

Enquiries
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Our reference Power Industry

31 May 2023

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Dear Jack

Liddell Future Land Use and Enabling Works (SSD-24937520) – Muswellbrook Shire Council comments on Environmental Impact Statement

Reference is made to the *'Liddell Future Land Use and Enabling Works Environmental Impact Statement'* (GHD, March 2023) (EIS) and associated appendices.

Muswellbrook Shire Council (Council) appreciate the opportunity to comment on the EIS and our submission follows. The submission was reviewed and endorsed by Council's State Significant Development Committee on 30 May 2023.

Comments to be addressed are numbered.

Project Description

The Liddell Future Land Use and Enabling Works (Project) will prepare the Liddell Power Station site for ongoing industrial activity as an Industrial Energy Hub and other beneficial uses. The Project is not seeking approval for the Industrial Energy Hub or other uses at this time.

Key elements of the Project are shown in Figure 1 and include:

- Construction, use and expansion of the existing "Borrow Pit" for material extraction and site recontouring (from 1.5M m³ of material extracted to 12M m³). The Borrow Pit will also be utilised by Bayswater Power Station and other AGLM projects;
- Construction and use of a hazmat landfill for disposal of asbestos containing materials (ACM) and synthetic mineral fibre (SMF);
- Demolition of the Power Station and Hunter Valley Gas Turbines (HVGTS) and any associated transmission lines and infrastructure (demolition will be via a staged approach, see Figure 2). A detailed schedule is not yet available;
- Recontouring and revegetation, where required;
- Ancillary works to the Liddell Ash Dam (LAD) to manage surface water and maintain structural integrity; and
- Surrender and consolidation of the following Muswellbrook Shire Council consents:
 - i. DA 2011-01 for Liddell Ash Dam;
 - ii. DA 1995-98 for sewerage effluent reuse;
 - iii. DA 2015-90 for ash line settling pond and associated infrastructure;
 - iv. DA 2015-91 for effluent pipeline from water treatment plant to outfall canal;
 - v. DA1986-51 for HVGTS.

