12,000 tonnes per annum of food and organic (FOGO) waste from Inner West Council to be transported via road to the Topsoil Organics Facility at Forbes. In 2024 the facility received 16,455 tonnes of FOGO waste under this approval, which 2024 was the first full calendar year of operation under this new approval (granted in latter 2023).

A total of 3 complaints were received by BTT during the 2024-2025 reporting period. All three complaints were odour complaints received directly from the neighbouring industrial site operated by IXOM, who are located north-east of BTT. While the same number of complaints were received in the previous reporting period, this number is consistent with the overall long-term trend of decreasing odour complaints received by the site. Additionally, only two of the received complaints were verified, while the third was found to be likely attributed to wastewater clean out works from a neighbouring site.

1.6 Need and justification

The NSW Government has introduced legislation mandating local councils provide separate FOGO waste collection services to all NSW households by July 2030 and for businesses and institutions in stages from July 2026. The goal is to halve the amount of organic waste sent to landfill and achieve net zero emissions from organics in landfill by 2030.

Therefore, in anticipation of an increased uptake of FOGO collections by councils and businesses, Veolia is expecting to receive increased quantities of FOGO (putrescible) waste from Sydney councils. Concurrently, Veolia has been receiving minimal quantities of non-putrescible waste, and this trend is expected to continue. This drives the need for an increased proportion of putrescible waste to be received at and transferred from BTT, within the existing approved total waste limit.

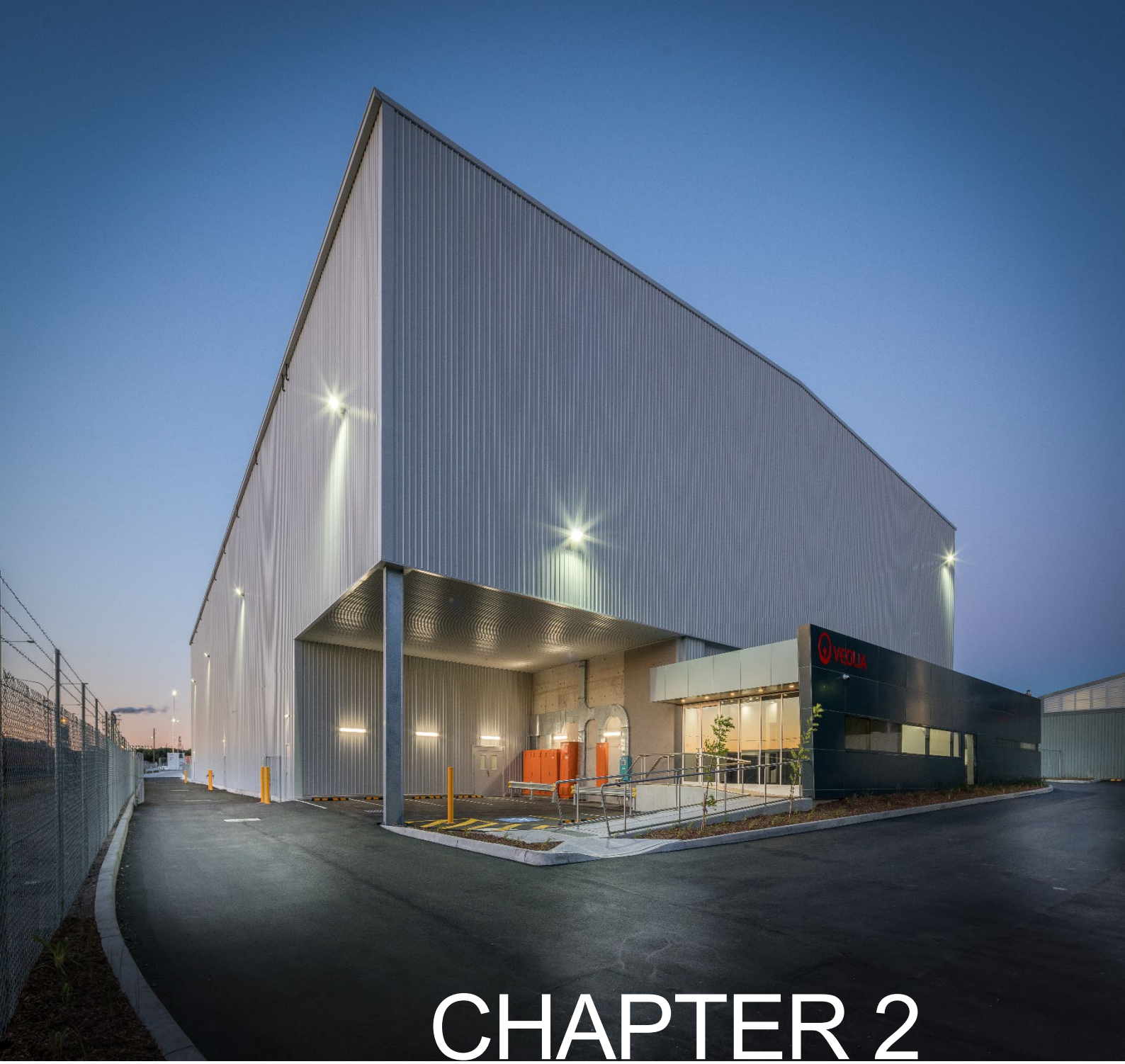
Veolia is also under pressure from Sydney councils to divert FOGO waste streams from landfill and direct it to a resource recovery facility to ensure that it is being recycled. This drives the need for an increase in the amount of FOGO waste to be transported by road.

Road transport of FOGO waste to resource recovery facilities other than Topsoil Organics at Forbes NSW is sought as a contingency in the event that there are transport disruptions en route to Topsoil Organics, or if the facility is unavailable to accept the waste. This might be due to temporary operational restrictions, for reasons relating to continued development approval, or for other unexpected reasons.

While FOGO transported by road to resource recovery facilities will primarily be that sourced from Inner West Council, due to their specific contractual requirement that the waste is recycled rather than landfilled (refer Modification 2), this modification seeks to amend the consent condition that limits road transport of FOGO to Inner West Council waste so that Veolia have operational flexibility and FOGO from other councils can be diverted from landfill and recycled. Operational flexibility allows for variations in FOGO waste quantities received from Inner West Council, potential changes in client contract requirements and simply the efficient filling of trucks on any given day, for example. These operational matters do not affect the potential environmental or social impacts of the activity.

Road transport of non-putrescible waste to resource recovery facilities other than the proposed Veolia Materials Recycling Facility in Camellia is sought as this facility has not yet been constructed and is unlikely to be constructed in the near future.

In summary, the proposed modification will help provide critical waste management services for the existing and future waste management needs of the Greater Sydney region and assist the NSW Government in achieving its waste management targets around increased FOGO separation, landfill diversion, resource recovery and recycling.



CHAPTER 2

STRATEGIC CONTEXT

2 STRATEGIC CONTEXT

2.1 Introduction

The location, accessibility and existing environment of the BTT is described in sections 1.3, 4 and 8 of the EIS. This chapter summarises aspects of the strategic context relevant to the site of the modification.

2.2 Site and location

The BTT occupies approximately 3.2 hectares of the following lots in Bayside Local Government Area, which are owned by Veolia (the site – Figure 2.1 and Figure 2.2):

- Lot A DP 366725 – 34 McPherson Street, Banksmeadow.
- Lot B DP 366725 – 36 McPherson Street, Banksmeadow.
- Lot 1 DP 435497 – 34 McPherson Street, Banksmeadow.
- Lot 20 DP 1231202 – 1 Beauchamp Road, Banksmeadow.

The site is zoned IN1 General Industrial under Chapter 5 (Three Ports – Port Botany, Port Kembla and Port of Newcastle) of State Environmental Planning Policy (Transport and Infrastructure) 2021. Development of waste and resource management facilities is permissible with consent in the zone.

The BTT is accessed as follows:

- Trains – via a branch line off the Botany Goods Line.
- Heavy vehicles – via an access road off Beauchamp Road.
- Light vehicles – via a driveway off McPherson Street.

The site is mostly sealed or covered by the terminal building, with the remainder comprising rail track and landscaped/grassed areas.

Built components of the BTT comprise:

- Access road.
- Veolia siding.
- Weighbridge.
- Container storage area.
- Diesel tank.
- Landscaping and site detention.
- Terminal building comprising:
    - Non-putrescible waste area.
    - Putrescible waste area.
    - Maintenance area.
    - Compactors.
    - Loading zone and weighbridge.

There are no waterways or recreational and protected areas near the BTT. The nearest residences are approximately 120-150 m east on Perry Street.

Figure 2.1 Regional context

Figure 2.2 Local context

2.3 Biophysical factors

2.3.1 Topography, geology and soils

The surface of the site has been cleared and reshaped to provide a relatively flat site for the BTT and is now entirely sealed apart from some areas adjacent to the rail line and driveway, which are vegetated with grass and shrubs.

The soil landscape and characteristics of the site are described in Soil Landscapes of the Sydney 1:100,000 Sheet as:

- Unit – disturbed terrain.
- Landscape type – disturbed.
- Soil type – fill areas commonly capped with up to 100 cm of mottled clay or transported fills.
- Limitations – dependent on the nature of the material but includes mass movement hazard, unconsolidated low wet-strength materials, impermeable soil, poor drainage, localised very low fertility and toxic materials.

Council's acid sulfate soils planning map shows the natural soils underlying the site to have a low risk of potential acid sulphate soil (PASS). The EIS stated PASS was predicted to mostly occur below 3 m below ground level (BGL). There was potential for PASS to occur closer to the surface in the west of the site.

Contamination was detected on site during investigations for the EIS. The site was remediated in accordance with Douglas Partners (2014) *Remediation action plan – proposed waste transfer facility* and was certified on 15 August 2016 under certificate number GN 497.

It is noted the proposal will not include surface disturbance and soils and previously undiscovered contamination (if any) will not be disturbed.

2.3.2 Hydrology and hydrogeology

The site is in the Botany Bay catchment area and regional topography slopes gently towards the southwest to Botany Bay. The site is in the Springvale Drain local catchment, which comprises 2.5 km of enclosed conduit and 1.4 km of open channel. The local catchment has little to no riparian vegetation and is in moderate to degraded condition.

Very little water falling outside the site flows into the site, therefore, runoff is predominantly generated on site. The site is mostly sealed and there are few opportunities for infiltration. Some stormwater is captured in a 40 kilolitre (kL) tank for non-potable water use. The balance of stormwater is captured in on-site detention prior to release to the council drain in McPherson Street.

The site has a low flood hazard and there is a minor risk of flooding. Notwithstanding, the on-site stormwater detention system has been designed to compensate for loss of flood storage from earthworks required to provide a level surface for construction of the BTT.

The site is above the Botany Sands Aquifer and groundwater levels are between 1.2 m and 5 m BGL in the east and an average depth of 0.7 m BGL in the west. The proposal will not include surface disturbance and groundwater will not be intercepted.

2.3.3 Biodiversity

The site is predominantly cleared of vegetation other than some exotic vegetation and the following native species adjacent to the driveway and rail line:

- Tallowwood (*Eucalyptus microcorys*).
- Spotted gum (*Corymbia maculate*).
- Weeping fig (*Ficus benjamina*).
- Swamp oak (*Casuarina glauca*).
- Norfolk Island pine (*Araucaria heterophylla*).
- Coastal wattle (*Acacia longifolia* subsp. *sophorae*).
- Weeping bottlebrush (*Callistemon viminalis*).

No threatened flora or fauna were observed on site during surveys for the EIS and habitat values for threatened species were poor.

The proposal will not include ground disturbance and no vegetation will be disturbed.

2.4 Existing land uses

Land uses surrounding the site reflect the areas' industrial zoning.

The following businesses are adjacent to the site:

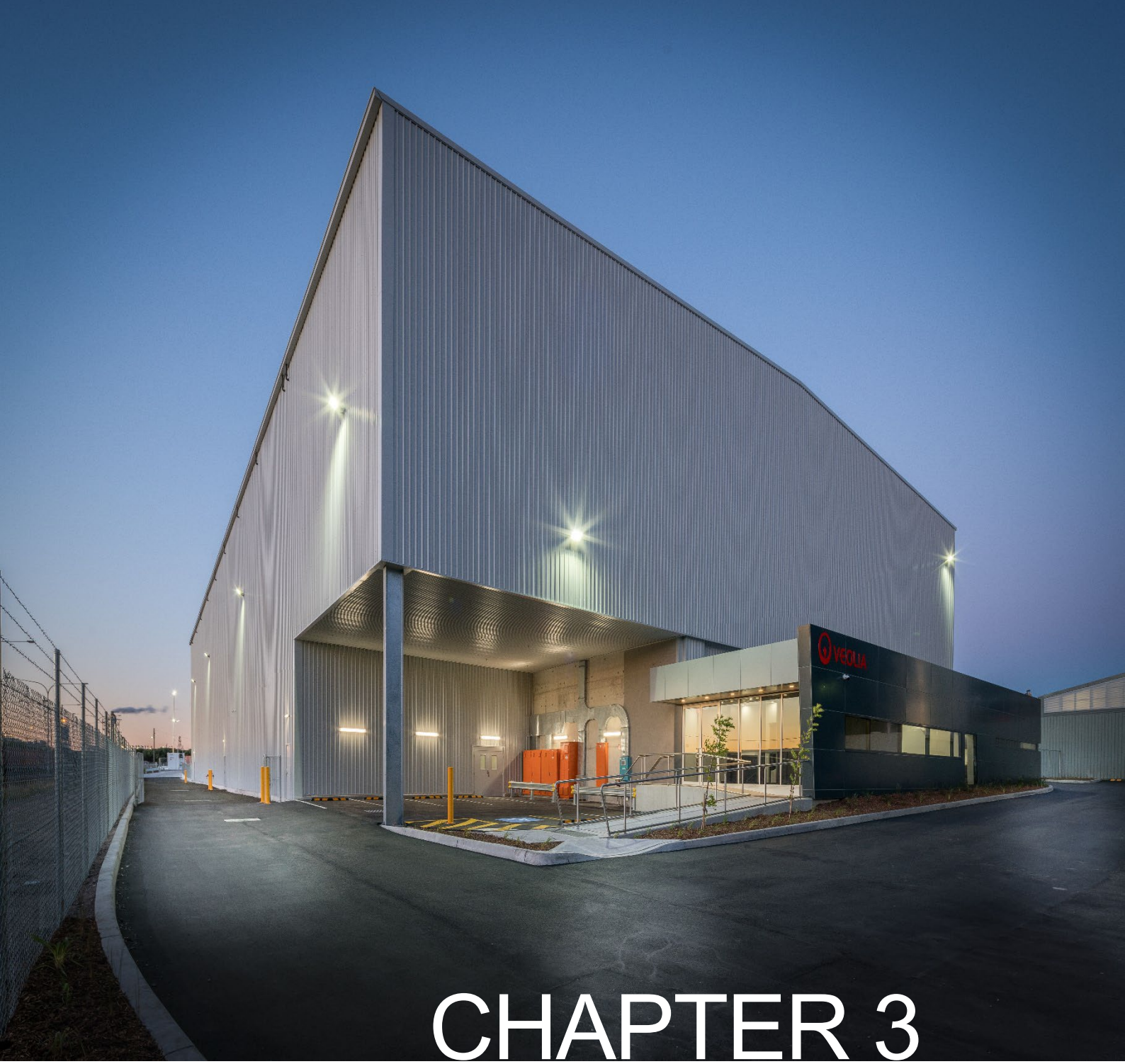
- South
  - Goodman Industrial Park (12A McPherson Street, Banksmeadow).
  - BM Recycling (38 McPherson Street, Banksmeadow).
- West – Orica Southlands Site (28A McPherson Street, Banksmeadow).
- North & east – Botany Industrial Park – IXOM ChlorAlkali (Denison Street, Banksmeadow).

