



Waste Management Plan

125 and 145-175 Lawson Rd, Badgerys Creek

Formus Property Pty Ltd

Level 26, 1 O'Connell Street,
Sydney NSW 2000

Prepared by:

SLR Consulting Australia

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Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
5.0	6 February 2026	Andrew Quinn	Gavin Hull	Andrew Quinn

Basis of Report

This report has been prepared by SLR Consulting Australia (SLR) with all reasonable skill, care and diligence, and taking account of the timescale and resources allocated to it by agreement with Formus Property Pty Ltd (the Client). Information reported herein is based on the interpretation of data collected, which has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of the Client. No warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from SLR.

SLR disclaims any responsibility to the Client and others in respect of any matters outside the agreed scope of the work.



Executive Summary

This waste management plan has been prepared by SLR Consulting Australia Pty Ltd in support of a development at 125 and 145-175 Lawson Road, Badgerys Creek (the site), including detailed approval for an industrial estate. The project seeks to deliver a new Industrial Estate comprising large and small format warehousing and distribution centres within Badgerys Creek.

The legal description of the site is outlined in Table 3 below.

Table 1 Legal Description

Property Address	Title Description
125 Lawson Road, Badgerys Creek	Lot 1 in DP226912
145 Lawson Road, Badgerys Creek	Lot 3 in DP226912
155 Lawson Road, Badgerys Creek	Lot 4 in DP226912
165 Lawson Road, Badgerys Creek	Lot 5 in DP226912
175 Lawson Road, Badgerys Creek	Lot 6 in DP226912

This WMP applies to the waste generated from the site preparation, demolition, construction and operational stages of the development using architectural drawings provided by the Client.

This WMP has been prepared to support a state significant development application (SSDA), SSD- 81662708 and in response to the requirements contained in the Secretary's Environmental Assessment Requirements (SEARs) dated 23 April 2025 and issued for the SSDA (SSD-81662708).

This report concludes that the proposed development is suitable and warrants approval subject to the implementation of the following mitigation measures.

- Separation of waste and recyclables for recovery or appropriate disposal.

Following the implementation of the above mitigation measures, the remaining impacts are appropriate.



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1.0 Introduction and Project Description

This waste management plan has been prepared by SLR Consulting Australia Pty Ltd in support of a development at 125 and 145-175 Lawson Road, Badgerys Creek (the site), including detailed approval for an industrial estate. The project seeks to deliver a new Industrial Estate comprising large and small format warehousing and distribution centres within Badgerys Creek.

Specifically, the SSDA seeks approval for the following:

- Construction of an industrial estate, comprising four warehouse buildings with a total of 46,153.9 m² of warehouse and ancillary office gross floor area (GFA). It will deliver a range of large and small format warehouse and distribution centres, as follows:
 - Warehouse 1 has a total GFA of 40,505.5 m²
 - – Warehouse GFA: 38,572.0 m²
 - – Office GFA: 1,877.5 m² plus 60 m² dock office
 - Warehouse 2 has a total GFA of 1,328 m²
 - – Warehouse GFA: 1,186 m²
 - – Office GFA: 142 m²
 - Warehouse 3 has a total GFA of 1,323 m²
 - – Warehouse GFA: 1,186 m²
 - – Office GFA: 137 m²
 - Warehouse 4 has a total GFA of 2,997 m²
 - – Warehouse GFA: 2,826.5 m²
 - – Office GFA: 140.9 m²
- Maximum building height of 19.6 m
- Provision of 233 on-site parking spaces split across the site.
- Construction of a private internal driveway along the northern boundary of 125 Lawson Road servicing Warehouses 2-4.
- Construction of Regional Basin.
- Associated landscaping work and deep soil areas comprising communal open space areas.
- Provision of road corridors providing an option for future delivery of local roads by the relevant roads authority.

The design for the development is shown in Figure 1 below.



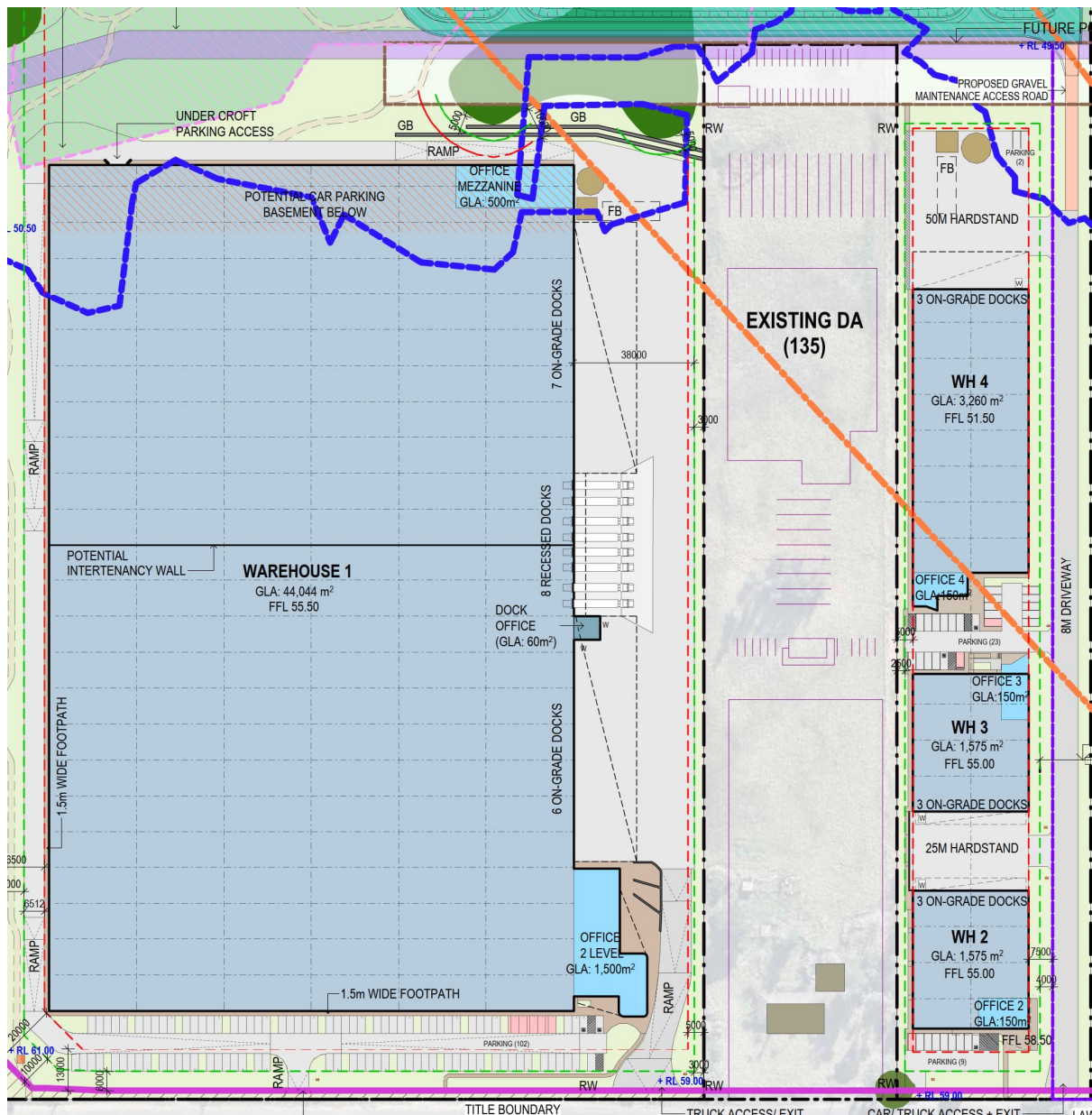


Figure 1 – Proposed warehouses

2.0 Purpose of the Report

2.1 SEARs

This WMP has been prepared in response to the requirements contained in the Secretary's Environmental Assessment Requirements (SEARs) dated 23 April 2025 and issued for the SSDA (SSD-81662708). The relevant requirements of the SEARs have been addressed using the Western Sydney Aerotropolis DCP 2022 (WSADCP) and Liverpool Development Control Plan 2008 (LDCP)¹ as guides. Specifically, this report has been prepared to respond to the SEARs requirements issued for waste management which are shown in Table 2 below.



Table 2 SEARs

Description of requirement	Section reference (this report)
<p>Waste Details of the quantities and classification of all waste streams to be generated on site during the development</p>	<p>For demolition and construction waste, please refer to:</p> <ul style="list-style-type: none"> • Table 4 Potential site preparation and construction waste types, classifications and management methods • Section 8.2 Waste Streams and Classifications • Section 8.3 Site Preparation Waste Types and Quantities • Section 8.4 Construction Waste Types and Quantities <p>For operational waste please refer to:</p> <ul style="list-style-type: none"> • Table 10 Potential waste types, classifications and management methods for operational waste • Section 9.2 Waste Streams and Classifications • Section 9.3 Estimated Quantities of Operational Waste.
<p>Details of waste storage, handling and disposal during the development, including consideration of impacts on the operations of Western Sydney Airport</p>	<p>For construction and site preparation waste please refer to:</p> <ul style="list-style-type: none"> • Section 8.7 Waste Segregation, Storage and Servicing <p>For operational waste please refer to:</p> <ul style="list-style-type: none"> • Section 9.7 Waste Avoidance, Reuse and Recycling • Table 10 Potential waste types, classifications and management methods for operational waste <p>For compliance with WSADCP please refer to Section 11.0 Compliance with the WSADCP</p>
<p>Details of the measures that would be implemented to ensure the development is consistent with the aims, objectives and guidance in the NSW Waste and Sustainable Materials Strategy 2041.</p>	<p>The NSW Waste and Sustainable Materials Strategy 2041 sets a target of 80% average recovery rate from all waste streams by 2030. The diversion of waste from landfill during the site preparation, construction and operational phases of the project will help achieve the targets. See</p> <ul style="list-style-type: none"> • Section 9.1 Targets for Resource Recovery • Section 9.1 Targets for Resource Recovery.

2.2 Government Agency Comments

Government agency comments are shown in this section with responses and where they are addressed in the WMP.

2.2.1 Liverpool City Council

Site Plans

Detailed site plans for the proposed facility shall be submitted with the Application and include:

- *Environmental safeguards such as trafficable bunds installed at the entry and exits of chemical and waste storage areas to prevent contamination of the surrounding environment;*
- *An enclosed building for the complete storage of chemicals and waste;*

¹ <https://www.liverpool.nsw.gov.au/development/liverpools-planning-controls/liverpool-development-control-plan>



Both the WSADCP and LDCP require waste storage areas to be 'screened', so in that sense they will be enclosed.

Waste Management

The Application shall specify how refuse and waste will be managed during site preparation, construction and operation. Suitable waste storage facilities are to be provided as part of the proposal. The garbage/waste storage areas shall be clearly identified on the site plans. The designated garbage/waste storage areas shall comply with the following requirements:

- a) The rooms shall be fully enclosed and provided with a concrete floor, and with concrete or cement rendered walls covered to the floor;*
- b) Provided with a hose cock for hosing the garbage bin bay and a sewerage drainage point in or adjacent to the bin storage area. The drainage point should have a fine grade drain cover sufficient to prevent coarse pollutants from entering the sewer. If the hose cock is located inside the bin storage bay, it is not to protrude into the space indicated for the placement of bins;*
- c) The room shall have a floor waste which is to consist of a removable basket within a fixed basket arrestor and is to comply with Sydney Water requirements; and*
- d) The room must include a tight-fitting, self-closing door and mechanical ventilation.*

How waste will be managed during site preparation, construction and operation are detailed in Section 8.0 Site Preparation and Construction Waste and Recycling Management and Section 9.0 Operational Waste and Recycling Management of this WMP.