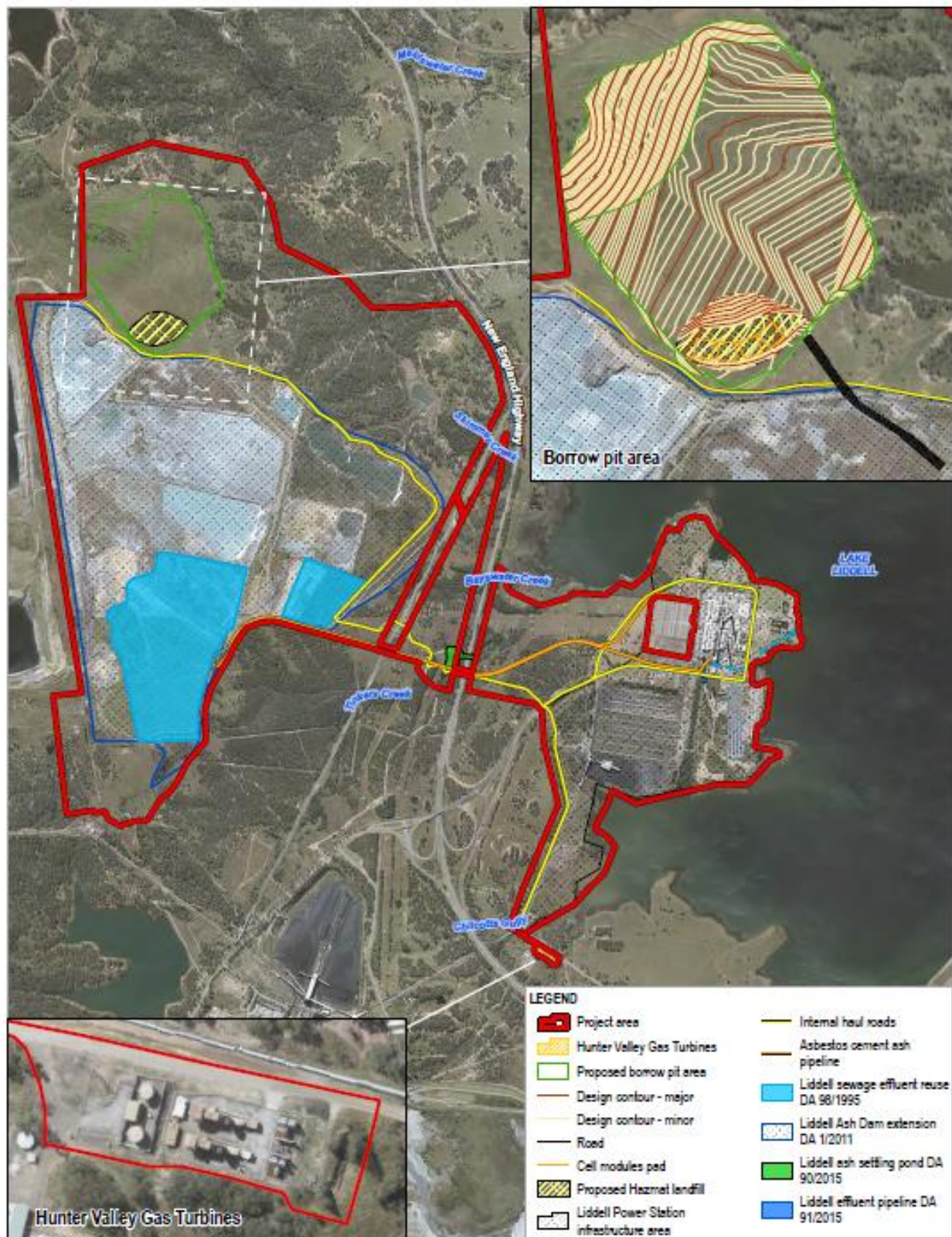


Figure 1 – Project Layout

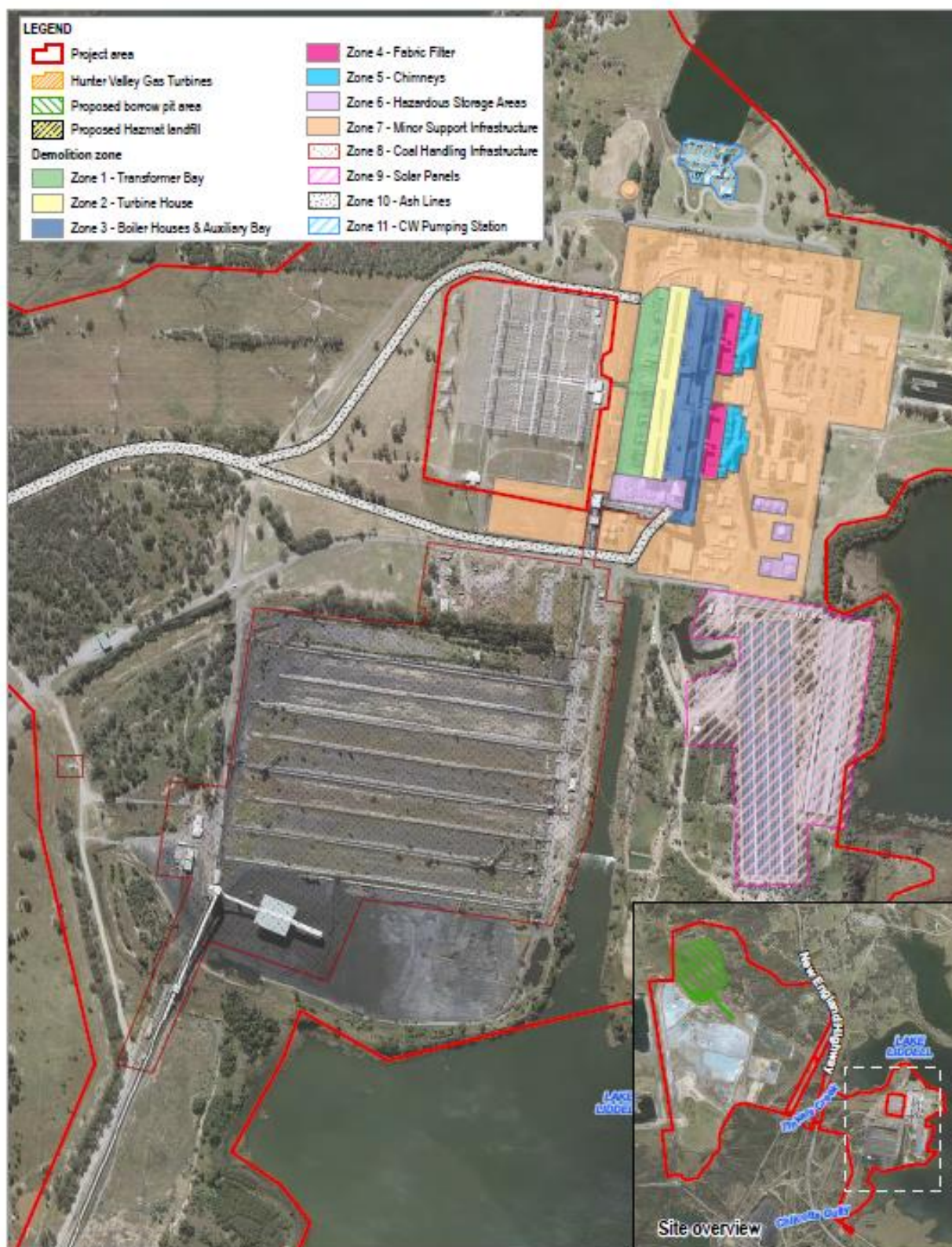


Figure 2 – Demolition Zones

A detailed schedule for demolition is not yet available, however the bulk of the work is expected to take approximately four years. An indicative summary schedule is shown in Table 1.

Table 1 – Indicative Schedule

Element	Year																			
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
LPS demolition works																				
Borrow pit																				
Landfill																				
Recontouring and stabilisation (borrow pit & landfill)																				
Gas turbine demolition																				

Demolition within each zone (see Figure 2) will be staged. Staging is detailed within the EIS. An indicative demolition schedule is shown in Table 2.

Table 2 – Indicative Demolition Schedule

Element	Year 1				Year 2				Year 3				Year 4			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Mobilisation	X															
Stage 1		X	X						O	O	O					
Stage 2		X							O	O	O					
Stage 3		X	X	X	X	X	X			O	O	O				
Stage 4			X	X	X						O	O	O	O		
Stage 5		X	X	X								O	O	O	O	
Stage 6							X	X	X				O	O	O	
Stage 7		X	X	X	X	X								O	O	
Stage 8			X	X	X	X	X	X						O	O	
Stage 9		X	X					X	X						O	
HVGT's		X	X	X												
Demobilisation																X

X – Denotes demolition of aboveground structures

O – Denotes demolition of, at, or below ground structures, primarily concrete slabs and footings.

Up to 75 to 100 full time equivalent personal will be required for the Project.

Surrender of Council Consents

Section 6.1.1.2 of the EIS states that several consents associated with the Liddell Power Station (LPS) will be surrendered as part of the Project. These consents are listed above.

Section 6.1.1.2 also states that “only works which are in addition to those currently approved under the various development consents associated with LPS would be detailed in the EIS.”

01. Staff have encountered similar situations with other projects in the shire and have observed challenges with this approach when the community have enquiries concerning the approved activities at the site.