2.5 Cultural factors

The EIS stated the La Perouse Local Aboriginal Land Council acknowledges the Gadigal and Bediagal clans as those which traditionally occupied the Sydney Coast to the north and north-west of Botany Bay. The site has not been identified by the Gadigal or Bediagal people as of indigenous heritage significance.

No recorded items of indigenous heritage were identified near the site during investigations for the EIS.

Investigations for the EIS identified the 'Main Administration Building' and 'mature ficus' items of historic heritage significance near the site (corner of Denison Street and Beauchamp Road).



CHAPTER 3

DESCRIPTION OF MODIFICATIONS

3 DESCRIPTION OF MODIFICATIONS

3.1 Increased putrescible waste

3.1.1 Summary

As summarised in Section 1.5, Veolia is expecting to receive increased quantities of FOGO (putrescible) waste from Sydney councils in response to the NSW Government mandate for collection of FOGO waste between now and 2030, and extending beyond. Concurrently, Veolia has been receiving minimal quantities of non-putrescible waste, and this trend is expected to continue. Therefore, Veolia is proposing to receive and transfer an increased proportion of putrescible waste at BTT, within the existing approved total waste limit. Veolia does not intend to receive increased volumes of non-putrescible waste in the near future, however would like to retain the ability to receive and transfer up to 100,000 tpa of non-putrescible waste.

Veolia proposes the receipt and transfer of up to 500,000 tpa of putrescible waste and up to 100,000 tpa of non-putrescible waste, such that the combined total of putrescible and non-putrescible waste received does not exceed 500,000 tpa.

That is, Veolia is not seeking to alter the total amount of waste permitted to be received at the BTT each year (500,000 tonnes), they are only seeking to alter the proportions of putrescible and non-putrescible waste able to be received.

A weighbridge and docket procedure at BTT records the types and quantities of waste received and transferred, including the source council and destination. This allows the mix of waste types and total volume of waste received to be progressively monitored. Service agreements with councils and other customers are established in advance of this, which allows Veolia to perform forward planning about the mix and quantities of waste being received.

The modification will not require any construction activities and will not impact any built or operational aspects of the BTT. Further, Veolia is not proposing any change to the BTT's existing at any-one-time waste storage limit of 6,225 tonnes.

3.1.2 Rail transport and other approvals

The BTT planning approval does not include any limits on train movements or configurations but does reference the EIS, which describes one train per day and includes general discussion of train length and rail sidings.

Increased transfer of putrescible waste to Crisps Creek Intermodal Facility near the WEP by rail will not require additional trains. Assuming an additional 100,000 tpa of putrescible waste is transferred to WEP by rail (none is FOGO transferred by road to resource recovery facilities), it represents a 25% increase to the approved volume of putrescible waste transfer by train, and will require an equivalent increase in the number of containers per train. Transfer of a total 500,000 tpa will require 52 containers per train operating 6 days per week or 62 containers per train operating 5 days per week. The longer train length to carry additional containers will remain within the limits of Veolia's Banksmeadow and Crisps Creek rail sidings and the train pathing on the rail network.

The Woodlawn bioreactor and Crisps Creek Intermodal Facility (IMF) planning approval (MP10_0012, modified 5 September 2025) includes the following relevant consent conditions (in summary):

Schedule 2 – General administrative conditions:

Woodlawn Bioreactor:

5. Putrescible waste received by rail from Sydney – max. 900,000 tpa

Crisps Creek IMF:

8. Received by rail from Sydney for processing at the Woodlawn AWT – max. 280,000 tpa

Schedule 5 – Crisps Creek IMF site

20. Only 2 trains (4 movements) in total are permitted to ingress and egress from the Crisps Creek IMF per day from Monday to Saturday

21. The tonnage of waste delivered to the IMF by train must not exceed 780,000 tpa, until the electronic signalling system has been implemented so as to eliminate the need for waste trains to stop across the road crossing at Tarago.

Condition 21 is an original consent condition (2012) and the signalling system has since been implemented to nullify this limit on rail traffic.

The Woodlawn Mechanical Biological Treatment (MBT) Facility planning approval (MP06_0239, modified 22 July 2024) includes the following relevant consent conditions (in summary):

2a. The applicant shall not receive more than:

240,000 tonnes of mixed waste a year on site, and

40,000 tonnes of garden waste on site.

The volume of waste transferred from Veolia's BTT and Clyde Transfer Terminal and received at Woodlawn bioreactor and MBT is continuously tracked by weighbridge data and reported weekly within the business to actively manage waste transfers between the facilities.

Of the almost 400,000 tpa of putrescible waste that is currently transferred by rail from BTT to WEP, approximately 250,000 tpa is directed to the bioreactor and approximately 150,000 tpa is directed to the MBT. This modification proposes an additional 80,000 – 100,000 tpa of putrescible waste to be transferred by rail from BTT to WEP and it is likely to be directed to the bioreactor.

Assuming a conservative maximum scenario where an additional 100,000 tpa of putrescible waste is transferred to WEP by rail (none is FOGO transferred by road to resource recovery facilities), both WEP facilities (bioreactor and MBT) and Crisps Creek IMF currently maintain capacity within their limits of approval to accept the additional waste proposed by this modification (Table 3.1).

The proposed BTT modification will be carried out within the limits of the existing Woodlawn bioreactor, Crisps Creek IMF and Woodlawn MBT approvals. In the event that any of these facilities were nearing their annual waste limit, continual waste volume tracking and advance warning allows Veolia to manage its waste consignments at BTT or Clyde Transfer Terminal.

Table 3.1 Relevant Woodlawn Eco Precinct and Crisps Creek IMF limits of approval [1]

Item	Woodlawn bioreactor (MP10_0012)	Woodlawn MBT (MP06_0239
Limits		
Received by rail from Sydney (tpa)	**900,000**	**280,000**
- Mixed waste (tpa)		**- 240,000**
- Garden waste (tpa)		- 40,000
Existing scenario		
From Clyde	470,000	30,000
From Banksmeadow	250,000	150,000
- Mixed waste (tpa)		- 140,000
- Garden waste (tpa)		- 10,000
Subtotal – existing scenario	**720,000**	180,000
Proposed additional From Banksmeadow[2]	100,000	0
Total – mod scenario	**820,000**	**180,000**

Notes: [1]Existing and proposed volumes are approximate and indicative for the purposes of showing operation within the approval limits. [2]This is a conservative maximum as up to 20,000 tpa is planned to be transported by road to other resource recovery facilities.

3.2 Increased road transport of FOGO

As summarised in Section 1.5, Veolia is under pressure from Sydney councils to divert FOGO waste streams from landfill and direct it to a resource recovery facility to ensure that it is being recycled. Therefore, Veolia proposes to increase the amount of FOGO waste to be transported by road.

Veolia proposes an increase in the amount of FOGO waste permitted to be transported by road from 12,000 tpa to up to 20,000 tpa.

This equates to an annual average increase of 32 tonnes per day which would be transported by two truck and dog combinations per day. Exact daily tonnes cannot be estimated as these fluctuate due to seasonality and council waste collection days.

The modification will not require any construction activities and will not impact any built or operational aspects of the BTT. Additional trucks (additional to the approved project and assessed truck volumes) will not be required as any road transport of FOGO waste from site will be in place of approved road transport of non-putrescible waste from site (refer to Section 1.4 for a summary of assessed truck volumes). Similarly, on-site articulated heavy vehicle movements were accounted for in the EIS.

The balance of FOGO waste received at BTT (approximately 16,000-17,000 tpa) will continue to be transported to WEP by train as summarised in Section 1.4. Or, all FOGO received at BTT may be transported to WEP by train. No FOGO will be transported from BTT to WEP by truck.

FOGO is counted as part of the putrescible waste limit applying to the site. No FOGO will be accepted at BTT additional to the consented putrescible waste limit.

3.3 Transfer of waste to other resource recovery facilities

As summarised in Section 1.5, road transport of FOGO waste to resource recovery facilities other than Topsoil Organics at Forbes NSW is sought as a contingency in the event that there are transport disruptions en route to Topsoil Organics, or if the facility is unavailable to accept the

waste. This might be due to temporary operational restrictions, for reasons relating to continued development approval, or for other unexpected reasons.

Road transport of non-putrescible waste to resource recovery facilities other than the proposed Veolia Materials Recycling Facility in Camellia is sought as this facility has not yet been constructed and is unlikely to be constructed in the near future.

In both cases, road transport will divert waste from landfill and facilitate recycling or resource recovery, which is understood to be the intent of the existing development consent conditions. The EIS proposed that non-putrescible would be transferred to resource recovery facilities such as the proposed Camellia Materials Recycling Facility. Similarly, the approved Modification 2 was based on diverting an amount of FOGO to ensure that it was recycled.

Written confirmation will be obtained from any proposed receiving facility to ensure that they hold suitable approvals and licences to accept the types and quantities of waste, prior to the transfer of waste to that facility. Service agreements established in advance will specify the types and maximum quantities of waste to be transferred.

Haulage routes will be governed by the performance-based standards map/approved road routes for the proposed vehicle combination and weight classes.

3.4 Environmental management

Potential odour, noise, traffic and other impacts associated with the proposed increase in putrescible waste volumes received and transferred at the site are assessed in Chapter 6 of this report.

Odour and other environmental issues are managed in accordance with site environmental plans, which address the management of putrescible waste. The existing dust suppression, fire deluge and ventilation systems within the terminal building are capable of addressing an increased volume of putrescible waste, given an equal reduction of non-putrescible waste.

FOGO is not sorted at the BTT as it is tipped inside the building and waste bound for WEP is containerised as soon as possible. Similarly, waste bound for Forbes and other resource recovery facilities will be loaded onto trucks as soon as possible. However, large contaminants such as bins or pieces of metal are removed by the loader operator. The FOGO is currently sorted at WEP and Forbes, and is proposed to be sorted at any other resource recovery facility employed, as these facilities are appropriately equipped for waste sorting, including picking lines.

As per current operations, any transport contract will specify the requirement for road worthy fit for purpose trucks including retention of maintenance schedules. The doors on the truck and trailer tipper bodies will be rubber sealed to prevent leakage of leachate and the tops covered by roller tarpaulins.

Veolia staff inspect the seals on truck and trailer bodies prior to loading trucks to ensure they are not damaged. Trucks or trailers with damaged seals are not loaded. Trucks and trailers are inspected for leaks again once loaded and leaking bodies are tipped back into the FOGO tipping area and the next truck filled.

A weighbridge and docket procedure at BTT records the types and quantities of waste received and transferred, including the source council and destination.

3.5 Conditions of consent

Conditions 5 and 5A of Schedule 2 of the existing SSD-5855 consent limit the receipt and transfer of waste at the BTT as follows:

5. The Applicant must not receive and transfer more than:

(a) 400,000 tonnes per annum of general solid waste (putrescible) to be transported via rail to the Veolia Woodlawn Eco Precinct and per Condition 5A

(b) 100,000 tonnes per annum of general solid waste (non-putrescible) to be transported by road to the proposed Veolia Materials Recycling Facility in Camellia.

5A. Within the putrescible waste limit specified in Condition 5(a), the Applicant must not receive more than 12,000 tonnes per annum of food and organic waste (FOGO) waste from Inner West Council to be transported via road to the Topsoil Organics Facility at Forbes.

Veolia is seeking to modify Conditions 5 and 5A of the consent, under section 4.55(1A) of the EP&A Act, to read as follows:

5. The Applicant must not receive and transfer more than 500,000 tonnes per annum of general solid waste, comprising:

(a) up to 500,000 tonnes per annum of putrescible waste, to be transported via rail to the Veolia Woodlawn Eco Precinct (except as otherwise provided by Condition 5A); and

(b) up to 100,000 tonnes per annum of non-putrescible waste, to be transported by road to an appropriately licenced resource recovery facility.

5A. Within the putrescible waste limit specified in Condition 5(a), the Applicant must not receive more than 20,000 tonnes per annum of food organic and garden organic waste (FOGO) waste to be transported, via road, to an appropriately licenced resource recovery facility.

The Definition of *Operation* in Schedule 1 to the consent is also requested to be modified accordingly.

