

## ASSESSMENT REPORT

### Section 75W Modification Spring Farm Resource Recovery Park

#### 1. BACKGROUND

Suez Recycling and Recovery Australia (formerly SITA Australia) is a French transnational infrastructure company specialising in waste and water management. It operates the Spring Farm Resource Recovery Park located off Richardson Road, Spring Farm, in the Camden local government area (see **Figure 1**). This facility was formerly known as Jacks Gully.



**Figure 1: Project Location**

##### 1.1. Site and surrounding land uses

The site is legally known as lot 35 in DP 1098588 and it is about 3.7 hectares in area. The site is accessed by a road extending from Springs Road, Spring Farm. Suez has a deed of agreement with Urban Growth NSW for the future provision of an access road off Liz Kernohan Drive. This would mean heavy vehicles no longer travel through residential areas.

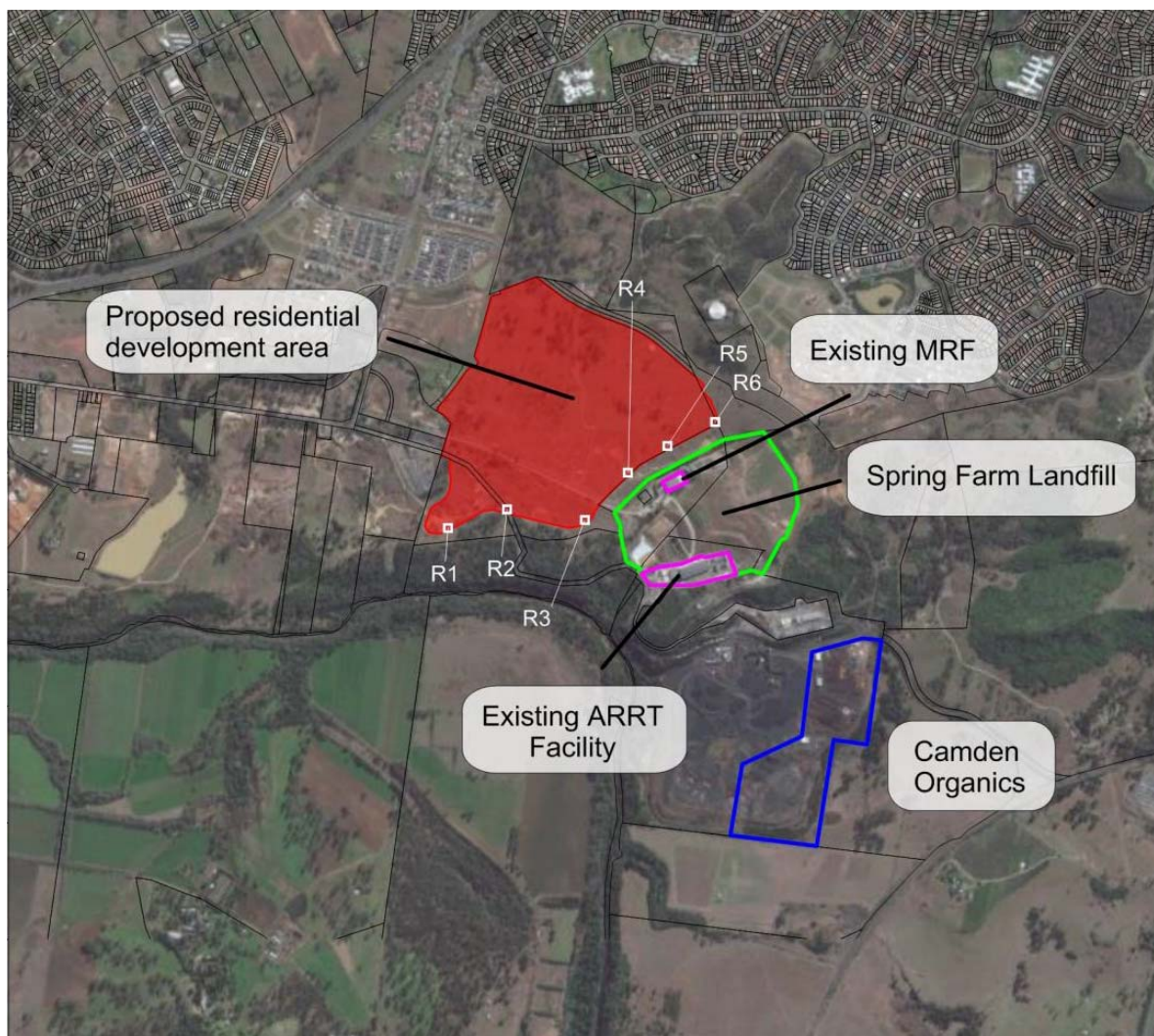
Recent residential development in Narellan Vale, Mt Annan and Spring Farm has brought residential development closer to the site. When fully developed, the nearest homes will be 70 metres (m) to the west. The Mt Annan Botanic Gardens is located about 220m to the east. The Nepean River is 270m to the south-west. A number of industrial premises are located to the south and these include a coal preparation plant, truck yard and a composting facility (Camden Organics) also operated by Suez.

