

Attachment 2 - Government Authority and Council advice



DOC25/802254-4

1 October 2025

David Ansen
Planning and Assessment Division
Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

By email: david.ansen@planning.nsw.gov.au

**EPA's Recommended Secretary's Environmental Assessment Requirements – Enfield
Material Recovery Facility Expansion - SSD-94439711**

Dear David,

I am writing in response to your request for the NSW Environment Protection Authority's (**EPA's**) advice in relation to the Secretary's Environmental Assessment Requirements (**SEARs**) for the Enfield Material Recovery Facility Expansion (**Proposal**) at Lot 24 DP 1200563, also known as 40-42 Madeline Street, Strathfield South, NSW 2136 (**Premises**).

Re.Cycle Operations Pty Ltd owns and operates the Premise and currently holds Environment Protection Licence 20576, issued under the *Protection of the Environment Operations Act 1997* (POEO Act), for Waste Storage (other types of waste) and Recovery of General Waste at the premises.

The EPA has considered the details of the Proposal as provided within the scope report titled "*Enfield Material Recovery Facility Increased Throughput Scoping Report*" dated September 2025 and prepared by EME Advisory on behalf of Re.Group Operations Pty Ltd (**Proponent**) and identified the information required to be provided by the Proponent.

The EPA understand the proposal is for:

- Increase of the site's total throughput from 99,900 tonnes per annum to 200,000 tonnes per annum. This is to allow an increase of glass recycling at the site.
- Increase the sites storage limits from 6,300 tonnes to 8,000 tonnes at any one time.
- Extend the temporary approved hours of operation to allow materials to be received at the Premise from 4.30am to 6pm, Monday to Saturday (this is consistent with the temporary DA but will revert to 4.30am to 3pm from 1 July 2027).
- Demolition of Building 3 and constructing a larger replacement building.
- Construction of a new enclosed overhead conveyor system extending from building 2 running parallel to building 1 and then spanning the yard and entering building 3.
- A new fully enclosed awing (with roof and side walls) attached to the MRF receival hall (building 2) and building 1 for overflow commingle waste materials.

NSW Environment Protection Authority

As the environmental steward and regulator of our State we are committed to a sustainable future. Join us on our mission to protect tomorrow together.

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- Increase of daily truck movements, up to 58 heavy vehicles for delivery of material and 13 heavy vehicles for collecting processed material.

The EPA has considered the details of the proposal and provides the recommended SEARs as **Attachment A**. In summary, the EPA's key environmental assessment requirements for the Proposal relate to:

- Waste
- Water
- Air
- Noise
- Contamination

In carrying out the assessment, the proponent should refer to the relevant guidelines listed, as well as any relevant industry codes of practice and best practice management guidelines.

The Proponent should be made aware that any commitments made in the environmental assessment may be formalised as approval conditions and may also be placed as formal licence conditions. Consistent with Part 9.4 of the POEO Act the EPA may require the provision of a financial assurance and/or assurances. The amount and form of the assurance(s) would be determined by the EPA and required as a condition of the licence.

If you have any questions about this request, please contact Joshua Delmore via email at josh.delmore@epa.nsw.gov.au.

Yours sincerely

Elizabeth
Watson

Digitally signed by
Elizabeth Watson
Date: 2025.10.01
14:04:47 +10'00'

Elizabeth Watson
A/Manager – Operations
NSW Environment Protection Authority

ATTACHMENT A

NSW EPA's Recommended Secretary's Environmental Assessment Requirements Enfield Material Recovery Facility Expansion, SSD-94439711