CHAPTER 4

STATUTORY CONTEXT

4 STATUTORY CONTEXT

4.1 Introduction

The legislative context of the BTT was described in detail in Chapter 5 of the EIS. This section summarises the approval pathway and any changes associated with the modification to the approval requirements summarised in the EIS.

4.2 Consent history

The following development consents relate to the BTT:

- SSD 5855 (determined April 2015): Receipt and transfer of up to 400,000 tonnes per annum of putrescible waste and transported by rail to the Veolia Woodlawn Waste Facility and the receipt and transfer of up to 100,000 tonnes per annum of non-putrescible waste to the proposed Veolia Materials Recycling Facility in Camellia.

- Modification 1 to SSD 5855 (determined August 2016):
  - To allow an additional six months to complete road upgrade works to the intersection at Beauchamp Road and Perry Street.
  - To prevent the emission of offensive odours and leachate leaking from waste containers.

- Modification 2 to SSD 5855 (determined November 2023): Road transport of 12,000 tpa of FOGO waste received from Inner West Council to the Topsoil Organics facility in Forbes, NSW.

4.3 NSW Environmental Planning and Assessment Act 1979

4.3.1 State significant development

The NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) and NSW Environmental Planning and Assessment Regulation 2021 form the statutory framework for planning approval and environmental assessment in NSW. Implementation of the EP&A Act is the responsibility of the Minister for Planning and Homes (the Minister), statutory authorities and local councils.

Part 4, Division 4.7 of the EP&A Act provides for the assessment of SSD where the Minister (or delegate) or the NSW Independent Planning Commission (IPC) is the consent authority.

The consent was granted by the IPC (previously the Planning Assessment Commission) on 28 April 2015.

Section 4.55 of the EP&A Act provides for the modification of SSD consents. Section 4.55(1A) allows modifications with minor environmental impact, where:

> A consent authority may, on application being made by the applicant or any other person entitled to act on a consent granted by the consent authority and subject to and in accordance with the regulations, modify the consent if—
>
> (a) it is satisfied that the proposed modification is of minimal environmental impact, and [refer Chapter 6]
>
> (b) 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), and [refer Chapter 3]

(c) it has notified the application in accordance with— [refer Chapter 5]

(i) the regulations, if the regulations so require, or

(ii) a development control plan, if the consent authority is a council that has made a development control plan that requires the notification or advertising of applications for modification of a development consent, and

(d) it has considered any submissions made concerning the proposed modification within any period prescribed by the regulations or provided by the development control plan, as the case may be.

Veolia is seeking to modify the development consent under Section 4.55(1A) of the EP&A Act.

The proposed modification is substantially the same development as approved, for the following reasons:

- No change is proposed to the total amount of waste approved to be received at and transferred from the BTT each year (500,000 tonnes), only change to the proportions of putrescible and non-putrescible waste within that limit is proposed.
- The modification will not require any construction activities and will not impact any built or operational aspects of the BTT.
- There will be no change to the existing approved hours of operation of the BTT – the facility is already approved to receive waste 24 hours a day, seven days a week.
- The existing on-site plant and equipment will be utilised to receive, consolidate and transfer the waste. No additional plant or equipment will be required.
- Increased transfer of putrescible waste to Crisps Creek Intermodal Facility near the WEP by rail will not require additional trains. A longer train length to carry additional containers will remain within the limits of Veolia's Banksmeadow and Crisps Creek rail sidings and the train pathing on the rail network.
- No new waste streams are proposed to be transported to or from the BTT. FOGO is counted as part of the putrescible waste limit applying to the site. No FOGO will be accepted at BTT additional to the consented putrescible waste limit.
- Road transfer of FOGO and non-putrescible waste to resource recovery facilities is already part of the existing project approvals.
- Increased road transport of FOGO will not require additional trucks (additional to the approved project and assessed truck volumes), as any road transport of FOGO waste from the site will be in place of approved road transport of non-putrescible waste from site (refer to Section 1.3 for a summary of assessed truck volumes).
- Road transport of FOGO and non-putrescible waste to other receiving facilities will continue to divert waste from landfill and direct it to resource recovery facilities.
- No new waste receipt, storage, transfer or transport processes are proposed. The site is approved to receive waste by truck, store waste onsite, transfer waste to trains and trucks and transport waste offsite by train and truck.

The proposed modification will have minimal environmental impacts. They are reviewed in Chapter 6.

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 likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality* when considering a development application. This modification report was prepared to summarise the likely impacts of the modification in accordance with Section 4.15(1)(b) of the EP&A Act.

4.3.2 Permissibility

The site is zoned IN1 General Industrial under Chapter 5 (Three Ports – Port Botany, Port Kembla and Port of Newcastle) of State Environmental Planning Policy (Transport and Infrastructure) 2021. Development of waste and resource management facilities is permissible with consent in the zone.

The modification will not change the site land use and the BTT remains permissible with consent in the zone.

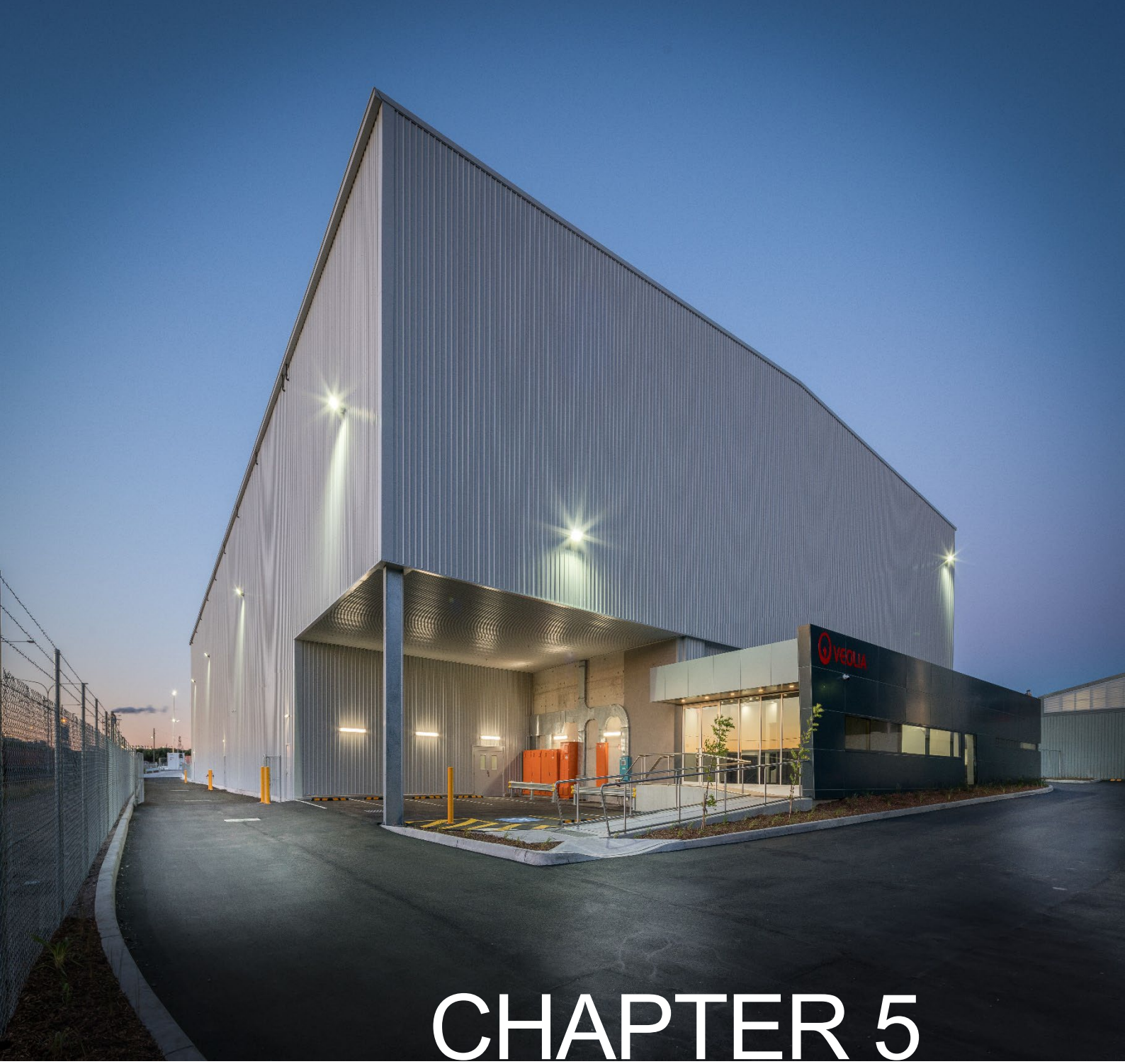
4.4 Approval requirements

The required approvals for the BTT are summarised in Table 5.4 of the EIS. The table is replicated in Table 4.1 including changes to the requirements because of the modification. The only change will be the requirement for an application to modify the consent under Section 4.55(1A) of the EP&A Act.

Table 4.1 Summary of approval requirements

Legislation	Authorisation	Consent of approving authority (at time of consent)	Change required from modification
EP&A Act	Development consent.	Minister or IPC	Consent was granted on 28 April 2015. Consent for Modification 1 was granted under Section 96(1A) of EP&A Act on 31 August 2016. Consent for Modification 2 was granted under Section 4.55(1A) of EP&A Act on 7 November 2023. The consent will need to be modified under Section 4.55(1A) of EP&A Act for Modification 3 (this application).
NSW *Protection of the Environment Operations Act 1997* (POEO Act)	EPL for waste processing (non-thermal treatment) and waste storage.	Environment Protection Authority (EPA)	The modification will not involve waste processing or waste storage and there will be no change to the requirement for an environment protection licence (EPL).
NSW *Roads Act 1993*	Section 138 permit for works on a public road.	Roads and Maritime Authority/Council	The modification will not involve changes to roads and the requirements for a Section 138 permit will not change.

Legislation	Authorisation	Consent of approving authority (at time of consent)	Change required from modification
NSW *Water Management Act 2000*	Water access licence under Section 60D and aquifer interference approval under Section 91F of the Act.	NSW Office of Water	The modification will not involve changes to water management/interference with an aquifer and there will be no change to this licence and approval.



CHAPTER 5

CONSULTATION

5 CONSULTATION

Based on the minor nature of the proposed modifications and low potential environmental and social impacts, consultation was limited to approval authorities, being DPHI and NSW Environment Protection Authority (EPA).

Modification 2 for the transport of FOGO in 2023 included consultation with Bayside Council, and Transport for NSW.

5.1 Department of Planning, Housing and Infrastructure

Element sent the modification scoping letter to a member of the DPHI industry assessment team via email on 30 June 2025. Element received a reply email on 25 August 2025 indicating general acceptance at a high level. An amended version of the scoping letter was sent to DPHI on 2 September 2025, which was discussed during a meeting on 3 September 2025. Brief meeting minutes and another amended scoping letter were provided by Element on 8 September 2025. Issues raised by the Department are listed in Table 5.1, with references to the section of this report where they are addressed.

Element lodged the modification scoping letter via the NSW Planning Portal on 9 October 2025.

Table 5.1 DPHI modification meeting comments

Comment	Reference
Clarify total proposed waste cap and mix, including procedures for waste tracking	Section 3.1.1
Rail and road transport scenarios	Sections 3.1.2, 3.2
Details of proposed FOGO and non-putrescible receiving facilities and requirement that they are appropriately licenced	Section 3.3
Consultation with NSW EPA	Section 5.2
BTT compliance record in the last two years	Section 1.5
Approval pathway and any related approvals	Sections 4.3.1, 3.1.2

5.2 Environment Protection Authority

A review of Environment Protection Licence 20581 indicates that EPL changes associated with the modification would be limited to waste volume limits (Condition L3.1) only. Nevertheless, Element provided a draft copy of the modification scoping letter to EPA by email on 5 September 2025, which was discussed during a meeting on 10 September 2025. Brief meeting minutes were provided by Element on 15 September 2025. Issues raised by EPA are listed in Table 5.1, with references to the section of this report where they are addressed.

Table 5.2 EPA modification meeting comments

Comment	Reference
Need and justification for the modification	Section 1.6
Environmental assessments to consider local/adjacent land use changes since the EIS (2014)	Section 6
Details of proposed FOGO receiving facilities	Section 3.3
EPL implications of the proposed modification	Section 5.2
Waste stream characteristics, especially odour profiles	Section 6.4
EPA suggested a site visit to review handling operations and odour	N/A

CHAPTER 6
ENVIRONMENTAL ASSESSMENT

6 ENVIRONMENTAL ASSESSMENT

6.1 Introduction

Key environmental matters requiring assessment were identified in a scoping letter to DPHI dated 11 September 2025 - *Scoping of environmental assessment for Banksmeadow Transfer Terminal – SSD 5855 Modification 3*.

The scoping letter identified road traffic, noise (primarily road traffic noise) and air quality (odour) as the key potential environmental factors associated with the modification. These are described in appendices A, B and C and summarised in sections 6.2, 6.3 and 6.4.

Other environmental matters described in Chapter 8 of the EIS are summarised in Section 6.5, with changes to these matters described in the context of the modification.

6.2 Road traffic

6.2.1 Scope of assessment

The proposed modification from a traffic and transport perspective is the transport of up to an additional 8,000 tpa of FOGO waste by road to a licensed waste recovery facility compared to the approved Modification 2 consent.

Despite the existing approvals to transfer non-putrescible waste from the facility via road, requiring up to 16 trucks per day as assessed in the EIS, minimal quantities of non-putrescible waste are currently received at BTT. Veolia does not intend to increase acceptance of non-putrescible waste in the future. Therefore, there is an approved capacity of 16 trucks per day that is not being utilised. (Refer to Section 1.4 for a summary of assessed truck volumes).

As such, additional trucks will not be required for the proposed increase in road transport of FOGO waste from site, as it will be in place of approved road transport of non-putrescible waste from site. Road transport of non-putrescible waste from site would reduce equivalent with any increase in receipt of putrescible waste at the site and road transport of FOGO. On-site articulated heavy vehicle movements were also already accounted for in the EIS.