02. Our preference is for a schedule that provides a detailed description of the approved LPS operations, licences and a description of the existing environmental management systems used to manage environmental issues.
03. To help Council and DPE to determine if it is appropriate to approve the surrender the five consents, the Proponent should complete an audit against each of the conditions and document the commitments from each of the associated impact assessments and how they are being addressed as part of the Project.

Demolition - Chimney Stacks

As stated in the Noise Impact Assessment (NIA) Blasting will be used to fell the chimney stacks. The closest receptor is the Liddell Recreation Park located approximately 2.2km away (HA01).

Blast noise levels are predicted to be 120 dBL_{peak} at the source, and - <20 dBL_{peak} at HA01 which complies with human comfort criteria. The dominant source of vibration is predicted to be from the stack impacting the ground. As stated in the Blast Impact Assessment, at 200 m, stack demolition may produce vibrations of approximately 4.5 mm/s, but since the nearest receptor is 2.2 km away, vibrations are expected to be negligible and comfortably below the 5 mm/s criteria for human comfort.

04. Council is interested in the control of impacts during chimney stack blasting. Any blast management plan should address explosive charge risks including safety, uncontrolled collapse, airborne dust and debris, noise and vibration, environmental impacts (soil and water contamination depending on materials in power station).

05. The blasting of the chimney stacks should be undertaken by a qualified professional experienced in explosive demolition techniques.

Contamination

Assessment Reliability

06. It is unclear whether the authors of the contamination assessment are certified under the Registered Environmental Practitioners Scheme.

07. Section 1.4.2 of the Contamination Assessment states that in consultation with the NSW EPA, under the NSW Site Auditor Scheme, AGLM has engaged the services of a Site Auditor to review and endorse the various contamination assessments being prepared by Kleinfelder to support lodgement of the EIS. Council would like an update on the Site Auditor's endorsement of the contamination assessment.