Waste storage areas are clearly identified on the site plans. Please see Figure 6 - Waste storage areas.

Council's letter sets out requirements for waste storage areas that are not specified in the WSADCP or the LDCP. These include being fully enclosed, having a concrete floor and concrete walls, a hose cock, sewerage drainage point, a floor waste drain, tight-fitting, self-closing door and mechanical ventilation.

The assumption is that the waste storage area will be a room. Enclosed waste rooms are typically not used in warehouse developments such as that proposed and while some of the requirements in Council's letter may be included, others are not appropriate. The waste storage areas will be screened as required in the WSADCP and LDCP.

2.2.2 Western Sydney Airport

This response states that:

Given the close proximity of the proposed development to WSI, the future parallel runway and its direct interfaces with Badgerys Creek, Pitt Street and Lawson Road the following will need to be addressed in the environmental assessment:

- The preparation of an Aviation Impact Assessment that addresses Part 4.3 of the State Environmental Planning Policy (Precincts – Western Parkland City) 2021, particularly in relation to aircraft noise, wildlife hazards (landscaping and waste management), lighting, airspace operation and public safety.*



An Aviation Impact Assessment is not within the scope of this waste management plan. Having said that, the WMP complies with the requirements of the WSADCP which addresses wildlife hazards. The bins proposed for the development have fixed lids and suitable enclosures are proposed for waste storage as required in the WSADCP.

Wildlife Hazards

The site is located within the 3 km Wildlife Buffer. Given the site location in relation to future flight paths and the extent of landscaping and bioretention basins, therefore the proposed development should address the following to minimise wildlife attraction:

- *The design and management of waste storage areas/receptacles during construction.*
- *External handling and storage of organic materials.*

The design and management of waste storage areas and receptacles during construction will be managed in accordance with the requirements of the Aviation Impact Assessment required by Western Sydney Airport.

Organic materials are not proposed to be collected at the development. Specialised storage for organics waste is not proposed and its future installation will depend on the tenant and the particular operations at the development.

3.0 The Site

The site is located at 125 and 145-175 Lawson Road, Badgerys Creek in Liverpool City Council area. The legal description of the site is outlined in Table 3 below.

Table 3 Legal Description

Property Address	Title Description
125 Lawson Road, Badgerys Creek	Lot 1 in DP226912
145 Lawson Road, Badgerys Creek	Lot 3 in DP226912
155 Lawson Road, Badgerys Creek	Lot 4 in DP226912
165 Lawson Road, Badgerys Creek	Lot 5 in DP226912
175 Lawson Road, Badgerys Creek	Lot 6 in DP226912

The location of the site is shown in Figure 2 below.





Figure 2 - Site location

It is important to note 135 Lawson Road is not owned by the applicant and is not applicable to this project. Hanson Construction Materials Pty Ltd owns this property which is subject to a development application (DA-1368/2021). DA-1368/2021 was lodged with Liverpool Council in 2021 for the construction and use of a concrete batching plant facility. In February 2025 it was addressed at the Liverpool Local Planning Panel in which it was refused.

4.0 Objectives

This WMP applies to the waste generated from the site preparation, construction and operational stages of the development using architectural drawings provided by the Client.

The objectives of this WMP are to:

- Identify potential waste likely to be generated during the site preparation and construction works and operation of the Development.
- Provide advice on how identified waste should be stored, handled, processed, disposed of, re-used or recycled in accordance with Council's requirements, relevant Australian codes and standards, such as NSW Waste and Sustainable Materials Strategy 2041, and better practice waste minimisation principles.
- Help implement safe and practical options for waste collection from the Development by private waste servicing contractors.
- Encourage waste avoidance and minimisation through design, ordering and planning.



5.0 Better Practice for Waste Management and Recycling

5.1 Waste Management Hierarchy

This WMP has been prepared in line with the waste management hierarchy shown in Figure 3. The hierarchy summarises the objectives of the *Waste Avoidance and Resource Recovery Act 2001*.

The waste management hierarchy comprises the following principles, from most to least preferable:

- Waste **avoidance**, prevention or reduction of waste generation. Achievable through better design and purchasing choices.
- Waste **reuse**, reuse without substantially changing the form of the waste.
- Waste **recycling**, treatment of waste that is no longer usable in its current form to produce new products.
- Energy **recovery**, processing of residual waste materials to recover energy.
- Waste **treatment**, reduce potential environmental, health and safety risks.
- Waste **disposal**, in a manner that causes the least harm to the natural environment.

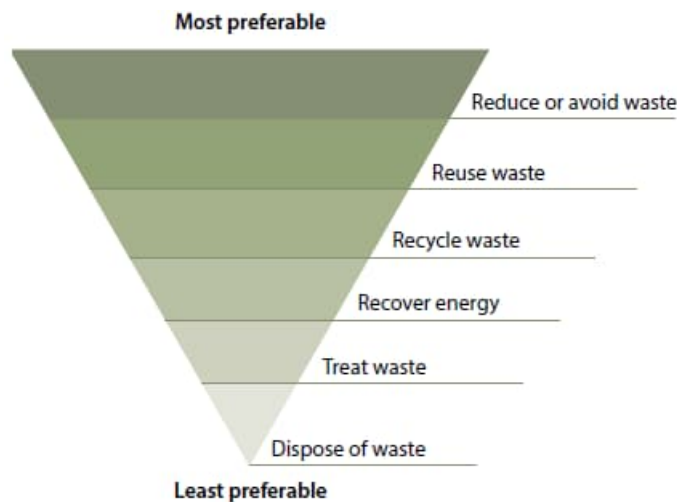


Figure 3 - Waste management hierarchy

5.2 Benefits of Adopting Better Practice

Adopting better practice principles in waste minimisation offers significant benefits for organisations, stakeholders and the wider community. Benefits from better practice waste minimisation include:

- Improved reputation of an organisation due to social and environmental responsibility.
- Lowered consumption of non-renewable resources.



- Reduced environmental impact, for example, pollution from materials manufacturing and waste treatment.
- Reduced expenses from lower waste disposal.
- Providing opportunities for additional revenue streams through beneficial reuse.

6.0 Waste Management Specialist

This waste management plan was prepared by Andrew Quinn, an environmental consultant with more than 30 years' experience in waste management. He has worked for the NSW EPA, waste management contractors and consultants. He has a Bachelor of Applied Science, University of Technology Sydney (2000), Master of Environmental Studies, Macquarie University (2009) and has lectured in waste management at the University of NSW.

His experience includes waste management plans for new developments, transfer station and resource recovery facility concept design and master planning, operational systems assessments, expert witness and due diligence for waste projects, waste chapters for EISs, contract and tender preparation, tender assessment and evaluation, resource recovery technology research, resource recovery management strategy and policy development, data analysis, managing and conducting waste audits of residential, commercial, industrial, landfill and MRF streams and in remote locations.

Andrew prepared the *Better Practice Guidelines for Waste Management and Recycling in Commercial and Industrial Facilities*, the NSW EPA's official guide to waste management in commercial and industrial developments. He has also prepared hundreds of waste management plans for new developments. Warehouse and logistics projects most relevant to this project include, among many others:

- Oakdale Development, Kemps Creek, NSW
- 14 Aquatic Drive, Frenchs Forest, NSW
- 4-10 Talavera Road, Macquarie Park, NSW
- M7 Business Park, Eastern Creek, NSW
- 115 Dunning Ave, Rosebery, NSW
- 20 Holbeche Road, Arndell Park, NSW
- Southern Distribution Centre, NSW
- 202 Euston Rd, Alexandria, NSW
- 50 Airds Rd, Minto, NSW
- 49 Stephen Road, Banksmeadow, NSW
- 27 Frank St, Wetherill Park, NSW
- Westlink Kemps Creek Logistics Masterplan, NSW
- Lidcombe Business Park, NSW
- Logistics Park, Horsley Park, NSW
- Leppington Industrial Estate, Leppington, NSW
- Bringelly Road Business Hub, Leppington, NSW.



7.0 Waste Management Guidance

7.1 Western Sydney Aerotropolis DCP 2022

The WSA DCP makes a number of references to waste management. Only those most relevant are detailed below, for example, references to residential developments are omitted. Where necessary, commentary is also provided on their application in this development.

2.7 Parking design and access

PO7 Vehicle access arrangements and queuing areas on a site shall minimise any adverse impact on infrastructure, road networks, safety, adjoining properties, amenity, and street trees.

- 5. Where the entry to a parking space is also the entry to a waste collection area, access should be possible via a PIN pad and code, to avoid the need for waste truck drivers to carry keys or access cards/fobs with them.*

This is will be installed at the site if necessary.

2.9 Service and loading design

PO1 Provide on-site loading and servicing that meets the demand generated by the development.

- 2. All servicing, including waste and recycling collection, to be carried out wholly within the site with collection points at convenient locations.*

This is the case for this development.

2.10.3 Wildlife Hazards

PO1 Development does not attract wildlife which would create a safety hazard to the operations of the Airport.

- 1. All waste bins are designed and installed with fixed lids.*
- 2. Any bulk waste receptacle or communal waste storage area is contained within enclosures that cannot be accessed by birds or flying foxes.*

The bins proposed have fixed lids and suitable enclosures are proposed for waste storage.

2.11 Services and Utilities

PO5 Infrastructure allows for co-location of compatible similar uses.

- 1. Allow for the installation of the following within the utility corridor:*
 - b. Vacuum waste collection system.*

This is not relevant in this particular development.



2.16 Waste Management and Circular Economy

Objectives

O1. Incorporate well-designed and innovative waste and recycling facilities in the building design stage.

O3. Minimise the amount of waste generated and going to landfill.

O4. Maximise waste separation and resource recovery.

O5. Provide innovative and best practice waste management collection systems and technologies for reuse, recycling, organics collection and product stewardship.

O6. Provide waste and recycling facilities that do not impact on amenity for residents, neighbours and the public, such as visually unpleasant areas, noise, traffic and odours from waste collection services, while also ensuring facilities are accessible, integrated wholly within the built form and easy to use.

The aim of the waste system at this development is to achieve these requirements.

PO1 Waste management measures are implemented at lot and neighbourhood scale to support circular economy activities.

1. Submit a waste management plan to support circular economy activities that also details the quantity and type of waste generated and how this will be managed, reused and recycled. Where possible, incorporate technologies such as vacuum extraction or on-site food processing.

A vacuum waste system is not proposed for this development. On-site food processing, whether composting, worm farms, dehydrators or small-scale anaerobic digestion, is not proposed for the development at this stage as the quantities of food are not known. The viability of an on-site food processing unit will depend on available quantities and types of food and the particular use for the development. Space is available should tenants wish to install an on-site food processing system in the future.

2. Co-locate and integrate waste infrastructure on sites with multiple uses by providing a single collection point for waste and recycling.

This is not relevant to this development.

3. Demonstrate that organic waste can be managed in the building through measures such as:

a. Multiple options for on-site organic waste to maximise recovery (e.g. communal composting, worm farms, individual composting, dehydrators);

c. Energy generation from organic waste (anaerobic digestion) at lot and precinct scale.