Although no additional heavy vehicle (or light vehicle) traffic is proposed as part of the current modification, a worst-case scenario where additional trucks are required has been assessed. SCT Consulting was engaged to perform a qualitative Traffic Impact Assessment (TIA) for an increase of 8,000 tpa of FOGO waste transported by road compared to the approved Modification 2 consent.

The TIA aims to establish an understanding of the current traffic and transport conditions of the areas surrounding the project and to assess potential traffic and transport impacts associated with the operation of the proposed modification. The assessment has reviewed the relative increase in site generated road traffic, based on the increase in truck movements relative to the existing approved truck movements. The TIA is included at Appendix A.

6.2.2 Traffic generation and distribution

Modification 2 assumed that road transport of 12,000 tpa of FOGO waste is expected to generate three heavy vehicle trips per day. Road transport of an additional 8,000 tpa of FOGO waste is expected to generate two heavy vehicle trips per day. This is based on FOGO waste being transported over 250 days in a year and 16 tonnes per truck.

Since the TIA assesses the potential traffic impacts with reference to the EIS, and Modification 2 did not update approved traffic volumes, the potential cumulative traffic impacts of Modification 2 and this Modification 3 are assessed. That is, road transport of 20,000 tpa of FOGO waste is expected to generate five heavy vehicle trips per day.

In the EIS, the proportion of putrescible waste vehicle trips generated in the AM and PM peak hours were estimated to be 6% and 2.4% of the daily trip generation, respectively. Given that the BTT operates 24 hours a day, seven days a week with no restrictions imposed on when heavy vehicles can enter the facility or travel on the surrounding road network, it is assumed that truck movements will generally be dispersed across the day.

Therefore, the five additional trucks per day could likely generate an increase of up to two truck movements (either in or out) during each AM or PM peak hour.

Trip distribution is expected to remain consistent with those given in the EIS, using an 80%/20% directional split for vehicles entering and exiting the site from the south and north respectively. However, during the period from 6 am to 8 pm, all traffic must approach from the south via Botany Road, given the right turn restrictions into the site at the Beauchamp Road/Perry Street/site access intersection.

An 80%/20% east/west directional split was assumed at the Botany Road / Beauchamp Road intersection for vehicles entering and exiting the site from the south.

6.2.3 Impact assessment

The two additional truck movements generated in the peak hours is less than one per cent of the total intersection traffic in the peak hours at the Beauchamp Road/Denison Street intersection under the cumulative future case assessed in the original EIS (2,103 vehicles in the AM peak hour and 2,038 vehicles in the PM peak hour).

This represents a negligible increase in traffic volume at the access intersection to the BTT and would have a negligible impact on traffic performance. It is also well within the daily fluctuations of traffic volumes on the surrounding road network.

6.2.4 Conclusion

Heavy vehicles associated with Modification 3 will not significantly impact the road network and management measures additional to those in the EIS will not be required.

6.3 Noise

6.3.1 Scope of assessment

Muller Acoustic Consulting was engaged to review and report potential noise impacts to sensitive receivers from road traffic and operations associated with the modification. The acoustic review is in Appendix B and summarised in this section.

Although no additional heavy vehicle (or light vehicle) traffic is proposed as part of the current modification, a worst-case scenario where five additional trucks per day are required (the potential cumulative traffic impacts of Modification 2 and this Modification 3 (20,000 tpa of FOGO waste)) has been assessed in this application for conservative purposes.

6.3.2 Road traffic noise

Trucks leaving the site would typically turn right on to Beauchamp Road to access the M5 Motorway via Botany Road and Foreshore Road. Trucks may also access the M5 by turning left onto Beauchamp Road and then travelling along Bunnerong Road and Wentworth Avenue.

There are no residences along the Beauchamp Road, Botany Road and Foreshore Road route. The nearest residences along the Beauchamp Road, Bunnerong Road and Wentworth Avenue route are approximately 15 m from the centreline of Beauchamp Road.

A review of the Transport for NSW Traffic Volume Viewer indicates that there is no existing traffic volume data for Beauchamp Road. Hence, the assessment has calculated the relative increase in site generated road traffic noise levels, based on the proportional increase in proposed truck movements relative to the existing approved truck movements.

An increase of ten heavy vehicle movements (i.e. five trucks) above the 742 existing approved heavy vehicle movements (i.e. 371 trucks), equates to an increase in site generated truck movements of approximately 1.3%, or an increase in road traffic noise levels of less than 0.1dB LAeq(period).

Where existing road traffic noise levels already exceed the relevant criteria, the NSW Road Noise Policy (RNP) (EPA, 2011) recommends an increase criterion of up to 2dBA, which represents a minor impact that is considered barely perceptible to the average person.

For reference, to achieve an increase of at least 2dBA, the site would need to generate at least 60% additional truck movements. Hence, the potential increase in road traffic noise levels, as a result of the modification, is considered to be negligible and would not be discernible to the human ear.

6.3.3 Operational noise

The proposed modification will not require a change in the type or number of plant and equipment, nor will it alter the existing hours of operation of the BTT. Therefore, there will be no increase in associated operational noise impacts.

It is anticipated that an increase of up to five trucks per day (ten heavy vehicle movements) would represent a negligible increase in noise generated at the site. Furthermore, a review of sensitive receivers has identified that the nearest residences (zoned industrial) are located approximately 150m to the east of the site, adjacent to Perry Street. Given the industrial nature of the locality and the high incidence of transportation noise (road, rail and aircraft), it is considered that the addition of five trucks per day on the subject site is unlikely to result in audible changes to noise emissions (received noise levels) at the nearest residential receivers.

6.3.4 Conclusion

Heavy vehicles associated with Modification 3 will not significantly increase road and site noise and management measures additional to those in the EIS will not be required.

6.4 Air quality and odour

Todoroski Air Sciences was engaged to review and report potential odour impacts associated with the modification. The odour memo is provided in Appendix C and summarised in this section.

6.4.1 Previous assessment

The *Banksmeadow Transfer Terminal – Air Quality Impact Assessment* (AQIA) (Wilkinson Murray, 2014) prepared as part of the EIS, assessed odour impacts under two operational scenarios: a typical operating day (400,000tpa of putrescible waste) and a worst-case day (500,000tpa of putrescible waste). Odour emission assumptions were based on actual odour measurements from a similar operating facility at Clyde Transfer Terminal.

The AQIA concluded that predicted odour levels under both scenarios would comply with the applicable odour impact assessment criteria and that the facility could operate without causing adverse air quality impacts. While results showed compliance with the most stringent 2 OU criterion at nearby residential receptors, higher (but still compliant) levels were predicted at the adjacent industrial and commercial receptors.

6.4.2 Impact assessment

Local and adjacent land use, waste stream characteristics and odour profiles, reference odour emissions, and relevant assessment criteria have not changed since 2014 and remain applicable for assessment of the current modification.

As described at Section 3.4, neither FOGO waste transferred by road or putrescible waste transferred by train are sorted at BTT and both are containerised or trucked as soon as possible. As per the odour memo (Appendix C), FOGO odour is indistinguishable from putrescible waste odour, and receival of FOGO is not capped (within the putrescible waste limit) by the existing consent. Therefore, on-site handling practices for FOGO waste due to be transported by road will not lead to different odour outcomes than current operations.

A review of the *Annual Environmental Management Report – Banksmeadow Transfer Terminal 2024-2025* (AEMR) (Veolia, 2025) found the odour performance of the Terminal was mostly consistent with the previous reporting period or improved:

- *Results of odour sampling collected during the reporting period indicate the odour performance of the roof discharge stack remains consistent with original design performance documented in the Air Quality Impact Assessment (Wilkinson Murray, 2014).*
- *Smoke testing results conducted throughout this reporting period have consistently indicated that there are no other potential fugitive emission release pathways from the waste shed area, apart from the entrance doorway.*
- *The Terminal received a decrease in odour complaints compared to the previous reporting period and is consistent with the current long-term trend of decreased odour complaints since commencement of operations.*

A total of 3 complaints were received by BTT during the 2024-2025 reporting period. All three complaints were odour complaints received directly from the neighbouring industrial site IXOM, who are located north-east of BTT. While the same number of complaints were received in the previous reporting period, this number is consistent with the overall long-term trend of decreasing odour complaints received by the site. Additionally, only two of the received complaints were verified, while the third was found to be likely attributed to wastewater clean out works from a neighbouring site.

6.4.3 Conclusion

Based on the review of the 2014 AQIA and odour-related complaints in the latest AEMR, the facility appears to be operating as intended, and odour controls are considered effective. The potential impacts of Modification 3 have already been addressed in the AQIA in the EIS, and no further quantitative assessment is considered necessary, as the predicted impacts are already

presented (refer to Figure 8-4 of the AQIA). Existing odour controls and regular odour audits will continue to apply for the proposed modification and ensure odour is managed from the operation.

6.5 Other environmental matters

Environmental matters that were determined during the EIS scoping phase as requiring assessment in the EIS are summarised from the EIS executive summary in Table 6.1, with changes to these matters described in the context of the modification.

Environmental matters that were determined during the EIS scoping phase as not requiring assessment in the EIS have not been considered in this report as they were minor in nature and will not be impacted by the modification.

As described in the table, the modification will not significantly impact any other environmental matters.

Table 6.1 Assessment of other environmental matters

Matter and EIS summary	Impacts associated with Modification 3
Soils and contamination Construction of the Proposal would require clearing of the whole Proposal site, which has the potential to cause erosion and sedimentation. The Site has been determined to pose a low potential erosion hazard, and the highly permeable course sand grains found within the area means that the sedimentation risk is lowered. Increased salinity may also become an issue during the construction phase and there is potential that potential acid sulphate soils (PASS) may be disturbed. Mitigation and management measures to minimise these risks would be implemented and an acid sulphate soils management plan should be prepared. Douglas Partners have undertaken detailed site investigations on the Site and identified six areas of environmental concern that require remediation and/ or management prior to use of the Keith Engineering site for the purposes of the Proposal. Management of soil contamination would also be required on Asciano land to make the land suitable for the Proposal. Douglas Partners (2013) undertook a review of remedial and management options that are available for the Proposal site. Remediation and on-going management to render the Site appropriate for the operation of the Banksmeadow TT would be undertaken as part of the Proposal. Key measures to manage soils and contamination on the Site include: ▪ A Construction Soil and Water Management Plan (CSWMP) would be developed prior to commencement of construction, in accordance with the Blue Book (Landcom, 2004). Progressive erosion and sediment control plans (ESCP) would be developed in accordance with CSWMP to reflect changes to the level of disturbance. ▪ A Remedial Action Plan prepared for the Keith Engineering land and a plan, detailing measures for the management of contamination identified on Asciano land would be implemented. The plans would be subject to review and approval of a NSW EPA accredited Site Auditor. ▪ An Acid Sulphate Soil Management Plan (ASSMP) would be developed prior to commencement of construction. Construction workers would be instructed on the identification of PASS and ASS during the site induction and the requirements of the ASSMP.	No impact as the modification will not involve ground disturbance.
Hydrology and flooding A Stormwater Management Report was prepared as part of the EIS. Construction of the Proposal would require clearing of the whole Proposal site, which has the potential to cause erosion and sedimentation. However, the Site has been determined to pose a low potential erosion hazard. There would be a minor impact on the groundwater level during the construction of the facility due to dewatering. Infiltration systems would not be utilised due to the proximity of the water table to surface level. The majority of the Site would be paved due to the nature of the development and their intermodal transport requirements. There is potential to significantly increase the amount of runoff from the Site once it is developed due to an increase in impervious surfaces and the interception of runoff that was previously escaping the Site in an uncontrolled manner. On-site detention (OSD) would be provided to mitigate the increase in flows leaving the Site and offset the increase in run-off. The area around the Site has been heavily disturbed and is a predominately industrial area; there are no permanent water resources on the Site and groundwater quality is low due to contamination from industrial activity in the area. The quality of	No impact as the modification will not involve ground disturbance.

Matter and EIS summary	Impacts associated with Modification 3
these water resources is unlikely to be reduced further by the Proposal. The Proposal has the potential to have an impact on stormwater quality leaving the Site. This would be mitigated through the implementation of water sensitive urban design (WSUD) measures to reduce the impact on stormwater quality as a result of the Proposal. Flood mapping prepared for Botany Bay City Council suggests that flood risk at the Site is low and any flood waters would be classified as part of the flood fringe. The Proposal has the potential to reduce the flood storage levels on-site due to levelling of the Site. To mitigate this impact it is proposed that the stormwater strategy would provide sufficient on-site storage to offset any loss in flood storage. Key measures to mitigate impacts on stormwater and flooding include: ▪ On site detention would be provided onsite to achieve Botany Bay City Council's requirement of 20% annual exceedance probability event 'natural condition' detention and to offset the calculated flood storage volume of 810 m^3. ▪ A 40 kL tank for stormwater storage would be provided beneath the terminal building for the purposes of washdown and toilet flushing to minimise potable water demand at the facility. ▪ Water sensitive urban design measures would be included within the detailed design for the Site and would include the provision of bioretention basins and oil and grease interceptors within the new drainage pits.	
Air quality Wilkinson Murray was engaged to undertake an air quality assessment for the Proposal, with input from The Odour Unit, based on the experiences at Veolia's Clyde Transfer Terminal. The construction phase of the Proposal would involve clearing of the Site and construction of the transfer terminal facilities, which would include activities with the potential to generate dust emissions. Exhaust emissions from operation of construction vehicles and plant would also generate particulate emissions. These impacts can be effectively controlled through the implementation of standard control measures. Air impacts associated with operations of the Banksmeadow TT comprise potential for dust and odour generation. Dust generated as a result of operation would be expected to be negligible. A dust suppression system would be installed within the terminal building that would emit a fine mist during dusty activities. To allow for the effective control of odour from the putrescible area of the building and minimisation of fugitive odour emissions, a ventilation system would be installed within the Banksmeadow TT building. The system would be designed to replace the air within the terminal building nine times per hour. Odour modelling has shown that, with the implementation of the ventilation stack, odour emissions from the Proposal would be well below the odour emission criteria and odour impacts are not predicted at any residential areas. Additional odour mitigation and management measures would be adopted as part of the Proposal to minimise the risk of odour impacts, including regular maintenance activities, washdown and management of putrescible waste on the tipping room floor on a first-in/ first out basis. An Odour Management Plan would be developed as part of the OEMP and would include additional procedures for minimising odour, including routine maintenance and cleaning of waste trucks and containers would not be allowed onsite, waste delivery trucks would be required to be fully enclosed or covered, waste streams would be kept separate, the floor area of the transfer terminal would be cleaned daily and odour monitoring and reporting would be undertaken to ensure compliance. The following key mitigation measures would be adopted for the Proposal to minimise air quality impacts:	Minimal impact to dust generation as the modification will not involve ground disturbance and truck movements on sealed surfaces will not generate significant dust. Minimal impact to odour generation as assessed at Section 6.4. As per current operations, any trucks transporting FOGO from the site will be sealed to contain odour.