Contamination Results Summary

A Preliminary Site Investigation (Stage 1) was undertaken in 2022. A Detailed Site Investigation (Stage 2) was completed in 2022.

A Baseline Contamination Assessment Report (BCAR) has been undertaken (as part of Stage 2 for this EIS) to identify where contamination exists and how it would be managed during and following demolition.

A high-level summary of the BCAR is as follows:

- Soil and groundwater contamination were found in the main infrastructure areas, particularly the Main Power Block and Coal Yards;
- Elevated concentrations of metals, petroleum hydrocarbons, and PFAS were detected, exceeding ecological assessment criteria;
- Sampling along Lake Liddell detected sediment and surface water samples exceeding criteria for metals and PFOS. Source-pathway-receptor linkages were identified, including potential risks to on-site workers, terrestrial ecosystems, and aquatic ecology.

There is one Underground Petroleum Storage System (UPSS) in the north-eastern portion of the power block. An analysis of data indicated potential leaks.

Several landfilling locations have been documented, as reported by ERM (2013) used for both disposal purposes and the expansion of foreshore areas. There is limited information available regarding the operational period, size, design (such as the use of liners and leachate control), exact locations, and types of materials deposited.

Two former asbestos disposal areas were identified, located within the Solar Array and Buffer Lands. AGLM propose to confirm their capping thickness and add additional capping materials (if required). These areas may incorporate future building/hardstand cover, to mitigate risks to human health and the environment.

08. Council requires clarification on the locations of all proposed contaminated sites. In addition to the proposed Hazmat Landfill (discussed below), it appears that there are multiple legacy contaminated sites that are proposed to left in-situ. The location of these sites should be provided as part of a site-wide masterplan (see Ref 20). If these sites are to remain in-situ, Council will require sites to be surveyed and registered as an 88B on the land title, including references to the applicable management plans.

Lake Liddell

The BCAR identified that additional studies and risk assessments may be required for Lake Liddell management and closure. Staff have raised this issue as part of the Closure and Rehabilitation Plan for the LAD.

The BCAR states that Lake Liddell is subject to a NSW Environment Protection (EPA) PFAS Management Plan, however Council Staff could not confirm this.

It is noted in the EIS, that Lake Liddell remains part of Bayswater PS so closure does not form part of this Project.

Stage 3 Remediation

The proposed future Stage 3 contamination investigation involves a Detailed Site Investigation (DSI) in currently inaccessible areas after decommissioning and/or demolition.

The aim of Stage 3 is to assess potential risks to ecological and human health to achieve ongoing industrial land use, such as an Industrial Energy Hub, by considering technical and commercial aspects in the site's redevelopment layout.

The contamination assessment indicates that potential contamination risks are not sufficient to present an impediment to the implementation of the Project and ongoing industrial use of LPS as an Industrial Energy Hub (or other beneficial use).

It is proposed that Stage 3 will include a detailed remediation strategy.

09. It is assumed that any remediation strategy would be integrated with the land use plan (see Ref 20) to appropriately address the intended final land use. Council would like the opportunity to comment on this strategy to confirm it meets the broader expectations of the site.

10. Following the completion of Stage 3 Remediation, Council will require AGLM to provide the following:
- A remediation completion report that provides a comprehensive summary of the remediation activities undertaken, including the specific remedial measures implemented, monitoring data collected during and after remediation, and the results of post-remediation sampling and testing. It should detail how the site has achieved the desired clean-up goals and compliance with applicable regulations and guidelines;
 - A long-term monitoring plan outlining any monitoring activities to be conducted over time. The plan should specify the monitoring parameters, sampling frequency, locations, and reporting requirements to ensure ongoing environmental protection and site management; and
 - A land use restriction plan: If the remediated site is intended for a new land use or development, information on any land use restrictions or controls required to ensure appropriate site management in the future.
11. Council is concerned about the long-term impacts of contamination on listed terrestrial fauna e.g the Regent Honey Eater which may utilise some areas of the site as foraging habitat. Council would like confidence that land that is likely to be used by these species is decontaminated to an acceptable standard prior to final rehabilitation. This may be achieved through trials using phytoremediation.

