

Representation for EIS or Territory Plan Amendment Notification - Submission confirmation

Your submission has been successful. Please keep a copy of this receipt for your records.

Date and time

17 Jul 2026 8:55:18 PM

Reference code

M7FJYWZC

Access Canberra

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Canberra City, ACT 2601

Phone: (02) 6207 1923
acepdcustomerservices@act.gov.au

Type of representation

About this form

Use this form to lodge a representation for a current amendment to the Territory Plan or a current Environment Impact Statement during the notification period.

Application type

Please select the application type:*

Territory Plan Amendment Notification ▼

Representor details

Title

■ ▼

Given name*

■■■■■

Family name*

■■■■■■■

Organisation name

Enter at least one phone number: *

Home phone

Work phone

Mobile

Email address*

Application details

Amendment number*

Draft Plan Amendment 14 (DPA-14)

Provide the details of your representation*

Objection to DPA-14 regarding Stockdill Drive

I am writing to formally object to Draft Plan Amendment 14 (DPA-14) which seeks to rezone Block 1653 for industrial use. This proposal is fundamentally flawed and procedurally suspect.

My grounds for objection include:

Governance and conflicts of interest:

The motivations behind this amendment point to significant conflicts of interest. The Suburban Land Agency and Riverview Developments appear to be driving this proposal for commercial gain. This mirrors the governance failures highlighted in the recent Auditor-General report into the Phillip Pool. Just like that project this amendment lacks specific analysis of whether this site is appropriate for the proposed use.

Masterplan and consultation failures:

This proposal directly contradicts the Ginninderry Masterplan. Stages 8 and 10 of the residential development are slated for the exact area along Stockdill Drive. Planning for new residential homes while rezoning adjacent land for a heavy waste facility is illogical. This consultation process has been hollow because the government admitted the temporary approval was only used to bypass zoning laws while the permanent pathway was retrofitted.

Environmental and safety risks:

The site is situated on a steep incline with a direct drainage path to a local creek. Runoff from this facility will impact the Murrumbidgee river system. The 2022 AECOM study identifies this area as prone to topographical trapping. This means dust and odour will settle over nearby residential corridors. The risk of fire from storing large volumes of green waste in a high-risk zone is also a major danger to our homes.

Operational and infrastructure concerns:

The infrastructure cannot handle this volume. Funneling heavy waste trucks through roads that serve our growing suburbs and school zones is a safety hazard. Adding this facility to the Land Use Table creates a precedent for industrial expansion. The reliance on the 2022 Stantec report for a Mitchell facility to justify this site is also flawed because it ignored the topographical warnings for Stockdill Drive.

I request that the Authority withdraw this amendment and return to evidence-based planning that puts the community first.

Regards,

[REDACTED]

Resident

You may upload any additional supporting documentation or photos.

- Maximum file size is 10Mb.
 - A maximum of 5 files can be uploaded.
-

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Copies of written comments will be made available on the authority website unless the submission is withdrawn. Copies of written comments will also be given to the proponent of the development proposal.

If you would not like your comments or a part of your comments to be made available on the website or to the applicant, a request must be made under Sections 502 or 503 of the *Planning Act 2023* (or Sections 411 or 412 of the *Planning and Development Act 2007*). A request for exclusion under these sections must be in writing, clearly identifying what parts of your submission you are seeking to exclude and how the request satisfies the exclusion criteria.

Printed copies of the draft amendment (this document) and background documents are available for inspection and purchase at the EPSDD Customer Service Centre, 8 Darling Street, Mitchell, Monday to Friday (except public holidays) between 8:30am and 4:30pm. Please call [**\(02\) 6207 1923**](tel:0262071923) to arrange a copy for purchase.

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Representation for EIS or Territory Plan Amendment Notification - Submission confirmation

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Date and time

18 Jul 2026 10:44:07 AM

Reference code

D9R48GXG

Access Canberra

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Canberra City, ACT 2601

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Home phone

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Amendment number*

DPA-14

Provide the details of your representation*

I object to Draft Plan Amendment 14 (DPA-14) and do not support making the green waste facility on Stockdill Drive permanent. I am concerned about the increased bushfire risk, traffic, noise, dust, odours and air pollution that could affect nearby residents and the surrounding environment. The facility was previously approved only on a temporary basis, and I do not believe there is sufficient justification to change the planning rules to allow it to become permanent. Before making such a significant planning change, the ACT Government should properly assess alternative locations for a north-side green waste facility. I respectfully request that DPA-14 be rejected and that planning priorities focus on providing the essential infrastructure and community services needed for our rapidly growing region.

You may upload any additional supporting documentation or photos.

- Maximum file size is 10Mb.
- A maximum of 5 files can be uploaded.

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Exemption from the public register

To approve your request to exempt all or part of your representation from the public register the Territory Planning Authority must be satisfied that the part of the representation to which your exclusion application relates contains information that:

- (a) the publication of which would disclose a trade secret; or
- (b) the publication of which would, or could reasonably be expected to
 - (i) endanger the life or physical safety of any person; or
 - (ii) lead to damage to, or theft of, property.

Please note: Completing this section does not guarantee your application for exemption from the public register will be approved. A customer service officer will contact you to discuss any request for exemption from the public register.

Do you want to apply to have all or part of your representation excluded from the public register?*

☐ Yes ☒ No

Provide details of your exemption request*

NA

Representation for EIS or Territory Plan Amendment Notification - Submission confirmation

Your submission has been successful. Please keep a copy of this receipt for your records.

Date and time

18 Jul 2026 3:42:23 PM

Reference code

7MNP HQ92

Access Canberra

GPO Box 158
Canberra City, ACT 2601

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Type of representation

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Amendment number*

Provide the details of your representation*

Please reassess alternate site.
- I reject DPA-14.
- Please reassess alternate site.
- DPA -14 is inconsistent with the Territory Act and Belconnen District Policy - a permanent green waste facility should not be permitted at Block 1653.
- As a local resident I am concerned about bushfire risk, environmental impacts, increased traffic, air pollution and odours caused by the green waste facility.

You may upload any additional supporting documentation or photos.