Matter and EIS summary	Impacts associated with Modification 3
▪ A Construction Air Quality Management Plan would be developed for the construction phase of the Proposal which would prescribe measures to minimise air quality impacts, including dust generation and emissions from construction machinery. ▪ The putrescible waste side of the terminal building would be enclosed, with the exception of vehicle access openings and an air extraction system. The air extraction system would service the putrescible waste and compactor area, within the northern end of the building, and would manage odour through a single exhaust point to allow for dispersion. ▪ The ventilation system for the putrescible waste area of the transfer terminal building would have a single vent stack that would extend to a height of 21 m with a diameter of 2.6 m and be designed to have an exit velocity from the stack of 20 m/s to ensure that the odour emissions from the facility achieve the odour criteria prescribed in the EPA Air Quality Guidelines. ▪ Containers used to transport putrescible waste by rail would have carbon filters installed within the air vent and rubber seals around the openings to prevent the emission of odour. ▪ Dust generated from non-putrescible and putrescible waste would be managed by dust suppression systems located within the southern end of the transfer building. ▪ An Odour Management Plan would be developed as part of the OEMP and would include a Procedure for Minimising Odour to ensure waste is managed to minimise the generation of odours.	
Hazards and risk A preliminary hazard analysis has been undertaken for the Proposal, which determined that the Proposal is below the screening thresholds for hazardous industries as only minimal quantities of hazardous material would be stored at the site. Risks associated with surrounding land uses, including the Botany Industrial Park were reviewed and it was confirmed that the Proposal site is outside the risk criteria for landuse planning and development of the Proposal is considered acceptable on the site. A review of other hazards and risks posed by construction and operation of the Proposal was undertaken and measures to mitigate those risks identified. Key risks associated with construction of the Proposal include the demolition of asbestos containing structures on Keith Engineering land and the storage of fuels and chemicals for use in construction on the site. All activities associated with the demolition of asbestos containing structures and removal and disposal of asbestos material would be undertaken in accordance with NSW WorkCover's guidelines and the Model Code of Practice - How to Manage and Control Asbestos in the Workplace (Safe Work Australia, 2011). Management and mitigation measures to reduce risk of spills or release of chemicals and fuels during the construction phase of the Proposal would be included in the Construction Environmental Management Plan and would include an asbestos management plan. A number of potential hazards to the environment and/or public health have been identified in relation to the operation of the Proposal; including the potential for spills, fires, disruption of operations, receipt of non-conforming waste, and electrical or equipment failure. Key mitigation measures that would be adopted for the Proposal to minimise hazards and risk include: ▪ Construction would be undertaken in accordance with the Work Health and Safety (WHS) Act 2011 and the Model Codes of Practice developed by Safe Work Australia.	No impact as the modification will not involve hazardous materials or any other new waste stream.

Matter and EIS summary	Impacts associated with Modification 3
▪ The OEMP, and supporting specific management plans, would be developed to minimise the likelihood of an incident occurring. The operational procedures to manage the risks associated with activities on the Site and would include an Incident Response Plan, Emergency Response Plan and a Pollution Incident Response Management Plan.	
Waste management Construction of the Proposal would require demolition of several existing buildings, which would generate quantities of waste, and the construction of the new facilities, which would also generate further waste in the form of packaging and excess materials. A Construction Waste Management Plan would be developed for the Proposal to identify the key waste streams, likely quantities and disposal locations. Once operational, the Proposal would be capable of processing and consolidating 400,000 t per annum of general solid (putrescible) waste for transport to the Woodlawn Eco-Project site, and 100,000 t of general solid waste (non-putrescible) for transport to various resource recovery facilities. Leachate generated at the Proposal site would be captured within the leachate drainage system, which would be separate from the stormwater system, and would be pumped out into ISO tankers for transport to the Woodlawn Eco-Project site. To minimise impacts associated with waste handling, waste received at the site would be handled on a 'first in / first out' basis, to minimise the residence time at the Proposal site. Procedures for identification and management of non-conforming wastes would be developed and included in the Operational Environmental Management Plan (OEMP) for the Proposal. Key waste management measures would include the following: ▪ Development of a Waste Management Plan that would be incorporated into the OEMP for the Site, which would detail waste screening processes, waste handling and loading procedures and including an Asbestos Waste Management Procedure. ▪ Development of an Operational Contingency Plan which would be incorporated into the OEMP and specify the procedures to be followed in the event of external or internal events that disrupt the operation of the Proposal.	No impact as the modification will not involve new waste streams or an increase to the total volume of waste received and transferred at and from the site. The proposed increase in the proportion of putrescible waste received and transferred is not expected to have any significant impacts, as assessed in Section 6. As described at Section 3.1.1, the modification will not require any construction activities and will not impact any built or operational aspects of the BTT. Further, Veolia is not proposing any change to the BTT's existing at any-one-time waste storage limit of 6,225 tonnes
Land use The Banksmeadow TT would provide an industrial land use consistent with the existing land use, the adjacent land uses and potential future land uses. The Proposal is consistent with land use zoning within the area and would enable the future facilitation of further industrial growth.	No impact as the modification will not result in a change of land use.
Biodiversity Construction of the Proposal is likely to require the removal of vegetation from the Site, with the exception of several lemon-scented gums at the McPherson Street site entrance. The removal of vegetation on the Site is not considered to significantly impact on biodiversity values as the Site supports low existing biodiversity values. Operational handling of waste within the Banksmeadow TT would have the potential to attract vermin, flies and birds as the decomposition of waste on-site would emit odours that attract these pests on the Site. This risk would be minimal as operation of the facility would be such that waste is not permitted to remain on-site, without being containerised, for a period greater than 24 hours and the containers of waste would be sealed air and water tight.	No impact as the modification will not involve ground disturbance. Odour and other environmental issues are managed in accordance with site environmental plans, which address the management of putrescible waste. The existing dust suppression, fire deluge and ventilation systems within the terminal building are capable of addressing an increased volume of putrescible waste, given an equal reduction of non-putrescible waste.

Matter and EIS summary	Impacts associated with Modification 3
	As described at Section 3.4, FOGO is not sorted at the BTT as it is tipped inside the building and waste bound for WEP is containerised as soon as possible. Similarly, waste bound for Forbes and other resource recovery facilities will be loaded onto trucks as soon as possible.
Indigenous heritage No recorded items of Indigenous heritage were identified within the vicinity of the Site. In addition, no native title claims have been found to exist within the determined area. The high level of disturbance at the Site would mean that items of heritage significance are unlikely to be discovered during excavation works for development of the Proposal.	No impact as the modification will not involve ground disturbance.
Non-indigenous heritage There are two heritage items located within proximity of the Banksmeadow TT site, being the Main Administration Building – "Orica" and the adjacent mature Ficus tree which are located within 200 m of the Site. Neither the construction nor operational phases of the Proposal are expected to impact on the heritage items identified. The high level of disturbance at the Site would mean that items of heritage significance are unlikely to be discovered during excavation works for development of the Proposal.	No impact as the modification will not impact adjacent lots containing heritage items.
Socio-economic It is not expected that the operation of the Banksmeadow TT would lead to any long-term socio-economic impacts or cause alteration to the socio-economic structure of the surrounding LGAs as the Site is located on industrially zoned land and would represent a conversion of the Site from one industrial land use to another. Construction of the Proposal may have the potential to impact on local residents through a temporary increase in noise and dust levels. These impacts would be appropriately managed and are likely to be minimal and localised. Overall the Proposal would provide a significant regional benefit delivering reduced waste transferred to landfill, increasing industrial resource use and creating employment opportunities.	No impact as the modification will not involve changes to land use, shift times, employment or local social infrastructure.
Visual amenity Given the industrial nature of the surrounding area, the visual impact of the Proposal would not be significant in the context of other buildings in the vicinity of the Site. The visual impact of the Proposal is considered to be low overall. During construction of the Proposal there is potential for visual impacts from the viewpoints of Beauchamp Road and McPherson Street. Mitigation measures such as hoardings, would reduce the risk of visual impacts associated with the construction of the Proposal. Light spill from the Site would be within the relevant criteria.	No impact as the modification will not involve changes to built components.
Cumulative impacts There are a number of future and proposed developments in the surrounding area, including the Port Botany Expansion Project, Orica's Southlands development, Qenos' Botany Industrial Park and a Bunnings Warehouse. The cumulative impacts of the project have been considered in relation to each of the key biophysical, social and economic impacts associated with the Proposal. Impacts of the Proposal, particularly in relation to traffic and air quality, have been considered in technical studies undertaken as part of the EIS. It was concluded that the Proposal is unlikely to have a	The traffic assessment implicitly accounts for cumulative impacts by assessing potential traffic impacts relative to background traffic. As summarised in Section 6.2.4, heavy vehicles associated with Modification 3 will not significantly impact the road network.

Matter and EIS summary	Impacts associated with Modification 3
cumulative impact on air quality and the traffic impact assessment found that there would be no additional traffic impacts associated with the Proposal, to those already identified in traffic impact assessments prepared for those developments. Mitigation measures have been recommended throughout the EIS to minimise the impacts associated with the Proposal.	The noise assessment implicitly accounts for cumulative impacts by assessing noise impacts relative to background noise. As described in Section 6.3.4, heavy vehicles associated with Modification 3 will not significantly increase road and site noise.

CHAPTER 7

EVALUATION OF MERITS

7 EVALUATION OF MERITS

State significant development consent 5822 was granted by the IPC on 28 April 2015 to develop and operate the BTT. The consent was modified on 31 August 2016 to allow additional time to upgrade site access and prevent odour emissions and again on 7 November 2023 to allow road transport of 12,000 tpa of FOGO waste received from Inner West Council to the Topsoil Organics facility in Forbes, NSW.

Veolia proposes to modify (Modification 3) the consent to enable:

- the receipt and transfer of up to 500,000 tpa of putrescible waste and up to 100,000 tpa of non-putrescible waste, such that the combined total of putrescible and non-putrescible waste received does not exceed 500,000 tpa;
- an increase in the amount of FOGO waste permitted to be transported by road from 12,000 tpa to up to 20,000 tpa (if not transferred by rail to Woodlawn Eco Precinct),
- ability to transport FOGO by road to the TopSoil Organics facility at Forbes, NSW, or alternate resource recovery facilities, and
- ability to transport non-putrescible waste by road to the proposed Veolia Materials Recycling Facility at Camellia, NSW, or alternate resource recovery facilities.

Section 4.55(1A) of the EP&A Act allows modifications with minor environmental impact. Veolia is applying to modify the consent under Section 4.55(1A) as the modification will have minor environmental impact and will be substantially the same development for which consent was granted.

The proposed modification will help provide critical waste management services for the existing and future waste management needs of the Greater Sydney region and assist the NSW Government in achieving its waste management targets around increased FOGO separation, landfill diversion, resource recovery and recycling.

A comprehensive review of environmental factors relevant to the modification including road traffic, noise (primarily road traffic noise) and air quality (odour) did not identify any significant potential impacts.

Management measures additional to those in the EIS will not be required and the table of approved mitigation measures for the project is unchanged from Modification 2.

Given the need for the project and lack of environmental impacts, it is clear the modification satisfies Section 4.55(1A) of the EP&A Act and will facilitate increased benefits from operation of the BTT.


VEOLIA

APPENDIX A

TRAFFIC IMPACT ASSESSMENT

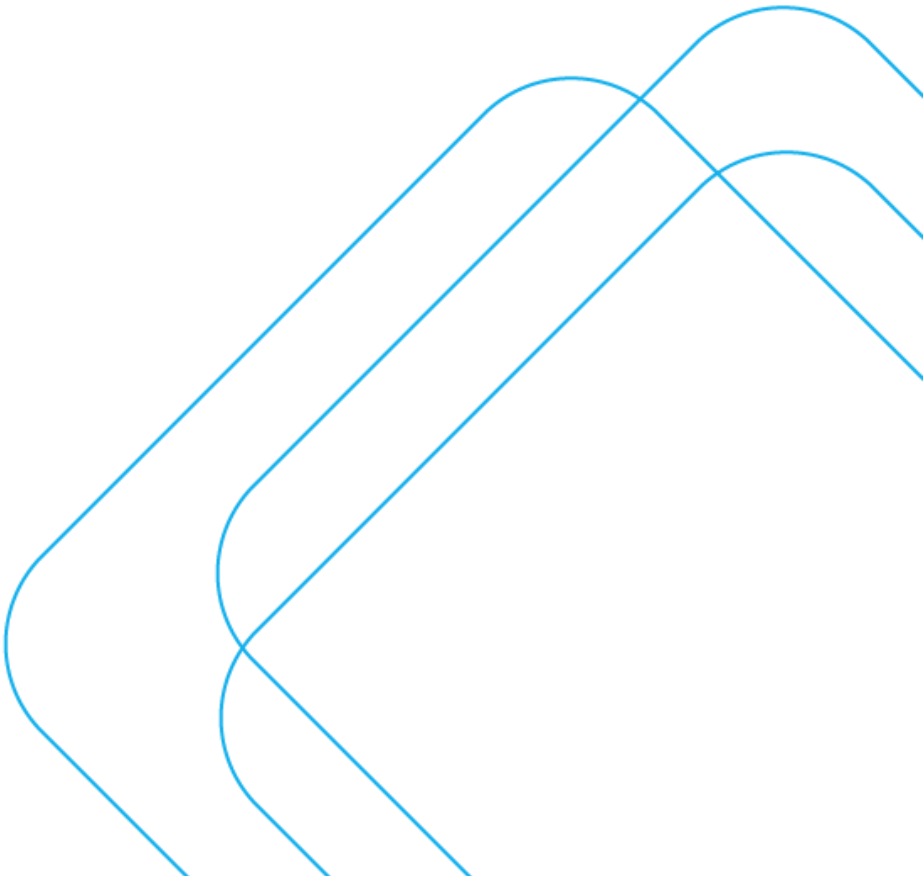
SCT Consulting

BANKSMEADOW WASTE TRANSFER TERMINAL SSD MOD 3

Traffic Impact Assessment

25 SEPTEMBER 2025

SCT Consulting acknowledges
the traditional owners of the lands
on which we work.
We pay our respects to Elders
past, present and emerging.