## 2. SITE HISTORY

The site was originally established as a local municipal landfill by Camden Council. At the time, planning approval was not required and the landfill was operated under agreement with the Metropolitan Waste Disposal Authority (MWDA). The MWDA assumed operation of the site from Council in 1974. From the late 1990s, a number of more advanced waste management and resource recovery facilities were progressively established at the site. In 2008, the landfill stopped accepting putrescible waste (but continues to accept non-putrescible waste). In 2011, Suez acquired the site from the NSW Government and by that time, the following facilities were present and operating (see **Figure 2**):

- a non-putrescible landfill;
- a materials recycling facility (MRF) and community drop-off facility;
- a landfill gas to energy generation plant; and
- an Advanced Waste Treatment (AWT) facility utilising a technology known as ArrowBio and incorporating a garden organics composting facility.

The AWT is the subject of this modification request. The AWT was granted Ministerial approval on 7 September 2006. While the technology in the facility is referred to as AWT in the approval, Suez has rebranded it to 'Advanced Resource Recovery Technology' (ARRT).



**Figure 2:** The Spring Farm Resource Recovery Park and proximity to residential receivers

## 2.1 Approved ARRT operation

The Ministerial approval allows the ARRT to receive 130,000 tpa of waste classed as General Solid (putrescible) Waste. Only 90,000 tpa may be processed in the ARRT for recycling, while the remaining 40,000 tpa is stored for distribution to other waste facilities for recycling or landfill. In addition, the approval authorises 25,000 tpa of garden waste and 5,000 tpa tank farm bio-solids to be composted in a Garden Organics Plant (see **Figure 3**).



**Figure 3** – the existing AWT, tank farm and Garden Organics Plant

The ARRT commenced operation in its ArrowBio specification in June 2008. The technology separated putrescible waste using water, which was in turn subject to digestion in a tank farm and produced biogas for combustion in the energy plant. The technology originated in Israel, but it encountered significant operational difficulties under local conditions. The operation of the tank farm in particular was hindered by odour problems and a build-up of sludge originating in the waste water stream.

After acquiring the site in 2011, Suez converted the wet separation process to a simpler dry mechanical separation process in 2011, while the tank farm was decommissioned altogether and remains unused. Currently, the site receives municipal waste under contract from the Macarthur Regional Organisation of Councils (MACROC), including Camden, Campbelltown, Wollondilly and Wingecarribee.

Suez has an agreement with Council to close the landfill by the end of 2017. This agreement is separate to the AWT project approval or the current modification.

## 2.2 Previous modifications

The original approval was granted in 2006 under Part 3A of the *Environmental Planning and Assessment Act* (EP&A Act) and it has been subject to a number of s75W modifications, which include:

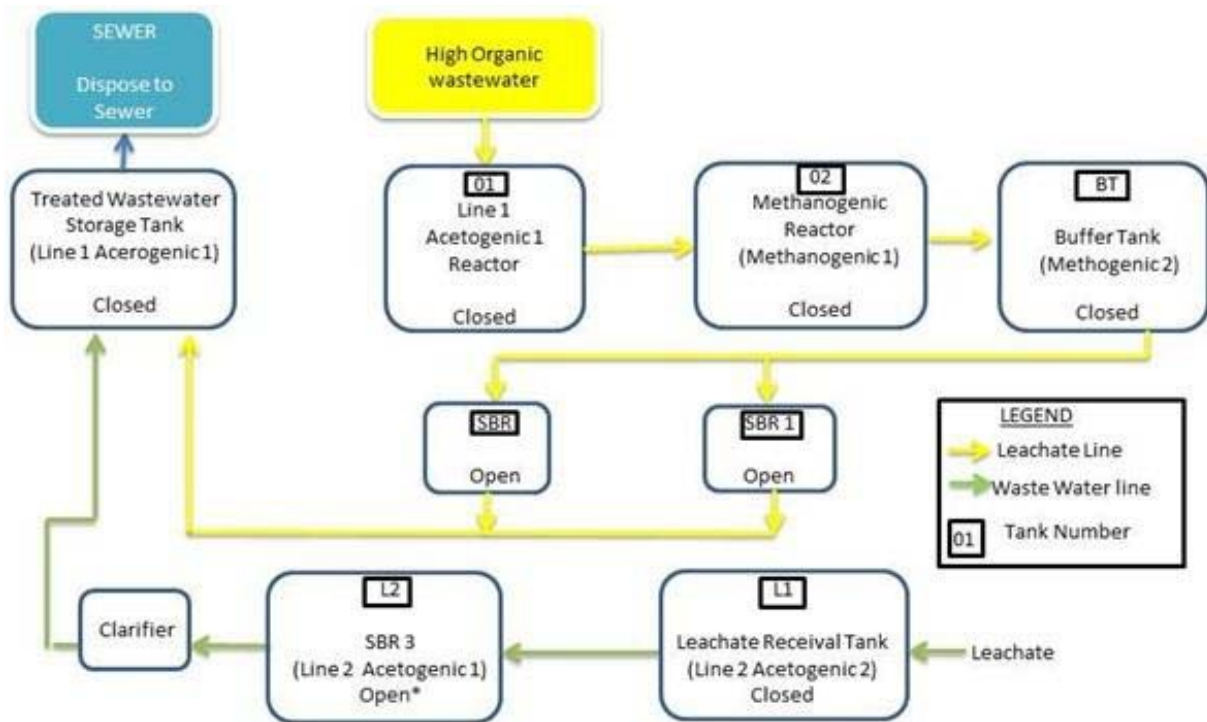
- modification 1 – to amend the project approval in order to reflect subdivisions, and to clarify extent of land subject to the approval (27 November 2006);

- modification 2 – to update lot numbers, description of land and modify air filtration technology (3 April 2009);
- modification 3 – to permit additional inputs to the Garden Organics Plant and to construct/commission a gas pipeline from the landfill to the Tank Farm (10 December 2010); and
- modification 4 – to permit further additional inputs and treatment of additional quantities of garden waste at the Garden Organics Plant (12 December 2010).

### 3. PROPOSED MODIFICATION

#### 3.1. Tank farm

The modification proposes that the tank farm be re-commissioned to receive 520m<sup>3</sup> per day of organic liquid waste and leachate from off-site for treatment. After a number of minor modifications, which are described in the Applicant's Environmental Assessment, the tank farm would be capable of processing the two different wastes in parallel, independent streams (see **Figure 4**). For flexibility, each stream would be capable of treating 520m<sup>3</sup> per day. However, the total combined throughput would be managed so that it did not exceed 520m<sup>3</sup> per day.



**Figure 4** – flow chart of the independent waste treatment streams

#### *Organic liquid waste*

The organic liquid waste stream would treat liquid waste with a high level of organic carbon from food processing industries such as beverage or dairy plants. The liquid waste undergoes anaerobic micro-organism digestion, which converts carbon and fatty acids to bio-gas. The bio-gas would be collected and directed to the electricity generator on the site. Excess bio-gas would be flared in the existing flare on the site.

#### *Leachate*

The leachate stream would treat leachate that has been collected from Suez's other waste management facilities. The leachate would undergo an aerobic treatment process.

The tank farm would treat both liquid waste streams to a standard that would comply with Suez's current Trade Waste Agreement with Sydney Water for disposal to sewer (i.e. nominally less than 600mg/L BOD and 100mg/L ammonia). Treated liquid waste would be tankered to an authorised Trade Waste receival facility (i.e backloaded in the delivery tankers). Separate to the modification, Suez continues to negotiate with Sydney Water about a permanent sewer connection to the site in conjunction with the residential development of land nearby. The permanent connection is separate to the current modification.

Bio-sludge, the residue of the digestion process would be treated aerobically and dewatered before being transferred for composting in the existing Garden Organics Plant on the site.

### **3.2. ARRT facility**

The modification proposes increasing the processing capacity of the ARRT from 90,000 tpa to 130,000 tpa. Note that under the current approval, the site may receive 130,000 tpa of general solid (putrescible) waste, but only 90,000 tpa may be processed in the ARRT. The remaining 40,000 tpa must be transferred to another facility for recycling or landfilling. The modification proposes that the ARRT be permitted to process all waste that is currently received at the site.