1. Environmental impacts of the project

- 1.1. The description should include the following for both the construction and operation of the project:
 - a. Details of the premises covered by the project including any relationship with any existing Environment Protection Licences
 - b. the layout of all the physical elements of the project within the project area, including all buildings, structures, works, haulage activities, pollution controls, stockpile and material handling areas, sealed and unsealed areas, landscaping and open space.
 - c. all mitigation measures that will be built into the physical layout and design of the project (such as noise walls)
 - d. any ancillary infrastructure for which approval is being sought (such as upgrades to utilities or surrounding roads)
 - e. identify those components of the physical layout and design that may change during the detailed design of the project, and set clear limits within which this change may occur without requiring amendments to the DA or modifications to the development consent if the project is approved
 - f. plans showing the layout and design in plan-view and cross section.
- 1.2. Identify any likely interactions between the development and any existing/approved developments and land uses in the area.
- 1.3. Identify all sensitive receivers likely to be affected by the development using clear maps/plans, including key landform areas, such as conservation areas and waterways.
- 1.4. Identify all potential environmental emissions, assess the likely environmental impacts, and describe the proposed mitigation measures to minimise environmental pollution to achieve compliance with relevant environmental legislation, policies, and guidelines.
- 1.5. The EIS must accurately summarise the key findings of the detailed technical studies in the appendices of the EIS and use suitable cross-referencing to reduce repetition between the two parts of the EIS.

2. EPA Licensing and Approval Requirements

- 2.1. Identify all approvals and licences required under environment protection legislation including details of all scheduled activities under schedule 1 of the *Protection of the Environment Operations Act 1997*.
- 2.2. Outline how the proposal and its environmental protection measures would be implemented and managed so as to demonstrate that the proposal is capable of complying with statutory obligations under EPA licences or approvals (e.g. outline of an environmental management plan).

3. Site Facilities

- 3.1. All waste activities must be conducted inside a fully enclosed building which includes but is not limited to receipt, sorting, processing, sampling, storage and loading
- 3.2. Waste and materials, including finished products, must not be stored outside
- 3.3. All used external surfaces, including any external haulage areas or roads, must be sealed hardstand and must be impermeable

- 3.4. Any unused external surfaces must be sealed hardstand and impermeable or vegetated

4. Site plan

- 4.1. A detailed existing and proposed site plan must be included in the Environmental Impact Statement (EIS). The existing and proposed site plan must identify at a minimum, but is not limited to:
- a. Site boundaries
 - b. Locations of the facilities
 - c. Buildings and structures
 - d. Traffic flows and directions
 - e. Haulage
 - f. Waste and material receipt, processing, storage, and loading areas
 - g. Quarantine area(s)
 - h. Infrastructure for environmental controls including dust, noise, water, and odour
 - i. Infrastructure for waste and material receipt, processing, storage, and loading
 - j. Weighbridges
 - k. Wheelwash
 - l. Stormwater drainage areas
 - m. Unused stabilised areas
 - n. Machinery storage areas
 - o. Vehicle parking areas
 - p. Any dangerous goods, hazardous goods and/or chemical storage areas (including any fuel storage areas)
 - q. Bunding.

5. Waste and materials management

- 5.1. The EIS must include a detailed assessment of the waste and material management processes to be undertaken at the Premises. This includes but is not limited to:
- a. Details of the sources of each waste and material type to be received at the Premises
 - b. Details of the types and quantities of each type of waste and material to be received at the Premises
 - c. Details of the maximum volume of each waste and material type and the total maximum volume of waste/material to be stored at the Premises at any one time
 - d. Details of the maximum annual throughput of each waste and material type and the total maximum throughput to be received at the Premises
 - e. A detailed description of receipt, processing, and storage, and loading procedures for each facility and each individual waste and material type
 - f. A description of how the Proponent will meet the EPA's record keeping and reporting requirements, including weighing material in and out of the Premises
 - g. Note: Refer to the EPA's Waste Levy Guidelines (Levy Guidelines) for more information. The Levy Guidelines are available at:
<https://www.epa.nsw.gov.au/your-environment/waste/waste-levy>

- h. Details of the type and quantities of materials to be produced and their intended fate
- i. The intended fates of all other waste and materials received/produced on site which are not suitable for re-use
- j. Details of any materials produced under a Resource Recovery Order/Resource Recovery Exemption (RRO/E) and the controls/procedures in place for meeting the conditions of that RRO/E
- k. Details of any materials produced which will require a specific RRO/E
- l. A description of procedures for dealing with non-conforming waste and materials (i.e. waste not permitted to be received at the Premises)
- m. Details of any testing/monitoring procedures
- n. Details of storage tonnage limits for unprocessed and processed wastes including the maximum total storage capacity at any one time.

