



STATEMENT OF ENVIRONMENTAL EFFECTS

WINDELLAMA CLAY MINE AND LANDFILL

Submitted to:

Goulburn Mulwaree Shire Council

Locked Bag 22, Goulburn NSW 2580

Submitted by:

Hi-Quality Waste Management Pty Ltd

PO Box 699 Hoxton Park NSW 2171

15 April 2025

STATEMENT OF CERTIFICATION

Statement of Environmental Effects prepared pursuant to the *Environmental Planning and Assessment Act 1979*.

Statement of Environmental Effects prepared by:

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Certification:

I certify that to the best of my knowledge this Statement of Environmental Effects:

- Has been prepared in accordance with the requirements of the *Environmental Planning and Assessment Act 1979*, and the *Environmental Planning and Assessment Regulations 2021*; and
- It does not contain information that is either false or misleading.

Date: April 15, 2025

Signature:

A handwritten signature in blue ink, appearing to be 'AZ', written over a light blue circular stamp.

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I. INTRODUCTION

In accordance with Section 4.55(2) of the *Environmental Planning and Assessment Act 1979 (EP&A Act)*, this Statement of Environmental Effects (**SEE**) has been prepared for submission to Goulburn Mulwaree Council (**Council**) to support a proposed modification (**the Proposal**) to the existing Development Consent DA 989/130 (**Original Consent**) at the Windellama Clay Mine and Landfill, located at 2622 Oallen Ford Road, Windellama, Lot 2, DP 81 1821 (**the Site**). The Proposal seeks to:

- Modernise the approved heavy vehicle types for use at the Site by removing outdated references to specific weights and configurations and expanding the approved heavy vehicle types, including Performance-Based Standards (**PBS**) vehicles, which offer improved load distribution, enhanced vehicle stability, reduced road pavement wear, and increased payload capacity. This update aligns with the applicable heavy vehicle permits issued by the National Heavy Vehicle Regulator (**NHVR**) for the haulage route and modern-day standards under the PBS framework.
- Introduce flexibility in daily truck movements by averaging movements over a calendar year, as the Site operates at reduced capacity during significant rain events and during quieter operational periods. This ensures that truck movements lost on these days can be carried over to other periods without increasing the total annual truck movements. The change will not result in a dramatic increase in trucks on any given day and is unlikely to be noticeable.

These modifications align with modern safety, efficiency, and infrastructure standards while enhancing the Site's operational efficiency by improving transport logistics and ensuring compliance with current regulatory frameworks.

I.1. The Proponent – HiQ

HiQ is an Australian-owned company with operations across New South Wales, Queensland, Victoria, and the Australian Capital Territory, with its headquarters based in Prestons, New South Wales. Established in 1964, HiQ has grown into a multi-disciplinary contractor within the waste sector, driven by a long-term vision and an in-depth understanding of the needs of clients, customers, and the broader industry. The company is committed to overcoming complex challenges through innovative solutions, leveraging a network of strategically located assets across the east coast and adopting both existing and emerging technologies.

With a strong track record in delivering safe and innovative waste management services, HiQ supports major public and private projects, specialising in waste and resource recovery. The company offers tailored solutions for a diverse range of clients across Australia.

The Site is owned by Patrick James Hallinan, the sole director of HiQ, with Hi-Quality Waste Management Pty Ltd acting as the operator.

I.2. Site Details

The Site is located within Goulburn Mulwaree Local Government Area and is zoned RU2 — *Rural Landscape* pursuant to the *Goulburn Mulwaree Local Environmental Plan 2009 (the LEP)*.

The Site is located on the eastern side of Oallen Ford Road approximately 3.3 kilometres to the south of the intersection of Sandy Point Road and Oallen Ford Road, with the surrounding area generally rural residential. The Site is approximately 50 km south-south east of Goulburn and 57 kilometres north-north east of Braidwood (refer to **Figure I**).

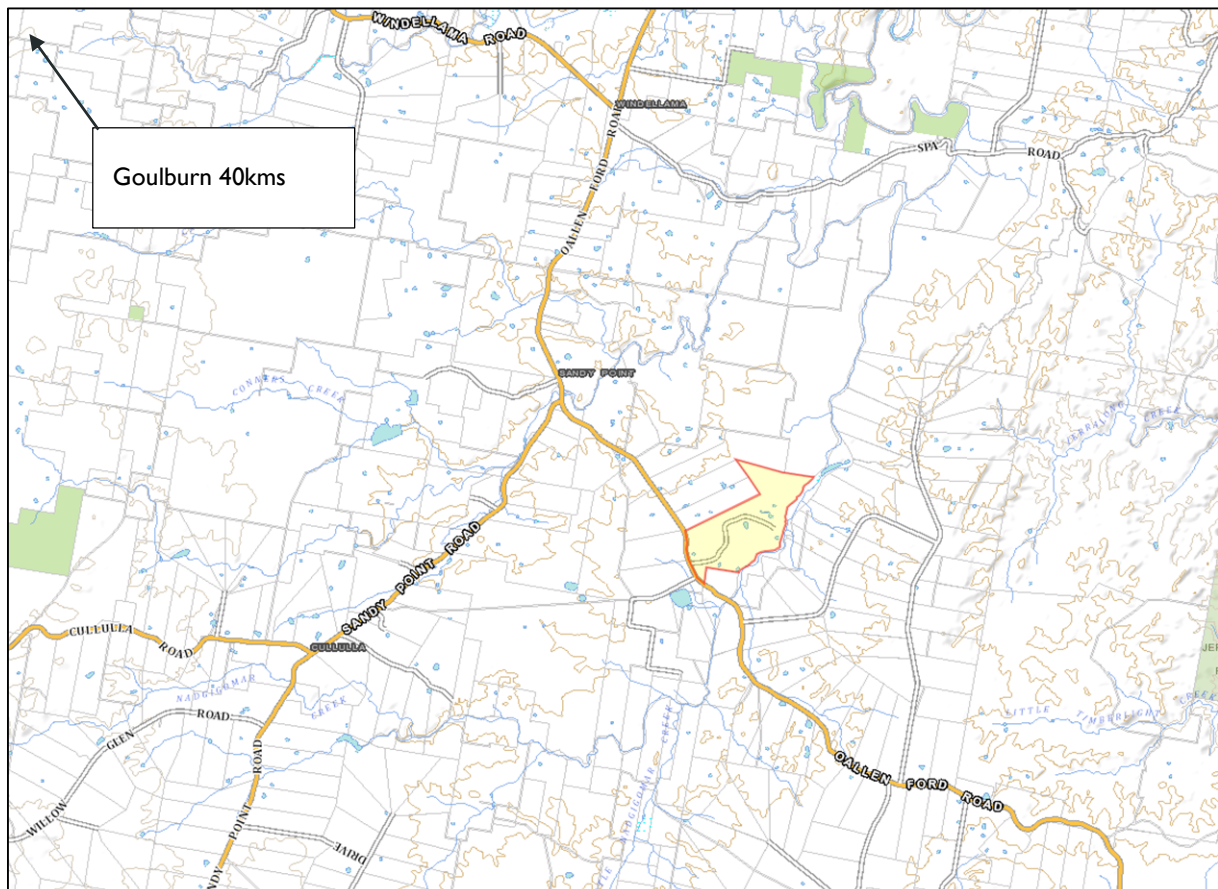


Figure 1: Site Location

The Site includes a clay deposit, which is extracted for use in brick making. The void created by the extraction of clay is progressively utilised for landfill waste acceptance, recycling activities and rehabilitation.

