



Our Ref: 208212\_LET\_008C.docx

15 June 2012

Department of Planning and Infrastructure  
GPO Box 39  
SYDNEY NSW 2001

**Attention: Andrew Hartcher**

Dear Mr Hartcher,

**MINOR MODIFICATION OF ORANGE WASTE PROJECT APPROVAL MP09\_0025 – FINAL  
RESPONSE TO PUBLIC SUBMISSIONS**

Further to the second round of public comments received in respect of the above Minor Modification Application, received by the proponent via the Department of Planning and Infrastructure correspondence dated 4 June 2012, please find attached to this letter the proponents response.

We note with agreement the comments of the Environment Protection Agency who advise no objections to the proposed modification. We specifically note the EPA's comments to the effect that they believe that the modifications will have a positive environmental impact to the operations at Euchareena Road in respect of noise, odour and water. We also note their comments with respect to compliance with the EPA licence with respect to noise at the Ophir Road site.

We note no objections to the modification from any of the regulatory stakeholders.

Should you have any questions regarding the above or the attached, please don't hesitate to contact the undersigned.

Yours faithfully  
**Geolyse Pty Ltd**

**DAVID WALKER**  
**Town Planner**

No. of Attachments – 1

1. Response to submissions

## Response to Second Round of Public Submissions – Orange Waste Project Minor Modification MP09\_0025

**Comment received from: Department of Planning and Infrastructure**

Issue No.	Comment	Response															
1	Clarification sought as to the extent of the reduction in car parking spaces at the Euchareena Road site and whether the spaces provided will be sufficient to meet the needs of the site.	<p>The plans approved attached to Project Approval MP09_0025 show 17 car parking spaces at the ERRRC complex. These spaces were to cater for staff, visitors and persons using the education facilities.</p> <p>Due to the relocation of the educational facilities from Euchareena Road to Ophir Road it is proposed to reduce the car parking provision to a total of 8 parking spaces; five related to the composting operations and three relating to the Council's office facility for the landfill site.</p> <p>Cabonne Council does not address car parking requirements in its Rural Development Control Plan. On this basis, the standards set down in the <i>RTA Guide to Traffic Generating Developments</i> (the Guide) have been applied.</p> <p>The Guide requires provision of car parking spaces at the following rates:  Offices – 1 space per 45 square metres  Factories – 1.3 space per 100 square metres  Warehouses – 1 space per 100 square metres</p> <p>Euchareena Road has the following building areas and car parking requirements on the basis of the above:</p> <table border="1"> <thead> <tr> <th></th><th>Area (m<sup>2</sup>)</th><th>Spaces required</th></tr> </thead> <tbody> <tr> <td><b>Council Office</b></td><td>25</td><td>1</td></tr> <tr> <td><b>Composting office</b></td><td>87</td><td>2</td></tr> <tr> <td><b>Receival building*</b></td><td>948</td><td>10</td></tr> <tr> <td><b>TOTAL</b></td><td><b>1060</b></td><td><b>13</b></td></tr> </tbody> </table> <p>* Based on warehouse requirement</p> <p>Neither the composting tunnels nor the maturation pad have been included in the above calculations on the basis that they will not, on their own, generate the need for additional employees.</p> <p>The receival building has been determined on the basis of a warehouse as the predominant activity will be transfer of materials into the composting tunnels, not the creation or breaking down of any items.</p> <p>On the basis of the above, the development is therefore deficient by 5 car parking spaces on the basis of the Guide. An additional 5 car parking spaces will be provided on the site to achieve the required standard; there is sufficient capacity to do so.</p>		Area (m <sup>2</sup> )	Spaces required	<b>Council Office</b>	25	1	<b>Composting office</b>	87	2	<b>Receival building*</b>	948	10	<b>TOTAL</b>	<b>1060</b>	<b>13</b>
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**Comment received from: Department of Planning and Infrastructure**