6. Waste and material types

- 6.1. The EPA requires detailed information on the waste and material types proposed to be received at the Premises. For each waste and material type, the EIS must detail the physical and chemical content of the waste/material, the types of pollution which may result from the storage and processing of that waste/material, and mitigation measures for managing any such impacts.
- 6.2. The EIS must explicitly identify each individual type of waste which will be received at the Premise, with reference to the EPA's Waste Classification Guidelines (Classification Guidelines) and the definitions set out under Schedule 1 of the POEO Act.

7. Waste, chemicals and hazardous materials and radiation

The EIS must assess the following waste, chemical and hazardous materials related aspects of the proposed development:

- 7.1. Assess and describe all aspects of waste generation, management and disposal associated with the proposed development.
- 7.2. Demonstrate compliance with all regulatory requirements outlined in the POEO Act and associated waste regulations.
- 7.3. Outline contingency plans for any event that may result in environmental harm, such as excessive stockpiling of material, or dirty water volumes exceeding the storage capacity available on-site.
- 7.4. Demonstrate that appropriate spill containment will be provided for storage, filling and loading of all fuels and other chemicals to be used on site, in accordance with all relevant Australian Standards, and/or NSW EPA's *Storing and Handling of Liquids: Environment Protection-Participants Manual* (DECC, 2007).
- 7.5. Identify the measures that would be implemented to ensure that the development is consistent with the aims, objectives and guidance in the *NSW Waste and Sustainable Materials Strategy 2041 Stage 1: 2021-2027*. Available at: <https://www.epa.nsw.gov.au/Your-environment/Recycling-and-reuse/Strategic-direction-for-waste-in-NSWWaste-and-Sustainable-Materials-Strategy>.
- 7.6. This waste facility will be required to report on the amount of waste being handled:
 - a. If it is located within or receives waste from the Metropolitan Levy Area (MLA) or Regional Levy Area (RLA), a weighbridge will need to be installed, and it will need to report monthly. If it is located within the Non-Levied Area (NLA), and only receives waste from the NLA, then it will need to report annually.

- b. Document how you will comply with Clause 36 of the *Protection of the Environment (Waste) Regulation 2018*. This Clause includes requirements regarding the installation and calibration of a weighbridge, vehicle flow plans, weighbridge software and associated recording and reporting requirements.
- c. Document how you will comply with the EPA's waste levy benchmark requirements including the software to be used.
- d. Nominate the upper limit of the amount of waste that may be stockpiled at your facility at any one time. This nominated amount will be considered when determining the maximum authorised amount of waste that may be at your facility at any time.
- e. Ensure that the facility complies with the waste levy requirements for the levy area in which it is located. Information about levy areas is available at <https://www.epa.nsw.gov.au/your-environment/waste/waste-levy/levy-regulated-area-and-levy-rates>.

8. Air issues

- 8.1. The EIS must demonstrate the proposal's ability to comply with the relevant regulatory framework, specifically the POEO Act and the *Protection of the Environment Operations (Clean Air) Regulation 2022*. This consideration should include section 129 of the POEO Act concerning control of "offensive odour".
- 8.2. The EIS must include an air quality impact assessment (AQIA). The AQIA must be carried out in accordance with the document, *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (2022). These are available at: <https://www.epa.nsw.gov.au/your-environment/air/industrial-emissions/approved-methods-for-the-modelling-and-assessment-of-air-pollutants>
- 8.3. The AQIA must identify all potential air emissions from the Premises during construction and operation, including, but not limited to, coarse particulates, PM10, PM2.5 and odour. The Proponent must assess the impact of these discharges and demonstrate effective control of all identified air emissions from the Premises.
- 8.4. The EIS must detail emission control techniques/practices that will be employed at the site and identify how the proposed control techniques/practices will meet the requirements of the POEO Act, *POEO (Clean Air) Regulation* (2022) and criteria within *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (2022).