The Site is approximately 150 hectares, with an existing weighbridge, wheel wash, office, maintenance shed, car park, recycling bins, leachate ponds, dams and the landfill footprint as shown in **Figure 2, Figure 3 and Appendix A.**

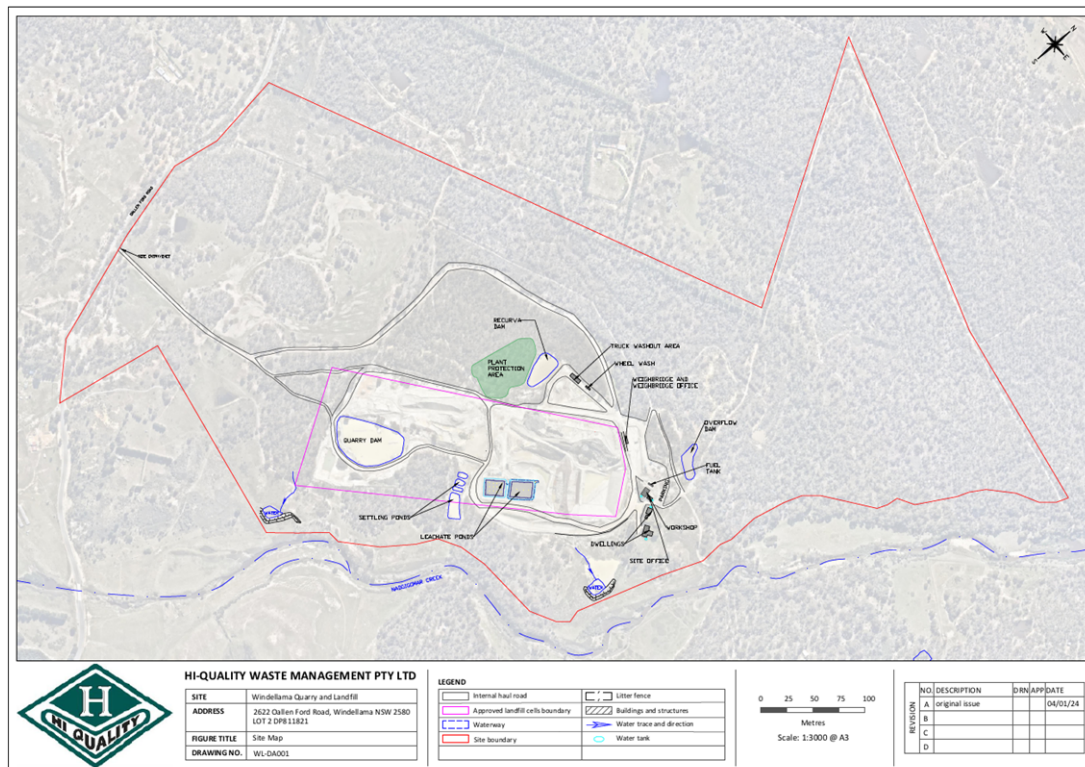


Figure 2: Site Map

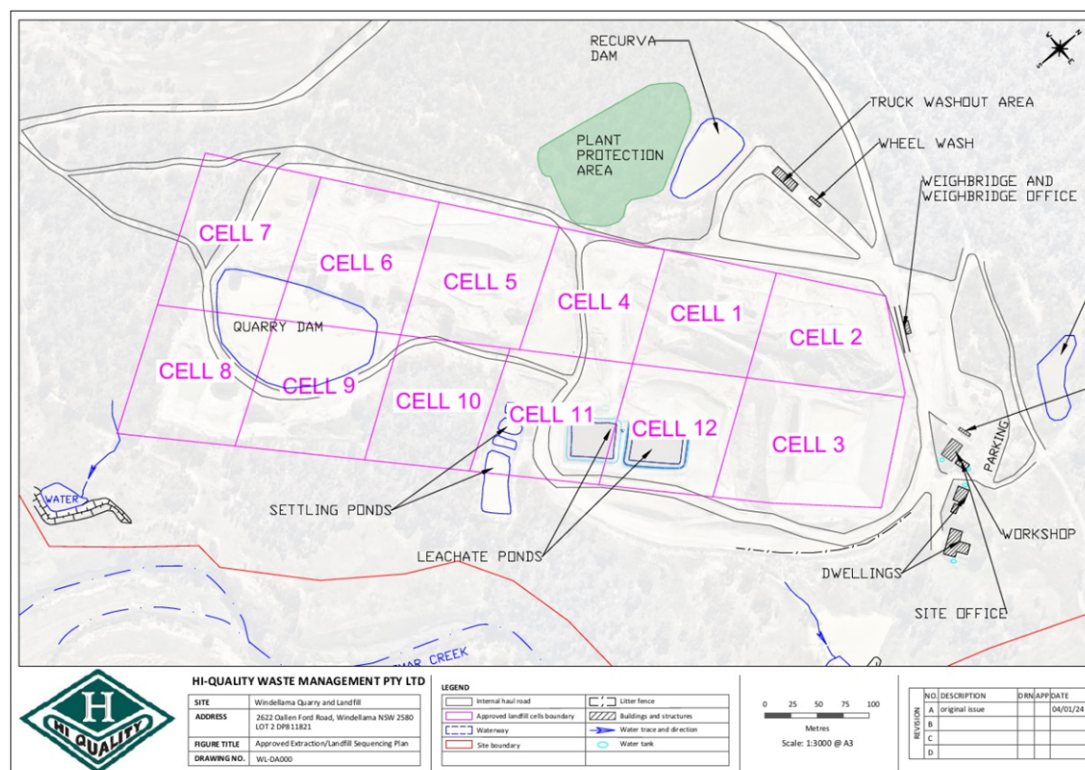


Figure 3: Approved Extraction/Landfill Sequencing Plan

2. EXISTING OPERATIONS

The existing operations at the Site include:

- The receipt of up to 120,000 tonnes per annum (**tpa**) of landfill waste;
- The receipt of up to 5,000 tpa of waste for recycling;
- The receipt of up to 8,000 tpa of paper pulp residue; and
- The extraction of clay/shale under development consent DA 145-9-1-47.

2.1. Approvals

Table 1 outlines the development approvals applicable to the Site:

Table 1: Applicable development approvals

DA / Consent #	Description	Date	Outcome/Notes
DA 145/9/1-73	Consent granted for extractive industry at the front of the Site (Front Pit)	1973	Extraction at the front pit ceased around 1995 and the area was rehabilitated.
DA 145/9/1-47	Consent granted by Council for clay extraction at the Site.	1981	
DA No. 13/96	Consent granted for construction of drainage control berms at the boundary of clay extraction.	1996	Consent surrendered as required by Condition 16 of the Original Consent.
DA 989/130	Consent granted for general solid waste (non-putrescible) landfill facility and concrete recycling, paper pulp recycling, paper pulp recycling and production of road making materials from recycled products with deferred commencement.	1999	Operational from 23 November 2004 after fulfilment of deferred commencement conditions.
MOD/0006/1011	Modification to DA 989/130 to increase waste received at the Site from 20,000 tpa to 120,000 tpa. Referred to as the Modified Consent throughout this document.	2012	Refused by Council in May 2011, but granted by LEC in May 2012 after negotiation.

2.2. Operating hours

All operations are conducted between 7:00 am and 5:00 pm, Monday to Friday. Trucks accessing to the haulage route are restricted to these operating hours and must avoid school bus schedule times, which are subject to annual updates as needed. These updates are incorporated into the Site's Traffic Management Plan (**TMP**) at **Appendix B** and communicated during driver inductions and at least annually, ensuring compliance before drivers are permitted to access the Site.