## **4. STATUTORY CONTEXT**

### **4.1 Modification request**

The ARRT was originally approved under Part 3A of the EP&A Act. Although Part 3A was repealed on 1 October 2011, the project remains a 'transitional Part 3A project' under Schedule 6A of the EP&A Act. Therefore, the proposed modification must be determined under Section 75W of the EP&A Act.

The Department is satisfied that the proposed changes are within the scope of Section 75W of the EP&A Act and do not constitute a new application.

### **4.2 Approval Authority**

The Minister for Planning was the approval authority for the original application. However, the A/Executive Director, Key Sites and Industry Assessments may determine the current modification request on behalf of the Minister in accordance with the Minister's delegations dated 16 February 2015, as follows:

- the relevant local council has not made an objection;
- a political donations disclosure has not been made; and
- there are fewer than 25 public submissions in the nature of objections.

## **5. CONSULTATION**

Under Section 75W of the EP&A Act, the Minister is not required to notify or exhibit the application. However, given the history of odour problems at the site, the Department determined that the modification application should be exhibited. The application was exhibited on the Department's website for 15 days, between 13 November 2013 and 28 November 2013.

### **5.1 Submissions**

The Department received five submissions during the exhibition period, three from Government agencies, one from Camden Council, and one from the State Member for Camden, Chris Patterson MP.

**Camden Council** and **Mr Patterson** objected to the modification based on the history of odour issues and complaints about the site, the potential future increase in cumulative odour impacts, combined with the proximity of the facility to the encroaching residential release

areas. Council also raised concerns with the adequacy of the Applicant's odour assessment report, questioning the disparity between this report and an odour assessment of the area prepared separately by Urban Growth.

The **Environment Protection Authority** (EPA) considered the Applicant's odour assessment report to be technically inadequate. EPA also raised issues with the Applicant's proposed classification and disposal of by-products (i.e sludge) from leachate and organic waste streams. The EPA recommended the modification be revised with more details for further review.

**Sydney Water** had no objection to the application, and provided comment regarding the requirement for a trade waste agreement to cover operations and the inclusion of an interim and eventual permanent sewer connection and pump.

**Roads and Maritime Services** raised no issues with the proposed modification.

## 5.2 Response to Submissions

Suez prepared a Response to Submissions report to address issues in the submissions, which was first submitted on 12 January 2015. Following further consultation with the EPA and Council, Suez submitted a final report on 1 June 2015, which addressed all outstanding issues. Key features of the final report included details of:

- the details of all potential odour sources and odour generating operational scenarios (including worst case scenario);
- process of de-sludging tanks in the tank farm, and confirmation that this process was included in the modelling for the odour assessment report;
- mobile odour mitigation equipment including odour neutralisers;
- additional information to address the apparent discrepancies between the Applicant's odour assessment report and the odour report prepared by Urban Growth; and
- a guarantee that the landfilling on the site will cease prior to 31 December 2017 (this is a separate agreement between Council and Suez as the landfill is not part of the ARRT Ministerial approval or this modification).

Given the passage of time between the exhibition of the original modification request, and the submission of the final report, the Department exhibited the proposal again with the final report for 29 days from 18 June 2015 to 17 July 2015.

Both Camden Council and the EPA provided submissions to the final report confirming that all outstanding issues had been addressed. The Department of Primary Industries, RMS and the Department of Trade and Investment also provided submissions, but raised no issues.

Two public submissions were received objecting to the modification on the basis of increased odour, incompatible land use, flora and fauna and noise impacts. The Department has considered these issues in its assessment of the proposal as provided in the following sections of this report.

## 6. ASSESSMENT

In assessing the modification, the Department has considered the following documents:

- the modification request and supporting document (see **Appendix B**);
- submissions from Camden Council, agencies and the public (see **Appendix C**);
- the Proponent's Response to Submissions reports dated 12 January 2015, 10 April 2015 and 1 June 2015 (see **Appendix D**);
- the original approval and previous modifications; and
- the relevant provisions of the EP&A Act.

The Department considers the key issue to be odour due to the history of odour emissions from the site and surrounding facilities, and the issues raised by Council and the EPA during the assessment of the modification. Other assessment issues are considered in **Table 1**.

## 6.1 Odour

From 2008, the operation of the ARRT in its ArrowBio hydro-mechanical specification led to significant and unexpected odour impacts on receivers in the locality. The Israeli based technology was found to be unsuited to local conditions and Suez (then SITA) decommissioned it shortly after acquiring the site in 2011. With reconfigured (and now dry) waste processes, the odour impacts of the facility have improved significantly, although they have not been eliminated altogether. The ARRT continues to contribute to the odour emissions from site in combination with the landfill and nearby organics processing facility.