9. Noise and Vibration

The EIS must assess the following noise and vibration aspects of the proposed development:

- 9.1. Operational and construction activities on the premises that maybe considered vibration intensive should be assessed using the guidelines contained in the *Assessing Vibration: a technical guideline* (DEC, 2006). These are available at: <https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/assessing-vibration>
- 9.2. Operational noise from noise intensive activities to be undertaken on the premises should be assessed using the guidelines contained in the *NSW Noise Policy for Industry* (EPA, 2017). Available at: [https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/noise-policy-for-industry-\(2017\)](https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/noise-policy-for-industry-(2017))
- 9.3. If applicable, noise on public roads from increased road traffic generated by land use developments other than road projects should be assessed using the guidelines contained in the *NSW Road Noise Policy* (EPA, 2011) and associated application notes. Available at: <https://www.epa.nsw.gov.au/your-environment/noise/transport-noise>.

10. Water

The EIS surface water quality assessment must:

- 10.1. Demonstrate that all practical measures to prevent, control, abate or mitigate water pollution have been implemented, including a description of options that were explored (such as reuse to avoid a discharge or treatment).
- 10.2. Provide details of the proposal that are essential for predicting and assessing potential impacts to receiving waters. This could include (but is not limited to):
 - a. Site layout, including details of the existing and proposed water management system.
 - b. Drainage map for the entire site identifying sub-catchments, flow paths, drainage infrastructure, design sizing of structures, water storages, discharge points, and any potential flow paths to receiving waters.
 - c. How stormwater will be managed in all phases of the project. Information should include, where appropriate, measures to avoid or minimise erosion, leachate generation, and sediment mobilisation at the site.
 - d. Identify and estimate the quality and quantity of all pollutants that may be introduced into the water cycle by source and discharge point, including residual discharges after mitigation measures are implemented. This should be undertaken for construction and operational phases.
- 10.3. Include a water pollution impact assessment undertaken consistent with the guidance available at <https://www.epa.nsw.gov.au/your-environment/water/managing-water-pollution-in-nsw/environment-protection-licensing/water-pollution-discharge-assessments>. The level of assessment should be commensurate with the risk to the environment and human health.

The EIS must describe how stormwater will be managed in all phases of the project, including details of how stormwater and runoff will be managed to minimise pollution. Information should include measures to be implemented to minimise erosion, leachate and sediment mobilisation at the site. The EIS should consider the guidelines *Managing urban stormwater: soils and construction*, vol. 1 (Landcom 2004) and vol. 2 (A. Installation of services; C. Unsealed roads; D. Main Roads; E. Mines and quarries) (DECC, 2008).

11. Wastewater

- 11.1. The EIS must include details of how wastewater at the facilities will be managed. This includes but is not limited to:
 - a. Storage, treatment, sampling, and disposal
 - b. Mitigation measures proposed to be implemented to prevent and mitigate leaks and spills from the treatment plant and other activities:
 - i. appropriate primary and secondary containment systems should be included
 - ii. details of bunding, isolation, overflow prevention and other controls should be prioritised to demonstrate spill and leak related risks have been appropriately considered and addressed.
 - c. Detailed information regarding any trade waste agreements in place with Sydney Water

12. Contamination

- 12.1. Identify the likelihood of contamination at the site and surrounding land (on different media such as soils, groundwater, ground gas, surface water and sediments, where applicable) by considering the context of past, current, and proposed land uses. The EIS must document how the assessment of contaminated land has been undertaken with regard to the relevant guidelines for contaminated land made or approved by the NSW EPA.
- 12.2. All reports on contamination must be prepared by a suitably qualified contaminated land consultant⁽¹⁾ who is also certified⁽²⁾.

(1) A suitably qualified and experienced contaminated land consultant is a contaminated land consultant who meets the competencies outlined in the Guideline on the Competencies and Acceptance of Environmental Auditors and Related Professionals (Schedule B9) as provided in the ASC National Environment Protection (Assessment of Site Contamination) Measure 1999 (as amended in 2013)."