3. DESCRIPTION OF THE PROPOSAL

3.1. Overview

The Proposal seeks to:

- Modernise the approved heavy vehicle types for use at the Site by removing outdated references to specific weights and configurations and expanding the approved heavy vehicle types, including PBS vehicles, which offer improved load distribution, enhanced vehicle stability, reduced road pavement wear, and increased payload capacity. This update aligns with the applicable heavy vehicle permits issued by the NHVR for the haulage route and modern-day standards under the PBS framework.
- Introduce flexibility in daily truck movements by averaging movements over a calendar year, as the Site operates at reduced capacity during significant rain events and during quieter operational periods. This ensures that truck movements lost on these days can be carried over to other periods without increasing the total annual truck movements. The change will not result in a dramatic increase in trucks on any given day and is unlikely to be noticeable.

The specifics of the Proposal are discussed in this section.

3.2. Modernising truck conditions

The aim is to remove outdated references to heavy vehicle weights and configurations that no longer reflect modern capabilities, allowing the Site to accommodate a broader range of efficient vehicles, including PBS vehicles.

PBS vehicles are designed with advanced engineering standards that improve load distribution and enhance vehicle stability, leading to safer operations. These vehicles also cause less wear on road pavements, contributing to the long-term sustainability of the haulage route. The inclusion of PBS vehicles also increases payload capacity, offering operational cost savings by allowing more products to be transported per trip.

The Proposal aligns with the applicable NHVR truck permits for the haulage route and ensures that the vehicles meet modern-day standards under the PBS framework. It supports a more efficient, safer, and environmentally friendly transportation system, helping to streamline operations and reduce environmental impact while maintaining compliance with regulatory standards.

3.3. Averaging of daily truck movements

To maintain efficiency despite weather-related disruptions and quieter periods, this change allows lost truck movements to be carried over to drier or busier times, keeping annual totals consistent and within approved limits. This flexibility prevents delays, ensures smoother logistics, and minimises disruptions without noticeably increasing daily traffic or exceeding approved thresholds.

3.4. Conditions of the Modified Consent to be modified

3.4.1. Condition 14A(a)

The specifics of Condition 14A(a) are outlined below:

Subject to all other conditions of this consent (including satisfaction of condition 14C), the maximum volume of product (landfill waste, recyclables or paper pulp) transported to the site is to be 576 tonnes per day. This equates to 18 one-way truck movements of a 32-tonne truck and dog combination. Truck movements are permitted Monday through Friday only.

The Proposal seeks to amend Condition 14A(a) to include reference to general access vehicles (**GAV**) and PBS vehicles, remove the 576-tonne daily limit, and replace the daily truck movement limit with an annual average, while maintaining the total annual tonnage cap of 120,000 tonnes as outlined in Condition 5C. This ensures no increase in overall annual traffic volumes.

It is proposed to update Condition 14A(a) as follows:

Subject to all other conditions of this consent (including satisfaction of Condition 14C), truck movements may be undertaken by general access vehicles (GAVs), Performance-Based Standards (PBS) vehicles, or any future vehicle types approved under the appropriate regulatory framework for use on the approved haulage route, with a daily average of 18 trucks, calculated annually. Truck movements are permitted Monday through Friday only.

The condition has been written to ensure flexibility and futureproofing, allowing for the inclusion of emerging vehicle technologies and regulatory frameworks. By referencing GAVs, PBS vehicles, and any future permit approved vehicle types, the condition avoids becoming outdated and ensures HiQ can continue to operate efficiently without the need for frequent amendments. This approach accommodates potential advancements in transportation standards while maintaining compliance with approved haulage routes and operational limits. The condition would therefore rely on approval from the NHVR and Council to issue truck permits for the haulage route, rather than the development consent being the regulatory constraint.

3.4.2. Condition 14A(b)

In addition to the modifications requested for Condition 14A(a), HiQ proposes to update the existing Condition 14A(b) that governs the export of clay from the Site. This condition currently specifies:

Subject to all other conditions of this consent, the maximum volume of clay product exported from the site is to be 192 tonnes per day. That is 6 one-way truck movements of a 32-tonne truck and dog combination. Truck movements are permitted Monday through Friday only.

Given the proposed modifications to Condition 14A(a), it would make sense to also update Condition 14A(b) by removing the daily tonnage limit of 192 tonnes for clay export and averaging the truck movements annually, consistent with the approach taken in Condition 14A(a).

It is proposed to update Condition 14A(a) as follows:

Subject to all other conditions of this consent, the maximum volume of clay product exported from the site is 6 one-way truck movements per day, averaged annually. Truck movements are permitted Monday to Friday only.

This update is proposed to streamline operations by removing the daily tonnage limit, relying solely on averaged truck movements, and ensuring consistency with the modifications to Condition 14A(a) regarding the transport of materials.

3.5. Other conditions for consideration

3.5.1. Compliance with Condition 5C of the Modified Consent

HiQ is committed to complying with Condition 5C of the Modified Consent, which authorises an increase in the maximum quantity of non-putrescible landfill waste that can be received at the Site from 20,000 tpa to 120,000 tpa, subject to meeting several requirements. These include obtaining an Environmental Protection Licence (**EPL**) that permits the increased volume, revising the necessary reports to reflect the increased tonnage, and updating several documents in accordance with the Modified Consent.

It is understood that the 576-tonne daily limit currently in Condition 14A(a) corresponds to approximately 150,000 tonnes per annum, which exceeds the 120,000-tonne annual limit specified in Condition 5C. This modification will ensure that the total annual tonnage limit of 120,000 tonnes is not exceeded, while allowing for flexibility in the types of vehicles used for transport.

As part of HiQ's operational procedures, the company actively monitors incoming waste daily. This ensures that the Site can track and identify any increases in volume that might approach the annual capacity of 120,000 tonnes. By maintaining this regular monitoring, HiQ can adjust operations as necessary to ensure compliance with the annual tonnage limit.

3.5.2. Consideration of the clay extraction consent 145/9/1-47

The Proposal will not interfere with any components of the existing clay extraction consent (145/9/1-47). The Site's clay extraction activities and the operations involved in the waste transport and disposal processes remain distinct. The Proposal is related solely to improving transportation efficiency without impacting the ongoing extraction activities or violating any terms of the clay extraction consent.

HiQ will continue to operate within the approved parameters of the clay extraction consent, ensuring that the extraction and disposal activities remain in compliance with all relevant regulatory requirements.

3.6. Context and justification of the Proposal

3.6.1. Advancements in heavy vehicle technology

Modern truck combinations under the PBS framework have greater capacities compared to the configurations prevalent 13 years ago, when conditions of the Modified Consent were drafted. As the transport industry evolves, it is essential for HiQ to adapt to these advancements to stay competitive while upholding the highest safety standards. To ensure continued flexibility, it's also important to avoid restricting to the PBS framework alone, in case the framework changes in the future, potentially leaving the operation non-compliant with outdated conditions.

PBS trucks are equipped with advanced safety features that make them extremely safe on the roads. These vehicles undergo rigorous assessments to meet high safety standards, enhancing stability and handling, and mitigating risks associated with their length.

Rigid references to specific weights and configurations in consent conditions can quickly become outdated, hindering HiQ's ability to adopt safer, more efficient vehicles. Emphasising the PBS framework (or future framework) allows for a more adaptable regulatory approach.

The PBS framework sets benchmarks for the design and performance of heavy vehicles. Unlike traditional prescriptive standards, the PBS framework focuses on outcomes, allowing the approval of vehicles that meet essential performance criteria, such as safety, efficiency, and environmental impact. PBS permits are granted only after thorough consultation with the NHVR, road managers, and heavy vehicle operators, ensuring the use of innovative designs.

