

Appendix C – Detailed Response to EPA Submission

The EPA has made a submission which is generally supportive of the draft Georges River LEP 2021, but does raise several matters and suggested amendments. These are discussed in further detail below.

Agency Issue	Panel's Response	Department's Assessment
Clause 1.2 Aims of the Plan The submission suggests the following aims be included: • <i>'To protect, maintain and improve waterway health to achieve the community environmental values and uses for waterways</i> • <i>To contribute to a circular economy that recognises waste as a resource and the collection and the transport of waste and recycling as an essential service that must be undertaken in a manner that is safe, efficient, cost effective and does not negatively impact on liveability and the environment'</i>	In response to the suggested amendments, the Panel: • has adopted the aim relating to waterways as a post-exhibition amendment. This post-exhibition amendment is further discussed in Section 3.3.1 – the Panel's post-exhibition amendments of the finalisation report; • notes the references to the Circular Economy, which will be explored for inclusion within the DCP; and • states that future waste amendments to the draft Georges River LEP 2021 may be considered at the completion of the Waste Strategy.	The Department considers that the Panel has responded appropriately to this matter.
Land Use Tables Issue 1 – All residential zones The submission suggests the introduction of an objective for all the residential zones to minimise conflict between land uses in adjoining zones.	In response to this suggested amendment, the Panel considered that any conflict between land uses will be considered as part of the development assessment process.	The Department considers that the Panel have responded appropriately to this matter.
Land Use Tables Issue 2 – B1 Neighbourhood Centre (B1), B2 Local Centre (B2) and B3 Commercial Centre (B3) zones	In response to this matter, the Panel noted the recommendations, but states that: • references to the Circular Economy will be	The Department considers that the Panel have responded appropriately to this matter.

Agency Issue	Panel's Response	Department's Assessment
The submission suggests: - the introduction of the following objective into the B1, B2 and B3 zones: <i>'To encourage the development of Circular Economy infrastructure close to where people live and work that enable the community to reuse, repair, recycle or dispose of their waste at safe, clean and easily accessible facilities'.</i> - that the B1, B2 and B3 zones seek to facilitate the following developments: - community garden; - reverse vending machines; - repair cafés; and - reuse or sharing facilities.	explored for inclusion in the DCP; - these uses are in keeping with land use terms 'community facilities' and 'light industries' under the Standard Instrument, which are proposed to be permitted with consent across all business and industrial zones under the draft Georges River LEP 2021; and - future waste amendments to the draft Georges River LEP 2021 may also be considered at the completion of the Waste Strategy.	
Land Use Tables Issue 3 – B4 Mixed Use (B4) zone The submission suggests: - the introduction of the following objectives into the B4 zone: <i>'To encourage the development of Circular Economy infrastructure close to where people live and work that enable the community to reuse, repair, recycle or dispose of their waste at safe, clean</i>	In response to this matter, the Panel noted the recommendations, but states that: - consideration of any potential amenity impacts is to be considered as part of the development assessment process; - that these uses are in keeping with land use terms 'community facilities' and 'light industries' under the Standard Instrument, which are proposed to be permitted with	The Department considers that the Panel have responded appropriately to this matter.

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<i>and easily accessible facilities</i> ○ <i>To prevent and minimise any adverse effect of development on amenity and the environment</i> ○ <i>To minimise conflict between land uses within this zone and land uses within adjoining zones'.</i> • that the B4 zone seek to facilitate the following developments: ○ community garden; ○ reverse vending machines; ○ repair café; and ○ reuse or sharing facilities.	consent across all business and industrial zones under the draft Georges River LEP 2021; and • future waste amendments to the draft Georges River LEP 2021 may also be considered at the completion of the Waste Strategy.	
Land Use Table Issue 4 – B6 Enterprise Corridor zone The submission suggests that the B6 zone seek to facilitate the following developments: • reverse vending machines; • repair café; • reuse or sharing facility/shop; • material bulking, sorting and storing facilities; • material reprocessing and manufacturing; • washing or pelletising facilities; and • reverse logistics facilities.	In response to this matter, the Panel considered that these uses are in keeping with land use terms 'community facilities' and 'light industries' under the Standard Instrument, which are proposed to be permitted with consent across all business and industrial zones under the draft Georges River LEP 2021. Future waste amendments to the draft Georges River LEP 2021 may also be considered at the completion of the Waste Strategy.	The Department considers that the Panel have responded appropriately to this matter.