(2) A certified consultant is a consultant certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme;

Note: If an auditor is being engaged for the project, the requirement for a certified consultant to prepare the contaminated land reports is still recommended as it will help ensure all assessment work is done as efficiently as possible, but it is optional. However, it must still be required for all reports to be prepared by a suitably qualified contaminated land consultant.

- 12.3. Where contamination is considered likely based on past or current land uses or other factors (such as offsite contamination migrating onto the site), undertake detailed site investigation/s to determine the nature and extent of the contamination.
- 12.4. Where contamination exists, assess if remediation of the land is required, having regard to current and future land uses; and the ecological and human health risks posed by the contamination to both onsite and offsite receptors.
- 12.5. Where a detailed site investigation is prepared and/or remediation is considered necessary, a NSW EPA accredited Site Auditor must be engaged to undertake an audit. The EIS must include copies of any Interim Audit Advice provided by the auditor and a Site Audit Statement and Site Audit Reports issued by the auditor which certifies the site can be made suitable for the proposed use
- 12.6. The following references should be included as relevant guidelines that must be followed when assessing contaminated land:
 - a. *Managing Land Contamination: Planning Guidelines SEPP 55 – Remediation of Land (DUAP and EPA, 1998)* - <https://www.epa.nsw.gov.au/sites/default/files/managing-contaminated-land-guidelines-remediation.pdf>
 - b. *Guidelines on the Duty to Report Contamination under the Contaminated Land Management Act 1997 (EPA, 2015)*
 - c. *Contaminated land sampling design guidelines - Part 1 and 2 (EPA, 2022)*
 - d. *Consultants reporting on contaminated land: contaminated land guidelines (EPA, 2020)*
 - e. *Guidelines for the NSW Site Auditor scheme 3rd edition (EPA, 2017)*
 - f. Any other relevant guidelines made or approved by the EPA under s105 of the *Contaminated Land Management Act 1997* - <https://www.epa.nsw.gov.au/your-environment/contaminated-land/statutory-guidelines>

13. Construction Works

- 13.1. The EIS must include detail of the construction works including:
 - a. any earthworks or site clearing; re-use and disposal of cleared material (including use of spoil on-site).
 - b. Identify, characterise and classify the following in accordance with the EPA's *Waste Classification Guidelines (2014)*:
 - i. all waste that will be generated onsite through excavation, demolition or construction activities, including proposed quantities of the waste;

- ii. all waste that is to be removed to an offsite location, including proposed quantities. Include the commitment to ensure this waste is taken to a facility that can lawfully receive it.

Note: The EPA's *Waste Classification Guidelines (2014)* are available at: <https://www.epa.nsw.gov.au/your-environment/waste/classifying-waste>

- c. construction timetable and staging; hours of construction; proposed construction methods.
 - d. environment protection measures, including noise mitigation measures - in accordance with the *Interim Construction Noise Guideline* (DECC, 2009), dust control measures and erosion, and sediment control measures- in accordance with *Managing urban stormwater: Soils and construction*, vol. 1 (Landcom 2004).
- 13.2. Include a site diagram showing the site layout and location of environmental controls.
- 13.3. Construction noise associated with the proposed development should be assessed using the *Interim Construction Noise Guideline* (DECC, 2009). These are available at: <https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/construction-noise>

14. Climate Change

- 14.1. Provide estimate of greenhouse gas (GHG) emissions for the project by carrying out a Greenhouse Gas Assessment consistent with the most recent version of the EPA's Greenhouse Gas Assessment Guide for Large Emitters (GHG guide) that is available on the EPA's website. The GHG estimate is to confirm if the project is likely to result in 25,000 tonnes or more of scope 1 and 2 emissions (CO₂-e), in any financial year during the operational life of the project. Input data and assumptions used to estimate GHG should be accompanied by supporting evidence.

Note: Where the proponent believes that certain requirements from the GHG guide are not applicable, the proponent may indicate that in the EIS but must provide sufficient justification.