Issue No.	Comment	Response
2	Clarification sought as to the size of the increase in capacity of Dam C from 0.5ML to 10ML. Provide justification for this increase.	<p>It is confirmed that Dam C, with a capacity of 0.5ML, has been replaced with Dams C1 – C5, with a combined capacity of 10ML.</p> <p>The increase in dam capacity enables the facility to store sufficient water without any of the dams needing to be at 100% capacity. This increased capacity provides the reduction in the level of water in the individual dams during periods of high rainfall, thereby ensuring there is no uncontrolled release of liquid residue from the dams into the local water environment.</p> <p>Condition 22 of Schedule 5 of Project Approval MP09_0025 requires that a water balance be completed as a component of the yet to be completed soil and water management plan. A water balance analysis of the water needs of the site has determined that the site will require five megalitres of water for operational activities. The above capacity ensures that this requirement is met.</p>
3	Clarification sought as to any change in gross floor area of buildings at the Ophir Road site as a result of the modification.	<p>Project Approval MP09_0025 allowed for the development of buildings with a total gross floor area (GFA) of 2916 metres at the Ophir Road site</p> <p>The modification application will result in the construction of one building with a GFA of 2,881.28 square metres, being 2,700 square metres for the operational floor of the Residual Waste Baling and Food and Garden Organics Building and 181.28 square metres of attached office space.</p> <p>This is a reduction of 34.75 square metres or 1% of the approved floor area.</p>

**Comment received from: Orange City Council**

Issue No.	Comment	Response
1	Identifies no issues with this modification. Impacts seem minor and the modification does not challenge any of Orange's Strategic Planning initiatives or goals and sits within an appropriate zone.	Noted

**Comment received from: Department of Primary Industries Office of Water**

Issue No.	Comment	Response
1	NSW Office of Water has reviewed the information and supports the proposal subject to the preparation of a Soil and Water Management Plan (SWMP) that appropriately considers the details of the modification. The SWMP is to be prepared in consultation with the NSW Office of Water.	Condition 22 of Schedule 5 of Project Approval MP09_0025 requires the preparation and implementation of a SWMP.  The SWMP will be prepared in consultation with the NSW Office of Water and to the satisfaction of the Director General of the Department of Planning and Infrastructure.

**Comment received from: Apiculture Risk Management Committee**

Issue No.	Comment	Response
1	The proposed modifications do not impact on the structure or operation of the various buildings or the two sites in a way that would increase risk to the apiary industry.	Noted. Specifically this is noted in respect of the comments by D & A Trowbridge who highlights concerns about proposed Dams C1 – C5 and their potential for impact on the apiculture industry. This is further addressed below.

**Comment received from: Cabonne Council**

Issue No.	Comment	Response
1	Insufficient details of the function of the additional 4 dams. Details of environmental mitigation measures and or lining required.	<p>The Evans and Peck Surface Water Assessment (Appendix J to the GHD EA) identify that the proposed function of Dam C (as originally designed) was to capture run-off from the composting maturation pad. Water would be extracted from this dam for maintenance of the moisture content required in the composting process. The report identifies that the composting maturation area will be isolated from the surrounding area by bunding to ensure that runoff from the area cannot drain to the surrounding land. The bunding would also ensure that runoff from the surrounding land cannot drain into the maturation area (page 24, Appendix J). This function has now been provided via Dams C3 and C4; see below.</p> <p>It was further clarified that stormwater drainage from the product maturation and product storage areas would be directed into a separate pond from which it would be recirculated into the compost (Page 28, Appendix J). The maturation pad would be sealed to prevent any leachate from the compost infiltrating into the surrounding soils. This function is now provided via Dams C1 and C2; see below.</p> <p>As per the above functions of Dams C1 – C4 remains the same as originally identified for Dam C, namely, that these dams will collect water from the compost maturation area and stormwater from the product storage areas. As the storage in these dams serves a pollution control function, it is exempt for consideration of the harvestable rights of the site (Page 35, Appendix J).</p> <p>Dam C5 will be used as a fire fighting resource. The dam serves no water harvesting role as water is to be pumped into this dam (referred to as a turkey nest dam). This dam is also therefore exempt from harvestable water rights.</p> <p>To clarify, the specific function of dams C1 – C5 is set out as follows:</p> <ul style="list-style-type: none"> <li>- C1: Capture and reuse of stormwater that has potentially been in contact with treated compost;</li> <li>- C2: Capture and reuse of stormwater that has potentially been in contact with treated compost;</li> <li>- C3: Captures residual runoff from composting process. Water in C3 will be used as top up water for the compost process and irrigation;</li> <li>- C4: Acts as a back up for C3 in times of high rainfall. When water levels in C3 reduce, water from C4 will be pumped back to C3. C4 will normally be less than 20% full; and</li> <li>- C5: To be used as a fire fighting resource. Serves no water harvesting role as water is to be pumped into this dam (a turkey nest dam).</li> </ul> <p>The design of these dams represents best management practise for water storage in respect of pollution control as identified by the NSW Office of Water.</p>