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Representation for EIS or Territory Plan Amendment Notification - Submission confirmation

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Date and time

19 Jul 2026 10:25:10 AM

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MSYJ6HYM

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Type of representation

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Representor details

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Territory Plan and Coordination Section

City and Environment Directorate

GPO Box 158

Canberra ACT 2601

via online form: <https://forms.act.gov.au/smartforms/servlet/SmartForm.html?formCode=1316>

via email: terrplan@act.gov.au

Dear Sir/Madam,

RE: DRAFT PLAN AMENDMENT 14 – BELCONNEN GREEN WASTE RECYCLING FACILITY AND BULK LANDSCAPE SUPPLIES – BLOCK 1653 BELCONNEN DISTRICT

This correspondence is written in objection to Draft Plan Amendment 14 (**DPA-14**), which proposes to amend the Belconnen District Policy — part D03 — of the Territory Plan 2023 to include ‘recycling facility’ and ‘bulk landscape supplies’ as additional assessable uses for Block 1653 Belconnen District (**the subject site**) [REDACTED]

Whilst we support, in-principle, the provision of reliable green waste services — and, more generally, the achievement of the circular economy objectives of the Territory — within the Belconnen District, DPA-14 is not a proportionate or adequately evidenced planning outcome.

Our objection to DPA-14 is raised on the following grounds:

- inconsistency with the National Capital Plan 1990;
- inconsistency with ACT strategic planning outcomes;
- incongruency of the land use scope;
- inadequacy of the Supporting Report;
- insufficiency of technical evidence; and
- amenity, environmental and landscape impacts.

On this basis, we respectfully request that DPA-14 is withdrawn, pursuant to section 66(1)(b) of the *Planning Act 2023* (ACT).

Inconsistency with the National Capital Plan 1990

The decision of the National Capital Authority Board, made under part 3.1.1 of the National Capital Plan 1990, to recognise the use of the subject site for ‘recycling facility’ and ‘bulk landscape supplies’ purposes is acknowledged.

Notwithstanding, DPA-14 is not consistent with relevant objectives; policies; and principles of the National Capital Plan 1990.

Part 2 of the National Capital Plan 1990 sets out a Statement of Planning Principles, encompassing themes of sustainability and liveability. Such subjects are “to be given due consideration ... in the planning and

development of Canberra and the Territory and in policies guiding these matters” and are “binding on both the Australian and ACT Governments”.

Under part 2.3 of the National Capital Plan 1990, the following principles are stated for sustainability objective one:

- c. The natural environment of Canberra and the Territory will be protected and improved by reducing resource consumption and waste, improving water security and quality, energy and food security and improving and protecting soil quality.*
- d. Ecological communities, threatened flora and fauna species, water catchments and water quality will be protected and supported by sustainable resource management.*
- e. Development will respect environmental values including water catchments and water quality and ensure resilience to the impacts of climate change.*

With reference to the commentary **below**, DPA-14 does not sufficiently demonstrate that the proposed uses on the subject site will appropriately preserve ecological values; soil quality; or watercourses.

Part 2.4 of the National Capital Plan 1990 identifies the following principles for liveability objective one:

- b. Planning controls should seek to ensure that development in all forms, including landscaping in urban and non-urban areas, complements and enriches its surroundings.*
- f. Vistas to major landscape features must be protected from and enhanced by development.*

Noting the **below** discussion, DPA-14 does not adequately demonstrate that the proposed uses on the subject site will maintain the amenity of the locality.

The General Policy Plan of the National Capital Plan 1990 establishes the broad framework for land use in the Territory. The subject site is located within the ‘Broadacre Areas’ policy area of the General Policy Plan.

Part 3.6.1 of the National Capital Plan 1990 prescribes the following policy for ‘Broadacre Areas’:

- a. Building, site and landscape development must be sympathetic to and not be discordant with the landscape setting of the National Capital.*

On the basis of the remarks **below**, DPA-14 does not suitably demonstrate that the proposed uses on the subject site are compatible with the surrounding setting.

Inconsistency with ACT Strategic Planning Outcomes

It is recognised that the ACT Planning Strategy 2018 (ACT Government, 2018) espouses waste reduction and improved resource efficiency as key directions to support a sustainable and resilient Territory. However, direction 3.6 emphasises that waste and resource recovery planning should “*be effectively integrated with infrastructure planning to provide long-term certainty and to manage potential conflicts with incompatible nearby land uses*” (p. 74).

By reason of the discussion below, in relation to **Incongruency of the Land Use Scope**
and **Amenity, Environmental and Landscape Impacts**

, DPA-14 does not suitably evidence that the proposed uses on the subject site deliver certitude into the future or are congruent with surrounding development.

Direction 2.4 identifies the necessity of “*protect[ing] existing industrial areas and service trades areas as important elements of a diverse economy*” (p. 58). Notably, Hume is distinguished as “*a key location for sustainable and innovative waste conversion and recycling businesses*” and the ‘IZ1 – General Industrial’ zone is ascertained as an appropriate location for land uses having material impacts upon amenity.

As such, DPA-14 — given the subject site is located within the Belconnen District and zoned ‘NUZ1 – Broadacre’ — operates contrary to the security of current industrial and service trade areas.

It is accepted that the Planning (Statement of Planning Priorities) 2025 (ACT) advocates increased housing supply and support for community needs across the ACT. In relocating current green waste recycling operations; and unencumbering developable land within the district of Belconnen, DPA-14 can be reasoned as endorsing such priorities. However, priority 6 identifies the need for environmental assessment and sufficient separation for potentially incompatible activities (including future waste facilities); and emphasises the need for protection of environmental values, blue-green corridors and the ACT landscape.

By virtue of the **below** remarks, DPA-14 does not adequately demonstrate that the proposed uses on the subject site are compatible with surrounding land uses or will suitably preserve ecological values.

It is acknowledged that the Planning (Belconnen) District Strategy 2023 (ACT) promotes sustainable neighbourhoods —targeting greater housing choice— and economic access and opportunity across the city —providing greater economic diversity and expanded access to employment opportunities. By relocating current green waste recycling operations; and unburdening developable land within the Belconnen District, DPA-14 is reasoned to support these objectives. However, this strategy also advances safeguarding of the blue-green network, encompassing initiatives such as the restoration of ecological connectivity between Molonglo and Belconnen Hills woodland complexes; and protection and enhancement of the Molonglo River Corridor and its catchment and tributaries.