Quality Assurance

Project:	Banksmeadow Waste Transfer Terminal SSD Mod 3		
Project Number:	SCT_00803		
Client:	Element Environment Pty Ltd on behalf of Veolia Environmental Services (Australia) Pty Ltd	**ABN:**	45 162 835 083 20 051 316 584
Prepared by:	SCT Consulting PTY. LTD. (SCT Consulting)	**ABN:**	53 612 624 058

Information	Name	Position	Signature
Author:	Nafisa Nishandar	Consultant	
Reviewer:	Nick Bernard	Director	
Authoriser:	Nick Bernard	Director	

Version	Date	Details
1.0	4 September 2025	Draft report
2.0	25 September 2025	Final report

Contents

1.0 Introduction

1.1 Background

Veolia Environmental Services (Australia) Pty Ltd (Veolia) owns and operates the Banksmeadow Waste Transfer Terminal (BWTT). The BWTT currently operates under State significant development (SSD) consent 'SSD-5855, granted by the NSW Planning Assessment Commission on 28 April 2015, for the construction and operation of a waste transfer terminal to receive, consolidate and transfer up to 400,000 tonnes per annum (tpa) of putrescible waste and 100,000 tpa of non-putrescible waste.

Veolia is now applying for Modification 3 (MOD 3) to modify development consent 'SSD-5855', under section 4.55(1A) of the NSW *Environment Planning and Assessment Act 1979*, to allow:

– Receipt and transfer up to 500,000 tpa of putrescible waste and up to 100,000 tpa of non-putrescible waste, such that the combined total of putrescible and non-putrescible waste received does not exceed 500,000 tpa, i.e. altering the proportions of putrescible and non-putrescible but not an increase in the total amount of waste received

– An increase in the amount of food and garden organic (FOGO) waste transported by road from 12,000 tpa to up to 20,000 tpa

– The ability to transport FOGO by road to the TopSoil Organics facility at Forbes, NSW, *or alternate organic offtake facilities*

– The ability to transport non-putrescible waste by road to the proposed Veolia Materials Recycling Facility at Camellia, NSW, *or alternate receiving facilities*.

The BWTT occupies 3.2 hectares in the suburb of Banksmeadow in Sydney's Eastern Suburbs, predominantly within the Bayside Local Government Area and is zoned as 'General Industrial' (IN1). The site consists of four lots, which are listed below with their corresponding address, and are shown in **Figure 1-1**.

– Lot A DP 366725 – 34 McPherson Street, Banksmeadow.

– Lot B DP 366725 – 36 McPherson Street, Banksmeadow

– Lot 1 DP 435497 – 34 McPherson Street, Banksmeadow

– Lot 20 DP 1231202 – 1 Beauchamp Road, Banksmeadow.

Figure 1-1: Botany Transfer Terminal constituent lots

1.2 Existing consent

The original development consent (SSD 5855) approved on 28 April 2015 was to receive and containerise up to 400,000 tonnes per annum (tpa) of putrescible waste for transfer by rail to the Crisp Creek Intermodal Facility near the Woodlawn Eco Precinct (WEP), whereupon it is lifted onto trucks and transported to the WEP about 8km away, with the empty train returning to the BWTT for reloading. The BWTT can containerise about 189 tonnes of putrescible waste per hour and is approved to receive waste 24 hours a day, seven days a week.

Two modifications have been applied since the original development consent. A summary of the previously approved modifications is shown in **Table 1-1**.

Table 1-1 Summary of previously approved modifications

Application No.	Modification description	Type	Determination date
SSD-5855-Mod 1	– To allow an additional six months to complete road upgrade works to the intersection of Beauchamp Road and Perry Street – To prevent the emission of offensive odours and leachate leaking from waste containers.	s.96 (1A)	31 August 2016
SSD-5855-Mod 2	Road transport of 12,000 tpa of FOGO waste received from Inner West Council to the Topsoil Organics facility in Forbes, NSW.	s.4.55(1A)	7 November 2023

Source: Element, 2025

The existing SSD-5855-MOD 2 consent limits the receipt and transfer of waste at the BWTT as follows:

> *5. The Applicant must not receive and transfer more than:*
>
> *(a) 400,000 tonnes per annum of general solid waste (putrescible) to be transported via rail to the Veolia Woodlawn Eco Precinct and per Condition 5A*
>
> *(b) 100,000 tonnes per annum of general solid waste (non-putrescible) to be transported by road to the proposed Veolia Materials Recycling Facility in Camelia.*
>
> *5A. Within the putrescible waste limit specified in Condition 5(a), the Applicant must not receive more than 12,000 tonnes per annum of food and organic waste (FOGO) waste from Inner West Council to be transported via road to the Topsoil Organics Facility at Forbes.*

1.3 Purpose of this report

This Traffic Impact Assessment (TIA) has been prepared to support the MOD 3 application under section 4.55(1A) of the NSW *Environment Planning and Assessment Act 1979*.

From a traffic and transport perspective, the main impact of the proposed modification is the transport of up to 20,000 tpa of FOGO waste by road to a licensed waste facility, which would be an increase of 8,000 tpa of FOGO waste transported by road compared to the approved MOD 2 consent. Other putrescible waste is transported from the site by rail and no increase to road transport of non-putrescible waste from site is proposed. Road transport of non-putrescible waste from the site would be reduced commensurate with any increase in receipt of putrescible waste at the site and road transport of FOGO.

The TIA aims to establish an understanding of the current traffic and transport conditions of the areas surrounding the project and to assess potential traffic and transport impacts associated with the operation of the proposed modification. The assessment has analysed the relative increase in site generated road traffic, based on the increase in proposed truck movements relative to the existing approved truck movements.

2.0 Existing conditions

2.1 Existing access

The BWTT is accessed by heavy vehicles from Beauchamp Road, at the intersection of Beauchamp Road and Perry Street via an access road, shown in **Figure 2-1**. There is a dedicated left turn bay for heavy vehicles entering the site from the south via Botany Road, with right turn access from Beauchamp Road into the site prohibited between 6am and 8pm.

Light vehicles access the site via a driveway off McPherson Street.

Figure 2-1 Heavy vehicle site access from Beauchamp Road

Source: Google Maps, 2021

2.2 Road network

The key roads in the vicinity of the site are Beauchamp Road, Perry Road, Botany Road, Bunnerong Road, and Denison Street. The road network surrounding the site is shown in **Figure 2-2**.

The characteristics of the surrounding roads are:

- **Beauchamp Road** is a State Road between Botany Road and Denison Street, and a Regional Road east of Denison Street. It is a two-way, two-lane road, with a posted speed limit of 50km/h and on-street parking north of Perry Street. Between Botany Road and Denison Street, Beauchamp Road is an approved B-double route for 25/26m vehicles.
- **Botany Road** is a key State Road that is a major freight corridor providing access to Port Botany. Botany Road serves a movement function as a two-way, three-lane road, with a posted speed limit of 70km/h. Botany Road is an approved B-double route for 25/26m vehicles. However, 25m B-double vehicles turning left onto Beauchamp Road are restricted under a General Mass Limit (GML).
- **Denison Street** is a north/south State Road that extends from Wentworth Avenue to Beauchamp Road. It is a two-way, two-lane road with a posted speed limit of 50km/h and has both restricted and unrestricted on-street parking along its length. Denison Street is an approved B-double route for 25/26m vehicles.
- **Bunnerong Road** is a north/south State Road that intersects with Botany Road and extends north to Kingsford joining Gardeners Road and Anzac Parade. Bunnerong Road has a posted speed limit of 60km/h and is a two-way, three-lane road, with restricted on-street parking. There are restrictions for defined heavy vehicles over 12.5m in length. Heavy vehicles are permitted to travel from Port Botany to a destination on Beauchamp Road and can make a left turn from Wentworth Avenue onto Denison Street despite “No Trucks” restrictions.
- **Perry Street** is an east/west local road that extends between Beauchamp Street and Bunnerong Road. It is a two-way, single-lane road with a posted speed limit of 50km/h and unrestricted on-street parking on both sides. It intersects with the site access and Beauchamp Road, however, vehicles over 3.5 tonnes are not permitted to travel on Perry Street.

Figure 2-2: Road network and classification surrounding the BWTT

Source: TfNSW, 2025

2.3 Public transport network

The 309 bus route runs between Port Botany and Redfern via Beauchamp Road and Botany Road. It operates between 4:23 am and 11:43 pm on weekdays with service headways between 3 and 11 minutes during peak periods. No other public transport is available within the vicinity of the site.

2.4 Active transport

Footpaths are present along both sides of Beauchamp Road, terminating shortly before Botany Road. Perry Street similarly has footpaths on both sides. McPherson Street, where light vehicles access the site, does not have any footpaths.

There are no dedicated cycleways or shared paths near the site.

2.5 Road safety

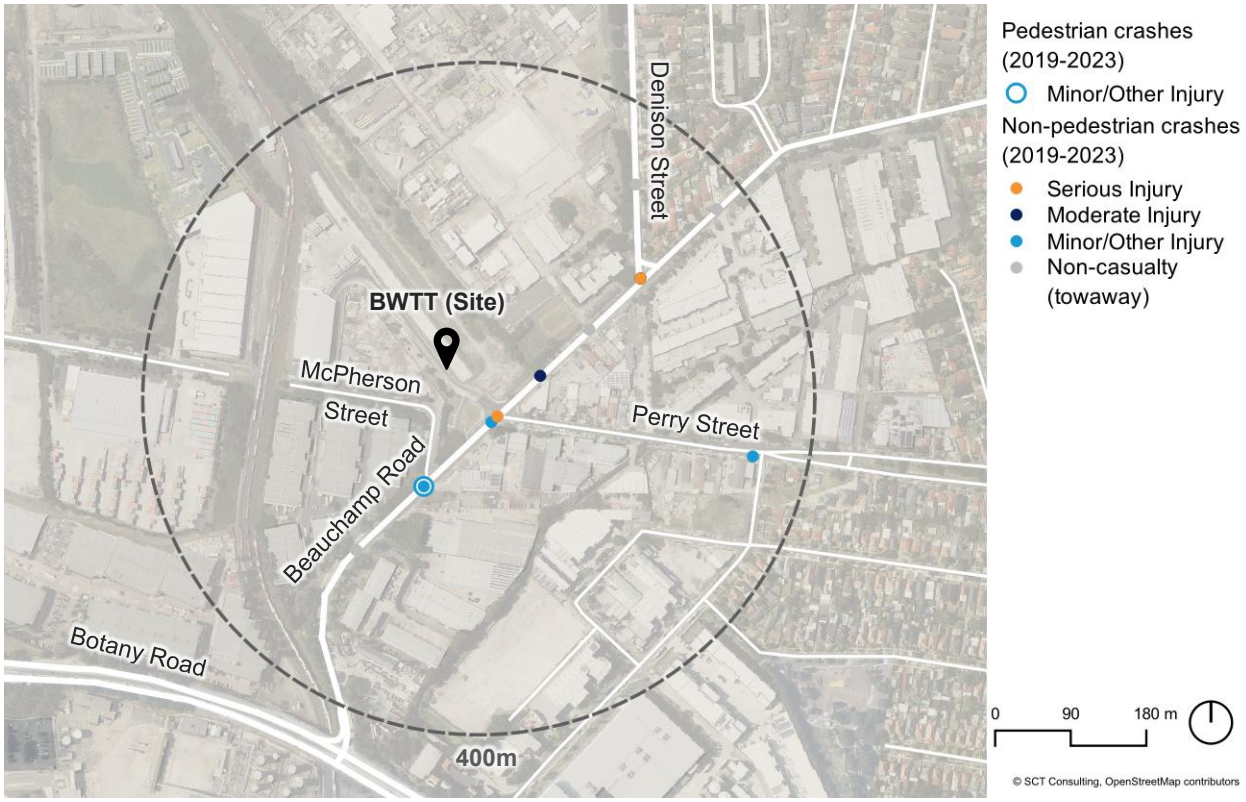
Crashes during the five year period from 2019 to 2023, and within 400m of the site, are shown in **Figure 2-3**.

Overall, 14 crashes occurred within a 400m radius of the site. Of these, 12 crashes were along Beauchamp Road. These include five non-casualty, three minor injury, two moderate and two serious injury crashes. Of the serious crashes, one was a right-through crash, between a car and a van, at the Beauchamp Road | Perry Street intersection.

Rear-end crashes (30 per cent) and crashes due to drivers emerging from driveways (30 per cent) were the most common types of crashes on Beauchamp Road and were spread along the length of the road.

One minor-injury, pedestrian-vehicle crash was recorded near McPherson Street.

Figure 2-3 Crash data (2019-2023) within 400m buffer of the site



Source: TfNSW, 2025

2.6 Existing site traffic generation

Under the original EIS, up to 371 heavy vehicle trips are expected to be generated per day, once the BWTT was operating at full capacity by 2020, comprised of:

– 215 trucks per day for the delivery of putrescible waste to the BWTT

– 140 trucks per day for the delivery of non-putrescible waste to the BWTT

– 16 trucks per day for the transfer of non-putrescible waste from the BWTT by road.