**Comment received from: Cabonne Council**

Issue No.	Comment	Response
2	<p>Implications of the receival hall having an open end in terms of visual amenity, noise and air issues. The realignment of the building may have an adverse impact on the amenity upon the nearby resident.</p>	<p><b>Noise:</b> The Noise Assessment completed by Heggies Pty Ltd (Appendix Q, GHD EA) confirms that the composting tunnels will be sealed hermetically by a tunnel door to contain odour and leachate (Page 10, Appendix Q). The modification does not seek to make any change to this arrangement. The composting tunnels remain enclosed and sealed as per the original project approval and noise assessment.</p> <p>The Noise Assessment confirms that operations within the composting tunnels would occur 24 hours a day/7 days a week (Page 16, Appendix Q). No change is proposed to this arrangement. As above, these tunnels will be hermetically sealed. There is no reference to activities within the receival hall occurring on this same frequency. It is specifically noted in the Air Quality Assessment, also prepared by Heggies Pty Ltd, that 'some components of the compost plant would operate on a 24 hour a day basis albeit with negligible noise generated' (Page 9, Appendix O).</p> <p>The Noise Modelling that was undertaken by Heggies took into account source sound level emissions and locations, screening effects, receiver locations, meteorological effects, ground topography and noise attenuation due to spherical spreading and atmospheric absorption. The noise modelling did not specifically address the effects of the undertaking of operations within either a completely or partially enclosed building. The modelling did consider composting in the two operation scenarios (Page 18, Appendix Q).</p> <p>In addition to the above it is noted that Appendix D of the Heggies Noise Assessment report contains a table showing the modelled noise of specific machinery types. The table implies that no building has been allowed for in the modelling - in other words, the individual noise sources within the building have been modelled directly, without reducing their noise levels due to the presence of a building.</p> <p>Therefore, whether there are roller doors or not in practice, the actual noise levels should be lower than those modelled in the noise assessment.</p> <p><b>Air/Odour:</b> The scope of the air quality assessment, prepared by Heggies Pty Ltd (Appendix O, GHD EA), was to identify existing air quality characteristics, identify suitable air quality management controls and determine the likely impact of the Euchareena Road RRC on local air quality, including both particulate matter and odour (Page 7, Appendix O).</p> <p>The Air Quality Assessment confirms that the composting tunnels would be hermetically sealed to contain odour and leachate (Page 12, Appendix O). It is confirmed that this approach remains unchanged by virtue of the minor modification application.</p> <p>The Air Quality Assessment set out initial assumptions that were made in deriving the emission inventory model. It was noted:</p> <p style="padding-left: 40px;">It has been assumed that as the front-end loader operation, waste unloading and shredding is carried out within the composting plant, a 30% particulate reduction factor has been applied, relating to partial enclosure (Page 31, Appendix O).</p>

**Comment received from: Cabonne Council**

Issue No.	Comment	Response
2 cont.		<p>The Air Quality Assessment concluded that the construction and operation of the proposed Euchareena Road RRC would have a negligible impact on local air quality.</p> <p><b>Visual amenity:</b> No change is proposed to the bund wall (originally shown on the Euchareena Road site layout on page 28 of the Project Approval, and shown on revised Drawing EV13 of the minor modification application) proposed to be built to the east of the receival building (Screening Bund 3). Notwithstanding the realignment of the receival building, the screening bund will continue to perform the function of screening the activities at the composting facility from the residential property to the east ('The Shades').</p>
3	No objection to the external finish or wall colour.	Noted
4	No objection to proposed modifications to Ophir Road site.	Noted
5	Community concern about application submitted to Cabonne Council to subdivide the composting facility from the residue of the lot.	<p>The decision by Orange City Council to subdivide the composting facility from the remainder of the lot represents an internal management decision, and has two primary drivers:</p> <ol style="list-style-type: none"> <li>1. The desire to separate the EPA licence into two licences; one for the landfill and one for the composting operations. The EPA have confirmed the suitability of this approach.</li> <li>2. Internal management of the site with respect to lease arrangements.</li> </ol> <p>The land would remain in the ownership of Orange City Council</p> <p>Schedule 6A of the <i>Environmental Planning Assessment Act 1979</i> (the Act) sets out the transitional arrangements that apply following the repeal of Part 3A of the Act. Clause 3B(2)(a) states:</p> <p><i>(2) After the repeal of Part 3A, the following provisions apply (despite anything to the contrary in section 75P (2)) if approval to carry out any development to which this clause applies is subject to Part 4 or 5 of the Act:</i></p> <p><i>(a) if Part 4 applies to the carrying out of the development, the development is taken to be development that may be carried out with development consent under Part 4 (despite anything to the contrary in an environmental planning instrument),</i></p> <p>As the subdivision of the land in question is development to which Part 4 applies, clause 3B(2)(a) as cited above is considered applicable. By virtue of clause 3B(2)(a), the determination of such an application is not within the transitional arrangements of Schedule 6A and therefore remains under Part 4. On this basis Cabonne Council is considered the appropriate consent authority to determine the application.</p> <p>To address the community concern about the possible future sale of the lot, Orange City Council would have no objection to a condition of the modified project approval stating that ownership of both lots is be retained in the name of Orange City Council.</p>