With the history of odour problems, and ongoing development of residential land in the area, the Department, Camden Council and the EPA have given close attention to the odour impacts of the proposed modification. The key issues for assessment include:

- the apparent differences between the odour report for the modification and an earlier odour report commissioned by Urban Growth NSW for a nearby residential release;
- the odour performance of the modification and predicted cumulative impacts; and
- proposed odour mitigation measures.

### *Odour report discrepancies*

The odour assessment report for the modification was prepared and submitted to the Department at roughly the same time in late 2013 as an odour assessment report that had been commissioned by Urban Growth NSW and submitted to Council in support of development application for a residential release area nearby.

The two reports made different findings about odour impacts in the area. The key differences was that Urban Growth had included an additional odour source, being a proposed additional facility producing 50,000 tpa of 'conditioned soil', and used different odour emission rates for the various other odour sources around the site.

Suez consulted with the EPA and Council about the odour assessment report for the modification to address these technical issues. A final odour assessment was submitted with the final Response to Submissions report. Both Council and the EPA have reviewed the final odour assessment and advised the Department that it addresses all earlier concerns.

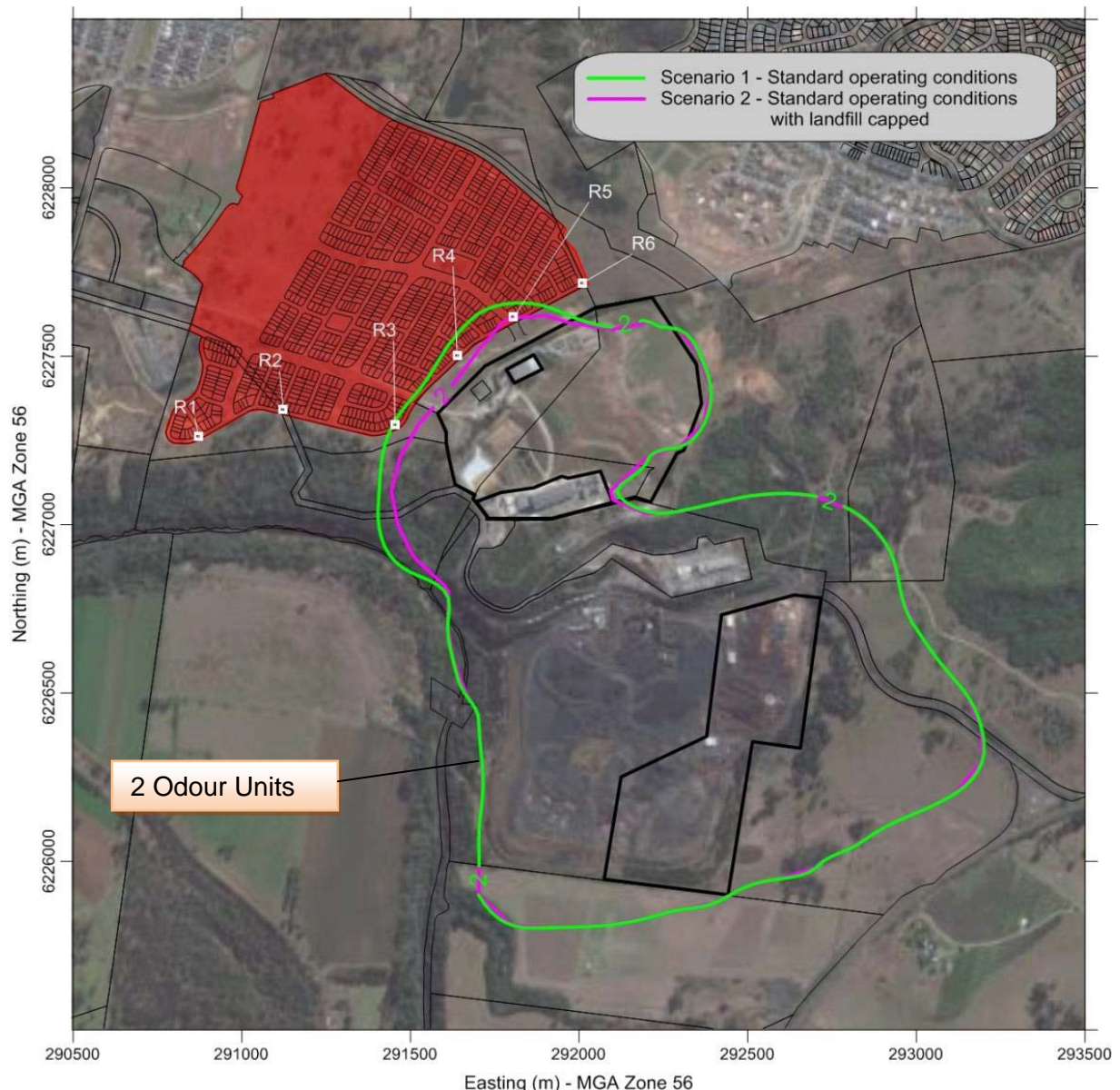
### *Odour impact predictions*

The final odour assessment report provided cumulative odour impact predictions for the modification to the ARRT, and other relevant sources in the locality. The emissions inventory for the predictions was compiled from direct measurements of these odour sources.

The modelled cumulative odour impacts demonstrated that two Odour Units (OUs) would not be exceeded at the nearest residential receivers. These predictions comply with the lowest criteria specified in the EPA's *Approved Methods for Modelling and Assessment of Air Pollutants in NSW*. A contour for two OUs is shown in **Figure 5**.

In interpreting **Figure 5**, it is important to note that the odour contour is applied to the map using an algorithm that smooths the contour between predictions at a range of representative receivers. However, for assessment purposes, the individual predictions are rounded to the nearest whole number. Therefore, while the green contour in **Figure 5** extends to future residential areas, indicating odour impacts in fractions above two OUs, the impacts at these receivers, according to the *Approved Methods* are regarded as two OUs.

In any case, once the landfill ceases to operate in 2017, the two OU contour moves to the east away from the future residential area, as indicated by the pink contour in **Figure 5**.



**Figure 5** – 2 Odour Unit isopleth for predicted cumulative odour impacts.

The Department also notes the following about odour assessment methodology in the *Approved Methods*:

- that odour concentration is expressed as the 99<sup>th</sup> percentile of one year of hourly predictions. This means that the two OU threshold may be exceeded from time to time, but not for more than 1% of the year, typically under unfavourable conditions. This is acceptable under the *Approved Methods*; and