The transfer of putrescible waste from the facility would be by rail, requiring one train per day.

The EIS examined trip generation during key AM and PM peak periods. These were 7.45–8:45am and 2.45–3.45pm. Trip generation was separated into the various waste types that would be transported from the facility, as follows:

– Putrescible waste

  - 13 heavy vehicles in and out in the AM assessment period
  - 6 trucks in and out in the PM assessment period.

– Incoming non-putrescible waste
  - 11 heavy vehicles in and out in the AM assessment period
  - 8 heavy vehicles in and out in the PM assessment period.
– Outgoing non–putrescible waste
  - Two heavy vehicles in and out in the AM assessment period
  - Two heavy vehicles in and out in the PM assessment period.

According to the original EIS, the BWTT would require up to 25 staff during the day shift and seven staff during the night shift. However, the start and end times for shifts do not coincide with the AM and PM road network peak periods and thus staff trips were not considered when assessing intersection performance.

However, as it occurs, minimal quantities of non-putrescible waste are received at BWTT and none is transported by road from site, that is, all non-putrescible waste is transported by rail. Veolia does not intend to increase acceptance of non-putrescible waste in the future. Therefore, there is an approved capacity of 16 trucks per day not being used.

2.7 Existing intersection performance

SIDRA modelling was undertaken as part of the original EIS (Hyder Consulting,2014). Four scenarios were examined:

– **Base case** – examined intersection performance using current traffic volumes and intersection configurations at the time of assessment.
– **Future case** – analysed intersection performance accounting for future background growth and growth due to major land use changes surrounding the site up to the year 2020, when the BWTT was expected to operate at full capacity as part of the EIS.
– **Proposal development case** – examined intersection performance with existing traffic volumes and configurations, no background growth or additional traffic due to other developments but included traffic volumes from the BWTT operating at peak capacity.
– **Cumulative future case** – analysed intersection performance accounting for future background growth, growth due to major land use changes surrounding the site, and traffic volumes from the BWTT operating at peak capacity in 2020. This scenario considers the most current intersection configuration with a dedicated left turn bay into the site and the banning of through movements from the Perry Street and Site access approaches.

2.7.1 Intersection performance assessment criteria

Level of Service (LoS) is a typical measure used by transport professionals to assess the operational performance of roads and intersections based on the average delay experienced by all vehicles passing through the road segment or intersection. **Table 2-1** presents the LoS criteria for intersection performance, as defined in the *Traffic Modelling Guidelines* (Roads and Maritime Services, 2013).

Table 2-1 Level of Service Index

Level of Service	Average Delay per Vehicles (sec/h)	Traffic Signals / Roundabout	Give Way / Stop Signs
A	Less than 14.5	Good operation	Good operation
B	14.5 to 28.4	Good with acceptable delays and spare capacity	Acceptable delays and spare capacity
C	28.5 to 42.4	Satisfactory	Satisfactory, but incident study required
D	42.5 to 56.4	Operating near capacity	Near capacity and incident study required
E	56.5 to 70.4	At capacity, at signals incidents will cause excessive delays. Roundabouts require other control method.	At capacity, requires other control method
F	70.5 or greater		

Source: Roads and Maritime Services, 2013, Traffic Modelling Guidelines and Akcelik & Associates, 2024, SIDRA Intersection User Guide

2.7.2 Intersection performance

The outcomes of the intersection modelling are presented in **Table 2-2** based on a modelling assessment using SIDRA Intersection 9 software.

The SIDRA results show long delays at the Beauchamp Road | Denison Street intersection in scenarios with future traffic growth. Intersection performance does not drastically deteriorate with the addition of development traffic, with the largest increase in delay being 18.5 seconds, occurring during the AM peak for the cumulative future case. This reflects that the worsening of this intersection is mainly due to the background traffic growth rather than the BWTT development.

Table 2-2: Intersection performance for each scenario modelled as part of 2014 EIS

Intersection	Weekday AM period			Weekday PM period		
	Volume	Delay	LoS	Volume	Delay	LoS
Existing base case						
Beauchamp Road / Perry Street / site access	2,029	13.6s	A	1,970	12.8s	A
Beauchamp Road / Denison Street	1,915	35.6s	C	1,829	121.8s	F
Botany Road / Beauchamp Road	2,856	17.9s	B	2,899	17.9s	B
Future case - no development						
Beauchamp Road / Perry Street / site access	2,148	14.8s	B	2,108	12.9s	A
Beauchamp Road / Denison Street	2,093	104.3s	F	2,032	415.1s	F
Botany Road / Beauchamp Road	3,060	18.7s	B	3,159	19.5s	B
BWTT development case						
Beauchamp Road / Perry Street / site access	2,077	48.5s	D	1,998	26.5s	B
Beauchamp Road / Denison Street	1,925	38s	C	1,835	130.4s	F
Botany Road / Beauchamp Road	2,898	18.2s	B	2,925	18.6s	B
Cumulative future case						
Beauchamp Road / Perry Street / site access	2,196	20s	B	2,136	18.1s	B
Beauchamp Road / Denison Street	2,103	122.8s	F	2,038	428.2s	F
Botany Road / Beauchamp Road	3,102	19s	B	3,185	19.8s	B

Source: Hyder Consulting, 2014

3.0 Proposed modifications

3.1 The proposal

From a traffic and transport perspective, the main impact of the proposed modification is the transport by road of an additional 8,000 tpa of FOGO waste to a licensed organics processing facility. This would increase the on-road transportation of FOGO from 12,000 tpa to a maximum of 20,000 tpa under this MOD 3 application.

3.2 Trip generation and distribution

MOD 2 assumed that road transport of 12,000 tpa of FOGO waste was expected to generate three heavy vehicle trips per day. Road transport of an additional 8,000 tpa of FOGO waste is expected to generate two heavy vehicle trips per day. This is based on FOGO waste being transported over 250 days per year and 16 tonnes per truck.

Since this assessment is assessing the potential traffic impacts with reference to the 2014 EIS and original project approval, and MOD 2 did not update approved traffic volumes, the potential cumulative traffic impacts of MOD 2 and MOD 3 are assessed. That is, road transport of 20,000 tpa of FOGO waste is expected to generate five heavy vehicle trips per day.

In the original EIS, the proportion of putrescible waste vehicle trips generated in the AM and PM peak hours were estimated to be 6% and 2.4% of the daily trip generation, respectively. Given that the BWTT operates 24 hours a day, seven days a week, with no restrictions imposed on when heavy vehicles can enter the facility or travel on the surrounding road network, it is assumed that truck movements will generally be dispersed across the day.

Therefore, the five additional trucks per day could likely generate an increase of up to two truck movements (either in or out) during each AM or PM peak hour.

Trip distribution is expected to remain consistent with that given in the EIS, using an 80% / 20% directional split for vehicles entering and exiting the site from the south and north respectively. It is noted that from 6am to 8pm, all traffic must approach from the south via Botany Road, given the right turn restrictions into the site at the Beauchamp Road/Perry Street/ Site access intersection.

An 80% / 20% east / west directional split was assumed at the Botany Road / Beauchamp Road intersection for vehicles entering and exiting the site from the south.

4.0 Traffic and transport impact assessment

4.1 Road network impact

Under the cumulative future case assessed in the original EIS, the total intersection traffic in the peak hours at the Beauchamp Road | Denison Street intersection, the worst performing intersection, was 2,103 vehicles in the AM peak hour and 2,038 vehicles in the PM peak hour. The two additional truck movements forecast to be generated in the peak hours is about 0.1 per cent of the total intersection traffic in each peak hour.

This represents a negligible increase in traffic volume at the intersection and would have a negligible impact on traffic performance. It is also well within the daily fluctuations of traffic volumes on the surrounding road network.

4.2 Public transport impact

Given that trip generation is to be entirely from heavy vehicles transporting waste, with no expected additional staff to produce demand for public transport, there would be no impact on the bus network. The minor increase in heavy vehicle movements is also expected to have a negligible effect on bus operations.

4.3 Active transport impact

Given the site would not generate additional active transport demand, there would be no impact on the active transport network. The low number of additional vehicles entering and exiting the site is likely to have minimal impact on any walking and cycling activity in the area.

4.4 Road safety impact

Given the low traffic generation from the proposal, and that truck movements to and from the site are controlled by a traffic signal, impacts to road safety are expected to be minimal.

5.0 Conclusion

Veolia is proposing to increase road transport of food organic and garden organic waste (FOGO) from the BWTT to a licensed organic facility from 12,000 tpa to 20,000 tpa.

This traffic impact assessment confirms that the proposal is likely to have a negligible impact on the road network and transport system in the vicinity of the BWTT, given that:

– The facility operates 24 hours a day, seven days a week, and so additional heavy vehicle movements will be spread out across the day. Increases in traffic volumes during the surrounding road network's peak hours are expected to be up to two heavy vehicle movements in each AM and PM peak hour.

– The traffic generation would increase traffic volumes by about 0.1 per cent of the overall intersection throughput during the peak hours from those assessed in the 2014 EIS. This would have a negligible impact on traffic performance and is well within the daily fluctuations of traffic volumes on the surrounding road network.

– While a worst-case scenario of additional FOGO trucks has been assessed, Veolia has not and does not intend to transport non-putrescible waste by truck from BWTT. Therefore, the FOGO trucks will be accommodated within the total volume of trucks described in the EIS and approved by the original development consent.

– There is no forecast impact on the public transport and active transport networks or on road safety.

As the proposal would have a negligible impact on road network performance, public transport, active transport and road safety, no mitigation measures are deemed necessary.

Thoughtful Transport Solutions

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APPENDIX B

ACCOUSTIC REVIEW

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10 September 2025

MAC231866-02LR1V2

Attention: Neville Hattingh
Element Environment Pty Ltd
PO Box 1563
Warriewood NSW 2102

Dear Neville,

Acoustic Review – Banksmeadow Waste Transfer Terminal – SSD Modification 3

Cnr Beauchamp Road and McPherson Street, Banksmeadow, NSW

1 Introduction

Muller Acoustic Consulting Pty Ltd (MAC) understands that Element Environment Pty Ltd (Element) on behalf of Veolia Environmental Services (Australia) Pty Ltd (Veolia), require an Acoustic Review (AR) of the proposed changes to the operation of the Banksmeadow Waste Transfer Terminal (BWTT) at the corner of Beauchamp Road and McPherson Street, Banksmeadow, NSW. The AR is required to support the Modification 3 (the Modification) of State significant development consent SSD-5855.

The assessment has been undertaken in accordance with the following documents:

- NSW Environment Protection Authority (EPA), Noise Policy for Industry (NPI) 2017;
- NSW Department of Environment, Climate Change and Water (DECCW) – NSW Road Noise Policy (RNP), March 2011;

A glossary of terms, definitions and abbreviations used in this report is provided in **Appendix A**.

2 Project Overview

The BWTT currently operates under SSD-5855, granted by the NSW Planning Assessment Commission on 28 April 2015, for the construction and operation of a waste transfer terminal to receive, consolidate and transfer up to 400,000 tonnes per annum (tpa) of putrescible waste and 100,000tpa of non-putrescible waste.

Veolia is now seeking approval to modify development consent SSD-5855, under Section 4.55(1A) of the Environmental Planning and Assessment Act 1979 (EP&A Act), to allow:

- the receipt and transfer up to 500,000tpa of putrescible waste and up to 100,000tpa of non-putrescible waste, such that the combined total of putrescible and non-putrescible waste received does not exceed 500,000tpa;
- an increase in the amount of food and garden organic (FOGO) waste transported by road from 12,000tpa to 20,000tpa;
- the ability to transport FOGO by road to the TopSoil Organics facility at Forbes, or alternate organic offtake facilities;
- ability to receive FOGO waste from suppliers other than Inner West Council; and
- ability to transport non-putrescible waste by road to the proposed Veolia Materials Recycling Facility at Camellia, NSW, or alternate receiving facilities.

In summary, Veolia is not seeking to alter the total amount of waste permitted to be received at the BWTT each year (i.e. 500,000tpa), they are only seeking to alter the proportions of putrescible and non-putrescible waste able to be received. In addition, within the putrescible waste limit of 500,000tpa, Veolia is proposing to transport up to 20,000tpa of FOGO received from Inner West Council, by road (i.e. an increase of 8,000tpa over the amount currently allowed to be transported by road).

Increased road transport of FOGO from 12,000tpa to 20,000toa will generate two additional truck and dogs per day, or four additional heavy vehicle movements per day. The additional trucks will be accommodated within the overall 371 trucks per day, already assessed by the EIS for the approved project. Notwithstanding, to consider the potential worst-case scenario, the additional truck movements are assessed in addition to the consented 371 trucks per day. Considering Modification 2 of SSD-5855 (approved November 2023) took the same approach for assessing road transport of 12,000tpa of FOGO waste (three trucks) without making any changes to the project approval conditions, the cumulative total (five trucks additional to the original consent) is assessed herein.

3 Acoustic Review

3.1 Operational Noise Levels

MAC understands that the Modification would not require any changes to site activities, including plant and equipment. Existing site activities include:

- receival of waste material via road;
- feeding of waste compactors by front-end loaders;
- compaction of waste into a consolidated bale, which is inserted into shipping containers;
- movement of containers to storage area;
- loading of containers to trains or trucks; and
- delivery of waste from the site via road or rail.

Under the existing consent and supporting documents, Veolia has approval to generate up to 355 trucks per day for the delivery of putrescible and non-putrescible waste to the site, as well as 16 trucks per day transferring non-putrescible waste from the site. However, due to lack of a suitable receiving facility, very minimal quantities of non-putrescible waste are currently received at the BWTT, and none is transported by road from the site. Other plant and equipment used on site include trains, waste compactors, front-end loaders, and container handlers.