**Comment received from: NSW Environment Protection Agency**

Issue No.	Comment	Response
1	The changes to the ERRRC will have an expected positive environmental outcome in relation to noise, odour and water. The EPA has no objections	Noted and agree.
2	In respect of the Ophir Road Resource Recovery Centre, the development must ensure compliance with the environment protection licence 5956 regarding noise.	Noted
3	The EPA has no objections to the proposed changes.	Noted.



**Comment received from: HUB Action Group**

Issue No.	Comment	Response
1	Additional dams: Seeks clarification on whether impact of additional dams has been assessed and clarification on whether this remains a minor modification.	<p>As previously stated above, the function of Dams C1 – C4 remains unchanged from that proposed for former Dam C. These dams are to be used for pollution control purposes only and represent a best management practise approach.</p> <p>Dam C5 is a turkey nest dam to be used for fire fighting purposes.</p> <p>Response below to point 7 of the comments of D &amp; A Trowbridge addresses the matter of whether the changes to the dams represent a minor modification.</p>
2	Additional dams: seeks clarity on the source, quality and end use of water within these dams.	Addressed above.
3	Additional dams: inherent attractor for bees and biosecurity risk	<p>The Apiculture Risk Management Plan notes at page 18, that: <i>Liquid residue collected from green waste may be accessible to bees. However; it is assumed that any insecticide which migrated into this liquid residue would be subjected to significant dilution, effectively removing any risk to apiculture.</i></p> <p>Additionally, Orange City Council has sought the comments of Assure Quality on this matter. They advise that they believe there would be no significant change in the risk to apiculture from this modification.</p> <p>It was agreed that there may be an increase in attractiveness associated with an increase in available water on site but it was also suggested that a significant increase in dilution potential would further reduce the risk associated with water in the dams.</p> <p>Additionally, as bees are more attracted to more odoriferous water sources, there is a possibility that more dilution would cause a reduction in the attractiveness of the water.</p> <p>On the above basis, it is considered that the additional dams will not result in any greater impact to the apiary industry than that which was approved via the project approval.</p>
4	Additional dams: will they be lined?	Dams C1 – C5 will be constructed in the same manner as was proposed for original Dam C. No change is proposed. It is noted in the Groundwater Assessment, prepared by Aquaterra Consulting Pty Ltd (GHD EA, Appendix K), that Dam C was to be clay lined with a minimum of 900mm of material (Page 38, Appendix K). No change is proposed to this construction method.
5	Additional dams: proposed storage capacity exceeds harvestable rights.	<p>As previously stated, the function of dams C1 – C4 remains unchanged as the proposed function of Dam C, ie, for pollution control. As such these dams are exempt from harvestable rights calculations.</p> <p>Dam C5 is a turkey nest dam and forms no harvesting function, it is also therefore exempt from harvestable rights.</p>

**Comment received from: HUB Action Group**

<b>Issue No.</b>	<b>Comment</b>	<b>Response</b>
6	Changes to composting building: Original studies were based on enclosed building.	<p>As noted above, the Air Quality Assessment completed by Heggies Pty Ltd, was undertaken with an initial assumption that the composting elements of the facility were to be partially enclosed. The modification to the building such that the eastern elevation is open sided therefore has no impact on the Air Quality Assessment.</p> <p>Both the Noise and Air Quality Assessment confirm that the composting tunnels are to be hermetically sealed to prevent escape of odour and leachate material. No change is proposed to this approach.</p> <p>Condition 26 of Schedule 5 to the Project Approval provides noise limits that apply during construction and operation. The proponent will ensure compliance with this condition. These limits are further reinforced by the EPA licence.</p>
7	Changes to composting building: realignment of building will result in noise transfer to Gosper residence.	<p>As stated above, the proponent remains committed to compliance with the project approval and EPA licence in respect of noise.</p> <p>It is noted on page 33 of Appendix O of the GHD Environmental Assessment, prepared by Heggies Pty Ltd and submitted in support of the original application, that the receival hall at Euchareena Road would not be fully enclosed. It follows that this assumption forms the basis of the reports prepared by Heggies. This assessment was undertaken with the primary noise generator, the shredder and the education centre, still located at Euchareena Road. As noted by the EPA this proposal will improve environmental outcomes.</p> <p>Subject to the above, and in consideration of Condition 26 of Schedule 5 of the Project Approval, it is not anticipated that noise transfer to nearby residential receivers would be increased via this modification application.</p>