Allowing both PBS vehicles and GAVs improves operational efficiency while prioritising safety and compliance. This change reduces heavy vehicle movements, eases road congestion, and enhances road safety, benefiting the community. It also helps foster positive relationships with local residents and demonstrates a commitment to being a responsible neighbour. Smedleys Engineers have provided a vehicle comparison report, which highlights the advancements in truck technology and the enhanced safety standards of PBS trucks, available at **Appendix C**.

3.6.2. New South Wales landfill waste crisis

New South Wales is facing a critical shortage of landfill space. As landfill capacity decreases across the region, the need for operational landfills to continue functioning and managing waste effectively becomes more pressing. The crisis refers to the point where the available landfill space in the state will no longer meet the growing demand for waste disposal, potentially causing significant disruptions to waste management processes. Approving this application is essential to mitigate the risks associated with this shortage and ensure that HiQ can continue to play a vital role in managing waste effectively, without contributing to the impending waste crisis.

4. ENVIRONMENTAL IMPACT ASSESSMENT

4.1. Air and odour

Condition 8(a) of the Original Consent stipulates that no offensive odour is to be emitted from the premises. Similarly, EPL 10398, under condition L5.1, mandates that the licensee must not permit the emission of offensive odour beyond the boundary of the premises. Both the Original Consent and the EPL outline specific dust suppression measures and monitoring requirements for the Site.

The existing conditions within the EPL and the Original Consent, relating to air quality and odour management, will remain in place and be fully adhered to under the Proposal, as there are no changes to operational activities or the intensity of operations proposed. As a result, the Proposal will not have any adverse effect on the local community's amenity in relation to air quality and odour.

4.2. Noise

Given that the overall number of trucks will not increase, no additional noise impacts are anticipated. All PBS trucks are expected to operate within the existing operational framework, with the newer trucks noise profiles being consistent with those of the trucks already approved. Therefore, there will be no increase in noise levels at the Site or along the haulage routes.

4.3. Visual

In terms of potential visual amenity impacts, due to the Site's existing topography and the fact that neither the operations, intensity, nor infrastructure will change because of the Proposal, it is anticipated that there will be no impact on visual amenity.

4.4. Traffic

To assess how the Proposal will impact on the approved haulage route, internal access roads, and the Site access, a Traffic Impact Assessment (**TIA**) has been prepared by EMM Consulting and is available at **Appendix D**. A summary of the existing environment, impact assessment, and proposed mitigation measures is provided in this section.

4.4.1. Existing conditions

The roads in the vicinity are classified into state, regional, and local roads, with the key roads identified as Braidwood Road, Lumley Road, Cullulla Road, Sandy Point Road, Oallen Ford Road, and the Site Access Road.

4.4.1.1. Braidwood Road

Braidwood Road is a north-south state road connecting Goulburn to Kings Highway. It has two lanes, a sealed surface, and a 9 m carriageway, with 3.5 m travel lanes and 1 m shoulders. The speed limit is 100 km/h, reducing to 60 km/h in Tarago and near schools. Approved for B-double access, it carries local, regional, and operational traffic. Several schools are located along the route, requiring careful traffic management.

4.4.1.2. Lumley / Cullulla Road

This local road runs east-west, connecting Braidwood Road to Sandy Point Road. It has one lane in each direction, a sealed surface, and a 7 m carriageway. The default rural speed limit is 100 km/h, with school zone limits during peak times. Heavy vehicles require a valid origin or destination. It primarily carries local

and development traffic, with several school bus stops along the route. Pavement conditions are generally good.

4.4.1.3. Sandy Point Road

This local road runs north-south, connecting Mayfield Road to Oallen Ford Road. It has one lane in each direction, a sealed surface, and a 7 m carriageway. The default rural speed limit is 100 km/h, with school zone limits during peak times. Heavy vehicles require a valid origin or destination. It primarily carries local and operational traffic, with several school bus stops along the route.

4.4.1.4. Oallen Ford Road

This local road runs north-south, connecting Goderich Street to the Shoalhaven River Crossing. It has one lane in each direction, a sealed surface, and a carriageway width of 8.0 to 8.5 m south of Sandy Point Road. The speed limit is 80 km/h between Sandy Point Road and the Site Access Road. Heavy vehicles require a valid origin or destination. It primarily carries local and operational traffic.

4.4.1.5. Site Access Road

This private HiQ-owned road runs east-west, approximately 3.3 km south of Sandy Point Road. It has one lane in each direction, a gravel surface, and an 8 m carriageway. The posted speed limit is 40 km/h and accommodates HiQ trucks. The road provides access to the Site from Oallen Ford Road and will continue to carry both light and heavy Site-related vehicles.

4.4.1.6. Key intersections

Key intersections on the haulage route include:

- Braidwood Road/Lumley Road/Wallace Street;
- Cullulla Road/Sandy Point Road;
- Sandy Point Road/Oallen Ford Road; and
- Oallen Ford Road/Site Access Road.

These intersections are either priority controlled or stop-controlled, predominantly serving regional or local traffic. Several of these intersections are large enough to accommodate heavy vehicle turns, though some show signs of pavement defects or wear. The road conditions are generally suitable for the intended development traffic, with no significant pedestrian connectivity along these routes.

4.4.1.7. Existing traffic volumes

Traffic surveys were conducted on key roads in the area to assess vehicle volumes, speeds, and heavy vehicle quantities. Braidwood Road recorded an average daily traffic (**ADT**) volume of approximately 1,886 vehicles, with heavy vehicles making up around 20.6% of the traffic.

Cullulla Road and Sandy Point Road had lower traffic volumes, with ADTs of 792 and 758 vehicles and heavy vehicle proportions ranging from 12.6% to 16.3%.

Oallen Ford Road recorded approximately 1,166 vehicles per day, with a lower heavy vehicle proportion of under 10%. The Site Access Road had a significantly lower ADT of 97; however, this figure is inflated due to the water truck circulating the facility every hour and use of the grader on the Site Access Road, artificially increasing the proportion of heavy vehicles to over 50% of the recorded traffic. Excluding these internal movements, the total number of external trucks accessing the facility remains within the approved limit of 36 per day.

Overall, the recorded traffic speeds were generally within the acceptable range of the posted limits, except for Oallen Ford Road, where the 85th percentile speed was slightly higher than the posted 80 km/h limit. The high proportion of heavy vehicles on certain routes reflects the area's industrial activities. Further details on these surveys, including specific count locations and methodology, can be found in Section 2.5.2 of the TIA at **Appendix D**.

4.4.1.8. Crash data analysis

A review of crash data from 2019 to 2023 identified eight recorded crashes in the vicinity of the Site, including one fatality, two minor injuries, and five non-casualty incidents. The fatal crash occurred on Cullulla Road, though the location had adequate sight distances, making road conditions an unlikely factor.

However, four additional run-off-road crashes on Cullulla Road suggest that its winding geometry and lack of shoulders may have contributed to these incidents. Other crashes included a cross-traffic collision at the Braidwood Road/Lumley Road/Wallace Street intersection, which is stop-controlled, reducing the likelihood of road deficiencies being a factor. Overall, with only eight crashes recorded over five years, the road network near the Site is generally considered safe.