On the basis of the **below** commentary, DPA-14 does not sufficiently establish that the proposed uses on the subject site will conserve or improve ecological values.

The Supporting Report (City and Environment Directorate, n.d.) accompanying DPA-14 relies upon Table 8 of the Planning (Belconnen) District Strategy 2023, which recommends the short-term provision of a ‘green waste transfer facility’ within the district. ‘Green waste transfer facility’ is not a term which is defined under this strategy or the Territory Plan 2023.

In accordance with the Territory Plan 2023, ‘waste transfer station’ means:

the use of land for the collection of waste into bulk containers for the further transport to a landfill site, recycling facility or other waste disposal facility.

Notably, ‘recycling facility’ and ‘waste transfer station’ are distinct types of development. The Planning (Belconnen) District Strategy 2023 cannot reasonably be treated as endorsement of ‘recycling facility’ and ‘bulk landscape supplies’ uses on the subject site.

The Policy Outcomes under the Non-Urban Zones Policy — part E07 — of the Territory Plan 2023 facilitate “a range of uses which require larger sites and/or a location outside urban area” and “activities requiring clearance zones or protection from conflicting development” in the ‘NUZ1’ zone. However, the following additional outcomes are stated:

3. *Promote development that does not adversely impact or visually intrude on the landscape and environmental quality of the locality.*
4. *Limit, where appropriate, development of uses that undermine the future use of land which may be required for urban and other purposes.*

With reference to the discussion **below**, DPA-14 does not appropriately establish that the proposed uses on the subject site maintain the amenity of the locality or are congruent with current and future land use in the area.

The following Assessment Outcomes are prescribed under the Non-Urban Zones Policy of the Territory Plan 2023 for the ‘NUZ1’ zone:

1. *Biodiversity connectivity is maintained across the landscape.*

2. *Loss of native habitat and biodiversity is avoided and/or minimised.*
3. *The health and functionality of waterways and catchments is maintained, including through application of water sensitive urban design principles.*
5. *The proposed use and scale of development are appropriate to the site and zone.*
6. *Adverse impacts of development on surrounding uses (both within a site and on adjoining sites) is minimised.*
13. *Threats to biodiversity such as noise, light pollution, invasive species incursion or establishment, chemical pollution, or site disturbance are avoided or minimised through good design.*
15. *The development considers and addresses site constraints, including heritage, natural features, topography, infrastructure and utilities.*
16. *Environmental risks, including topography, noise, bushfire, flooding, contamination, air quality or hazardous materials are appropriately considered for the development on the site.*
19. *Waste is appropriately managed on site without having a detrimental impact on the surrounding area.*

With reference to the discussion **below**, DPA-14 does not adequately evidence that that the proposed uses on the subject site appropriately preserve ecological values or are consistent with surrounding development.

Incongruency of the Land Use Scope

The Supporting Report included with DPA-14 identifies that the proposed amendment to the Territory Plan 2023 facilitates the relocation of an existing green waste facility currently operating on the West Belconnen landfill site. This facility:

accepts green waste material including pruning, leaves, and grass clippings, which are processed and recycled on-site to produce forest litter, organic mulch, and compost soil. These recycled products are sold back to the community for landscaping and related uses. (p. 4)

DPA-14 specifically seeks to amend the Belconnen District Policy of the Territory Plan 2023 to include 'recycling facility' and 'bulk landscape supplies' as additional assessable uses for the subject site. No consequential amendment to development controls or technical specifications are proposed via DPA-14.

Under the Territory Plan 2023, 'recycling facility' is defined as:

the use of land for depositing, storing, separating, dismantling, salvaging, treating, renovating, or redistributing discarded materials and scrap goods for use as recycled materials, such as paper, glass, plastics, timber, garden and food waste, metals, manufacturing off-cuts, household goods and oils.

'Bulk landscape supplies' means:

the use of land for the bulk sale of sand, soil, screenings, and other such garden materials.

As the definitions of 'recycling facility' and 'bulk landscape supplies' are not confined to the green-organics functions nominated, DPA-14 would operate to permit a far broader land use scope than that which appears to be intended. In respect of a 'recycling facility', materials other than green waste could be deposited; redistributed; separated; stored; treated; or otherwise handled, including food waste; glass; household goods; manufacturing off-cuts; metals; oils; plastic; and/or timber. In respect of 'bulk landscape supplies', materials other than those yielded from green waste may be retailed, including sand; screening; and/or other garden supplies.

Such activities would have distinctly diverse impacts in relation to contamination, dust, noise, odour and visual amenity.

It is unclear how, if at all, the proposed uses will be limited solely to activities associated with green waste.

Strategic planning should not effect to create a general land use scope, reliant upon future discretionary assessment to impose appropriate restrictions thereupon.

Whilst the Supporting Report included with DPA-14 identifies the proposed facility as a response to an immediate need to relocate existing green waste operations, the proposed amendment would permanently modify the Territory Plan to permit 'recycling facility' and 'bulk landscape supplies' uses on the subject site. The amendment itself is not temporary in nature and there is no certainty that the proposed uses would cease after any nominated operational period. Strategic planning controls should not be permanently broadened to facilitate what is presented as an interim requirement without sufficient justification regarding the long-term suitability of the land for such purposes.

Ultimately, DPA-14 would enable poor planning outcomes beyond the scope of the objectives expressed.

Inadequacy of the Supporting Report

In accordance with section 55 of the *Planning Act 2023*, a supporting report for a draft major plan amendment:

means a detailed report setting out all of the following:

- a) ...*
- b) the positive and negative impacts of the proposed amendment;*
- c) a statement about how the proposed amendment would give effect to the planning strategy and—*
 - (i) any relevant district strategy;*

It is respectfully submitted that the Supporting Report associated with DPA-14 does not provide the requisite level of analysis for the inclusion of 'recycling facility' and 'bulk landscape supplies' as additional assessable uses for the subject site.

The potential negative impacts in relation to DPA-14 appear to have been given only cursory consideration, with environmental; non-agricultural land use; and traffic impacts "*expected to be appropriately mitigated through alignment with key protections and requirements contained in the Territory Plan*" (. 8).