**Comment received from: D & A Trowbridge**

Issue No.	Comment	Response
1	Inadequacy of drawings: drawings do not show the detail of the building including which side is open.	<p>Detailed design has been undertaken since project approval was granted which has, as might be anticipated, resulted in the preparation of detailed plans of the development.</p> <p>In respect of the modification application the proponent has sought to remain consistent with the level of information provided in the project approval. It is acknowledged that this has resulted in a perceived lack of information.</p> <p>Attached to this response are detailed plans of the composting facility. These plans are consistent with the written descriptions provided in the previous documentation relating to the minor modification application.</p>
2	Inadequacy of drawings: no detail has been provided on design of composting tunnels.	See above.
3	Noise and Odour: Realignment of the receival building and the prevailing direction of winds has ramifications for the nearest receptor, 'The Shades'. The noise and odour assessment are affected by the change to the alignment of the building	<p>As previously stated, the air quality assessment was undertaken on the basis that the composting facility was partially enclosed. Therefore the proposed modification to have this building open on the eastern end does not affect the conclusions of this report. No change is proposed to the management of the air within the tunnels, and the shredding facility which would have received original food and garden waste unsorted and un-shredded has been located at Ophir Rd. Fresh or recycled air would be blown into each tunnel by fan, with surplus exhaust air being discharged to a biofilter (Page 10, Appendix Q).</p> <p>As stated above in the response to comments received from the HUB Action Group, it is noted on page 33 of Appendix O of the GHD Environmental Assessment, prepared by Heggies Pty Ltd and submitted in support of the original application, that the receival hall at Euchareena Road would not be fully enclosed. It follows that this assumption forms the basis of the reports prepared by Heggies Pty Ltd, including the Noise Assessment.</p> <p>Subject to the above, and in consideration of Condition 26 of Schedule 5 of the Project Approval, it is not anticipated that noise transfer to nearby residential receivers would be increased via this modification application.</p>
4	Noise and Odour: Use of equipment within the composting building would be prone to echo and has not been assessed	As identified, it is assumed that the Noise Assessment completed by Heggies Pty Ltd was predicated on an assumption that the building would not be completely enclosed. On this basis it is considered that the conclusion of the Noise Assessment, that noise impacts would be below the identified noise criterion at the three nearby residential receptors, remains valid.
5	Noise and Odour: the conditions of approval permit the operation of indoor composting 24 hours a day, 7 days a week.	<p>The Noise Assessment completed by Heggies Pty Ltd confirms that the operating hours of on-site operations would be conducted between 0800 and 1700 Monday to Sunday (Page 7, Appendix Q). This was subject to a caveat that '<i>some components of the plant would operate on a 24 hour a day basis, albeit with negligible noise generated</i>'. Whilst it is not explicitly stated in the Noise Assessment it is assumed that the above reference is to activities within the hermetically sealed composting tunnels, and not within the receival building itself.</p> <p>To clarify the situation, the proponent has no objection to a condition of the project approval that sets down that activities in the receival building outside of the above listed operational hours should be limited to non-plant related activities.</p>