Please refer to the previous comment about on-site food processing



PO2 Waste and recycling facilities promote waste separation and reduce contamination. Materials are separated at source to achieve higher value recovery.

Source separation is proposed according to Liverpool Council's documentation.

1. Collection points (including but not limited to reverse vending machines and e-waste drop-off) must be located with adequate space for servicing, ease of use and to encourage the separation of waste material. Collection points are documented in the waste management plan and are easily accessible.

This is the case for this development.

2. Provide separate and enclosed storage for liquid, chemicals, and hazardous waste.

Space has been allowed for these waste streams should they be generated during the operational stage.

4. Consolidated organic waste drop off points are designed to minimise any potential odour and vermin risks. This includes the provision of rooms that are temperature controlled and suitably ventilated.

Specialised storage for organics waste is not proposed and its future installation will depend on the tenant and the particular operations at the development.

PO3 The location of waste management is clearly indicated for each site and neighbourhood.

1. Provide uniform waste management design and colour coding in accordance with AS 4123 across residential and commercial developments.

This is the case for this development.

2. Waste management systems and rooms are located inside buildings to support a heightened amenity and urban design outcome. Waste must not be left outside (excluding during collection) to avoid attracting animals.

Screened waste areas are proposed to be adjacent to buildings.

PO4 Waste bins are provided to a level commensurate with waste produced for each development as outlined in Council's waste and recycling service.

1. Waste storage areas are designed to:

- a. Accommodate the required number and size of waste bins;*
- b. Provide space for the bins to be accessed, rotated and manoeuvred for emptying;*
- c. Allow for future waste separation practices; and*
- d. Account for different uses in mixed use development through the provision of separate and enclosed collection rooms for both residential and commercial uses.*



This is the case for this development.

PO5 Implement innovative waste management storage systems that are safe, healthy, and efficient.

1. *Waste storage areas are to:*
 - a. *Be well-lit and ventilated;*
 - b. *Include water and drainage facilities for cleaning the bins and bin storage area;*
 - c. *Be easily and conveniently accessible for all users and collection contractors;*
 - e. *Comply with Local Council Policy and contractual service provisions.*
2. *Collection and loading points are to be:*
 - a. *Level;*
 - b. *Free of obstructions;*
 - c. *Easily accessible from the nominated waste and recycling storage area;*
 - d. *Be integrated wholly within the built form to support a heightened amenity outcome;*
 - e. *Be accessible by heavy rigid collection vehicles to permit entry and exit of the site in a forward direction;*
 - f. *Comply with the Building Code of Australia and Relevant Australian Standards; and*
 - g. *Comply with Local Council Policy and contractual service provisions.*
3. *Provide safe and easy access to waste and resource recovery areas for residents, building managers and collection contractors.*
4. *Ensure waste and recycling areas flexibly adapt to other types of waste and materials storage over time.*
5. *Design waste and recycling facilities to prevent litter and contamination of the stormwater drainage system.*

This is the case for this development.

PO6 Waste management storage systems minimise negative impacts on the streetscape, public domain, building presentation or amenity of pedestrians, occupants, and neighbouring sites.

1. *Waste storage and collection areas are to:*
 - a. *Where possible, be integrated wholly within the developments built form;*



- b. Not be visible from the street or public domain;*
 - c. Not adjoin private open space, windows, habitable rooms, or clothes drying areas;*
 - d. Not be located within front setbacks; and*
 - e. Comply with Local Council Policy and contractual service provisions.*
- 2. Collection points and systems are designed to minimise noise for occupants and neighbours during operation and collection.*

This is the case for this development.

PO7 Recognise waste types, generation rates and separation needs may change during the useful life of a building.

- 1. Waste and resource recovery facilities are sited to enable possible future expanded floor area.*
- 2. Design waste and resource recovery facilities to enable installation of new, potentially larger equipment*

This is the case for this development.

3.2 Parking and travel management

PO2 To promote efficient and safe vehicle circulation, manoeuvring and parking (including service vehicles and bicycles).

- 6. All loading and unloading areas are to be:*
 - b. Separated from car parking and waste storage and collection areas.*

This is the case for this development.

7.2 Aerotropolis DCP 2022 – Appendices. November 2022

This document makes a number of references to waste management. The most relevant are detailed below.

D.7 Aviation Safeguarding Assessment

Wildlife Hazards (Wildlife Hazard Assessment and Wildlife Management Plan)

- *A waste management plan for the operation of the use must be submitted for the following uses within the 3 km, 8 km and 13 km buffer:*
 - a. Agriculture;*
 - b. Agricultural produce industry;*
 - c. Aquaculture;*
 - d. Camping Grounds;*



- e. *Eco-tourist facility;*
- f. *Food and Drink Premises;*
- g. *Garden Centre;*
- h. *Hotel;*
- i. *Intensive plant agriculture;*
- j. *Intensive livestock agriculture;*
- k. *Kiosk;*
- l. *Livestock processing industry*;*
- m. *Plant Nursery;*
- n. *Recreation facility (outdoor); and*
- o. *Recreation facility (major).*

'Warehouse' is not among the listed uses.

D.46 Waste Management Plan

- *A Waste Management Plan details the volumes and types of waste that will be generated by the development. It also details where waste containers will be stored, size of bin rooms, location of any planned equipment for treating waste, or systems for transferring waste (such as chutes), location of collection points and the ongoing management of collection of waste and recycling during operation. A waste management plan is also required for demolition and construction stage of the development.*
- *All new commercial, mixed use and residential flat buildings or additions to these development types are to prepare a waste management plan.*
- *Refer to the Better practice guide for resource recovery in residential developments for more information on how to prepare a waste management plan and for calculating commercial and industrial waste and residential waste and recycling generation rates.*

This waste management plan complies with these requirements.

7.3 Aviation Safeguarding Guidelines – Western Sydney Aerotropolis and surrounding areas. November 2022

This documents states that:

Under the Western Parkland City SEPP and the Aerotropolis DCP:

3. *development applications for specified uses on land within the 13 km buffer zone must be accompanied by a waste management plan for the operation of the use of the land.²*

² Page 17



7.4 Liverpool Development Control Plan 2008

Part 1 General Controls for all Development

14. Demolition of Existing Developments

Section 14 of Part 1 of the DCP relates to demolition of existing developments. The relevant sections state that:

Demolition

6. Asbestos, if identified in the building, must be removed and disposed of in accordance with the requirements of Work Cover. Where the amount or type of asbestos materials to be removed requires a licensed asbestos contractor to undertake the removal and disposal, both Council and the Principle Certifying Authority must be advised in writing of the name, address and asbestos license details of the contractor undertaking that work and the name and address of the facility to which the materials will be taken.

11. A Waste Management Plan (WMP) is to be submitted with the Development Application. The WMP must include realistic estimates of the volume or area of all types of waste material to be generated from the demolition and excavation activities. Details of how each of those materials will be re-used, recycled or disposed of is to be provided, including the locations to which the materials will be taken.

12. The waste management plan together with proof of lawful disposal for all waste that is disposed of, or otherwise recycled from the site must be retained on site. Proof is to include a log book with associated receipt/invoices, waste classification, and site validation certificate. All entries must include:

- Time and Date
- Description and size of waste
- Waste facility used
- Vehicle registration and company name

Both the log book and the associated receipts must be made available for inspection by authorised Council Officer at any time during site works.

16. All construction and demolition waste must be inspected, graded and sorted in accordance with current EPA standards. Once sorted, it must be either recycled or disposed of according to its classification.

25. Waste Disposal and Re-use Facilities

Section 25 covers waste storage facilities in new developments. The relevant sections state:

This section applies to all applications that propose:

2. Demolition of an existing building.
3. Construction of any development including alterations and additions.
4. Any development that requires a waste bay or the like.



Non-residential development

Note: Council does not provide waste services to non-residential premises. Owners and operators of non-residential premises must engage a private commercial waste contractor to remove and legally dispose of the waste their premises generates.

1. Development applications for all non-residential development must be accompanied by a waste management plan that addresses:

- best practice recycling and reuse of construction and demolition materials,
- use of sustainable building materials that can be reused or recycled at the end of their life,
- handling methods and location of waste storage areas, such that handling and storage has no negative impact on the streetscape, building presentation or amenity of occupants and pedestrians, and
- procedures for the on-going sustainable management of green and putrescible waste, garbage, glass, containers and paper, including estimated volumes, required bin capacity and on-site storage requirements.

Waste Management Facilities

1. Waste management facilities shall be provided for in all new buildings (except dwelling houses, Attached dwellings, Semi-Detached Dwellings and Dual Occupancy). These shall be designed to ensure that the storage and collection of waste and recyclables is user friendly for both the occupant and the waste collection contractor.

- The area must be suitably located on premises in terms of accessibility for both the occupants and the waste and recycling contractor.

3. Provision of ongoing waste management facilities shall include:

- Bin bays are to be well ventilated and screened to a minimum height of 1.5m by a structure and landscaping. Construction materials are to be compatible with the proposed development and adjoining development.

- Bin bays or waste service rooms are to be sufficiently open and well lit to allow safe use after dark

- A hose cock for hosing the garbage bin bay and a sewerage drainage point are to be provided in or adjacent to the bin storage area. The drainage point should have a fine grade drain cover sufficient to prevent coarse pollutants from entering the sewer. If the hose cock is located inside the bin storage bay it is not to protrude into the space indicated for the placement of bins. Responsibility for cleaning of all waste storage areas should be determined when designing the system and clearly stated in the waste management plan.

Access to waste and recycling storage

4. Waste service rooms or compartments where provided, shall be enclosed and of design compatible with the proposed development. Adequate ventilation shall be provided for the room or compartment. Suitable arrangements for transfer of any interim storage to the main bin bay are to be indicated in the WMP.



5. Waste and recycling collection vehicles should be able to service the development efficiently and effectively and with no need to reverse.

Other Waste Considerations

4. Signage should be in English, and consideration given to other languages reflective of the most recent demographics of Liverpool LGA. Illustrative graphics will form a minimum 50% of the area of the signage. Council can provide appropriate bin bay usage signs if required. Signage is to be prominently posted in each bin bay, or waste service room indicating that:

- Garbage is to be placed wholly within the garbage bins provided.
- The area is to be kept tidy.

Part 7 Development in Industrial Areas

6. Building Design, Streetscape and Layout

Service Areas

Service areas including waste, recycling areas and external storage areas are to be located away from principal street frontages and screened from view.

10. Site Services

Waste management

Owners are to provide their own waste management services. These facilities will vary depending on the needs of the site. Any waste management equipment must not be visible from the street. Waste bins must be provided in a designated area that is easily and safely accessible for workers.

7.5 State Environmental Planning Policy (Sustainable Buildings) 2022

The SEPP addresses waste in *Chapter 3 Standards for non-residential development* where it states:

3.2 Development consent for non-residential development

(1) In deciding whether to grant development consent to non-residential development, the consent authority must consider whether the development is designed to enable the following—

(a) the minimisation of waste from associated demolition and construction, including by the choice and reuse of building materials,

7.6 ESD Report

The ESD Report 125 & 145-175 Lawson Road, Badgerys Creek Revision: 1.1, 14 May 2025 prepared by Jensen Hughs has also been consulted to ensure this WMP complies with it.

The ESD Report addresses waste management in several sections.