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Land Use Table Issue 5 – the IN2 Light Industrial (IN2) zone The submission suggests: - the introduction of the following objectives into the IN2 zone: <i>'To encourage a range of uses that support the creation of jobs and new skill sets in a Circular Economy around repair, reuse, recycling, manufacturing and reprocessing</i> <i>To support a closed loop industrial ecology network that allows the precinct to circulate and reuse materials, products, energy and water</i> <i>To prevent and minimise any adverse effects of development on the environment'</i> - Council consider the role of IN2 zoned land in helping to deliver types of Circular Economy infrastructure and activities.	In response to this matter, the Panel adopted the following objective to support a closed loop industrial ecology network and Circular Economy: <i>'To encourage a range of uses that support repair, reuse, recycling, remanufacturing and reprocessing'.</i> This post-exhibition amendment is further discussed in Section 3.3.1 – the Panel's post-exhibition amendments of the finalisation report. The Panel also considered that: - the introduction of Clause 6.12 - Environmental sustainability in certain business, industrial and residential zones will seek to achieve the objective recommended to minimise adverse impacts of development in this zone on the environment; and - the delivery of the Circular Economy that future waste amendments to the draft Georges River LEP 2021 may also be considered at the completion of the Georges River Waste Strategy.	The Department considers that the Panel have responded appropriately to this matter.

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Clause 6.2 Earthworks The submission states that effective measures should be put in place to ensure any fill material is fit for purpose by including the following additional consideration: • <i>'(n) that any fill material must be virgin excavated natural material (VENM) or fill that meets all of the conditions of a recourse recovery order issued by the EPA.'</i>	In response, the Panel considered that the reference to specific orders, including recourse recovery, is a matter to be specified by the DCP. The Panel noted that this matter will be explored for inclusion in the DCP.	The Department considers that the Panel have responded appropriately to this matter.
Clause 6.11 Design Excellence The submission recommends that consideration relating to waste management facilities for design excellence should be strengthened. The recommended post-exhibition amended to this proposed clause is: • <i>'subclause 4(d)(xvii) - the provision of integrated waste and recycling infrastructure on site, addressing storage, safety, efficiency, accessibility to waste, reuse and recycling services, and collection without compromising the safety and amenity of the public domain.'</i>	In response, the Panel amended the draft Georges River LEP 2021 to include this recommended post-exhibition amendment. This post-exhibition amendment is further discussed in Section 3.3.1 – the Panel's post-exhibition amendments of the finalisation report.	The Department considers that the Panel have responded appropriately to this matter.
Clause 6.12 Environmental Sustainability in Certain Business, Industrial and Residential Zones	In response, the Panel noted this recommended post-exhibition amendment, however considered that:	The Department considers that the Panel have responded appropriately to this matter.

Agency Issue	Panel's Response	Department's Assessment
The submission recommends that a reference to the principles of Circular Economy should be added to strengthen the proposed environmental sustainability provision. The recommended post-exhibition amended to this proposed clause is: • <i>'subclause 3(e) - supports the delivery of Circular Economy principles including but not limited to a reduction in new materials consumption and use of sustainable materials, including recycled content in concrete, sustainable timber and PVC minimisation.'</i>	• references to the Circular Economy will be explored for inclusion within the DCP; and • future waste amendments to the draft Georges River LEP 2021 may also be considered at the completion of the Waste Strategy.	