**Comment received from: D & A Trowbridge**

Issue No.	Comment	Response
6	Noise and Odour: it is unreasonable to expect that existing noise and odour modelling could be used on a building that is not enclosed.	Comments provided above that address this matter.
7	Size and location of new dams: Increase in size of dam C cannot be considered minor.	<p>The application to seek a minor modification to Project Approval MP09_0025 is sought via Section 75W of the Act. Notwithstanding that this section of the Act has now been repealed, Part 3C of Schedule 6A of the Act sets down that it remains applicable for the purpose of a modification of a concept approval.</p> <p>Section 75W states, in part, at clause (2):  <i>...the proponent may request the Minister to modify the Minister's approval for a project.</i></p> <p>It goes on to state at clause (7):  <i>This section does not limit the circumstances in which the Minister may modify a determination made by the Minister under Division 3 in connection with the approval of a concept plan.</i></p> <p>On the basis of the above, the legislation provides the flexibility within the system to seek modification to a concept approval without limitation to the scale or nature of the modification.</p> <p>As such, the increase in size of Dam C to form Dams C1 – C5 is able to be approved in the context of Section 75W.</p>
8	Size and location of new dams: increase in capacity of dams leads to an exceedence of harvestable rights	<p>As previously stated, the function of dams C1 – C4 remains for pollution control. As such, these dams are exempt from harvestable rights calculations.</p> <p>Dam C5 is a turkey nest dam and is to be used for fire fighting purposes. This dam is therefore also exempt from harvestable rights.</p>
9	Size and location of new dams: if the estimate of 8.1ML for dust suppression is exceeded due to an increase in composting operations further odour and dust impact assessments would be required.	There is no suggestion in this modification application that increased dust suppression will be required. The water within Dams C1 – C5 is not now, nor has it ever been, identified for use for dust suppression purposes.
10	Size and location of new dams: the quality and purpose of dams C1 – C5 is unstated. Is an increase in leachate generation proposed?	<p>As stated above, the function of dams C1 – C4 remains as stated in the original application, being for pollution control purposes. No increase in generation is proposed. The increase in the dam capacity is simply to achieve best management practise for water that has come into contact with maturing compost.</p> <p>As previously stated Dam C5 will be used for storage of water for fire fighting purposes. This dam will serve no harvesting purposes and will be a 'turkey nest' dam, ie, water will be pumped into it. Dams of this nature are exempt from harvestable rights.</p>
11	Apiary: clarification required of quality and purpose of water in dams C1 – C5.	See above.

**Comment received from: D & A Trowbridge**

Issue No.	Comment	Response
12	Apiary: Increasing the availability of permanent water in dams C1 – C5 contradicts the recommendation of the ARMP with respect to ensuring sufficient provision of permanent water close to bee hives.	<p>The Apiculture Risk Management Plan notes at page 18, that: <i>Liquid residue collected from green waste may be accessible to bees. However; it is assumed that any insecticide which migrated into this liquid residue would be subjected to significant dilution, effectively removing any risk to apiculture.</i></p> <p>Additionally, Orange City Council has sought the comments of Assure Quality on this matter. They advise that they believe there would be no significant change in the risk to apiculture from this modification.</p> <p>It was agreed that there may be an increase in attractiveness associated with an increase in available water on site but it was also suggested that a significant increase in dilution potential would further reduce the risk associated with water in the dams.</p> <p>Additionally, as bees are more attracted to more odorous water sources, there is a possibility that more dilution would cause a reduction in the attractiveness of the water.</p> <p>On the above basis, it is considered that the additional dams will not result in any greater impact to the apiary industry than that which was approved via the project approval.</p>
13	Landscaping: Concern over apparent absence of landscaping around the composting building	Screening bund 3 remains unchanged from the project approval. Landscaping remains in broadly the same location as set down the project approval.
14	Landscaping: the change in colour of the building will increase the visual impact.	This is a subjective issue. It is the proponents view, and we note this is shared by Cabonne Council, that the change from a light green to light grey hue will not have a significant impact on visual amenity. The proponent is comfortable with the application of a condition to the modified project approval that the building should be clad so as to be in keeping with existing development within the area. The proponent is satisfied that the use of a light grey external cladding would satisfy this condition if applied. The use of this colour is also in response to the particular environment that exists within a composting facility, and the need to provide robust and corrosive resistant materials.
15	Landscaping: Landscaping on the eastern boundary of the composting building would provide screening from nearby residences.	This landscaping (screening bund 3) remains as per the project approval. No change is proposed via this minor modification application.

**Comment received from: Ian and Mel Gosper**

Issue No.	Comment	Response
1	Increase in dam capacity of dams C1 – C5 does not represent a minor modification.	Addressed via comments above.
2	Due to the location of their dwelling, any change to water movements will affect them greatly.	Dam function within Dams C1 – C5 with respect to surface water discharge remains unchanged to that set out in the project approval and the surface water assessment.
3	Concern about the implications of the proposed two lot subdivision being assessed by Cabonne Council to separate the composting facility from the remainder of the site.	Addressed via comments above.