Based on the existing approved operations, it is anticipated that an increase of up to five trucks per day (ten heavy vehicle movements) would represent a negligible increase in noise generated at the site. Furthermore, a review of sensitive receivers has identified that the nearest residences (zoned industrial) are located approximately 150m to the east of the site, adjacent to Perry Street. Given the industrial nature of the locality and the high incidence of transportation noise (road, rail and aircraft), it is considered that the addition of five trucks per day on the subject site is unlikely to result in audible changes to noise imissions (received noise levels) at the nearest residential receivers.

3.2

Road Traffic Noise Assessment

Road traffic noise is assessed in accordance with the provisions of the NSW Road Noise Policy (RNP) (EPA, 2011). The RNP provides the following criteria for existing residences affected by additional traffic on existing freeways/arterial/sub-arterial roads generated by land use developments:

- Day period (7am to 10pm) – 60dB $LA_{eq(15hr)}$; and
- Night period (10pm to 7am) – 55dB $LA_{eq(9hr)}$.

Where existing road traffic noise levels already exceed the relevant criteria, the RNP recommends an increase criterion of up to 2dBA, which represents a minor impact that is considered barely perceptible to the average person.

MAC understands that upon leaving the site, trucks would typically turn right on to Beauchamp Road to access the M5 Motorway via Botany Road and Foreshore Road. Trucks may also access the M5 by turning left onto Beauchamp Road and then travelling along Bunnerong Road and Wentworth Avenue.

A review of aerial imagery identifies that there are no residential receivers adjacent to the travel route via Beauchamp Road, Botany Road and Foreshore Road. Where vehicles travel via the Beauchamp Road, Bunnerong Road and Wentworth Avenue route, the nearest residential receivers are located approximately 15m from the centreline of Beauchamp Road.

A review of the Transport for NSW *Traffic Volume Viewer* indicates that there are no existing traffic volume data for Beauchamp Road. Hence, the assessment has calculated the relative increase in site generated road traffic noise levels, based on the proportional increase in proposed truck movements relative to the existing approved truck movements.

An increase of ten heavy vehicle movements (ie five trucks) above the 742 existing approved heavy vehicle movements (ie 371 trucks), equates to an increase in site generated truck movements of approximately 1.3%, or an increase in road traffic noise levels of approximately 0.06dB $LA_{eq(period)}$. For reference, to achieve an increase of at least 2dBA, which represents the RNP increase criterion, the site would need to generate at least 60% additional truck movements. Hence, the potential increase in road traffic noise levels, as a result of the Modification, is considered to be negligible and would not be discernible to the human ear.

4 Concluding Statement

Muller Acoustic Consulting Pty Ltd (MAC) has undertaken an Acoustic Review of proposed road transport of waste from the Banksmeadow Waste Transfer Terminal (BWTT) at the corner of Beauchamp Road and McPherson Street, Banksmeadow, NSW.

The Acoustic Review has demonstrated that road transport of up to 20,000tpa of FOGO waste (five trucks additional to what the EIS assessment assumed for the original project, and including the cumulative total of Modification 2 and this Modification) would result in a relative increase in road traffic noise levels of approximately 0.06dBA, which is significantly lower than the RNP +2dB increase criterion. Hence, it is considered that the increase in heavy vehicle movements generated by the Modification would result in a negligible increase in road traffic noise levels, which would not be discernible to the human ear.

A review of existing approved operations and the proximity of the site to the nearest sensitive receivers has demonstrated that the Modification is unlikely to result in audible changes to noise imissions at the nearest residential receivers.

Based on the above findings, there are no noise related issues which would prevent the approval of the Modification.

We trust the above information is satisfactory and if you have any further question regarding the Acoustic Review please contact the undersigned.

Yours sincerely

Dale Redwood
Lead Acoustic Consultant
BSc (Hons) | MAAS
dredwood@mulleracoustic.com
Reviewed: Oliver Muller, Principal Acoustic Scientist, BSc (REM & HGeog) | MAAS

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Appendix A – Glossary of Terms

A number of technical terms have been used in this report and are explained in **Table A1**.

Table A1 Glossary of Acoustical Terms

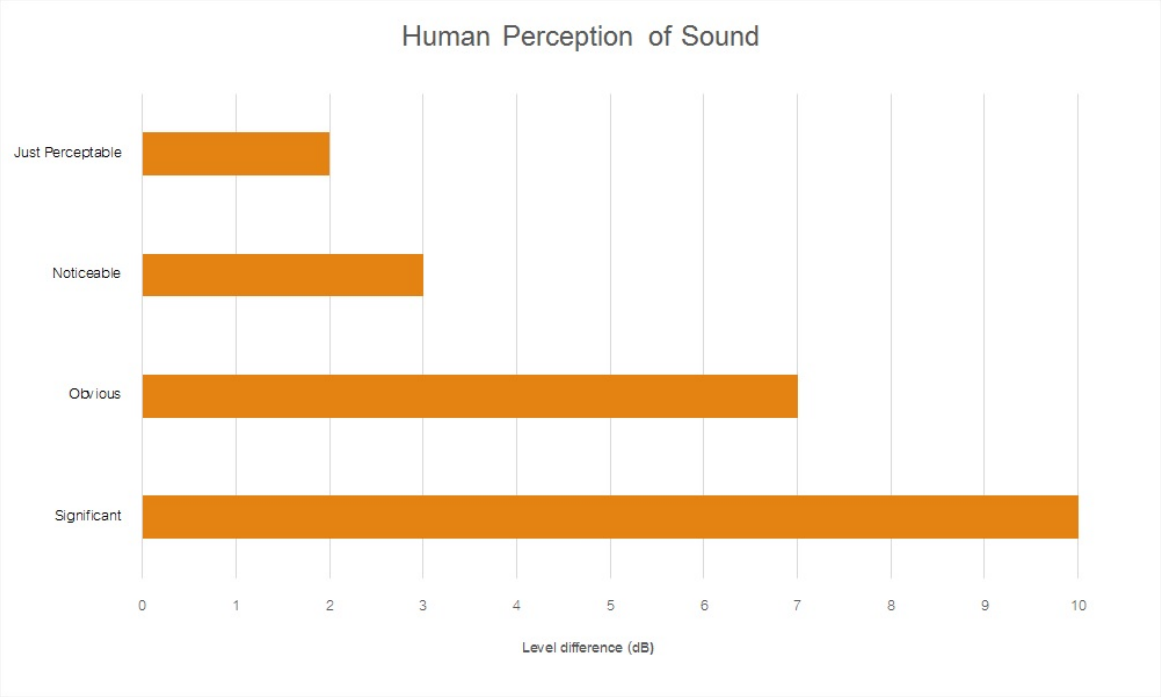
Term	Description
1/3 Octave	Single octave bands divided into three parts
Octave	A division of the frequency range into bands, the upper frequency limit of each band being twice the lower frequency limit.
ABL	Assessment Background Level (ABL) is defined in the NPI as a single figure background level for each assessment period (day, evening and night). It is the tenth percentile of the measured L90 statistical noise levels.
Ambient Noise	The total noise associated with a given environment. Typically, a composite of sounds from all sources located both near and far where no particular sound is dominant.
A Weighting	A standard weighting of the audible frequencies designed to reflect the response of the human ear to sound.
Background Noise	The underlying level of noise present in the ambient noise, excluding the noise source under investigation, when extraneous noise is removed. This is usually represented by the LA90 descriptor
dBA	Noise is measured in units called decibels (dB). There are several scales for describing noise, the most common being the 'A-weighted' scale. This attempts to closely approximate the frequency response of the human ear.
dB(Z), dB(L)	Decibels Z-weighted or decibels Linear (unweighted).
Extraneous Noise	Sound resulting from activities that are not typical of the area.
Hertz (Hz)	The measure of frequency of sound wave oscillations per second - 1 oscillation per second equals 1 hertz.
LA10	A sound level which is exceeded 10% of the time.
LA90	Commonly referred to as the background noise, this is the level exceeded 90% of the time.
LAeq	Represents the average noise energy or equivalent sound pressure level over a given period.
LAmax	The maximum sound pressure level received at the microphone during a measuring interval.
Masking	The phenomenon of one sound interfering with the perception of another sound. For example, the interference of traffic noise with use of a public telephone on a busy street.
RBL	The Rating Background Level (RBL) as defined in the NPI, is an overall single figure representing the background level for each assessment period over the whole monitoring period. The RBL, as defined is the median of ABL values over the whole monitoring period.
Sound power level (Lw or SWL)	This is a measure of the total power radiated by a source in the form of sound and is given by 10.log10 (W/Wo). Where W is the sound power in watts to the reference level of 10^{-12} watts.
Sound pressure level (Lp or SPL)	the level of sound pressure; as measured at a distance by a standard sound level meter. This differs from Lw in that it is the sound level at a receiver position as opposed to the sound 'intensity' of the source.

Table A2 provides a list of common noise sources and their typical sound level.

Table A2 Common Noise Sources and Their Typical Sound Pressure Levels (SPL), dBA

Source	Typical Sound Pressure Level
Threshold of pain	140
Jet engine	130
Hydraulic hammer	120
Chainsaw	110
Industrial workshop	100
Lawn-mower (operator position)	90
Heavy traffic (footpath)	80
Elevated speech	70
Typical conversation	60
Ambient suburban environment	40
Ambient rural environment	30
Bedroom (night with windows closed)	20
Threshold of hearing	0

Figure A1 – Human Perception of Sound



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APPENDIX C

ODOUR MEMO

TODOROSKI AIR SCIENCES
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29 September 2025

Mark Terei
Principal Environmental Consultant
Element Environment
Via email: mark.terei@elementenvironment.com.au

RE: Odour Memo for Veolia Banksmeadow Transfer Terminal Modification 3

Dear Mark,
Todoroski Air Sciences has reviewed the proposed modifications associated with the Veolia Banksmeadow Transfer Terminal (Modification 3) and considered whether a detailed air quality impact assessment is required to accompany the Modification Report.

It is understood that Modification 3 would involve the following:

- the receipt and transfer up to 500,000 tonnes per annum (tpa) of putrescible waste and up to 100,000tpa of non putrescible waste, such that the combined total of putrescible and non-putrescible waste received does not exceed 500,000tpa;
- an increase in the amount of food and garden organic (FOGO) waste transported by road from 12,000tpa to up to 20,000tpa;
- ability to transport FOGO by road to the TopSoil Organics facility at Forbes, NSW, or alternate organic offtake facilities; and,
- ability to transport non-putrescible waste by road to the proposed Veolia Materials Recycling Facility at Camellia, NSW, or alternate receiving facilities.

Currently approved operations at the site allow for the receival and transfer of up to 400,000tpa of putrescible and 100,000tpa of non-putrescible waste. Modification 3 would effectively allow for the transfer of up to 100,000tpa more putrescible waste in place of the approved non-putrescible amount, with no change to the total volume of waste accepted. This change could result in increased odour emissions due to the higher proportion of putrescible waste.

The *Banksmeadow Transfer Terminal – Air Quality Impact Assessment* (AQIA) (**Wilkinson Murray, 2014**) assessed odour impacts under two operational scenarios: a typical operating day (400,000tpa of putrescible waste) and a worst-case day (500,000tpa of putrescible waste). Odour emission assumptions were based on actual odour measurements from a similar operating facility at Clyde. The facility was subsequently approved for the transfer of 400,000tpa, consistent with the typical day scenario, which demonstrates that the

assessment was suitably robust. This also indicates that worst-case day scenario of 500,000tpa, as proposed under Modification 3, would remain appropriate.

The AQIA concluded that predicted odour levels under both scenarios would comply with the applicable odour impact assessment criteria and that the facility could operate without causing adverse air quality impacts. While results showed compliance with the most stringent 2 OU criterion at nearby residential receptors, higher levels (still within acceptable limits) were predicted at the adjacent industrial and commercial receptors. The surrounding land use has not materially changed since the preparation of the AQIA, with residential and industrial areas remaining in their original locations; therefore, no adjustment to the assessment is warranted in this regard.

It is noted that the AQIA applied the 2005 version of the *Approved Methods for Modelling and Assessment of Air Pollutants in New South Wales*, which has since been updated in 2022. The updated Approved Methods did not alter the odour impact assessment criterion, and accordingly the conclusions of the AQIA remain valid.

A review of the odour complaints in the *Annual Environmental Management Report – Banksmeadow Transfer Terminal 2023-2024* (AEMR) (**Veolia, 2024**) found three odour complaints during the reporting period, all of which were from the adjacent industrial facility. This low complaint rate aligns with the AQIA predictions and suggest the current odour control are effective.

The additional transport of FOGO material by road is not expected to result in any tangible change to odour impacts at the site. Handling and transfer of FOGO will occur entirely within the enclosed building, under the same operational conditions as existing putrescible waste. The vehicles transporting FOGO will be fully covered, will only briefly transit the site, and will not represent a significant additional odour source.

FOGO does not present a different odour profile to general putrescible waste. Under current household waste management practices, FOGO is separated into the green-lid bin rather than disposed of in the red-lid bin. In effect, this material would previously have been part of the putrescible waste stream that was included in the original odour sampling and assessment for the facility. The separation of FOGO does not introduce new odorous characteristics; rather, it represents a reclassification of the same waste stream. Accordingly, the odour profile of the facility is not expected to differ from that assessed in the AQIA.

Based on our review of the AQIA and odour-related complaints in the AEMR, the facility appears to be operating as intended, and odour controls are considered effective. The potential impacts of Modification 3 have already been addressed in the AQIA, and no further quantitative assessment is considered necessary, as the predicted impacts are already presented (refer to Figure 8-4 of the AQIA). Existing odour controls and regular odour audits will continue to apply for the proposed Modification and ensure odour is managed from the operation.

Please feel free to contact us if you would like to clarify any aspect of this memo

Yours faithfully,
Todoroski Air Sciences

Philip Henschke

References

Veolia (2024)

"Annual Environmental Management Report – Banksmeadow Transfer Terminal 2023-2024", prepared by Veolia, June 2024.

Wilkinson Murray (2014)

"Banksmeadow Transfer Terminal – Air Quality Impact Assessment", prepared for Veolia Environmental Services c/- Hyder Consulting Pty Ltd by Wilkinson Murray, April 2014.

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