1.2.2 State Environmental Planning Policies (SEPP)

+ *SEPP (Sustainable Buildings) 2022: Mandates operational GHG reductions, Net Zero Carbon Plan, embodied carbon disclosure (for >1,000 m²), renewable readiness, water efficiency, and waste minimisation.*

The SEPP (see Section 7.5), refers to minimising waste during demolition and construction including choice of building materials. These are covered in Table 4 Potential site preparation and construction waste types, classifications and management methods and Section 8.5 Waste Avoidance Strategies and Section 8.6 Re-use, Recycling and Disposal of this WMP.

4.1 SEPP (Sustainable Buildings) 2022 Requirements

Construction Waste and Circular Economy: *Develop a Construction Waste Management Plan, use materials with recycled content and provide for on-site waste separation and recycling.*

These requirements are covered in Table 4 Potential site preparation and construction waste types, classifications and management methods and Section 8.5 Waste Avoidance Strategies, Section 8.6 Re-use, Recycling and Disposal and Section 8.7 Waste Segregation, Storage and Servicing, of this WMP.

6.3 Sustainable Construction

Sustainable construction aims to address the consumption of resources within a building construction context, by encouraging the selection of lower-impact materials. This section will also aim to achieve absolute reductions in the amount of waste generated or the recycling of as much of the waste generated as possible, which will help lower the embodied carbon of the building.

Feature	Design Strategy	Objective/ Impact
Construction and Demolition Waste	+ Waste contractors and waste processing facilities servicing the project demonstrated compliance with a recognised Construction and Demolition Waste Reporting Criteria, and the total amount of waste sent to landfill is less when compared against a typical building.	Reduce construction waste going to landfill by reusing or recycling building materials

These requirements are covered in Table 4 Potential site preparation and construction waste types, classifications and management methods and Section 8.5 Waste Avoidance Strategies and Section 8.6 Re-use, Recycling and Disposal, of this WMP.



7.1 Green Star Buildings

The key minimum expectations and climate positive pathway requirements are listed below.

Table 4 Minimum Expectations and Climate Positive Pathway requirements for 4 and 5-star ratings

* Black = minimum expectations for all ratings. **Orange = Climate Positive Pathway requirements for 5 stars

Credit	Minimum Expectations and Climate Positive Pathway Requirements
Responsible Construction	<p>The building is designed for the collection of separate waste and resource streams.*</p> <p>The building provides a dedicated and adequately sized waste and resource storage area.</p> <p>The building ensures safe and efficient access to waste and resource storage areas for both occupants and waste and resource collection contractors.</p>
Responsible Resource Management	<p>The building is designed for the collection of separate waste and resource streams.</p> <p>The building provides a dedicated and adequately sized waste and resource storage area.</p> <p>The building ensures safe and efficient access to waste and resources storage areas for both occupants and waste and resource collection contractors</p>

Ensuring the minimum expectations are met for Responsible Construction is a matter for the building contractor, however, these requirements are covered in Table 4 Potential site preparation and construction waste types, classifications and management methods and Section 8.5 Waste Avoidance Strategies, Section 8.6 Re-use, Recycling and Disposal and Section 8.7 Waste Segregation, Storage and Servicing, of this WMP.

Ensuring the minimum expectations are met for Responsible Resource Management is a matter for building management, however, these requirements are covered in Section 9.4 Waste Storage Area Size, Section 9.5 Total Waste Storage Area and Section 9.6 Space allowed for waste storage, of this WMP.

7.7 Other Guides

In addition to the above plans and guidelines, SLR also consulted:

- EPA Better Practice Guidelines for Waste Management and Recycling in Commercial and Industrial Facilities (EPA C&I Guidelines)³
- Penrith City Council's Industrial, Commercial and Mixed-Use Waste Management Guidelines⁴
- The Hills Development Control Plan 2012⁵.

³ <https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/managewaste/120960-comm-ind.pdf>

⁴ [https://www.penrithcity.nsw.gov.au/images/documents/building-development/planning-zoning/planning-controls/waste management guidelines industrial commercial mixed usepdf.pdf](https://www.penrithcity.nsw.gov.au/images/documents/building-development/planning-zoning/planning-controls/waste%20management%20guidelines%20industrial%20commercial%20mixed%20use.pdf)

⁵ <https://www.thehills.nsw.gov.au/Business-Building/Planning-Guidelines/The-Hills-Development-Control-Plan>



8.0 Site Preparation and Construction Waste and Recycling Management

8.1 Targets for Resource Recovery

Targets for new development are expected to contribute to state-specific targets. The NSW Waste and Sustainable Materials Strategy 2041 (DPIE, 2021) sets a target of 80% average recovery rate from all waste streams by 2030. Analysis by the NSW EPA (2022-2023) indicates that construction and demolition waste recovery rates in 2022-2023 were 73%.⁶

It is anticipated that the waste minimisation measures in the following sections will assist the Development to meet these targets. Waste reporting and audits can be used to determine the actual percentage of wastes that are being, or have been, recycled during the site preparation, site clearance and construction stages of the Development.

Waste generated during site clearance and construction will be reused on site wherever possible, especially in the case of soil and fill. Waste and recyclables taken off site will be recycled, or disposed of, at facilities lawfully able to accept them.

8.2 Waste Streams and Classifications

The site preparation and construction activities are anticipated to generate the following broad waste streams:

- Site preparation waste as outlined in Section 8.3
- Construction waste as outlined in Section 8.4
- Packaging waste, and
- Work compound waste from on-site employees.

A summary of likely waste types generated from site preparation and construction activities, along with their waste classifications and proposed management methods are provided in Table 4. For further information on how to determine a waste's classification refer to the NSW EPA (2014) *Waste Classification Guidelines*⁷. Further information on managing site preparation, demolition and construction waste is also available on the NSW EPA website⁸ and the Western Sydney Recycling Directory – Construction and Demolition Waste 2017.⁹

Table 4 Potential site preparation and construction waste types, classifications and management methods

Waste Types	NSW EPA Waste Classification	Proposed Management Method
Site preparation and Construction		
Sediment fencing, geotextile materials	General solid waste (non-putrescible)	Reuse at other sites where possible or disposal to landfill

⁶ <https://www.epa.nsw.gov.au/your-environment/waste/waste-overview/waste-performance-data>

⁷ Available online from <https://www.epa.nsw.gov.au/your-environment/waste/classifying-waste/waste-classification-guidelines>

⁸ Available online from <http://www.epa.nsw.gov.au/your-environment/waste/industrial-waste/construction-demolition>

⁹ <https://www.blacktown.nsw.gov.au/files/content/public/services/waste/demolition-and-construction-waste/western-sydney-recycling-directory-cd-updated-nov-2017.pdf>



Waste Types	NSW EPA Waste Classification	Proposed Management Method
Concrete	General solid waste (non-putrescible)	Off-site recycling for filling, levelling or road base
Bricks and pavers	General solid waste (non-putrescible)	Cleaned for reuse as footings, broken bricks for internal walls, crushed for landscaping or driveway use, off-site recycling
Gyprock or plasterboard	General solid waste (non-putrescible)	Off-site recycling or returned to supplier
Sand or soil	General solid waste (non-putrescible)	Off-site recycling
Metals such as fittings, appliances and bulk electrical cabling, including copper and aluminium	General solid waste (non-putrescible)	Off-site recycling at metal recycling compounds and remainder to landfill
Conduits and pipes	General solid waste (non-putrescible)	Off-site recycling
Timber – treated	General solid waste (non-putrescible)	Reused for formwork, bridging, blocking, propping or second-hand supplier
Timber - untreated		Off-site recycling, chip for landscaping, sell for firewood, reused for floorboards, fencing, furniture, mulched secondhand supplier and remainder to landscape supplies.
Doors, windows, fittings	General solid waste (non-putrescible)	Off-site recycling at secondhand supplier
Insulation material	General solid waste (non-putrescible)	Off-site disposal
Glass	General solid waste (non-putrescible)	Off-site recycling, glazing or aggregate for concrete production
Asbestos	Special waste	Off-site disposal to a licensed landfill facility.
Fluorescent light fittings and bulbs	General solid waste (non-putrescible)	Off-site recycling or disposal, contact <i>FluoroCycle</i> for more information ¹⁰
Paint	Liquid waste	Off-site recycling, Paintback collection ¹¹ or disposal
Synthetic rubber or carpet underlay	General solid waste (non-putrescible)	Off-site recycling, reprocessed for other uses
Ceramics including tiles	General solid waste (non-putrescible)	Off-site recycling
Carpet	General solid waste (non-putrescible)	Off-site recycling, disposal or reuse
Packaging		
Packaging materials, including wood, plastic, including stretch wrap or LDPE, cardboard and metals	General solid waste (non-putrescible)	Off-site recycling

¹⁰ Available online from <http://www.fluorocycle.org.au/> or <http://www.environment.gov.au/settlements/waste/lamp-mercury.html>

¹¹ Available online from <https://www.paintback.com.au/>



Waste Types	NSW EPA Waste Classification	Proposed Management Method
Wooden or plastic crates and pallets	General solid waste (non-putrescible)	Reused for similar projects, returned to suppliers, or off-site recycling. Contact <i>Business Recycling</i> for more information ¹²
Work Compound and Associated Offices		
Food Waste	General solid (putrescible) waste	Dispose to landfill with general garbage
Recyclable beverage containers, such as glass and plastic bottles, aluminium cans and steel cans	General solid waste (non-putrescible)	Recycling at off-site licensed facility or at NSW container deposit scheme 'Return and Earn' facility ¹³
Clean paper and cardboard	General solid waste (non-putrescible)	Paper and cardboard recycling at off-site licensed facility
General domestic waste generated by workers such as soiled paper and cardboard, food and polystyrene	General solid waste (non-putrescible) mixed with putrescible waste	Disposal at landfill

8.3 Site Preparation Waste Types and Quantities

Images from Google Earth and NSW Government Explorer show that the site is largely undeveloped but features several houses, farm outbuildings and farm dams. These are shown in Figure 4 below.

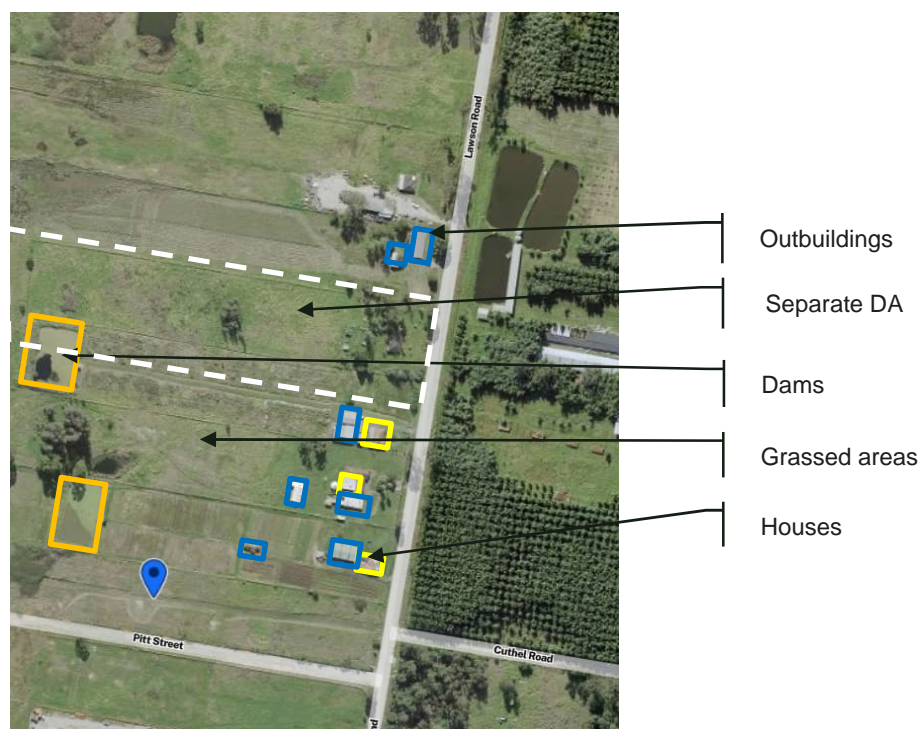


Figure 4 - Site features

¹² Available online from <https://businessrecycling.com.au/>

¹³ Available online from <http://returnandearn.org.au/>



The site preparation phase of the project will involve clearing vegetation and removal of the existing structures. SLR has assumed soil will be removed to a depth of 300 mm, the grass layer is 100 mm.