File Ref. No: FRN25/2911 BFS25/6611 8000045295
TRIM Doc. No: D25/112836
Contact: Senior Firefighter Ross Blanchard

23 September 2025

DAVID ANSEN
NSW Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Dear David,

Re: Advice on Secretary's Environmental Assessment Requirements (SEARs) – ENFIELD MATERIAL RECOVERY FACILITY EXPANSION 40-42 MADELINE STREET, STRATHFIELD SOUTH NSW 2136 (SSD-94439711)

Fire and Rescue NSW (FRNSW) acknowledge correspondence received on 18 September 2025, requesting input into the preparation of the SEARs for ENFIELD MATERIAL RECOVERY FACILITY EXPANSION 40-42 MADELINE STREET, STRATHFIELD SOUTH NSW 2136 (SSD-94439711). FRNSW have reviewed the SEARs along with the Scoping Report with particular focus to Section 7.1.4.

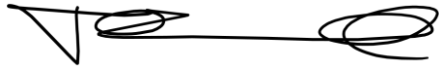
The Scoping Report details a Recycling Facility. It has been the experience of FRNSW that Recycling Facilities present special problems of fighting fire and suitable additional provisions are likely to be required in accordance with E1D17 and E2D21 of the National Construction Code 2022¹.

FRNSW will likely recommend a Fire Safety Study (FSS) be developed in accordance with the Hazardous Industry Planning Advisory Paper No 2² as a condition of consent. The FSS should be used to inform the design and as such it is FRNSW Position³ that the FSS be developed to the satisfaction of FRNSW prior to any further submission being made to FRNSW; this includes: an Initial Fire Safety Report (IFSR) and / or Performance-Based Design Brief / Fire Engineering Brief Questionnaire (FEBQ).

The FSS should be prepared consistent with the relevant FRNSW Fire Safety Guidelines and FRNSW Technical Information Sheets⁴ with particular focus to Fire safety in waste facilities⁵ and Access for fire brigade vehicles and firefighters⁶.

Project proponents undertaking the FSS are to engage directly with FRNSW by submitting all correspondence electronically to FireSafety@fire.nsw.gov.au and reference FRNSW file number FRN25/2911. Further information regarding FRNSW Meetings⁷ and FRNSW Written Reports⁸ can be found at the FRNSW Building Fire Safety Industry Portal⁹.

Yours sincerely,



Superintendent James O'Carroll
Manager
Fire Safety Liaison Unit

Cc: david.ansen@planning.nsw.gov.au

¹ <https://ncc.abcb.gov.au/editions/ncc-2022>

² <https://www.planning.nsw.gov.au/sites/default/files/2023-03/hazardous-and-offensive-planning-advisory-paper-no-2-fire-safety-study-guidelines.pdf>

³ <https://www.fire.nsw.gov.au/page.php?id=9447&position=51>

⁴ <https://www.fire.nsw.gov.au/page.php?id=9166>

⁵ https://www.fire.nsw.gov.au/gallery/files/pdf/guidelines/guidelines_fire_safety_in_waste_facilities.pdf

⁶ https://www.fire.nsw.gov.au/gallery/files/pdf/guidelines/guidelines_access_for_emergency_vehicles.pdf

⁷ <https://www.fire.nsw.gov.au/page.php?id=9193>

⁸ <https://www.fire.nsw.gov.au/page.php?id=9156>

⁹ <https://www.fire.nsw.gov.au/page.php?id=9140>

28 September 2025

TfNSW Reference: SYD25/01172/01
DPHI Reference: SSD-94439711



Ms Kiersten Fishburn
Secretary
Department of Planning, Housing, and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Attention: David Ansen

**REQUEST FOR SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS (SEARS)
ENFIELD MATERIAL RECOVERY FACILITY
40-42 MADELINE STREET, STRATHFIELD SOUTH**

Dear Ms Fishburn,

Thank you for providing Transport for NSW (**TfNSW**) an opportunity to provide input to draft Secretary's Environmental Assessment Requirements (**SEARs**) for the proposed changes to the existing Enfield Material Recovery Facility at 40-42 Madeline Street, Strathfield South.

TfNSW has reviewed the scoping report (prepared by EME Advisory in September 2025) and provides assessment requirements and comments in **TAB A** for the consideration of the Department of Planning, Housing and Infrastructure (**DPHI**).