4.4.1.9. Community concerns

During community consultation events, concerns were raised about a section of Cullulla Road between Willow Glen Road and the Homestead Nursery. A review of crash data over the past five years identified five crashes, including one fatal crash in 2020, likely caused by excessive speed on a left-hand bend. The remaining incidents involved vehicles leaving the road at bends, also linked to speeding. A Site visit in November 2024 confirmed the presence of multiple warning signs and an advisory speed limit of 65 km/h, which appears to have improved safety, as no crashes were recorded in 2023 or 2024. Additional mitigation measures are recommended in **Section 4.4.4** of this report and Section 5 of the TIA.

4.4.2. Traffic generation and distribution

HiQ is proposing to average truck movements across a calendar year, providing flexibility in scheduling to accommodate varying operational needs, including working around wet weather. The proposed traffic assessment assumes a maximum of 36 truck per day as an upper limit, rather than a fixed 18 trucks per day, ensuring that the Site can adapt to varying operational and weather conditions without exceeding the total annual truck limit which is 4,536 (18 trucks per day x 252 operational days).

Traffic distribution will remain consistent with current patterns, with most vehicles traveling north along Braidwood Road. No changes to this distribution are expected because of the Proposal. There are no anticipated significant cumulative traffic impacts from other nearby projects, such as the Woodlawn Waste and Energy Facility, which is unlikely to affect local traffic during peak times. Additionally, no new local developments in the vicinity are expected to impact traffic flows, eliminating the need for a cumulative traffic impact assessment.

Table 2: Estimated operational traffic movements

Units	Existing approval	The Proposal
Maximum waste import per annum (tonne)	120,000	120,000
Maximum daily production (tonne)	576	1,656
Average truck payload carrying capacity (tonne)	32	46
Maximum trucks per annum	4,536	4,536

Units	Existing approval	The Proposal
Maximum trucks per day	18	36
Maximum truck movements per day (inbound and outbound)	36	72
Total peak hour truck movements (assuming 15% of total truck movements per day)	6	11
Light vehicles per day (Staff and visitors)	8	8
Light vehicle movements per day (Staff and visitors)	16	16
Total peak hour light vehicle movements (Conservatively assuming all staff and visitors arrive in the AM peak hour and depart in the PM peak hour)	8	8
Total maximum daily light and heavy vehicle trips	26	44
Total maximum daily light and heavy vehicle movements (excluding internal movements)	52	88
Total peak hour movements	14	19

4.4.3. Impact assessment

The TIA evaluates the potential effects of the proposed operations on the local road network, specifically focusing on the performance of key intersections during peak hours. The key findings of the TIA are discussed in this section.

4.4.3.1. Intersection Performance (SIDRA Modelling)

Both AM and PM peak hours at Braidwood Road/ Lumley Road/Wallace Street intersection show good operational performance with a Level of Service (**LOS**) of A (excellent). The intersection is capable of handling both existing and additional traffic volumes without major impacts on operation or delays. However, turning at this intersection may not be possible for two trucks simultaneously due to space constraints. That said, trucks of this size currently navigate this intersection with no troubles, and due to the low number of vehicles accessing it per day, it is unlikely that two trucks would turn simultaneously anyway.

4.4.3.2. Road warrant for upgrades

The roads along the haulage route largely meet the design standards outlined in the Austroads *Guide to Road Design*. All roads, except some sections of Oallen Ford Road, meet the required width for the expected traffic. The increase in heavy vehicle movements is unlikely to cause significant issues.

4.4.3.3. Road safety assessment

Intersection sight distance requirements

The Safe Intersection Sight Distance (**SISD**) at each unsignalised T-intersection is assessed to ensure turning traffic can observe gaps in major road traffic for safe merging. The SISD is based on a presumed design speed that is typically 10 km/h higher than the posted speed limit.

Braidwood Road/Lumley Road/Wallace Street intersection

At this intersection, the required SISD for a design speed of 70 km/h is 151 m. The sight distances in both directions exceed the minimum requirement, with 350 m to the left and 290 m to the right.

Sandy Point Road/Cullulla Road intersection

For Sandy Point Road, with a design speed of 90 km/h, the required SISD is 214 m. The sight distances meet this requirement, with 500 m to the left and 280 m to the right.

Oallen Ford Road/Sandy Point Road intersection

At this intersection, the sight distance to the left meets the required 214 m for a design speed of 90 km/h. However, the sight distance to the right is limited to 150 m due to road curvature. To mitigate this, an advanced intersection warning sign is recommended for northbound vehicles.

Oallen Ford Road/HiQ access road intersection

The sight distances at this intersection meet the minimum SISD requirement, with 220 m to the left and 240 m to the right, both satisfying the 214 m required for a 90 km/h design speed.

4.4.4. Mitigation measures

This section outlines the recommended mitigation measures to address the identified risks and hazards from the TIA.

4.4.4.1. Improvements to public roads

To enhance road safety and maintain the integrity of the haulage route, it is recommended that repairs be carried out at the Braidwood Road/ Lumley Road/Wallace Street intersection by Council, including fixing pavement defects and repainting faded line markings. These repairs will improve the intersection's condition and ensure it can safely accommodate traffic.

HiQ has made substantial contributions to Council for road maintenance over the past decade, ensuring the upkeep of public roads affected by its operations. This commitment will continue, with HiQ contributing \$0.53 per km (indexed annually in line with the Consumer Price Index) for the haulage route, as recommended in the Modified Consent. HiQ is currently paying contributions at a rate of \$1.645 per tonne of waste imported and \$1.531 per tonne of clay exported. These contributions will be paid quarterly and allocated to road maintenance and pavement rehabilitation efforts.

4.4.4.2. On Site safety enhancements

To improve safety within the Site, it is recommended that the microwave letterbox at the Site entrance be removed, as it could distract incoming drivers.

Additionally, faded signage at the Site should be replaced. Specifically:

- The 40 km/h speed limit sign should be updated to ensure clear and visible communication for drivers.
- The faded 'Condition of Entry' sign at the Site entrance should be replaced with a new, more visible sign to improve safety and compliance.

4.4.4.3. TMP implementation

The recently updated TMP will be implemented as part of the Proposal to ensure safe and efficient traffic operations both within the Site and along the haulage route. The TMP includes measures to regulate truck movements and enforce compliance with road safety standards.

4.4.4.4. Additional safety and traffic measures

To further mitigate potential risks and enhance road safety, the following measures are recommended:

- Oallen Ford Road/Sandy Point Road intersection – Install an advanced intersection warning sign for northbound vehicles to address poor sight distance due to road curvature. This will alert drivers to the upcoming intersection and reduce the risk of accidents.
- School bus services and safety – Haulage trucks will continue to avoid operating during school AM and PM hours to prevent disruptions to school bus services. This measure enhances road safety for children, school staff, and other road users by minimising conflicts between heavy vehicles and school buses.

These mitigation measures aim to address identified risks, enhance safety, and improve traffic management along the haulage route and within the Site. HiQ's continued financial contributions to road maintenance highlight its long-standing commitment to supporting local infrastructure and ensuring the safe and efficient operation of its haulage routes.

5. LEGISLATIVE FRAMEWORK

5.1. Environmental Planning and Assessment Act 1979

5.1.1. Section 4.10 Designated development

It is acknowledged that the development, under the Original Consent, was approved as Designated Development. The Site is located within the Sydney drinking water catchment, and development for the purpose of a waste management facility is classified as designated development under the EP&A Act, irrespective of its capacity.

Given the Site's location within a drinking water catchment area, the Proposal must comply with relevant provisions under the EP&A Act and Regulation. The Proposal remains consistent with the existing approval for designated development, as no physical changes to the Site or operations will alter the existing impacts as previously assessed and approved.