As neither the WSADCP nor the LDCP provide figures for demolition of site clearance waste generation, SLR has adopted the 'Three bedroom house', and modified slightly the 'Factory' waste generation rates, found in The Hills DCP 2012, for estimating the type and quantities of waste generated from the removal of sheds.

The proposed waste generation rates shown in Table 5 below.

Table 5 Site preparation waste generation rates

Area	Rate Type	Area (per m ²)	Waste types and quantities (m ³)							
			Timber/Gyprock	Bricks	Roof tiles	Soil	Vegetation	Concrete	Metal	Other
Houses	Three bedroom brick house	1000	13	123	9				0.7	
Outbuildings	Factory	1000				4.8		2.1	0.6	0.5
Grass	Vegetation	1000				300	100			

The waste generation rates in Table 5 have been used to estimate the quantities of waste generated from site preparation. These are shown in Table 6 below.

Table 6 Estimated site preparation areas and waste quantities

Areas	Area (m ²)	Waste types and quantities (m ³)							
		Timber/Gyprock	Bricks	Roof tiles	Soil	Vegetation	Concrete	Metal	Other
Houses	697	9.1	86	6.3	-	-	-	0.5	-
Outbuildings	1,412	-	-	-	6.8	-	3.0	0.8	0.7
Grass	120,888	-	-	-	36,266	12,089	-	-	-
Total	122,997	9.1	86	6.3	36,273	12,089	3.0	1.3	0.7

The table shows that almost 100% recovery is possible, so a target of 80% is certainly achievable.

8.4 Construction Waste Types and Quantities

The WSADCP and LDCP provide no advice on construction waste quantities. As an alternative, SLR has adopted the 'Factory' and 'Office' waste generation rates from The Hills' DCP for estimating the type and quantities of waste generated during construction. The construction waste generation rates used are shown in Table 7 below.



Table 7 Construction waste generation rates

Rate Type	Area (m ²)	Waste types and quantities (m ³)								
		Timber	Asphalt	Concrete	Granular Base	Bricks	Gyprock	Sand or Soil	Metal	Other
Warehouse	1000	0.25		2.1		1.65	0.45	4.8	0.6	0.5
Office	1000	5.1		18.8		8.5	8.6	8.8	2.75	5.0
Hardstands	1000			2.1				4.8	0.6	0.5
Car parks	1000		0.25	0.225	1.0					
Local Road	1000		0.25	0.225	1.0					

The waste generation rates in Table 7 are used to estimate the quantities of waste generated from the construction of the Development. Figures for hardstands, car parking and the local road assume 10% waste. The total estimated construction waste quantities are shown in Table 8 below. The areas listed are based on the areas shown in the drawings:

- 24295_DA002_A_Warehouse 1- Site Plan.pdf and
- 24295_DA010_A_Warehouse 2-4 - Site Plan.pdf.

Table 8 Estimated types and quantities of construction waste

Areas	GFA (m ²)	Waste types and quantities (m ³)								
		Timber	Asphalt	Concrete	Granular Base	Bricks	Gyprock	Sand or Soil	Metal	Other
Warehouse 1	38,572	9.6	-	81.0	-	63.6	17.4	185.1	23.1	19.3
Warehouse 2	1,186	0.3	-	2.5	-	2.0	0.5	5.7	0.7	0.6
Warehouse 3	1,186	0.3	-	2.5	-	2.0	0.5	5.7	0.7	0.6
Warehouse 4	2,827	0.7	-	5.9	-	4.7	1.3	13.6	1.7	1.4
Office 1	1,937	9.9	-	36.4	-	16.5	16.7	17.0	5.3	9.7
Office 2	142	0.7	-	2.7	-	1.2	1.2	1.2	0.4	0.7
Office 3	141	0.7	-	2.6	-	1.2	1.2	1.2	0.4	0.7
Office 4	141	0.7	-	2.6	-	1.2	1.2	1.2	0.4	0.7
Hardstand	16,921	-	-	35.5	-	-	-	81.2	10.2	8.5
Car parks	3,059	-	0.01	0.01	0.3	-	-	-	-	-
Total	66,111	23	0.01	172	0.3	92	40	312	43	42

The table shows that, assuming 'Other' is landfilled, 94% recovery is possible, so a target of 80% is certainly achievable.

8.5 Waste Avoidance Strategies

The Building Contractor, Building Designer and/or those in equivalent roles should follow better practice waste management and the principles of ecologically sustainable development.

Recommendations for the Building Designer include:

- Using prefabricated components
- Using low formaldehyde wood products, post-consumer reused timber and/or Forest Stewardship Council certified timber



- Using fittings and furnishings that have been recycled, are made from or incorporate recycled materials and have been certified as sustainable or environmentally friendly by a recognised third-party certification scheme
- Preferentially using building materials, fittings and furnishings, including structural framing, roofing and façade cladding, that have longer life and better re-use and recycling potential
- Reducing the use of polyvinyl chloride products
- Preferentially using paints, floor coverings and adhesives with low VOC (volatile organic compound) content
- Avoiding unsustainable timber imports including western red cedar, oregon, meranti, luan or merbau
- Selecting materials based on low embodied energy properties that suit the Project, such as recycled materials including recycled steel and glass-wool insulation, or concrete with slag and fly ash content
- Centralising wet areas together to minimise piping, and
- Designing for deconstruction rather than demolition.

Recommendations for the Building Contractor include:

- Applying practical building designs and construction techniques
- Investigating leased equipment and machinery rather than purchase and disposal
- Sorting and segregating site preparation and construction waste to ensure efficient recycling of waste
- Preferentially selecting building materials, fittings and furnishings, including structural framing, roofing and façade cladding, that have longer life and better re-use and recycling potential
- Store waste on-site appropriately to prevent cross-contamination and/or mixing of different waste types
- Reducing packaging waste by:
 - Returning packaging to suppliers where practicable to reduce waste further along the supply chain
 - Purchasing in bulk
 - Requesting cardboard or metal drums rather than plastics
 - Requesting metal straps rather than shrink wrap, and
 - Using returnable packaging such as pallets and reels.
- Arranging deliveries 'as needed' to mitigate degradation, weathering or moisture damage, and
- Ensure subcontractors are informed of and implement site waste minimisation and management procedures.



8.6 Re-use, Recycling and Disposal

Effective management of materials and construction and site preparation waste, including options for reuse and recycling where applicable and practicable, will be conducted. Only waste that cannot be cost effectively reused or recycled are to be sent to landfill or appropriate disposal facilities.

In accordance with the best practice waste management, the following specific procedures should be implemented:

- Facilitate on-site source separation to ensure efficient recycling
- Concrete, tiles and bricks will be reused or recycled off-site
- Steel will be recycled off-site, and all other metals will be recycled where economically viable
- Framing timber will be recycled off-site
- Windows, doors and joinery will be recycled off-site, where possible
- All glass that can be economically recycled will be recycled
- All solid waste timber, brick, concrete, rock that cannot be reused or recycled will be taken to an appropriate facility for treatment to recover further resources or for disposal to landfill in an approved manner
- Facilitate re-use of materials on-site
- Provide separate waste bins for recyclable and non-recyclable general waste
- Retain used crates for storage purposes unless damaged
- Recycle cardboard, glass and metal waste
- Dispose of all asbestos, hazardous and/or intractable waste in accordance with SafeWork NSW and NSW EPA requirements
- All used crates will be stored for reuse unless damaged
- Deliver batteries to drop off-site recycling facility, and
- Where source separation is utilised, materials are to be kept uncontaminated to guarantee the highest possible re-use value.

8.7 Waste Segregation, Storage and Servicing

8.7.1 Waste Segregation and Storage

Waste materials produced from site preparation and construction activities are to be separated at the source and stored separately on-site.

It is anticipated that the Project will provide enough space on-site for separate storage in, for example, separate skip bins or appropriately managed stockpiles, of the following waste types:

- Bricks, concrete and scrap metal
- Metal and steel, in a condition suitable for recycling at metal recycling facilities
- Timber



- Glass
- Hardstand rubble
- Hazardous waste, if present
- Paper and cardboard
- General co-mingled recycling waste, and
- Non-recyclable general waste.

If there is insufficient space on-site for full segregation of waste types, the site manager, or equivalent role, should consult with the waste and recycling collection contractor to confirm which waste types may be co-mingled prior to removal from the site.

8.7.2 Waste Storage Areas

Waste storage areas will be accessible and allow sufficient space for storage and servicing requirements. The storage areas will also be flexible in order to cater for change of use throughout the project. Where space is restricted, dedicated stockpile areas are to be delineated on the site, with regular transfers to dedicated skip bins for sorting.

All waste placed in skips or bins for disposal or recycling will be adequately contained to ensure that the waste does not fall, blow, wash or otherwise escape from the site. Waste containers and storage areas are to be kept clean and in a good state of repair. The storage spaces should include consideration for applicable weather protection measures.

In accordance with better practice waste management, areas designated for waste storage should:

- Allow unimpeded access by site personnel and waste disposal contractors
- Take into account environmental factors which could potentially cause an impact to the waste storage, such as slope, drainage and the location of watercourses and native vegetation
- Allow sufficient space for the storage of garden waste and other waste materials on-site
- Employ adequate environmental management controls to prevent off-site migration of waste materials and contamination from the waste. For example, consideration of slope, drainage, proximity relative to waterways, stormwater outlets and vegetation
- Consider visual amenity, safety and accessibility in their selection, and
- Not present hazards to human health or the environment.

8.7.3 Waste Servicing and Record Keeping

The Site Manager or equivalent role is to:

- Arrange for suitable waste collection contractors to remove any construction waste from site
- Ensure waste bins are not filled beyond recommended filling levels
- Ensure that all bins and loads of waste materials leaving site are covered
- Maintain waste disposal documentation detailing, at a minimum:



- Descriptions and estimated amounts of all waste materials removed from site
- Details of the waste and recycling collection contractors and facilities receiving the waste and recyclables
- Records of waste and recycling collection vehicle movements, for example, date and time of loads removed, licence plate of collection vehicles, tip dockets from receiving facility, and
- Waste classification documentation for materials disposed to off-site recycling or landfill facilities.
- Ensure lawful waste disposal records are readily accessible for inspection by regulatory authorities such as Council, SafeWork NSW or NSW EPA, and
- Remove waste during hours approved by Council.