Should you have any questions regarding the above matter, please contact Annelly Ketheson, Land Use Planner, on phone 9983 2731 or via email at development.sydney@transport.nsw.gov.au.

Yours sincerely,

Brendan Pegg
Senior Manager Land Use Assessment Central and Western
Transport Planning
Planning, Integration and Passenger Division

TAB A - TfNSW suggested requirements and comments

- An analysis of the existing traffic network, including the road hierarchy, current and future daily peak hour (light and heavy) vehicle movements and existing and future performance levels of nearby intersections.
- A forecast of additional daily and peak hour vehicle movements because of the proposal and identification of potential traffic impacts on road capacity, intersection performance and road safety (including pedestrian and cycle conflict).
- Proposals to mitigate any traffic impacts, including intersection upgrades to achieve acceptable performance.
- Details of car parking provision, having regard to relevant parking rates, specifications and standards.
- Details of proposed vehicular access, loading and unloading deliveries and servicing arrangements, and any proposed infrastructure improvements or measures to reduce potential conflicts with pedestrians and cyclists.
- Swept path diagrams depicting vehicles entering, exiting and manoeuvring throughout the site.



Your ref: SSD-94439711
Our ref: DOC25/804837

David Ansen
Planning Officer
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

By email: david.ansen@planning.nsw.gov.au

2/10/2025

Subject: Major Projects – New Request for SEARs Advice - Enfield Material Recovery Facility Expansion (SSD-94439711) (Strathfield)

Dear David,

I refer to the 18 September 2025 request for input from the Conservation Programs, Heritage and Regulation (CPHR) Group of the Department of Climate Change, Energy, the Environment and Water on the Planning Secretary's environmental assessment requirements (SEARs) for the above State significant development application.

CPHR has reviewed the Scoping Report prepared by EME Advisory Pty Ltd dated September 2025 and recommends the proponent address the requirements below and attached.

Biodiversity assessment requirements

In relation to point 4 of the recommended biodiversity environmental assessment requirements, please note the minimum information and spatial data requirements are in Tables 24 and 25 of the Biodiversity Assessment Method 2020 (BAM). Other requirements, such as those relating to the BAM Calculator and Biodiversity Offset Assessment Management System, can be found searching 'guides, tools and databases' at environment.nsw.gov.au.

Please contact Greater Sydney Planning team at Khatera.tokhi@dcceew.nsw.gov.au should you have any queries regarding this advice.

Yours sincerely,

Louisa Clark
Director, Greater Sydney Branch
Regional Delivery
Conservation Programs, Heritage and Regulation Group

**CPHR Environmental Assessment Requirements – Enfield Material Recovery Facility
Expansion (SSD-94439711) (Strathfield)**

Biodiversity

1. Biodiversity impacts related to the proposed development are to be assessed in accordance with Section 7.9 of the *Biodiversity Conservation Act 2016* (BC Act), the Biodiversity Assessment Method 2020 (BAM) and documented in a biodiversity development assessment report (BDAR). The BDAR must include information in the form detailed in the BC Act (s.6.12), *Biodiversity Conservation Regulation 2017* (s.6.8) and the BAM, including an assessment of the impacts of the proposal (including an assessment of impacts prescribed by the regulations).
2. The BDAR must document the application of the avoid, minimise and offset framework including assessing all direct, indirect and prescribed impacts in accordance with the BAM.
3. The BDAR must include details of the measures proposed to address the offset obligation as follows:
 - The total number and classes of biodiversity credits required to be retired for the development/project.
 - Any proposal to make a payment to the Biodiversity Conservation Fund.
4. The BDAR must be submitted with all spatial data associated with the survey and assessment as per the BAM.
5. The BDAR must be prepared by a person accredited in accordance with the *Accreditation Scheme for the Application of the Biodiversity Assessment Method Order 2017* under s.6.10 of the BC Act.