Proposed Hazmat Landfill

The proposed landfill area is located within the Borrow Pit, immediately north of the LAD and comprises an existing mine overburden area emplaced on AGLM land approximately 30 years ago by the former Drayton coal mine. Containment cells will be created within the landfill (see Figure 1) to enable disposal of asbestos contaminated soil, ACM and SMF. Up to approximately 30,000 m3 of mainly asbestos waste will be disposed in this area.

The landfill would also be utilised by Bayswater Power Station.

A variation to EPL 2122 will be sought for waste disposal for the proposed landfill.

An indicative landfill schedule is shown in Table 3.

Table 3 – Indicative Landfill Schedule

Element	Year									
	2	3	4	5	6	7	8	9	10	11
Cell 1 construction										
Cell 1 filling										
Cell 1 capping										
Cell 2 construction										
Cell 2 filling										
Cell 2 capping										
Cell 3 construction										
Cell 3 filling										
Cell 3 capping										
Cell 4 construction										
Cell 4 filling										
Cell 4 capping										
Rehabilitation										

12. Council supports onsite disposal which diverts waste from landfill and avoids vehicle movements transporting asbestos on public roads.

13. Rather than create a greenfield contamination site, other options should be investigated including disposal within the ash dam, the former quarry and existing asbestos landfill sites.
14. The landfill design will make allowance for an interim capping system, or similar, to allow for intermittent filling of the landfill as required. Dust controls must be in place for the interim capping / intermittent filling methods.
15. It is unclear whether the landfill is proposed to be lined.
16. The asbestos material would be transported to the landfill via existing internal haul roads. AGLM to confirm whether trucks will be covered.
17. Runoff from disturbed areas and runoff from undisturbed areas incidentally collected will be directed into the existing Settling Pond. Council staff note that during rehabilitation, the Settling Pond will need to be treated appropriately e.g. dredged and remediated to remove any contamination.
18. Section 8.7.3 of the EIS states that the landfill will be capped with the approved capping cover material. However, the “approved capping material is unclear”.

Rehabilitation

Council Officers note Section 8.7.3 of the EIS which states “Key project completion criteria would be determined in consultation with relevant government agencies... and documented in the appropriate management plan.”

The Rehabilitation Management Plan (RMP) (2017) was approved on 25/05/2017. In 2023, AGL resubmitted the LAD Closure and Rehabilitation Plan (15/02/2023) for the LAD and Borrow Area. Council staff provided comments on this Plan in May 2023. Council Officers support the regular review of the LAD Closure Plan, rather than it being a static document, so that it can be modified with improved knowledge over time.

19. Council requests the RMP be updated for the Project, in consultation with Council.

Final Landuse

Vegetation

A summary of revegetation is provided in Table 4.

Table 4 – Proposed Vegetation in the Project Area

Domain	Revegetation comment
LPS – disturbed areas not identified for ongoing commercial/ industrial use	Exotic sterile pasture grass - Grass species and seeding rates will be based on the time of year and seed availability.
LPS – existing vegetation along Lake Liddell	Supplementary planting of trees along Lake Liddell consistent with existing species.

Domain	Revegetation comment
Borrow area	Woodland species commensurate with the Central Hunter Grey Box- Ironbark Woodland – to create linkages and develop a corridor between existing endangered communities and enhance wildlife movement.
Landfill	Exotic sterile pasture grass - Grass species and seeding rates will be based on the time of year and seed availability. Grass species will be planted on the landform above the landfill area including a 5 m buffer to ensure that tree root penetration of the cap is managed.

The final land use is a critical aspect of the Project.

The Secretary's Environmental Assessment Requirements (SEARs) for the Project in relation to future land use is provided in Table 5.

Table 5 – Secretary's Environmental Assessment Requirements Final Land use

Requirements	Where addressed
Future land use – including:	
Evaluation of potential future land uses on the site considering local and regional strategic plans and opportunities to maximise the range of possible future uses through remediation and rehabilitation of the site;	Section 8.1.3
Justification for selection of the remediation methodology and rehabilitation strategy and the suitability of the proposed remedial and rehabilitation strategies for achieving the preferred final land use(s);	Section 8.1.3
Details of any restrictions on future development of the land and liabilities for on-going management of residual contamination or discharges from site;	Section 8.1.3 and 8.3.3 Appendix E
If relevant, details of the long-term strategy for funding the maintenance of any residual contamination or discharges;	Section 8.1.3 and Section 8.3 Appendix E
Details of engagement with the local community in selecting the preferred final land use.	Section 8.1.3

The aim of the Project is to enable ongoing industrial use of the site.