If skips and bins are reaching capacity, removal and replacement should be organised as soon as possible. All site generated building waste collected in the skips and bins will leave the site and be deposited in the approved site lawfully able to accept them.

8.8 Signage

For best practice, standard signage is to be posted in all waste storage and collection areas. All waste containers should be labelled correctly and clearly to identify stored materials.

Signs approved by the NSW EPA for labelling of waste materials are available online¹⁴ and should be used where applicable. A selection of signs prepared by NSW EPA is provided in Figure 5 below.



Figure 5 - Examples of NSW EPA labels for waste and skip bins

8.9 Site Inductions

All staff, including sub-contractors and labourers, employed during the site preparation and construction phases must undergo induction training regarding waste management.

¹⁴ NSW EPA approved waste materials signage <https://www.epa.nsw.gov.au/your-environment/recycling-and-reuse/business-government-recycling/standard-recycling-signs>



Induction training is to cover, as a minimum, an outline of the WMP including:

- Legal obligations and targets
- Emergency response procedures on-site
- Waste priorities and opportunities for reduction, reuse and recycling
- Waste storage locations and separation of waste
- Procedures for suspected contaminated and hazardous waste
- Waste related signage
- The implications of poor waste management practices, and
- Responsibilities and reporting, including identification of personnel responsible for waste management and individual responsibilities.

It is the responsibility of the site manager or building contractor or equivalent role to notify Council of the appointment of waste removal, transport or disposal contractors.

8.10 Monitoring and Reporting

During the site preparation and construction phases, the following monitoring practices will be considered to improve site preparation and construction waste management and to obtain accurate waste generation figures:

- Conduct waste audits of current projects where feasible.
- Note waste generated and disposal methods.
- Look at past waste disposal receipts.
- Record this information to track waste avoidance, reuse and recycling performance and to help in waste estimations for future waste management plans.

Records of waste volumes that are recycled, reused or contractor removed should be maintained. Dockets or receipts verifying recycling and disposal in accordance with this WMP should be kept and presented to regulatory bodies when required.

Daily visual inspections of waste storage areas should be undertaken by site personnel and inspection checklists and logs recorded for reporting to the site manager or equivalent if required. These inspections can be used to identify and rectify any resource and waste management issues.

Waste audits could be carried out by the building contractor or equivalent role to gauge the effectiveness and efficiency of waste segregation procedures and recycling and reuse initiatives. Where audits show that the above procedures are not carried out effectively, additional staff training should be undertaken and signage re-examined.

8.11 Roles and Responsibilities

All personnel have a responsibility for their own environmental performance and compliance with all legislation. It will be the responsibility of the site manager, or equivalent role, to implement the WMP, and the responsibility of employees and subcontractors to ensure that they comply with the WMP at all times.



Suggested roles and responsibilities for waste management at the site are provided in Table 9 below. Where possible, a construction environmental manager, or equivalent role, should be appointed for the site preparation and construction work. An equivalent construction environmental manager role is defined to be a person dedicated to overseeing the environmental compliance and performance of a development. Where a construction environmental manager is not appointed, responsibilities in Table 9 for the construction environmental manager will become those of the site manager.

Table 9 Suggested site preparation and construction waste management roles and responsibilities

Role	Responsibilities
Site Manager	<ul style="list-style-type: none"> • Ensuring plant and equipment are well maintained
	<ul style="list-style-type: none"> • Ordering only the required amounts of materials
	<ul style="list-style-type: none"> • Keeping materials segregated to maximise reuse and recycling
	<ul style="list-style-type: none"> • Ensuring that waste sorting and storage areas are maintained in a tidy and functional state and do not present hazards to human health or the environment
	<ul style="list-style-type: none"> • Ensure hazardous or contaminated materials are appropriately managed and disposed
	<ul style="list-style-type: none"> • Ensure site records and documentation is kept and is complete
	<ul style="list-style-type: none"> • Ensure this WMP are implemented, and
	<ul style="list-style-type: none"> • Liaise with Council and regulatory authorities as required.
Construction Environmental Manager or equivalent	<ul style="list-style-type: none"> • Ensuring staff and contractors are aware of site requirements for waste management
	<ul style="list-style-type: none"> • Establishing separate skips and stockpiles and recycling bins for effective waste segregation and recycling purposes
	<ul style="list-style-type: none"> • Developing or identifying, and using, local commercial opportunities for re-use of materials where re-use on-site is impractical
	<ul style="list-style-type: none"> • Facilitate correct waste collection
	<ul style="list-style-type: none"> • Engage suitable waste collection and disposal contractors
	<ul style="list-style-type: none"> • Approval of off-site waste disposal locations and checking licensing requirements
	<ul style="list-style-type: none"> • Arranging for the assessment of potentially hazardous or contaminated materials
	<ul style="list-style-type: none"> • Arranging for appropriate contaminated waste management and approval of off-site waste transport, disposal locations and checking licensing requirements
	<ul style="list-style-type: none"> • Monitor and maintain site environmental controls and
	<ul style="list-style-type: none"> • Monitoring, inspection and reporting requirements.



9.0 Operational Waste and Recycling Management

9.1 Targets for Resource Recovery

Targets for new development are expected to contribute to state-specific targets. The NSW *Waste and Sustainable Materials Strategy 2041* (DPIE, 2021) sets a target of 80% average recovery rate from all waste streams by 2030. Analysis by the NSW EPA (2022-2023) indicates that the commercial and industrial waste recovery rate in 2022-2023 was 51%.¹⁵

It is anticipated that the waste minimisation measures in the following sections will assist the Development to achieve this recycling rate. Waste reporting and audits can be used to determine the actual percentage of wastes that are being or have been recycled during operation.

9.2 Waste Streams and Classifications

The operation of the warehouse is anticipated to generate the following broad waste streams:

- General waste and commingled recycling
- Bulk packaging waste including polystyrene and cardboard boxes
- Food and organic waste
- E-waste
- Bulky waste items such as furniture and
- Plant and general maintenance waste.

Potential waste types, their associated waste classifications, and management methods are provided in Table 10. For further information on how to determine a waste's classification, refer to the NSW EPA (2014) *Waste Classification Guidelines*¹⁶. Recycling drop-off locations and contacts can be found on <https://businessrecycling.com.au/> for each waste type.

Table 10 Potential waste types, classifications and management methods for operational waste

Waste Types	NSW EPA Waste Classification	Proposed Management Method
General Operations		
Clean office paper	General solid (non-putrescible) waste	Paper recycling at off-site licensed facility
Cardboard including bulky cardboard boxes	General solid (non-putrescible) waste	Cardboard recycling at off-site licensed facility
Recyclable beverage containers, glass and plastic bottles, aluminium cans, steel cans	General solid (non-putrescible) waste	NSW container deposit scheme 'Return and Earn', container recycling at off-site licensed facility
Food waste	General solid (putrescible) waste	Compost on or off-site or dispose to landfill with general garbage

¹⁵ <https://www.epa.nsw.gov.au/your-environment/waste/waste-overview/waste-performance-data>

¹⁶ Available online from <https://www.epa.nsw.gov.au/your-environment/waste/classifying-waste/waste-classification-guidelines>



Waste Types	NSW EPA Waste Classification	Proposed Management Method
Lead-acid or nickel-cadmium batteries	Hazardous waste	Off-site recycling, Contact the Australian Battery Recycling Initiative ¹⁷ for more information
Other batteries	General solid waste (non-putrescible)	
Mobile Phones	General solid waste (non-putrescible)	Off-site recycling; can be taken to the Mobile Muster program. Contact Mobile Muster for more information
Bulky polystyrene	General solid (non-putrescible) waste	Off-site recycling or disposal at landfill
Furniture	General solid (non-putrescible) waste	Off-site reuse or disposal to landfill
E-waste	General solid waste (non-putrescible)	Off-site recycling
Clinical waste	Special waste	Stored, handled, collected and disposed of according to AS 3816 and the <i>Protection of the Environment Operations Act 1997</i>
Printer toners and ink cartridges	General solid waste (non-putrescible)	Off-site recycling, free disposal box or bags and pickup service exists for printer toners and ink cartridges
General garbage, including non-recyclable plastics	General solid (putrescible and non-putrescible) waste	Disposal at landfill
Maintenance		
Spent smoke detectors - some commercial varieties ¹⁸	Hazardous waste	Disposal to landfill, or off-site disposal at licenced facility
Spent smoke detectors - others	General solid (non-putrescible) waste,	
Glass, other than containers	General solid (non-putrescible) waste	Off-site recycling
Light bulbs and fluorescent tubes	General solid (non-putrescible) waste	Off-site recycling or disposal, contact FluoroCycle ¹⁹ or Lamp Recyclers ²⁰ for more information
Empty oil and other drums or containers, such as fuel, chemicals, paints, spill clean ups that were previously used to store Dangerous Goods (Class 1, 3, 4, 5 or 8) and residues have not been removed by washing or vacuuming.	Hazardous waste	Transport to comply with the transport of Dangerous Goods Code applies in preparation for off-site recycling or disposal at licenced facility
Empty oil and other drums or containers, such as fuel, chemicals, paints, spill clean ups that have been cleaned by washing or vacuuming.	General solid waste (non-putrescible)	
Garden organics - lawn mowing, tree branches, hedge cuttings, leaves	General solid (non-putrescible) waste	Reuse on-site or contractor removal for recycling at licenced facility

¹⁷ <http://www.batteryrecycling.org.au/home>

¹⁸ The Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) require that when more than 10 smoke alarms (particularly americium-241 sources) are collected for bulk disposal they must be treated as radioactive waste and the requirements of the National Health and Medical Research Council's Code of practice for the near-surface disposal of radioactive waste in Australia (1992) must be met.

¹⁹ <https://www.fluorocycle.org.au/>

²⁰ <https://www.lamprecyclers.com.au/>



9.3 Estimated Quantities of Operational Waste

In the absence of any waste generation rates in the WSADCO or LDCP for estimating the type and quantities of waste generated from the operational activities of the development, SLR has adopted the 'Offices' and 'Warehouse' waste generation rates from EPA's C&I Guidelines and Penrith City Council's Industrial, Commercial and Mixed-Use Waste Management Guidelines. The operational waste generation rates used are shown below in Table 11.

Table 11 Operational waste generation rates

Development Use	Source	Source Category	Litres per 100 m ² per day	
			General Waste	Recycling
Office	NSW EPA C&I Guidelines	Offices	8	6
Warehouse	Penrith City Council's Waste Management Guidelines	Warehouse (office)	10	10

Using the waste generation rates in Table 11 above, the approximate weekly waste quantities for the development have been calculated based on the following assumptions:

- The floor areas as detailed in drawings *24295_MP01_C_SSDA MASTERPLAN.pdf*
- A week comprising seven days of operation.
- No compaction of any streams.

The estimated quantities of operational waste generated by the development are shown in Table 12.