Flood Risk Management

6. The EIS must include a flood impact and risk assessment (FIRA) prepared in accordance with the [Flood Risk Management Guideline LU01 Flood impact and risk assessment](#). The FIRA is to be prepared by suitably qualified engineers with experience in flood risk management in NSW. As a minimum the FIRA must:
 - Identify and describe post development scenario(s) for flood behaviour, constraints and risk on the site and its surrounding areas for the full range of abovementioned events. Details of the development must be included in the verified models.
 - Provide mapping of flood behaviour for existing conditions and post development scenarios for both mainstream flooding and local overland flooding for the 5%, 1%, and 0.5% or 0.2% AEP and PMF as well as the 1% AEP and PMF behaviour under climate change.
 - Identify and describe the flood constraints on the land (floodways, flood storage, flood hazard and emergency response issues) for the full range of abovementioned events, for both mainstream flooding and local overland flooding.
 - Assess the appropriateness of the development or development types for the location based on the flood constraints on the land.
 - Identify the impacts of the development on flood behaviour and risk for the abovementioned flood events.
 - Identify and assess the adequacy of management measures and controls to:
 - effectively address flood constraints to ensure the flood risks to the proposed development and its users are acceptable, and
 - manage flood and associated emergency management impacts due to the development on existing communities and individual property owners and occupiers.
 - Address flood-related emergency response issues and site access arrangements, in accordance with [Flood Risk Management Guideline EM01 Support for Emergency Management Planning](#).
 - Assess climate change impacts on flood behaviour in accordance with [Flood Risk Management Guideline FB01 Understanding and managing flood risk](#).

Note: Flood modelling is to be undertaken by a suitably qualified engineer consistent with Council's requirements and Australian Rainfall and Runoff. Flood behaviour includes flood volume, extent, depth, level, velocity, duration, rate of rise, flood function and hazard. Flood risk is a function of flood behaviour, exposure and vulnerability for each element at risk. Impacts of flooding include changes to flood behaviour and risks to the community including emergency management response for the community.

Water and soils

7. The EIS must map the following features relevant to water and soils including:
 - Acid sulfate soils (Class 1, 2, 3 or 4 on the Acid Sulfate Soil Planning Map).
 - Rivers, streams, wetlands, estuaries (as described in s.4.2 of the BAM).
 - Wetlands as described in s.4.2 of the BAM.
 - Groundwater.
 - Groundwater dependent ecosystems.
8. The EIS must describe background conditions for any water resource likely to be affected by the development, including:
 - Existing surface and groundwater.
9. The EIS must assess the impact of the development on hydrology, including:
 - Effects to downstream rivers, wetlands, estuaries, marine waters and floodplain areas.
 - Effects to downstream water-dependent fauna and flora including groundwater dependent ecosystems.
 - Impacts to natural processes and functions within rivers, wetlands, estuaries and floodplains that affect river system and landscape health such as nutrient flow, aquatic connectivity and access to habitat for spawning and refuge (e.g. river benches).

End of Submission

26 September 2025

David Ansen
Major Projects
Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street,
Locked Bag 5022, Parramatta, NSW 2124

Dear David,

**SEARS – SSD-94439711 – 40-42 MADELINE STREET, STRATHFIELD SOUTH –
MATERIALS RECOVERY FACILITY EXPANSION**

Strathfield Council has reviewed the Secretary's Environmental Assessment Requirements (SEARs) request submitted by Re.Cycle Operations Pty Ltd for a State Significant Development (SSD) at 40-42 Madeline Street, Strathfield South where they operate a materials recycling facility (MRF).

Noting the Scoping Report, Council is satisfied with the Environmental Assessments planned for inclusion in the EIS. Council's Waste Management and Environmental Health Team did not have any further comments. Council's Traffic and Transport Engineer made the following suggestions:

- Consider the existing approved site layout and the layout proposed by the modification to demonstrate that vehicles can access and move through the site safely under both options.
- The traffic impact assessment will need to consider the traffic generation for the site and the impact on the local Road network accordance with TfNSW's Guide to Traffic Impact Assessment (TfNSW, 2024) and other relevant guidelines and standards.

Please do not hesitate to contact the undersigned or Joe Gillies, Senior Planner on 9748 9632 to discuss the above.

Yours sincerely,



Paul Reid
Director Planning and Environment