In our opinion, the report should provide a detailed assessment of:

- the consequences of the permitting unrestricted 'recycling facility' use — as defined under the Territory Plan 2023 — on the subject site, rather than only the current green waste recycling operation;
- the planning justification for 'bulk landscape supplies' as a separate use, rather than regarding it as a function of green waste processing operations;
- the direct and cumulative effects of the proposed uses, including —
 - existing and future land use in the surrounds;
 - the Molonglo River catchment; and
 - future residential development in the locality; and
- the reasoning for the displacement of the recommendation of the Design Options Study (Cardno/Stantec, October 2022) for Block [REDACTED] Belconnen District as a long-term waste management facility opportunity.

The suitability of the proposed uses on the subject site, with regard to potential negative impacts, is most appropriately resolved via DPA-14. Future discretionary development assessment should not be relied upon to remedy deficiency in the strategic evidence for the amendment.

The Supporting Report underpinning DPA-14 states that the proposed amendment is “*not inconsistent*” with the ACT Planning Strategy 2018, as the subject site “*is within the Broadacre Areas identified in the Policy Plan*” (p. 10). This statement does not ascertain how DPA-14 gives effect to the ACT Planning Strategy 2018.

Insufficiency of Technical Evidence

The Aboriginal Cultural Heritage Assessment (Past Traces Heritage Consultants, December 2021) accompanying DPA-14 concerns part Block 1582 Belconnen District, a retired parcel from which the subject site was derived. This Assessment was prepared for a specific green waste and composting facility scheme upon a portion of the retired block. The Assessment encompassed a field survey over the retired block, to determine the potential for impacts to any heritage sites. It is noted that vegetation coverage across the majority of the retired block was moderate to high, resulting in a general rating of low ground surface visibility; and a moderate degree of survey coverage and effectiveness. The field survey identified two sites consisting of isolated finds. The Aboriginal Cultural Heritage Assessment recommended that additional assessment is undertaken in the event of any alteration of the development footprint.

The Ecological Review (Capital Ecology, December 2021) included with DPA-14 relates to retired Block 1582 Belconnen District. This Review was intended to record the general condition of vegetation and habitat present on the retired block, and to identify any areas of potential ecological significance. The Review involved a brief inspection of the retired block. The inspection distinguished the existence of remnant Blakely’s Red Gum and Apple Box trees; and indigenous established eucalypt trees. The Ecological Review noted that the remnant eucalypts are likely to provide foraging habitat for Superb Parrot and other significant woodland birds, and recommended that these are retained and protected.

The Traffic Impact Assessment (Calibre Professional Services, April 2022) supporting DPA-14 relates to retired Block 1582 Belconnen District. This Assessment was prepared for a general green waste facility and bulk landscape supplies scheme upon a portion of the retired block of approximately 35,000 square metres. The Assessment considered trip generation, traffic distribution and network traffic volumes. The Traffic Impact Assessment concluded that the network is expected to perform adequately in both current and future scenarios.

Given the potential for adverse impacts to arise as a consequence of the proposed uses on the subject site, it is our view that DPA-14 should be substantiated by current; robust; and site-specific technical evidence.

Moreover, we consider that DPA-14 should be informed by investigations regarding:

- air quality;
- contamination;
- dust;
- erosion;
- fire risk;
- groundwater and receiving-water impacts;
- noise and vibration;
- odour; and
- visual amenity impacts.

The proposed amendment would be more satisfactorily validated by comprehensive technical evidence.

Amenity, Environmental and Landscape Impacts

The Supporting Report accompanying DPA-14 indicates that the current green waste facility is subject to an environmental clearance zone “*of up to 1,000 metres*” (p. 4). Existing structures on our leasehold are located

circa 800 metres from the subject site, within the necessary clearance zone. In addition, the 1,000 metre environmental clearance zone considerably restricts the development potential of our leasehold in relation to the ancillary dwelling authorised by the Crown lease.

The existence of this clearance zone may also constrain the future use and development potential of adjoining rural land. In particular, uncertainty remains as to the extent to which the proposed uses may prejudice future subdivision opportunities; and the establishment of additional lawful dwellings or other sensitive uses on neighbouring parcels. Such an outcome would be inconsistent with Policy Outcome 4 of the Non-Urban Zones Policy of the Territory Plan 2023, which seeks to avoid development that undermines the future use of land required for urban and other purposes.

Therefore, DPA-14 does not maintain the amenity of surrounding development.

The Supporting Report further states that the subject site *“is considered to be of relatively low ecological ... significance, reflecting its historical use”* (p. 4). Any environmental impacts are to *“be appropriately mitigated through ongoing environmental authorisation and agreement under the Environment Protection Act”* 1997 (ACT) (p. 8). However, pursuant to the Planning (Belconnen) District Strategy 2023, the subject site forms a part of the blue-green network for the district of Belconnen and the broader Territory. The subject site is distinguished as ‘Urban ACT Ecological Network’. The subject site is immediately surrounded by other ‘Urban ACT Ecological Network’ land to the northwest; and land containing ‘Sensitive Ecological Communities’ to the northeast, southeast and southwest. Creek lines exist to the north; northeast; southeast; and south of the subject site, which flow to the Molonglo River Reserve and the Molonglo River.

Use of the subject site for the purposes of a ‘recycling facility’ and ‘bulk landscape supplies’ is understood to necessitate the use of heavy machinery; produce substantial additional vehicular movements; and require the stockpiling of materials. These uses, moreover, are comprehended to generate dust; leachate; and weed propagules. The Design Options Study included with DPA-14 further notes that the subject site *“is steep and will require significant earthworks”* (p. vi), which will increase the possibility of erosion and run-off into nearby creeks and the Molonglo River.

Importantly, the degradation of the surrounding waterways would be of significant detriment to the agricultural operations occurring on our leasehold.

The proposed uses have the potential to compromise our ability to satisfy the environmental obligations associated with our lease and Land Management Agreement. We are required to actively manage weeds, protect native habitat and maintain the ecological values of the land. The importation and processing of green waste creates a significant risk of weed establishment and spread, including by way of vehicle movements; windborne seed dispersal; stormwater runoff; and unlawful dumping outside operating hours. These risks may substantially increase the management burden and cost borne by adjoining rural Lessees and undermine the long-term environmental outcomes that have been achieved on the land.