Table 12 Estimated operational waste and recycling quantities

Location	Description			Total per Day (L)		Total per Week (L)	
	Type	Area m ²	Generation Rate Source	Garbage	Recycling	Garbage	Recycling
Warehouse 1	Warehouse	38,572	Penrith City Council	3,857	3,857	27,000	27,000
	Office	1,937	NSW EPA C&I Guidelines	155	116	1,085	814
Warehouse 2	Warehouse	1,186	Penrith City Council	119	119	830	830
	Office	142	NSW EPA C&I Guidelines	11	8.5	80	60
Warehouse 3	Warehouse	1,186	Penrith City Council	119	119	830	830
	Office	141	NSW EPA C&I Guidelines	11	8.5	79	59
Warehouse 4	Warehouse	2,827	Penrith City Council	283	283	1,979	1,979
	Office	141	NSW EPA C&I Guidelines	11	8.5	79	59

9.4 Waste Storage Area Size

The waste storage areas for the development must be large enough to adequately store all quantities of operational waste and recycling between collections. Given the nature of the development and its size and scope, a combination of front-lift and rear-lift waste collection services is the most likely to be used by contractors and tenants.

The most common front lift bin capacity is 3 m³ and these have been assumed when calculating bin numbers and storage space for the largest warehouse, Warehouse 1. A common rear lift bin capacity is 1100 L and these have been assumed when calculating bin numbers and storage space for the three smaller warehouses, Warehouse 2, Warehouse 3 and Warehouse 4.



To allow for ready movement of bins into and out of the bin storage areas, at least 200% of the total minimum bin storage area has been allowed for.

The proposed bin dimensions are those published by Council and shown Table 13 below. Bin dimensions may differ slightly between manufacturers.

Table 13 Bin dimensions

Bin Capacity	Height (mm)	Depth (mm)	Width (mm)	Footprint (m ²)
3 m ³	1590	2040	1650	3.37
1100 L	1270	1420	1100	1.56

The recommended storage areas do not include the storage of bulky waste. The LDCP makes no particular specification for bulky waste storage for this kind of development.

9.5 Total Waste Storage Area

The estimated number of bins required for weekly storage of operational waste and recycling generated by the development are shown in Table 14 and are based on:

- The estimated quantities of operational waste and recycling shown in Table 12
- The bin dimensions shown in Table 13.

Table 14 Recommended number of bins and storage areas

Location	Bin Capacity		Collections Per Week		Actual Number of Bins			Area Required (m ²)
	Garbage	Recycling	Garbage	Recycling	Garbage	Recycling	Total	
Warehouse 1	3 m ³	3 m ³	4	4	3	3	6	40.4
Warehouse 2	1100 L	1100 L	2	2	1	1	2	6.2
Warehouse 3	1100 L	1100 L	2	2	1	1	2	6.2
Warehouse 4	1100 L	1100 L	3	3	1	1	2	6.2

9.6 Space allowed for waste storage

The drawings show the location of the waste storage areas for each of the five warehouse buildings. An area of about 40 m² has been allowed Warehouse 1. Bins in Warehouses 2, 3 and 4 will be stored within each building and wheeled out for collection. Areas of 6.2 m² in each case have been allowed in each case.

Locations for waste storage are shown in Figure 6 below



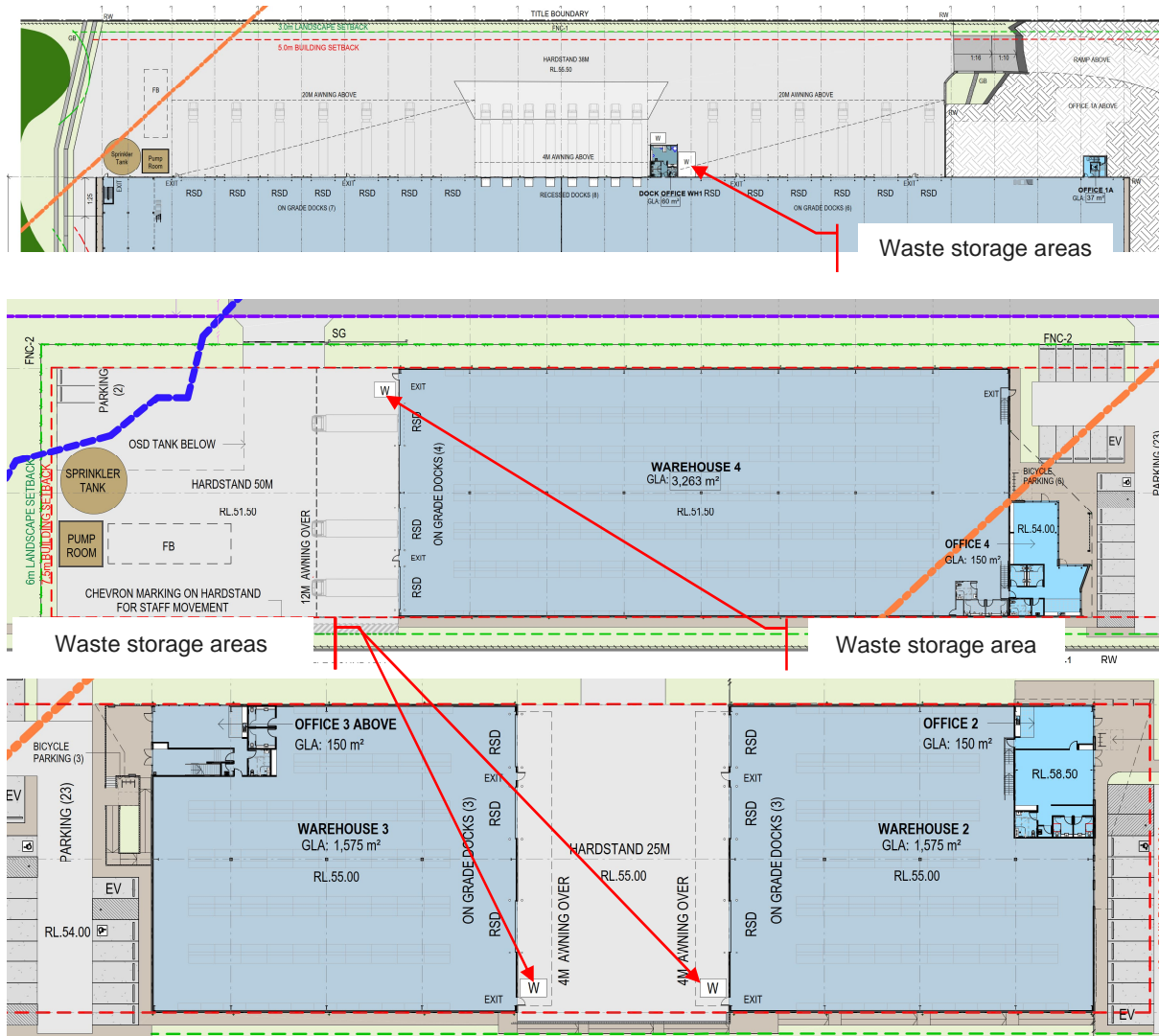


Figure 6 - Waste storage areas

9.7 Waste Avoidance, Reuse and Recycling

9.7.1 Waste avoidance

Waste avoidance measures include:

- Returning packaging materials like cardboard to the suppliers through the services of the supplier delivery trucks, allowing the reduction of waste further along the supply chain
- Providing ceramic cups, mugs, crockery and cutlery rather than disposable items
- Bulk purchasing and the purchasing of items that use minimal packaging
- Presenting all waste reduction initiatives to staff and tenants as part of their induction program, and
- Leasing equipment and machinery rather than outright purchase and disposal.



9.7.2 Re-use

Possible re-use opportunities include establishing systems with in-house and supply chain stakeholders to transport products in re-useable packaging where possible.

9.7.3 Recycling

Recycling opportunities include:

- Collecting and recycling e-waste
- Printer toners and ink cartridges, if purchased, are collected in allocated bins for appropriate contractor recycling
- Paper recycling trays provided in communal and staff areas for scrap paper collection and recycling
- Providing separate receptacles for general waste, recycling and paper and cardboard throughout public areas, as well as within staff areas, to encourage source-separation of waste streams
- Work with tenants to investigate opportunities for the use of recycled paper bags or reusable bags in place of plastics bags
- Separating, by a reasonable distance, the storage areas for recyclables from the general waste storage areas to avoid cross contamination, and
- Development of 'buy recycled' purchasing policy.

9.8 Litter Management

For the health and safety of staff, customers and visitors, careful consideration should be given to litter management. Good practice litter management is encouraged to reduce the impact of the Warehouse on the surrounding environment, increase amenity for customers and staff and minimise the likelihood of vermin and flies.

Good practice litter management controls include the following:

- The placement of general waste and comingled recycling bins in easily accessible areas including along walkways and aisles and at pedestrian entry and exit points to the car parks
- The use of water refillers and bubblers to discourage the use of single use plastic water bottles
- The use of clear signage throughout the warehouse to label bins, direct visitors and staff to bin locations and encourage disposal of waste and recyclables in an appropriate way. Signage is further discussed in Section 9.11
- Training of employees, cleaners and contractors on litter management issues and controls
- Regular litter collections
- Cultivating a culture of positive attitudes towards litter reduction
- Using accessible communication platforms, including the distribution of e-newsletters, texts, messages on invoices or signage around the premises to inform visitors of the warehouse's commitment to the environment, and



- Promotion or sale of branded reusable items, such as Keep Cups and reusable bottles, to discourage the use of single-use plastic cups and bottles.

9.9 Hazardous waste

If liquid, chemicals, and hazardous waste are regularly generated from any tenancy, a separate, enclosed storage area will be established inside the tenancy. This area will be designed and maintained to comply with relevant legislation and Australian Standards.

9.10 Communication Strategies

Education and communication on waste management initiatives and measures should be regularly and clearly conveyed to Managers, staff, cleaners and visitors. This assists in overcoming the transient nature of contractors, staff and visitors. Benefits of providing this communication include:

- Improved satisfaction with services
- Increased ability and willingness to participate in recycling
- Improved amenity and safety
- Improved knowledge and awareness through standardisation of services
- Increased awareness or achievement of environmental goals and targets
- Reduced contamination of recyclables stream which can incur a collection contractor penalty fee
- Greater contribution to state-wide targets for waste reduction and resource recovery.

To realise these benefits, the following communication strategies is recommended for the Facilities Manager:

- Use consistent signage and colour coding throughout the warehouse
- Ensure all tenants are informed of correct waste separation and management procedures
- Provide directional signage to show locations and routes to waste storage areas
- Repair signs and labels promptly to avoid a breakdown in communication
- Clearly label general and comingled waste bins to ensure no cross contamination and to identify the types of waste that may be disposed of in each bin, and
- Educate all tenants and contractors associated with the Warehouse, ensuring they adhere to this WMP.

9.11 Signage

Signs which clearly identify waste management procedures and provisions to contractors, tenants and visitors should be distributed around the warehouse.

The design and use of safety signs for waste rooms and enclosures should comply with Australian Standard *AS 1319 Safety Signs for the Occupational Environment* and clearly describe the types of materials designated for each bin.



Colour-coded and labelled bin lids are necessary for identifying bins and the Australian Standard AS 4123.7-2006 (R2017) *Mobile waste containers Part 7: Colours, markings, and designation requirements* provides recommendations for the designated colours for waste bins depending on the type of waste the bins are to receive. The colours anticipated to apply to ongoing waste generated by the Warehouse are:

- Blue: Paper and cardboard
- Yellow: Recyclables (other than paper and cardboard)
- Red: General waste
- Green: Garden organics

All bin signage should also follow the NSW EPA's standard signage.²¹

Other key signage considerations are:

- Clear and correct labelling on all waste and recycling bins, indicating the correct type or types of waste that can be placed into a given bin, as shown in Figure 7 below.
- Signposts and directions to location of waste storage areas
- Clear signage in all waste storage areas to instruct users how to correctly separate waste and recycling
- Maintaining a consistent style colour scheme that complies with AS 4123, and a system for signs throughout the warehouse, and
- Emergency contact information for reporting issues associated with waste or recycling management.