- very sensitive individuals may experience odour impacts below the lowest threshold in the *Approved Methods* of two OUs. This is also acceptable under the *Approved Methods*.

#### *Odour mitigation measures*

To achieve the level of odour performance predicted in the odour assessment report, Suez must continue odour mitigating operational practices at the site, which include:

- delivery of waste in enclosed vehicles;

- the handling of waste inside a fully enclosed building with air extraction systems equipped with ozone injection to treat odours before discharging to the atmosphere;
- high speed roller shutters and coordinated waste deliveries to avoid prolonged periods where vehicle access doors to the building are open;
- processing all waste as soon as practicable after delivery;
- installation of odour scrubbers on tanks in the tank farm with odorous emissions;
- dewatering of sludge from the tank farm in a dewatering press within the building;
- daily cleaning of floors in the waste receipt hall, using odour neutralising agents during incidents and immediate spill clean-up; and
- capturing biogas for electricity generation or flaring.

These mitigation measures would continue to be enforceable by the Department under the existing Operational Environmental Management Plan for the site. In addition, and due to the history of odour problems at the site, the Department has recommended a condition in the approval requiring Suez to commission an independent audit of the ARRT. The audit would need to be prepared within 6 months of commencing operation by an independent expert, whose appointment has been approved by the Secretary of the Department (Secretary). The audit would be required to validate odour impacts of the facility against the predictions in the final odour assessment report (i.e. no more than two OUs at nearby receivers). The audit would also be required to benchmark the ARRT against industry best practice and make recommendations for additional odour controls if found to be necessary to validate the facility. If such recommendations were made by the independent auditor, the recommended approval condition specifies that Suez must comply with any reasonable requirements of the Secretary with respect to the recommendations in order to improve the odour impacts of the facility. In addition, the Department has included its standard conditions for annual review and tri-ennial independent environmental audits for the whole facility. These ongoing reviews and audits would be capable of identifying ongoing odour issues and also enable the Secretary to specify reasonable additional impact including odour impact mitigation measures.

#### *Conclusion on odour impacts*

The Department acknowledges the extensive history of odour problems with the operation of ArrowBio technology within the ARRT and surrounding land uses. The Department also notes that residential receivers are increasingly in close proximity to these uses. The Department recognises that odour impacts from the ARRT improved significantly with the decommissioning of ArrowBio and, in consultation with Camden Council and the EPA, the Department has closely examined the possible odour related impacts of the proposed modifications to the ARRT and tank farm.