The suitability of the proposed uses on the subject site, with regard to potential environmental impacts, is most appropriately resolved by DPA-14, rather than via future arrangements with the Environment Protection Authority. DPA-14 does not duly demonstrate that the proposed uses on the subject site will adequately preserve ecological values, soil quality or watercourses in the locality.

The Design Options Study associated with DPA-14 indicates that the prominence of the subject site *“within the surrounding landscape would have a significant”* visual impact (p. iv). The proposed uses on the subject site will interrupt current sightlines and disrupt major vistas.

Consequently, DPA-14 does not sustain or enhance the existing landscape setting.

As such, we contend that the subject site is not suitable for ‘recycling facility’ and ‘bulk landscape supplies’ use.

Concluding Comments

Section 46 of the *Planning Act 2023* states that the object of the Territory Plan 2023 is:

to ensure, in a manner not inconsistent with the national capital plan, that the planning and development of the ACT provides the people of the ACT with an attractive, safe and efficient environment in which to live, work and have their recreation.

Moreover, pursuant to section 47 of the *Planning Act 2023*, the Territory Plan must “*promote the principles of good planning*” and “*give effect to the planning strategy and district strategies*”.

For the reasons stated above, DPA-14 is not considered to amend the Territory Plan 2023 in such a way as to meet these statutory requirements. Therefore, the withdrawal of DPA-14, in accordance with section 66(1)(b) of the *Planning Act 2023*, is merited.

Yours sincerely,

A solid black rectangular box used to redact the signature of the official.

Representation for EIS or Territory Plan Amendment Notification - Submission confirmation

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19 Jul 2026 1:24:44 PM

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Given name*

Family name*

Organisation name

Enter at least one phone number: *

Home phone

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Application details

Amendment number*

DPA-14

Provide the details of your representation*

I object to Draft Plan Amendment 14 (DPA-14). I do not believe a permanent green waste facility is an appropriate long-term use for this location. The surrounding area is continuing to grow, with more homes, families and a nearby school, making it increasingly important to protect local amenity and the surrounding environment. I am concerned that a permanent facility could result in increased heavy vehicle traffic, noise, dust and odours, which may affect nearby residents and the broader community. Before changing the planning rules to allow the facility to become permanent, the ACT Government should undertake a thorough assessment of alternative locations. I respectfully request that DPA-14 be rejected and that planning decisions prioritise infrastructure and services that better support our growing community.

You may upload any additional supporting documentation or photos.

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From: [REDACTED]
To: [Terrplan](#)
Subject: Draft Plan Amendment 14 - Belconnen green waste recycling facility and bulk landscape supplies
Date: Sunday, 19 July 2026 4:21:35 PM

Caution: This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

To Whom It May Concern at Territory Plan and Coordination Section, CED

I wish to comment Draft Plan Amendment 14.

Long term use for Block 1653

I note that Block 1582 shown in DA202240118 has been enlarged by about 50% from a square shape to a trapezoid Block 1653. I have not found any explanation for this change.

However, the correspondence between SLA and NCA in the background papers mention “green waste facility” and “green waste site” and “green waste and composting” more a dozen times and yet the Territory Plan says nothing about green waste specifically. Instead, the Dictionary defines “Recycling Facility” as “the use of land for depositing, storing, separating, dismantling, salvaging, treating, renovating, or redistributing discarded materials and scrap goods for use as recycled materials, such as paper, glass, plastics, timber, garden and food waste, metals, manufacturing of-cuts, household goods and oils.”

I am suspicious that the ACT Government and/or City Services will be able under Major Amendment 14 to extend the use of the larger Block 1653 to make it into a more general recycling facility which accepts any of the above categories of waste. Especially as the Design Options Study by Cardno in 2022 (who recommended Block 1582) was tasked with finding a replacement for Michell RMC and its waste streams.

Ecological suitability of site

The sediment retaining pond at the southern boundary of Block 1653 is only about 100 metres from a watercourse which can flow along the boundary of the neighbouring [REDACTED] [REDACTED] This watercourse joins the Molonglo River about 2 kilometres away and is not diluted by the Murrumbidgee River water for another 15 kilometres. If the pond is unable to hold all the polluted water coming from the green waste facility, then a long stretch of the river may be seriously affected.

Fire-fighting risks

The 40,000 litre tank shown in DA202240118 can only hold about one hour’s fire-fighting water supply. Which is totally inadequate. It was stated in DA202240118 documents that CSG would be responsible for re-filling the tank but I doubt that enough water tankers can be found quickly enough to allow effective fire-fighting. This could mean fire fighters have to stand by and watch equipment, sheds and landscape materials burn. And there is a risk of a bushfire spreading from the site into the river valley by the prevailing north west wind.

If mains water is connected to the green waste site it will undoubtedly make fire-

fighting easier. And there will be water for keeping the dust down and providing proper amenities for the CSG staff. However, the amount of runoff could be considerable for fires which burn for days. A Google search “Parkwood Mulch Fire” and looking at “Image” results shows photos of the ACT Rural Fire Service fighting a fire in December 2012. Three hoses are in operation and a large area is covered in foam. So polluted water and fire-fighting foam could easily find their way into the river system.

Access road

DA202240118 stated that the gravel access road was to be only 4.5 metres wide (from my memory), not wide enough for two trucks to pass. And CSG estimates that there will be 50 truck trips each day for landscape supplies and delivery. Will there be a stop/go traffic light system installed at each end of the road? Or will it be made wider for the 1,400 vehicles per day which are expected to use it, as mentioned in the Traffic Impact Assessment 1 2022 by Calibre?

The actmapi contour map shows there is a 64 metre drop over approximately 1.3 kilometres from Stockdill Drive down to the green waste site. This is steeper than the 56 metre drop over 1.5 kilometres along the Deep Creek valley from William Hovell Drive, down to the Molonglo River between the two halves of Whitlam. The access road will need “significant earth works “ according to The Design Options Study. And may still not be safe for heavy trucks and laden trailers in fog and wet weather.

I ask CED to undertake further studies to find a more suitable site for a green waste facility in north Canberra or NSW.