Notwithstanding the classification of the development, it is important to note that the Council will remain the consent authority for the Proposal under Section 4.55(2) of the EP&A Act, unless the application is considered contentious by way of objection. If fewer than 10 submissions are received, the Council is required to determine the application in accordance with Section 275 of the *Environmental Planning & Assessment Regulation 2021*.

5.1.2. Section 4.14 consultation and development consent – certain bushfire prone land

The Proposal does not alter the existing development's suitability or compliance with bushfire protection requirements. As the Site is not subject to any changes in land use or development type that would introduce new risks, the Proposal is unlikely to trigger new bushfire-related concerns.

Given that the existing landfill operations have already been assessed regarding bushfire protection and appropriate measures are in place, the Proposal will continue to adhere to the relevant bushfire protection requirements set out in *Planning for Bush Fire Protection 2019*. Furthermore, the Proposal does not result in any increase in the scale or nature of development that would impact bushfire risk or require additional consultation with the NSW Rural Fire Service, as no new risks are introduced.

5.1.3. Section 4.46 What is “integrated development”?

The Proposal does not introduce any changes to the development that would trigger the need for referral to the Environment Protection Authority (EPA) under Section 48 of the *Protection of the Environment Operations Act 1997* (POEO Act). The Proposal is of a minor nature, focusing on operational efficiencies and does not alter the existing conditions of the development in a way that would impact environmental protection matters governed by the EPA.

Furthermore, the Original Consent was referred to the National Parks and Wildlife Service (NPWS) under Section 90 of the *National Parks and Wildlife Act 1974* (NPW Act). The Proposal does not result in new impacts to matters protected under the NPW Act that would warrant re-referral to the NSW Department of Environment and Heritage (DEH) (formerly NPWS) for their revised General Terms of Approval (GTAs). The Proposal does not increase the scale or intensity of the development, and the environmental impacts remain consistent with the conditions of the Original Consent.

As such, there is no requirement to refer the Proposal to the EPA or the DEH for further review or revised GTAs.

5.1.4. Section 4.55(2) modification application

It is proposed that the Proposal be assessed under Section 4.55(2) of the EP&A Act. While legal advice obtained from McCullough Robertson supported the application proceeding under Section 4.55(1A), Council has since advised that, in their opinion, the application is more appropriately categorised as a Section 4.55(2) modification. As such, the application has been prepared and submitted on that basis.

Legal advice obtained from McCullough Robertson is available at **Appendix E. Table 3** below demonstrates compliance with Section 4.55(2) of the EP&A Act.

Table 3: The Proposal's Compliance with Section 4.55(2) of the EP&A Act

Fact to be taken into consideration	Comment
A consent authority may, on application being made by the applicant or any other person entitled to act on a consent granted by the consent authority and subject to and in accordance with the regulations, modify the consent if:	
a) <i>it is satisfied that the development to which the consent as modified relates is substantially the same development as the development for which consent was originally granted and before that consent as originally granted was modified (if at all), and</i>	<p>The Proposal seeks to modify aspects of the original development consent, but does not change the fundamental nature, use, or operation of the approved development.</p> <p>Key components of the original development remain unaltered, including:</p> <ul style="list-style-type: none"> • The nature and purpose of the development • The location of the site and access • The approved haulage route <p>Modifications are limited to updates that improve operational efficiency, such as enabling the use of Performance Based Standard (PBS) vehicles and removing outdated daily tonnage limits. These changes do not alter the character or intent of the approved development and therefore the development remains substantially the same.</p>
b) <i>it has consulted with the relevant Minister, public authority or approval body (within the meaning of Division 4.8) in respect of a condition imposed as a requirement of a concurrence to the consent or in accordance with the general terms of an approval proposed to be granted by the approval body and that Minister, authority or body has not, within 21 days after being consulted, objected to the modification of that consent, and</i>	Consultation with any relevant public authorities or Ministers will be undertaken as part of the modification assessment process. At the time of lodgement, no objections have been received; however, any required agencies will be given the opportunity to comment within the statutory timeframe.
c) <i>it has notified the application in accordance with—</i> i. <i>the regulations, if the regulations so require, or</i> ii. <i>a development control plan, if the consent authority is a council that has made a development control plan that requires the notification or advertising of applications for modification of a development consent, and</i>	Notification of modifications under Section 4.55(2) is at the discretion of the consent authority. In this case, Council has discretion under its <i>Community Participation Plan</i> (Goulburn Mulwaree Council, 2024) and the <i>Goulburn Mulwaree Development Control Plan (the DCP)</i> to determine whether public notification is required. The Proposal will be notified in accordance with Council's requirements, if applicable.
d) <i>it has considered any submissions made concerning the proposed modification within the period prescribed by the regulations or provided by the development control plan, as the case may be.</i>	Any submissions received during the public notification period, if notified, will be reviewed and considered by the consent authority prior to determination. A response will be provided addressing any issues raised during the exhibition period, in line with the statutory process.

Section 4.55(3) of the EPA Act states, “In determining an application for modification of a consent under this section, the consent authority must take into consideration such of the matters referred to in section 4.15 (1) as are of relevance to the development the subject of the application”.

Accordingly, **Table 4** below, demonstrates compliance with Section 4.15(1) of the EP&A Act.

Table 4: The Proposals compliance with Section 4.15(1) of the EP&A Act

Fact to be taken into consideration	Comment
a) the provisions of: i. any environmental planning instrument, and	The Proposal remains consistent with the objectives and provisions of the relevant planning instruments which have been considered further in this section.
ii. any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and	Not applicable, as there are no proposed instruments currently relevant to the Proposal
iii. any development control plan, and	The Proposal complies with the relevant provisions of the DCP, as noted in Section 5.2.1.
iiia. any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4, and	Not applicable.
the regulations (to the extent that they prescribe matters for the purposes of this paragraph), and	The Proposal complies with all applicable regulations as identified in the relevant sections.
i. the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,	The Proposal is not anticipated to result in significant impacts on the natural or built environments, or on the social or economic conditions in the locality. The Proposal aims to enhance operational efficiency without altering the approved land use, site boundaries, or infrastructure. Therefore, the likelihood of substantial environmental or social disruption is minimal.
ii. the suitability of the site for the development,	The Site is well-suited for the Proposal, as it is an existing landfill with approved operations under the Original Consent. The Proposal is minor in nature and does not involve any changes to the Site's land use, boundaries, infrastructure, or core activities. The Proposal remains consistent with the existing operations, and the Site has previously been assessed as appropriate for such activities. Given the landfill's established status, the Proposal aims to enhance operational efficiency without altering the core operations or increasing the scale of development. The Proposal is expected to have no material impact on the overall suitability of the Site for landfill operations.

Fact to be taken into consideration	Comment
iii. any submissions made in accordance with this Act or the regulations,	At the time of lodgement, no public submissions have been received in accordance with the relevant provisions of the EP&A Act or associated regulations. As this application is being submitted under Section 4.55(2), notification is at the discretion of the consent authority. Should public notification be undertaken, any submissions received during the exhibition period will be reviewed and addressed. Additionally, comments from relevant referral agencies will be considered as part of the assessment process.
the public interest	<p>The Proposal is in the public interest as it seeks to improve the operational efficiency of the existing landfill development without altering the approved land use, Site boundaries, infrastructure, or activities. The minor nature of the Proposal ensures that the environmental, social, and economic impacts will remain minimal.</p> <p>Furthermore, the proposal is consistent with the objectives of the relevant environmental planning instruments and aligns with the existing land use, thereby supporting the continued safe and sustainable operation of the Site for the benefit of the local community.</p>

5.1.5. Section 4.56 modification by consent authorities of consents granted by the Court

A comparison is made between Section 4.55 and Section 4.56 of the EP&A Act to clarify the appropriate pathway for the Proposal. While Section 4.55 provides a framework for modifying development consents not granted by the Court, Section 4.56 applies to modifications to consents granted by the Court. In this case, the Original Consent was not granted by the Court, and as such, Section 4.55 is the correct pathway for the Proposal.