The Department's assessment has concluded that the proposed modifications can be expected to remain within the lowest odour criteria specified within the EPA's Approved Methods (i.e two OUs). The predicted odour emissions are unlikely to lead to a further deterioration in air quality for nearby residential receivers.

The existing approval conditions for the ARRT require Suez to:

- employ odour mitigating practices such as ensuring odorous material is enclosed at all possible times;
- maintain the ARRT enclosure and all air handling and treatment devices; and
- maintain good hygiene within the operation and process all received waste as quickly as possible.

The Department also notes Suez's commitment to Council to cease landfilling by 31 December 2017, which will make further improvements on the odour profile of the site, although the landfill is governed separately and it is outside the scope of the current

modification. In addition, should unexpected odour problems arise, the Department's recommended conditions include a requirement for an independent odour audit of the facility, which would identify additional odour mitigation that may be necessary to address these unexpected issues.

## 6.2 Other Issues

**Table 1: Other Issues**

| <b>Issue</b> | <b>Consideration</b>  | <b>Recommend</b>                   |
|--------------|---|------------------------------------|
| Traffic      | <ul style="list-style-type: none"> <li>• The traffic assessment report prepared by Cardno and submitted with the modification request assesses traffic for the whole site including the ARRT, landfill and garden organics plant. It factors in the cessation of landfilling in 2017, temporary tankering of treated liquid waste off site until a sewer connection is provided, and the temporary use of the current access off Spring Drive until a dedicated haul route is provided off Liz Kernohan Drive to the east of the new residential development.</li> <li>• The assessment concludes that:               <ul style="list-style-type: none"> <li>○ recent weighbridge data for the site indicates an average of 194 heavy vehicles trips per day, which is below the forecasted traffic of 288 in the original project application;</li> <li>○ the modification will result in an extra 42 heavy vehicle trips per day (i.e tankers conveying liquid waste and treated liquid waste), which is considered a marginal increase and is expected to have negligible impacts on the existing road network; and</li> <li>○ in the long term with the new haul route off Richardson Road, the additional 42 heavy vehicle movements would represent less than 5% of the anticipated traffic on the new roads, which is also a marginal increase with negligible impacts.</li> </ul> </li> <li>• The Department also notes that the proposed increase in processing capacity in the ARRT does not result in additional waste being accepted at the site (only that the ARRT would be permitted to process all waste already approved for receipt).</li> <li>• The existing approval includes a range of traffic related conditions to minimise traffic impacts (such as transport hours and routes) and these will continue to apply to the ARRT and tank farm in any modified approval.</li> <li>• Neither Council nor the RMS raised any traffic related issues and the Department is satisfied that the marginal increase in traffic associated with the liquid waste deliveries would have negligible impact on the local road network.</li> </ul> | No additional conditions required. |
| Noise        | <ul style="list-style-type: none"> <li>• The modification request included an acoustic assessment prepared by Cardno. It primarily focused on potential road noise impacts of the proposed modification.</li> <li>• The assessment concluded:               <ul style="list-style-type: none"> <li>○ traffic noise for the existing access arrangements of Richardson Road increase by no more 0.2db(A), which is a negligible increase; and</li> <li>○ traffic noise for the future access arrangements from Liz Kernohan Drive would increase by no more 0.7db(A), which is a negligible increase.</li> </ul> </li> <li>• The Department notes that Liz Kernohan Drive is already required to be fitted with acoustic barriers as a result of the anticipated general traffic and that no further acoustic</li> </ul>   | No additional conditions required. |