Regards

[REDACTED]
[REDACTED] [REDACTED]
[REDACTED]
[REDACTED]

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DPA-14

Submission Opposing Draft Plan Major Amendment 14

Belconnen Green Waste Recycling Facility and Bulk Landscape Supplies – Block 1653, Stockdill Drive

Prepared for: ACT Planning Directorate

Subject: Opposition to Draft Plan Major Amendment 14 (DPA-14)

This submission strongly opposes Draft Plan Major Amendment 14 (DPA-14), which seeks to amend the Territory Plan to permit a permanent green waste recycling facility and bulk landscape supplies depot on Block 1653, south of Stockdill Drive.

While the objectives of improving resource recovery and reducing landfill are supported, the proposed location is fundamentally unsuitable. The amendment would permit industrial land uses immediately adjacent to rapidly growing residential communities without adequately addressing traffic impacts, environmental health, bushfire risk, planning transparency or long-term strategic planning.

The proposal represents a significant departure from the existing Territory Plan by introducing land uses that are currently prohibited under the NUZ1 zoning. Before any permanent planning changes are made, the ACT Government should undertake a comprehensive reassessment of alternative sites and publish all supporting technical assessments to enable informed public consultation.

Accordingly, this submission requests that Draft Plan Major Amendment 14 not proceed in its current form.

Background

The ACT Government proposes to amend the Territory Plan to allow "recycling" and "bulk landscape supplies" on Block 1653 to facilitate the relocation of the Belconnen green waste facility from Parkwood Road.

Although the proposal has been presented as a replacement green waste facility, the amendment would permanently broaden the allowable land uses on the site. The planning implications extend well beyond a simple green waste drop-off facility.

The proposal would establish industrial-scale waste processing adjacent to established and emerging residential communities including Strathnairn and Macnamara.

Planning Concerns

1. Inappropriate Location

The proposed site is significantly closer to residential neighbourhoods than the existing Parkwood Road facility.

Residents purchased homes in Ginninderry without disclosure that a permanent green waste recycling and bulk landscape supply facility would later be established nearby.

Good planning practice requires potentially incompatible land uses to be appropriately separated from residential communities.

Alternative industrial or rural locations exist throughout Belconnen and Molonglo that are:

- * further from residential development;
- * serviced by more suitable transport infrastructure;
- * better able to accommodate heavy vehicle movements; and
- * more appropriate for long-term waste infrastructure.

Despite repeated community requests since 2022, the ACT Government has not publicly released a transparent comparison of alternative sites or explained why Block 1653 represents the preferred option.

2. Territory Plan Amendment Creates Much Broader Development Rights

DPA-14 does not simply permit a green waste facility.

It introduces "recycling" as a permitted land use.

During the community meeting on 2 July 2026, ACT Government representatives confirmed that the Territory Plan definition of recycling encompasses processing materials into raw materials for manufacturing.

This definition could potentially enable future applications involving:

- * food organics processing;
- * glass recycling;
- * plastics recycling;
- * cardboard processing;
- * metal recycling;
- * oil recycling; and
- * other industrial recycling operations.

Residents have not been provided with a comprehensive explanation of the long-term planning implications of permanently changing the Territory Plan.

Without clear limitations written into the Territory Plan itself, future development applications may seek substantially different industrial activities than those currently described.

3. Bulk Landscape Supplies are Inconsistent with Existing Planning Intent

The proposal also seeks to permit bulk landscape supplies.

This use is currently prohibited within the site's zoning.

Introducing commercial bulk landscape supply operations represents a substantial change to the planning intent of the land.

The scale of the proposed development raises legitimate community concerns that the facility will operate as more than a neighbourhood green waste drop-off point.

Greater transparency is required regarding:

- * the intended business model;
- * commercial operations;
- * compost production;
- * landscape material sales;
- * anticipated heavy vehicle movements; and
- * future expansion opportunities.

4. Traffic and Infrastructure

Traffic remains one of the most significant concerns.

Previous traffic assessments estimated approximately 700 additional vehicle movements per day associated with the facility.

Pro Hart Avenue is already experiencing increasing traffic volumes as Ginninderry continues to develop.

Current infrastructure is not designed to accommodate:

- * increased heavy vehicles;
- * commercial traffic;
- * customer vehicles;
- * residential growth; and
- * construction traffic simultaneously.

Following the July 2026 community meeting, Ginninderry confirmed that duplication of Pro Hart Avenue is unlikely to be required for approximately ten years.

This means a permanent industrial facility would commence operation well before supporting transport infrastructure exists.

The proposal therefore places unnecessary pressure on local roads while increasing:

- * traffic congestion;
- * noise;
- * road safety risks;
- * pedestrian conflicts; and

- * emissions.

5. Environmental Health and Air Quality

The proposal has not demonstrated that surrounding communities can be adequately protected from environmental impacts.

Green waste processing generates:

- * dust (PM10);
- * fine particulate matter (PM2.5);
- * bioaerosols;
- * odour;
- * diesel emissions;
- * compost gases; and
- * smoke during fire events.

The ACT Government has advised there is currently no scheduled odour monitoring program proposed for the facility, with monitoring instead relying primarily upon public complaints.

This approach is inconsistent with best-practice environmental management for a permanent waste processing facility located near residential communities.

6. Western Edge Air Quality Findings

The proposed site sits within the Western Edge Investigation Area.

The ACT Government's Preliminary Air Quality Assessment identified several characteristics that warrant careful consideration before locating pollution-generating industries within this area.

The study found that portions of the Western Edge:

- * experience cold air pooling;
- * are susceptible to temperature inversions;
- * allow pollutants to recirculate rather than disperse;
- * contain valleys capable of trapping particulate pollution; and
- * may experience elevated PM2.5 and PM10 concentrations during stable weather conditions.

These findings are directly relevant to a permanent green waste processing facility where particulate emissions are generated through:

- * shredding;
- * chipping;
- * screening;
- * stockpile handling;
- * truck movements; and
- * compost processing.

Before permanently amending the Territory Plan, comprehensive site-specific air quality modelling should be completed and released for public review.

7. Bushfire Risk

The proposal also increases bushfire risk.

Green waste stockpiles are combustible.

Large mulch and compost stockpiles can:

- * self-heat;
- * ignite;
- * generate smoke;
- * produce ember attack; and
- * contribute to fire spread.