As noted in the EIS, the existing zoning of the Project area is SP2 Infrastructure (Power Generation) is a constraint on future development as the permissible land use is restricted to power generation, development that is ordinarily incidental or ancillary to power stations.

The EIS notes that "Project demolition plans for the coal plant and solar arrays may be structured to allow redevelopment to occur ahead of the main power station site if determined necessary".

AGL have had discussions with Council staff and DPE on pathways to amend Muswellbrook Local Environment Plan 2009 to permit further uses, with consent, on the Liddell site.

20. While the EIS makes reference to a Land Use Study, in particular a conceptual masterplan for the Liddell Core Investigation Area, the LPS Final Landform (Figure 3) and the Industrial Energy Hub, it would be expected that the EIS would contain a masterplan similar to that provided in Hunter Regional Plan 2041 (Figure 4) and also include a Project scale plan to generally show the location of areas proposed for employment generating activities and open space / biodiversity.

21. The most significant negative social impact identified in the Social Impact Assessment for the Project was "Uncertainty about future industries at the LPS site has the potential to create stress and anxiety for some individuals, which may affect some people's wellbeing". This impact reinforces the necessity for clarity on the future planning of the site identified above.

22. Council is particularly interested in vegetation corridors within the Shire. Whilst the Hunter Regional Plan 2041 shows a vegetation corridor across the site, it is unclear whether this incorporates general principles from the '*Synoptic Plan Integrated Landscapes for Coal Mine Rehabilitation in the Hunter Valley of NSW*' (Synoptic Plan) which is a cumulative rehabilitation plan for major project sites in the Shire.

The Project is located immediately west of the Maxwell Underground Coal Mine (SSD 9526) (Maxwell) and immediately north of the existing Hunter Valley Operations North HVO North), currently preparing a Submissions Report as part of a new application (SSD 11826681).

Maxwell has an approved rehabilitation plan and HVO North is currently preparing its Submissions Report. Staff have previously made submissions to Maxwell and HVO North in relation to rehabilitation plans showing neighbouring sites. Both projects commit to preparing a rehabilitation plan consistent with the principles of the Synoptic Plan.

Any rehabilitation plan for the Project should consider and include rehabilitation plans for Maxwell, HVO North and the Synoptic Plan to ensure long term biodiversity corridors are preserved in the Shire.

Final Landform

23. Most of the site (except for the borrow area) is a gentle slope. These areas will still require certain design principles (identified in the Rehabilitation Strategy) including a drainage design. The drainage design and final landform contours should be incorporated into site wide masterplan (see Ref 20)
24. As stated in the EIS, the final landform of the Borrow Area is required to have a maximum grade of 16.7% consistent with DA 2011-01.

Proposed Substrate

Crushed concrete from the demolition works suitable for reuse, is proposed to be applied to majority of the site as stabilisation (up to 300 mm thick) to support new construction and help prevent soil erosion. Suitable crop cover would be applied in some areas where practical.

The area that will be covered with crushed concrete is shown in by the pink polygon in Figure 3.

25. Council is concerned about the potential impacts of using concrete as substrate and require further information on how the following will be managed:
- a) Leaching of contaminants - Crushed concrete may contain contaminants such as heavy metals or residual chemicals from previous use or demolition. Over time, these contaminants can leach into the surrounding soil or groundwater, posing environmental risks.
 - b) Soil pH and nutrient imbalance - Crushed concrete may alter the pH and nutrient composition of the soil, affecting its fertility. This can require additional soil amendments and adjustments to maintain a suitable growing environment;

- c) Structural integrity - While crushed concrete can provide stability, over time it may experience settlement or uneven settling, leading to potential structural issues. Regular inspection and maintenance may be necessary to address any concerns.
- d) Limited permeability - Crushed concrete can have reduced permeability compared to natural soils, which may hinder water infiltration and drainage. This can result in poor water management, potential waterlogging, or increased runoff.
- e) Aesthetics and land use limitations - The use of crushed concrete as a substrate may not be visually appealing. Additionally, it may limit certain land use activities depending on the composition and condition of the substrate and make ongoing maintenance (e.g. site slashing) harder to achieve.