Figure 7 - Example NSW EPA labels for ongoing waste

²¹ NSW EPA waste signs/posters <http://www.epa.nsw.gov.au/wastetools/signs-posters-symbols.htm>



9.12 Monitoring and Reporting

Monitoring is recommended to ensure waste and recycling management arrangements and provisions for the Project are functional, practical and are maintained to the standard outlined in this plan, at a minimum.

During the warehouse's operation, visual assessments of bins and bin storage areas should be conducted by the Facilities Manager.

Quantities of waste and recycling associated with disposal of waste and recycling, including dockets, receipts and other physical records should be recorded by the Facilities Manager. This is to allow reviews of the waste management arrangements and provisions at the site over time. Records of waste disposal should also be available to regulatory authorities such as the NSW Environment Protection Authority and SafeWork NSW, upon request.

Any deficiencies identified in the waste management system, including, unexpected waste quantities, should be rectified by the Facilities Manager as soon as it is practical. Where audits show that recycling is not carried out effectively, management should carry out additional staff training, signage re-examination and reviews of the waste management system where the audit or other reviewing body has deemed necessary. If this waste management plan no longer sufficiently meets the needs of the warehouse, review and updates to maintain suitability must be undertaken.

9.13 Roles and Responsibilities

It is the responsibility of the Facilities Manager, or equivalent role, to implement this WMP and a responsibility of all tenants and staff to follow the waste management procedures set out by the WMP. SLR recommends that all subcontractors have the roles and responsibilities of all waste management personnel identified and the warehouse's waste management system clearly explained. A summary of recommended roles and responsibilities are provided in Table 15.

Suggested roles and responsibilities for site preparation, demolition and construction waste management.

Table 15 Suggested operational waste-related roles and responsibilities

Responsible Person	General Tasks
Facilities Manager or equivalent role	Ensure the WMP is implemented throughout the life of the operation.
	Update the WMP as needed to ensure the plan remains applicable to the site.
	Undertake liaison and management of contracted waste and recycling collections with contractors and any relevant authorities.
	Regularly conduct waste audits to review system performance and identify any additional materials that could be recovered.
	Manage any complaints and non-compliances reported through waste audits and other sources.
	Ensure all monitoring and audit results are well documented and conducted as specified in this WMP.



Responsible Person	General Tasks
	Conduct regular waste sorting, physical condition and cleanliness inspections of bins, waste storage rooms and all other waste management equipment for functionality, hygiene and safety.
	Manage ongoing education on correct source separation and waste management at least every three months.
Cleaners and tenants	Transfer general waste, recyclables, cardboard and food waste to the waste storage areas daily or as required.
	Clean and maintain all bins and waste and recycling rooms as per the direction of the Facilities Manager, or equivalent role.
	Monitor bins to ensure no overfilling occurs.
	Ensure bins and waste storage areas are kept tidy and clean.
	Compliance with the provisions of this WMP.
	Adhere to all waste management directions and comply with the warehouse's waste management provisions as outlined by the Facilities Manager.
	Organise cleaning and maintenance requirements for waste management equipment as required.
	Ensure waste and recycling storage areas are kept tidy.
	Monitor bins to ensure no overfilling occurs and manage unexpected waste quantities to mitigate waste overflow in storage areas
	Ensure effective signage, communication and education is provided to alert visitors, employees, site management staff and cleaners about the provisions of this WMP and waste management equipment use requirements.
	Monitor and maintain signage to ensure it remains clean, clear and applicable.
	Ensure that regular cleaning and daily transfer of bins is correctly being undertaken by the cleaners.
	Ensure all waste compactors and balers are maintained and operational.
	Ultimately responsible for the management of all waste management equipment, cleaning requirements, waste transfer and collection arrangements.

10.0 Assessment and findings

The WMP establishes that during ongoing operation of the warehouses, eight collections for waste and recycling will be provided per week for one warehouse, four for these streams at two other warehouses and six collections for these streams for the remaining warehouses. This amounts to 22 vehicle movements per week.

The WMP also establishes that the amount of space allowed for waste and recycling on-site is more than adequate to store the amounts projected to be generated.

11.0 Compliance with the WSADCP

The waste management requirements of the WSADCP, and associated documents, are detailed in Sections 7.1, 7.2 and 7.3 above. As far as it is possible to say, based on the proposed plans, the development complies with the WSADCP, other than the following:



2.11 Services and Utilities

PO5 Infrastructure allows for co-location of compatible similar uses.

1. Allow for the installation of the following within the utility corridor:

b. Vacuum waste collection system.

A vacuum waste collection system is not proposed for this development.

PO1 Waste management measures are implemented at lot and neighbourhood scale to support circular economy activities.

1. Submit a waste management plan to support circular economy activities that also details the quantity and type of waste generated and how this will be managed, reused and recycled. Where possible, incorporate technologies such as vacuum extraction or on-site food processing.

A vacuum waste system is not proposed for this development. On-site food processing, whether composting, worm farms, dehydrators or small-scale anaerobic digestion, is not proposed for the development at this stage as the quantities of food are not known. The viability of an on-site food processing unit will depend on available quantities and types of food and the particular use for the development. Space is available should tenants wish to install an on-site food processing system in the future.

2. Co-locate and integrate waste infrastructure on sites with multiple uses by providing a single collection point for waste and recycling.

This is not relevant to this development.

3. Demonstrate that organic waste can be managed in the building through measures such as:

a. Multiple options for on-site organic waste to maximise recovery (e.g. communal composting, worm farms, individual composting, dehydrators);

c. Energy generation from organic waste (anaerobic digestion) at lot and precinct scale.

Please refer to the previous comment about on-site food processing

4. Consolidated organic waste drop off points are designed to minimise any potential odour and vermin risks. This includes the provision of rooms that are temperature controlled and suitably ventilated.

Specialised storage for organics waste is not proposed and its future installation will depend on the tenant and the particular operations at the development.



12.0 Cumulative impacts

The projected cumulative quantities of waste and recyclables, 63.0 m² each per week, are insignificant compared to the quantities of waste and recyclables generated in Sydney every day. This quantity of material amounts to one compactor's worth. Allowance has been made for the separation of recyclables as much as possible, guided by the waste generation rates in suitable guidance documentation. It is possible that further separation and recovery of waste materials will be made during the operational phase of the development.

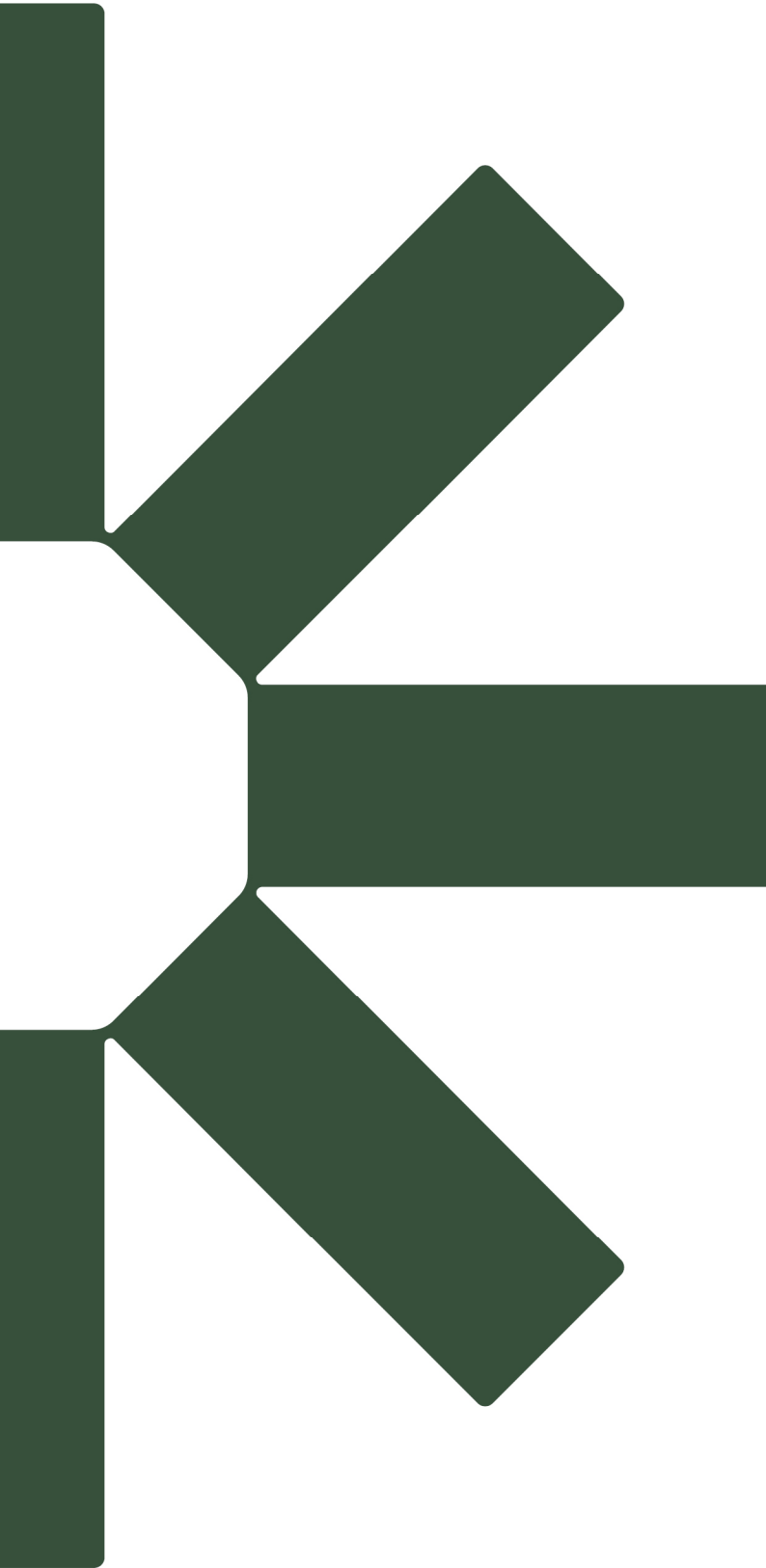
The 22 waste and recycling vehicle movements anticipated to be required each week are insignificant compared to the number of vehicle movements likely to be undertaken along Lawson Road in the future. The area close to Western Sydney Airport and will soon be a major industrial area with most lots along Lawson Road, and the parallel Martin Road, already either developed or planned for development.

In addition, a waste facility, Cleanaway's Kemp's Creek Resource Recovery Centre, is less than 1 km away. This waste facility is visited by thousands of large and small vehicles delivering waste, recyclables and organics every week. It is possible that many of the vehicles collecting waste and recyclables at the warehouses will dispose of them at the facility and would have been passing by on Lawson Road on the way to the facility, whether the warehouses were there or not. As a result, the number of waste collection vehicles travelling in the vicinity of the warehouse will not be affected by its development.

13.0 Mitigation measures

As the waste-related impact of the warehouse is zero or negligible, no mitigating measures are proposed beyond those for the separation of recyclables already detailed.





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