The proposed site is located within an area recognised as bushfire prone.

The Western Edge Investigation Area reports acknowledge ongoing bushfire exposure associated with:

- * western mountain weather systems;
- * prevailing north-west winds;

- * historical bushfire events; and
- * climate change.

Locating substantial combustible stockpiles closer to residential communities unnecessarily increases risk to:

- * nearby homes;
- * public infrastructure;
- * surrounding native vegetation; and
- * emergency response capability.

Independent bushfire assessment should be completed before permanent planning changes are considered.

8. Consultation and Governance

The consultation process has not met community expectations regarding transparency.

Community concerns include:

- * alternative site assessments have not been released;
- * ACT Government agency advice remains unavailable during consultation;
- * environmental assessments are incomplete;
- * no comprehensive needs assessment has been published;
- * no clear operational limits have been identified; and
- * previous commitments to provide additional information have not been fulfilled.

Meaningful consultation requires the public to have access to all relevant technical information before consultation closes.

9. Economic and Community Impacts

The proposal risks reducing residential amenity and confidence in future planning decisions.

The surrounding communities continue to experience rapid residential growth supported by substantial private and public investment.

Introducing industrial waste processing into this developing residential corridor may negatively affect:

- * residential amenity;
- * perceived liveability;
- * property confidence;
- * investment certainty; and
- * community trust in strategic planning.

Canberra requires modern waste infrastructure.

However, infrastructure should be located where industrial impacts can be appropriately managed without compromising nearby residential communities.

Requested Outcomes

The ACT Planning Directorate should:

1. Reject Draft Plan Major Amendment 14 in its current form.
2. Undertake a new independent site selection study that includes all available land, including sites unavailable during the 2022 feasibility assessment.
3. Publish the complete assessment of all alternative sites.
4. Complete independent:
 - * air quality modelling;
 - * odour modelling;
 - * bushfire assessment;
 - * traffic assessment; and
 - * cumulative environmental impact assessment.
5. Publish all ACT Government agency advice before any planning decision is made.
6. Clearly define and legally restrict the future land uses permitted on Block 1653 rather than relying on broad Territory Plan definitions.
7. Clarify whether the proposed facility is genuinely temporary or intended as permanent strategic waste infrastructure.

8. Investigate alternative industrial locations that are further removed from existing and future residential communities and supported by appropriate road infrastructure.

Conclusion

The ACT Government's commitment to improving resource recovery and reducing landfill is acknowledged and supported. However, achieving these objectives should not come at the expense of sound planning principles, community health, environmental protection, or public confidence in the planning system. Draft Plan Major Amendment 14 seeks to permanently expand industrial land uses on Block 1653 without adequately demonstrating that the location is suitable or that less impactful alternatives have been properly assessed.

Until comprehensive technical studies, transparent site selection processes and meaningful community consultation have been completed, the amendment should not proceed.

For these reasons, Draft Plan Major Amendment 14 should be refused, and the ACT Government should undertake a transparent reassessment of alternative locations for this important regional infrastructure.

You may upload any additional supporting documentation or photos.

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To approve your request to exempt all or part of your representation from the public register the Territory Planning Authority must be satisfied that the part of the representation to which your exclusion application relates contains information that:

- (a) the publication of which would disclose a trade secret; or
- (b) the publication of which would, or could reasonably be expected to
 - (i) endanger the life or physical safety of any person; or
 - (ii) lead to damage to, or theft of, property.

Please note: Completing this section does not guarantee your application for exemption from the public register will be approved. A customer service officer will contact you to discuss any request for exemption from the public register.

Do you want to apply to have all or part of your representation excluded from the public register?*

- ☐ Yes ☒ No

Provide details of your exemption request*

Not requesting submission be excluded from the public register

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Given name*

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DPA-14

Submission Opposing Draft Plan Amendment 14

Belconnen Green Waste Recycling Facility and Bulk Landscape Supplies – Block 1653, Stockdill Drive

I oppose Draft Plan Amendment 14, which proposes to amend the Territory Plan to permit a permanent green waste recycling facility and bulk landscape supplies depot on Block 1653, south of Stockdill Drive.

While I support the ACT Government's objective of reducing landfill and improving resource recovery, the proposed location is inappropriate due to its likely impacts on traffic, bushfire risk and public health. These impacts have not been adequately addressed, and more suitable alternative locations should be considered before permanent changes to the Territory Plan are made.

Traffic and Infrastructure

The proposed facility is expected to generate approximately 700 additional vehicle movements each day, including heavy vehicles, on Pro Hart Avenue and surrounding roads. These roads are already experiencing increasing traffic volumes as Ginninderry continues to grow and are not designed to accommodate both rapid residential expansion and industrial traffic.

Following the July 2026 community meeting, Ginninderry confirmed that major upgrades to Pro Hart Avenue are unlikely for many years. This means the facility would operate well before the supporting road infrastructure is in place, increasing congestion, noise, emissions and road safety risks for nearby residents, pedestrians and cyclists.

Locating regional waste infrastructure where transport infrastructure is already under pressure is inconsistent with sound planning principles.

Bushfire Risk

The proposed site is located within a recognised bushfire-prone area adjoining expanding residential communities.

Green waste, mulch and compost stockpiles present well-documented fire risks. Large stockpiles can self-heat, ignite and generate embers during bushfire events, increasing the potential for fire spread to surrounding homes, infrastructure and native vegetation.

The ACT Government's own Western Edge Investigation Area studies acknowledge the area's ongoing bushfire exposure and recommend continued mitigation as climate conditions become more severe.

Given these risks, a permanent green waste processing facility should not be located closer to residential neighbourhoods without a comprehensive and publicly available bushfire assessment demonstrating that the risks can be effectively managed.

Air Quality and Community Health

Green waste processing generates dust, fine particulate matter (PM2.5 and PM10), bioaerosols, diesel emissions and odour through activities such as shredding, chipping, screening and stockpile handling. The ACT Government's Preliminary Air Quality Assessment for the Western Edge Investigation Area identified that parts of this area are susceptible to temperature inversions, cold air pooling and valley effects that can trap airborne pollutants close to the ground rather than allowing them to disperse.