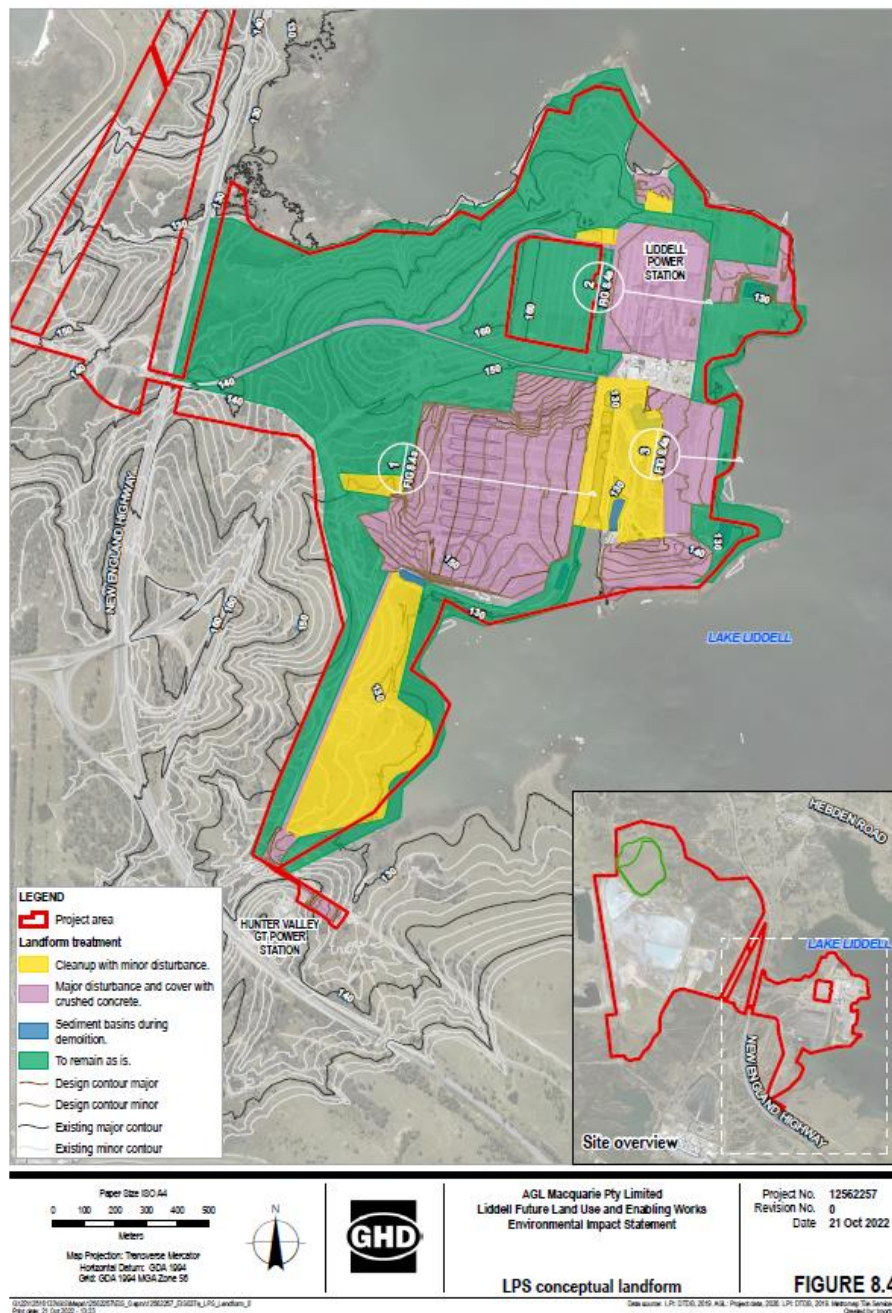
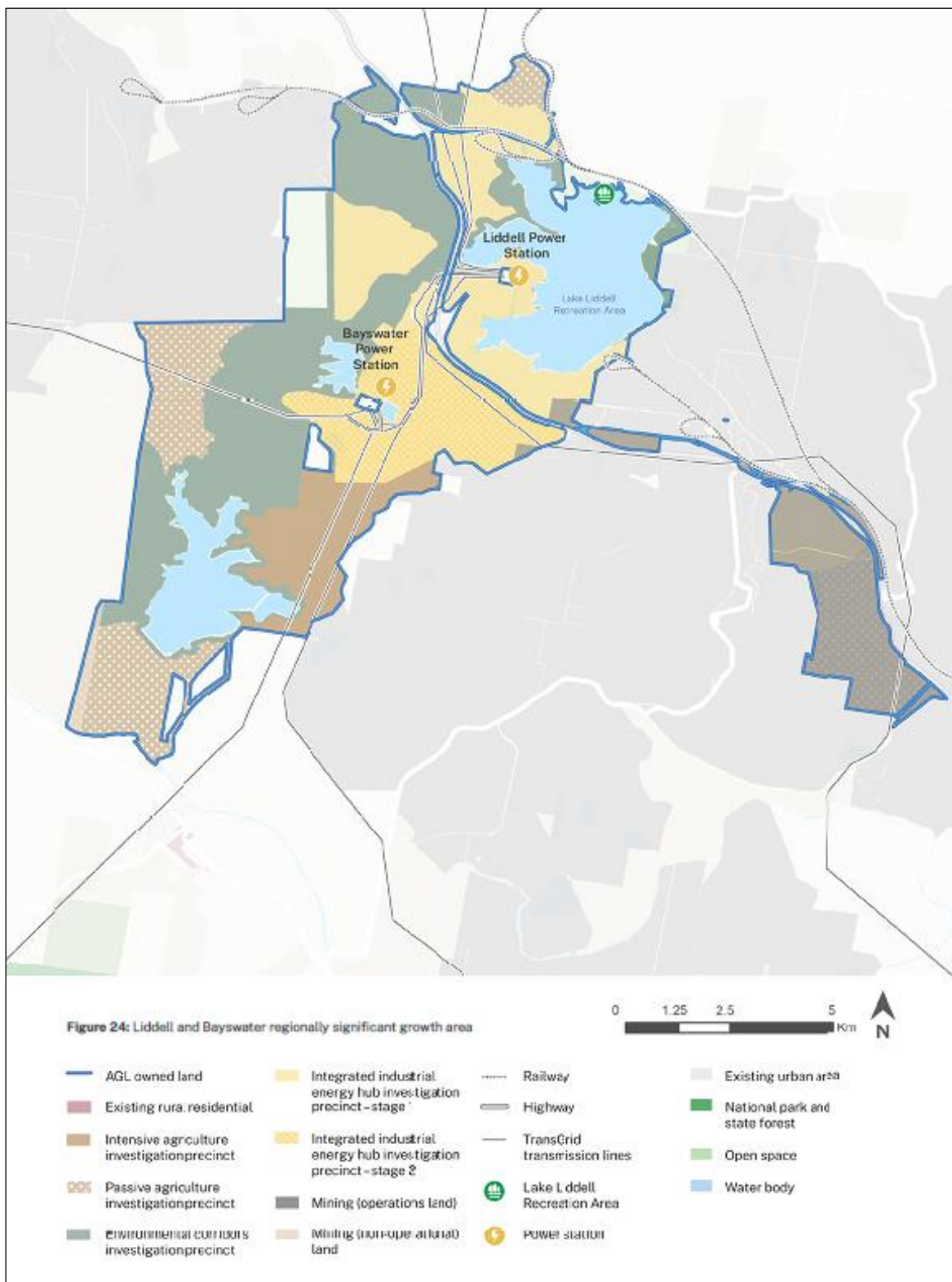