Under Section 4.56(1C) of the EP&A Act:

“The modification of a development consent in accordance with this section is taken not to be the granting of development consent under this Part, but a reference in this or any other Act to a development consent includes a reference to a development consent as so modified.”

This provision clarifies that a modification approved by the Court, such as the Modified Consent, is not regarded as a "consent granted by the Court" for the purposes of Section 4.56(1). This interpretation aligns with the Court of Appeal's observations in *Ku-ring-gai Council v Buyozo Pty Ltd [2021] NSWCA 177*, which state that a modification shares the characteristic of authorising future actions but is distinct from the granting of original development consent.

The case of *X-Sealant Pty Ltd v Burwood Council [2023] NSWLEC 1469* reinforces this distinction:

- The original consent was granted by the Sydney Eastern City Planning Panel.
- Modifications to this consent were subsequently approved by the Court.
- A later modification was filed under Section 4.56, but the Court ruled this pathway inapplicable as the original consent had not been granted by the Court. The matter proceeded under Section 4.55(1A) instead.

This precedent confirms that modifications to consents not originally granted by the Court must proceed under Section 4.55. The Proposal aligns with this interpretation, as the Original Consent was not Court-

granted. Refer to **Appendix E** for the legal opinion provided by McCullough Robertson, which outlines the justification for proceeding with the Proposal under Section 4.55(1A).

5.2. Applicable Environmental Planning Instruments

5.2.1. State Environmental Planning Policies (SEPPs)

5.2.1.1. SEPP (Biodiversity and Conservation) 2021

The Proposal is classified as a Module 1 development under the Neutral or Beneficial Effect (NorBE) Guidelines, as outlined in Chapter 6 of this SEPP.

In accordance with the NorBE Guidelines, WaterNSW was contacted during the preparation of the Proposal to confirm their requirements. WaterNSW advised that the Council would request their concurrence once the Proposal is formally submitted.

Given the nature of this project and the minimal environmental impacts anticipated from the Proposal, it is unlikely that WaterNSW will raise any significant concerns or objections. As such, this is unlikely to result in any additional water quality impacts. However, WaterNSW will formally review the application and provide concurrence once it is referred by Council.

5.2.1.2. SEPP (Resilience and Hazards) 2021

The Proposal does not introduce new activities or changes to the approved operations that would result in additional land contamination or necessitate remediation.

The Proposal is specific to modernising operational conditions and does not alter the nature or intensity of the approved use of the Site. As such, the land remains suitable for the modified development without requiring further remediation under Chapter 4 of the SEPP.

5.2.1.3. SEPP (Transport and Infrastructure) 2021

The Site is zoned *RU2 Rural Landscape*, which is identified as a prescribed zone under Section 2.152 of this SEPP. Development for the purpose of a waste or resource management facility is permissible in this zone with development consent.

The Proposal does not seek to change the approved land use, which aligns with the definition of a waste disposal facility under Division 23. The Proposal relates to modernising operational conditions and updated compliance measures.

The Proposal does not introduce significant changes to traffic generation. However, minor repairs may be required to ensure compliance with contemporary traffic and safety standards. This includes repairs to the Lumley Road/Braidwood Road/Wallace Street intersection, addressing pavement defects, and repainting faded line markings.

As the nature and purpose of the Proposal remain consistent with the approved use, it therefore complies with the provisions of the SEPP. No additional impacts beyond those originally assessed are anticipated.

5.2.2. Goulburn Mulwaree Local Environmental Plan 2009

5.2.2.1. Zoning and permissibility

While waste or resource management facilities are prohibited under the *RU2 Rural Landscape* zoning, the permissibility of the Proposal is derived from Section 2.153 of the *SEPP (Transport and Infrastructure) 2021*, which allows development for a waste or resource management facility in a prescribed zone, including *RU2*.

The Proposal does not seek to alter the underlying zoning or approved land use but aligns with the permissibility framework established under this SEPP.

The Proposal is consistent with the objectives of the RU2 zone under the LEP, as presented in **Table 5**.

Table 5: The Proposals consistency with the LEP RU2 objectives

Objective	Consideration
<i>To encourage sustainable primary industry production by maintaining and enhancing the natural resource base</i>	The Proposal does not impact primary industry activities in the area, as it involves the continuation of the existing waste disposal use. Environmental management practices remain in place to protect the natural resource base.
<i>To maintain the rural landscape character of the land.</i>	The Proposal will not alter the visual or landscape character of the Site. Existing rehabilitation obligations will continue to ensure the rural character is restored upon cessation of activities.
<i>To provide for a range of compatible land uses, including extensive agriculture</i>	The Proposal maintains compatibility with surrounding land uses, including agriculture, and does not interfere with adjacent rural activities.
<i>To protect, manage, and restore areas with high conservation, scientific, cultural, or aesthetic values</i>	The Proposal adheres to the Site's existing environmental controls, ensuring no impacts on areas of high conservation or cultural significance.
<i>To protect and enhance the water quality of receiving watercourses and groundwater systems and reduce their degradation</i>	The Proposal incorporates updated environmental management measures, including ongoing surface and groundwater monitoring, to protect water quality.
<i>To preserve environmentally sensitive land, including catchment areas, and prevent development likely to result in environmental harm</i>	The Proposal complies with environmental management requirements, ensuring sensitive land and catchment areas are preserved. Formal referral to WaterNSW will ensure no environmental harm.
<i>To minimise the potential for conflict between adjoining land uses</i>	The Proposal does not introduce new land uses and maintains operational controls, such as a traffic management plan, to minimise impacts on adjoining properties.

5.2.2.2. Consideration of relevant clauses in LEP

In addition to demonstrating consistency with the RU2 zone objectives, the Proposal has regard to the relevant clauses within the LEP as presented in **Table 6**.

Table 6: The Proposals consistency with the LEP relevant clauses

Objective	Consideration
<i>Clause 1.2 Aims of Plan</i>	The Proposal aligns with the LEP's aims by ensuring a balance between development and environmental sustainability while supporting orderly land use.

Clause 2.3 Zone Objectives and Land Use Table	The Proposal is consistent with the RU2 zone objectives and derives permissibility under SEPP (Transport and Infrastructure) 2021.
Clause 2.7 Demolition Requires Development Consent	Any demolition works would comply with development consent obligations as set out in this clause.

5.2.3. Goulburn Mulwaree Development Control Plan 2009

The DCP has been prepared to support all planning instruments applying to the Goulburn Mulwaree Local Government Area. The following provisions from the DCP may also be relevant to the Proposal. These provisions address environmental, site-specific, visual, heritage, and stormwater considerations, and are presented in **Table 7**.