These findings are particularly relevant to a permanent green waste processing facility. Pollutants generated on site may accumulate during stable weather conditions, increasing the potential for adverse impacts on nearby residential communities.

Despite these known conditions, no site-specific air quality modelling has been released to demonstrate that emissions can be safely managed. In addition, ACT Government representatives advised that there is currently no scheduled odour monitoring program proposed for the facility, with monitoring instead relying on complaints from the public.

A precautionary approach should be adopted before introducing a pollution-generating industrial use into an area where government studies have already identified potential constraints on pollutant dispersion.

Recommendation

Before proceeding with Draft Plan Amendment 14, the ACT Government should:

undertake a new assessment of alternative sites located further from residential communities;
publish updated traffic, bushfire and air quality assessments for public review;
demonstrate that surrounding infrastructure can safely accommodate the proposed increase in traffic; and
provide clear evidence that public health and environmental risks can be effectively mitigated.

Until these matters are addressed, I do not support Draft Plan Amendment 14.

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DPA-14

Provide the details of your representation*

Submission on Draft Plan Amendment 14

I oppose Draft Plan Amendment 14 because I don't believe Block 1653 is the right location for a permanent green waste recycling facility and bulk landscape supplies depot.

I understand the need for Canberra to invest in better recycling infrastructure, and I support improving resource recovery. My concern isn't with having a green waste facility—it is with where it is being located.

The biggest issue is traffic.

Ginninderry is one of Canberra's fastest-growing areas, yet the road infrastructure has not kept pace with residential growth. Pro Hart Avenue is already carrying increasing volumes of local traffic, and the surrounding road network will only become busier as more homes are built. Adding hundreds of additional vehicle movements every day, including trucks servicing a regional facility, is difficult to justify when the necessary road upgrades are still years away.

It makes little sense to place infrastructure that services the whole of Belconnen and West Canberra in an area where the transport network is already under pressure.

Residents are being asked to accept the impacts of a regional facility before the supporting infrastructure exists.

I'm also disappointed by the lack of transparency throughout this process.

Since the proposal was first announced, the community has repeatedly asked why this site was chosen over other available locations and what alternatives were considered. Despite those requests, there has never been a clear explanation of the decision-making process or a publicly available comparison of potential sites.

Good planning relies on community confidence, and that confidence is difficult to maintain when important information isn't shared.

It is also worth noting that the ACT Government has recently acquired additional land (CSIRO land) that already benefits from established road infrastructure and better regional access. Sites with existing transport connections should be properly assessed before permanently rezoning land immediately adjacent to growing residential communities. A location that is already serviced by appropriate roads would better accommodate increased traffic while also serving a wider catchment across Canberra.

This proposal feels like another example of growth occurring ahead of infrastructure. Residents are encouraged to move into new suburbs with the expectation of well-planned communities, yet essential infrastructure continues to lag while industrial uses are introduced into developing residential areas.

I urge the ACT Government to pause Draft Plan Amendment 14, undertake a transparent assessment of alternative sites, and select a location that is supported by appropriate infrastructure and better suited to a regional waste facility.

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Email address*

Application details

Amendment number*

Provide the details of your representation*

My name is [REDACTED] and I would like to submit a representation to object to the draft plan amendment DPA-14 that will enable a new green waste facility off Stockdill Drive.

I live [REDACTED] and I believe the introduction of a new green waste facility will have a direct impact on me, my property & the residents of Ginenderry and the surrounding suburbs.

My reasons for the objection are as follows:

-The current zone (NUZ1) prohibits the development of recycling facilities, recyclable material collection and bulk landscaping supplies

-There is currently only one entry/exit road into the Ginninderry estate. There is currently a significant amount of traffic from residents, cyclists, pedestrians, tradespeople & heavy commercial water waste vehicles using Pro Heat Avenue and Stockdill Drive. Additional traffic to a new facility will be unsustainable. There would be a significant amount of noise pollution, specifically negatively impacting my property. There will also be an increased risk of motor vehicle accidents for people sharing the roads. Drake Brockman's drive, which currently receives a heavy amount of traffic, is not in any condition to have more vehicles use this road due to all the potholes and surface patching over the past 24 months.

-The Ginninderry development is committed to developing a conservation corridor for the area that will benefit all ACT residents and visitors. The construction of a green waste facility will negatively impact this by disturbing the wonderful natural views of the Mologolo valley.

The introduction of a green waste facility will affect the air quality by way of strong odours. This will have a negative impact on residents' quality of life and will negatively impact property values. There is already a water waste facility off Stockdill Drive, which currently negatively impacts air quality.

There will be an increased bushfire danger in the area. The introduction of a green waste facility will pose a significant risk of danger to residents, property and surrounding critical infrastructure, such as the water treatment plant and nearby high-tension electrical powerlines and substation. There will also be a high potential for increased insurance premiums for residents as a result of the increased bushfire risk.

I thank you for taking the time to consider my objections and would respectfully ask that the draft plan amendment application for the green waste facility not be approved.

Kind Regards

[REDACTED]

You may upload any additional supporting documentation or photos.

- Maximum file size is 10Mb.
 - A maximum of 5 files can be uploaded.
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Disclaimer

Your personal information will be managed in accordance with the *Information Privacy Act 2014* and the Environment, Planning and Sustainable Development Directorate (EPSDD) [**Information Privacy Policy**](#), which is available for viewing on EPSDD's website.

Copies of written comments will be made available on the authority website unless the submission is withdrawn. Copies of written comments will also be given to the proponent of the development proposal.

If you would not like your comments or a part of your comments to be made available on the website or to the applicant, a request must be made under Sections 502 or 503 of the *Planning Act 2023* (or Sections 411 or 412 of the *Planning and Development Act 2007*). A request for exclusion under these sections must be in writing, clearly identifying what parts of your submission you are seeking to exclude and how the request satisfies the exclusion criteria.

Printed copies of the draft amendment (this document) and background documents are available for inspection and purchase at the EPSDD Customer Service Centre, 8 Darling Street, Mitchell, Monday to Friday (except public holidays) between 8:30am and 4:30pm. Please call [**\(02\) 6207 1923**](#) to arrange a copy for purchase.

☐ [Click here for more information on applying for exemption from the public register.](#)