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|                | <p>treatment would be required for the ARRT modification.</p> <ul style="list-style-type: none"> <li>• The Department also notes that the ARRT is fully enclosed and the tank farm is not of itself a noisy facility. The noise impacts of on-site operations is not expected to materially change with the proposed modification despite not having been modelled in the noise assessment report.</li> <li>• The existing approval includes a range of noise related conditions to minimise noise impacts (such as operating hours and noise limits) and these will continue to apply to the ARRT and tank farm in any modified approval.</li> <li>• Neither the EPA nor Council raised any noise issues with the proposed modification and the Department is satisfied potential noise impacts would be minimal.</li> </ul>  |   |
| Soil and Water | <ul style="list-style-type: none"> <li>• The modification request included a soil and water assessment report prepared by Cardno.</li> <li>• The existing approval includes conditions that provide for surface water management and there is existing soil and water management systems over the whole of the site, which manage clean and dirty run off areas, retain water for re-use and minimise the risk of leachate or other contaminate polluting surface waters.</li> <li>• While the proposed modification includes receiving leachate and organic liquid waste on the site, the existing system of buildings, tanks and bunded areas is adequate to manage the waste stream without any material changes.</li> <li>• Any impacts that result from accidental spills of liquid waste would be adequately managed under the existing protocols in the surface water management system.</li> <li>• The disposal of treated liquid waste would occur under a Trade Waste Agreement with Sydney Water.</li> <li>• Neither the EPA, Sydney Water nor Council raised any soil or water issues and the Department is satisfied that the proposed modification would have minimal impacts.</li> </ul>  | No additional conditions required.  |
| Hazards        | <ul style="list-style-type: none"> <li>• The modification request included a preliminary risk screening and hazards and risks report prepared by Cardno.</li> <li>• The screening indicated that a number of dangerous materials would be transported to and stored on the site. These materials are typically acids, bases and flocculants used that would be used in the tank farm.</li> <li>• Only sodium hydroxide is stored in sufficient quantities that exceed the screening threshold. There are no dangerous materials that are transported in sufficient quantities to warrant a route selection study.</li> <li>• The hazards and risks report indicated that the risks of hazardous scenarios such as spills and fires can be adequately mitigated with appropriate: <ul style="list-style-type: none"> <li>○ operational and emergency response protocols;</li> <li>○ signage and personal protective equipment; and</li> <li>○ maintenance of storage and processing equipment.</li> </ul> </li> <li>• While the Department has noted that the hazards and risk report has not fully discussed potential off-site risks, the Department has assessed that: <ul style="list-style-type: none"> <li>○ preventative measures are in place to prevent the ignition of biogas in the gas of biogas release; and</li> <li>○ off-site risk of sodium hydroxide spill is not expected to be significant because of the buffer distance to surrounding land uses.</li> </ul> </li> <li>• The Department is satisfied that, with the implementation of these mitigation measures, there are no major residual risks</li> </ul> | <p>Conditions of consent require the applicant to:</p> <ul style="list-style-type: none"> <li>• Prepare HAZOP, FHA, EP and SMS plans for the modification.</li> </ul> |

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|  | <p>or significant threats to life, assets or the environment.</p> <ul style="list-style-type: none"> <li>• The Department has included standard hazards and risk conditions in the recommended modification approval.</li> </ul> |  |
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## 7. CONCLUSION

The proposed modification involves increasing the throughput of waste in the existing ARRT so that it is authorised to process all waste that is approved to be accepted at the site. The modification also involves re-commissioning the tank farm to treat new liquid waste streams.

The Department recognises the history of odour problems associated with the ARRT in its former ArrowBio specification. The Department also notes the planned residential areas in close proximity to the site and the potential for land use conflicts to arise with odour impacts. However, the Department is aware that the odour impacts of the site have improved significantly with the decommissioning of the ArrowBio hydro-mechanical process in 2011. The ArrowBio technology was from Israel and it was unsuited to local conditions.

The modification request included a detailed odour assessment report, which was revised in consultation with Council and the EPA until all technical issues were fully resolved. The report found that the site, as proposed to be modified, would not result in a further deterioration in air quality, or lead to unacceptable impacts in residential areas.

The proposed modification represents a suitable adaption of currently under-utilised infrastructure on the site and adds to the limited availability of liquid waste treatment facilities in the metropolitan area. The Department is satisfied that, subject to the completion of an odour audit after the commencement of operation, the modification is unlikely to increase the environmental impacts of the existing site. Consequently, the Department recommends approval subject to conditions.

## 8. RECOMMENDATION

Under delegation of the Minister, it is RECOMMENDED that the A/Executive Director, Key Sites and Industry Assessments;

- consider the findings and recommendations of this report;
- approve the proposed modification under Section 75W of the EP&A Act;
- sign the attached instrument **Appendix A**.

David Mooney  
Team Leader  
Industry Assessments

  
Chris Ritchie 26/11/15  
Director  
Industry Assessments

David Gainsford  
A/Executive Director  
Key Sites and Industry Assessments

## **APPENDIX A – NOTICE OF MODIFICATION**

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## **APPENDIX B – MODIFICATION REQUEST**

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See the Department's website at

[http://majorprojects.planning.nsw.gov.au/index.pl?action=view\\_job&job\\_id=6231](http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=6231)

## **APPENDIX C – SUBMISSIONS**

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See the Department's website at

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## **APPENDIX D – RESPONSE TO SUBMISSIONS**

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See the Department's website at

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