Table 7: The Proposals consistency with the DCP

Section	Consideration	Alignment with Proposal
Part 2 Plan Objectives 2.1 General Objectives	The Proposal must align with the general objectives of the DCP, ensuring that it is consistent with the overall aims of the planning framework.	The Proposal is consistent with the general objectives, as it seeks to enhance the sustainability of the operation, preserve the rural landscape, and ensure environmental protection.
Part 3 Environmental Management	The Proposal should demonstrate how development minimises environmental impacts, with attention to waste management and pollution control strategies.	No changes to the existing Site or its current operations are proposed as part of the Proposal. As such, there will be no additional environmental impacts beyond those previously assessed and mitigated.
Part 5 Principal Development Controls – Rural 5.9 Rural land use conflict	This section addresses rural land use conflicts and provides guidance on how to manage potential issues arising from the development's interaction with other land uses.	The Proposal is unlikely to cause land use conflicts, as it is not proposing to introduce new land uses or impacts.
Part 6 Special Development Types 6.11 Extractive industries	This section outlines community consultation controls for specific types of developments, including extractive industries, which may be applicable to the Proposal.	HiQ maintains regular communication with the local community through its biannual Community Liaison Committee (CLC) meetings. The committee provides updates on the operation of the Site, including any specific modifications. This ongoing dialogue ensures that the local community is informed and can provide feedback on the Proposal, aligning with the DCP's objectives for community involvement in extractive industries.
Part 7 Engineering Requirements 7.2 Roads	Specifically, Section 7.2.3 focuses on heavy vehicle haulage routes, which should be considered in relation to traffic impacts and road suitability.	The Proposal includes minor repairs to intersections and haulage routes (see Section 4.4.4) to support traffic needs with minimal disruption. While traffic generation remains unchanged, maintenance may be required to meet safety standards, including pavement defect fixes, and line marking repairs to the Braidwood Road/Lumley Road/Wallace Street intersection.

5.3. NSW Protection of the Environment Operations Act 1997

The POEO Act requires that scheduled activities, which are defined in Schedule 1 of the POEO Act, operate under an EPL. The Site activities are defined as scheduled activities and have an EPL administered by the EPA. The licence authorises waste disposal by application to land.

5.4. Environmental Protection and Biodiversity Conservation Act 1999

The Commonwealth *Environmental Protection and Biodiversity Conservation Act 1999* (**EPBC Act**) aims to protect matters of national environmental significance (**MNES**). If an action or project will, or is likely to, have a significant impact on any of the MNES, it is deemed to be a Controlled Action and requires approval from the Commonwealth Environment Minister or the Minister's delegate.

The Proposal does not intend to have a significant impact on a matter of environmental significance; therefore, the proposal does not require a referral under the EPBC Act.

6. CONSULTATION

6.1. Goulburn Mulwaree Council

HiQ engaged with the Council on several occasions to discuss various aspects of the Site's operations.

- On 7th March 2024, HiQ had a pre-lodgement meeting with the Council to discuss a proposed modification to the Original Consent. This modification initially aimed to update the landfill cell sequencing, stormwater management, site management plans, and several conditions of consent, including the updating of Condition 14A(a) and 14A(b). However, following further consideration, HiQ decided to proceed with the already approved sequencing plan. As a result, the urgency of the modifications were reduced, and a formal modification application was not submitted at the time.
- On 9th October 2024, HiQ met with Council representatives Scott Martin and Amanda Brown on-site to discuss the Proposal and HiQs NHVR truck permits. It was agreed that the Proposal should be submitted to the Council as soon as possible to ensure HiQ can maintain compliance with the Modified Consent.
- On 16th January 2025, HiQ met with Council staff to provide an update on the Proposal. These discussions prompted further consideration of necessary mitigation measures as detailed in Section 4.4.4 to ensure safe and efficient operations.

6.2. Community consultation

On 10th February 2025, HiQ presented the Proposal to the Tarago Progress and District Progress Association Incorporated (**TADPAI**) for the first time, followed by a presentation to the Windellama CLC on 11th February 2025.

Before these presentations, HiQ had informed community members during the 2024 CLC meetings about its intention to submit the Proposal, with no concerns raised at the time.

At the February 2025 meetings, the Proposal was discussed, with a focus on the key benefits of using PBS trucks.

Concerns raised during the meetings included:

- **Truck widths:** There were concerns about whether the proposed trucks would be wider than those currently approved for use on the roads. It was clarified that the proposed trucks are not wider than the existing trucks currently used.
- **Accident-prone areas:** A concern was raised about a specific location on the haulage route between Willow Glen Road and the Homestead Nursery, where motor vehicle accidents and black spots are frequent. It was suggested that vehicle-activated flashing lights be installed at Homestead Nursery to alert road users when trucks are approaching these locations.
- **Haulage route navigation:** Concerns were raised regarding the ability of 30m A-double trucks to navigate the haulage route. However, 26m B-double trucks currently operate along this route without issue, and since both vehicle types have similar widths and turning characteristics, the 30m A-doubles will also be able to do so efficiently. To further ensure safe and seamless operations, additional operational measures will be implemented, such as route-specific driver training and monitoring, reinforcing the feasibility of these larger vehicles on the existing route.
- **Visibility and site entrance safety:** Concerns were raised regarding limited visibility caused by trees along the fence line close to the Site entrance. Suggestions included the installation of a truck flashing sign near Claypit Road for vehicles approaching the Site entrance from the south on Oallen Ford Road, which is not part of the approved haulage route. Recommendations included the

installation of vehicle-activated flashing lights at the Site entrance and the investigation and rectification of any obstructions caused by trees on the fence line.

- **Council road widening:** Queries were raised about potential Council road widening on Oallen Ford Road near the Site. A notice published by Council on 14th February 2025 confirmed essential road rehabilitation works on a 1 km section of Oallen Ford Road, approximately 1 km from Windellama Hall, but did not coincide with the approved haulage route. The future for road widening closer to the Site remain unclear.
- **Council contributions:** Questions were raised about how Council utilises the contributions HiQ pays for the usage of the haulage route. It was mentioned that the haulage route has not been adequately maintained, and further clarification from the Council may be needed to understand how these contributions are allocated for road maintenance or improvement projects along the approved haulage route.

HiQ is scheduled to meet with TADPAI and the CLC in April 2025 to provide an update on the Proposal. These discussions are part of HiQ's ongoing efforts to engage with the community and ensure that the Proposal aligns with both operational needs and community expectations.

7. CONCLUSION

This SEE provides a comprehensive assessment of the Proposal in relation to the relevant provisions of the EP&A Act. The Proposal is permissible with consent and aims to increase the Site's operational efficiency while enhancing its environmental and safety performance.

The assessment confirms that the Proposal complies with all applicable planning instruments and legislation. It will not result in any significant adverse environmental impacts at the Site, its surroundings, or the broader local area. Additionally, the proposed mitigation measures have effectively addressed all identified risks, particularly regarding traffic and road safety. This includes integrating advancements in transport infrastructure and vehicle standards, as well as improvements to the TMP.

The Proposal seeks to:

- Modernise the approved truck types for use at the Site by removing outdated references to specific truck weights and configurations and expanding the approved heavy vehicle types, including PBS trucks, which offer improved load distribution, enhanced truck stability, reduced road pavement wear, and increased payload capacity. This update aligns with the applicable truck permits issued by the NHVR for the haulage route and modern-day truck standards under the PBS framework.
- Introduce flexibility in daily truck movements by averaging truck numbers over a calendar year, as the Site often closes during significant rain events and during quieter operational periods. This ensures that truck movements lost on wet days can be carried over to drier periods without increasing the total annual truck movements. The change will not result in a dramatic increase in trucks on any given day and is unlikely to be noticeable.

Overall, the Proposal updates the Site's operational consent to align with modern transport standards and best practices while maintaining compliance with regulatory requirements. Given its demonstrated benefits and robust mitigation measures, it is recommended that Council approve the Proposal.

8. APPENDICES

APPENDIX A – Site Plans

APPENDIX B – HiQ’s Traffic Management Plan

APPENDIX C – PBS Vehicle Comparison

APPENDIX D – Traffic Impact Assessment

APPENDIX E – Legal advice regarding proposed approval pathway for modification to Windellama Quarry and Landfill