Figure 3 – LPS Conceptual Landform (source: Rehabilitation Strategy)



**Figure 4 – Liddell and Bayswater Power Station Proposed Growth Area
(source: Hunter Regional Plan 2041)**

Socio-Economic

A Socio-Economic Impact Assessment (SIA) for the Closure of Liddell Power Station was provided to Council in July 2022. Some impacts have been addressed through a Voluntary Planning Agreement.

The Social Impact Assessment for the Project (March 2023) includes mitigation measures for the Project only.

26. Council requires some confidence that AGLM have undertaken measures to actively manage site closure and request a retrospective Socio-Economic Closure Plan be prepared to outline how AGLM. This is noted in the Planning Agreement. This would be achieved through a regular reports on how the site closure was actively managed:

- a. To minimised adverse impacts for workers, firms and the community;
- b. To assist workers to secure new jobs and to maximise their future career options;
- c. To strengthen the long-term sustainability of the Upper Hunter economy;
- d. To maintain and improve social cohesion and community spirit throughout the change process; and
- e. To maintain collaborative and inclusive governance dedicated to promoting community cohesion through the transformation process.

27. The Socio-Economic Closure Plan should also:

- a. Consider the report 'Identifying measures of success for a global best-practice thermal coal mine and thermal coal-fires power station closure' (UniSA, 2020), specifically the objectives, targets, indicators and measures outlined in Appendix A.
- b. Include a tabulated description of objectives, targets, indicators and measures like those presented Appendix A of UniSA (2020) and tailored to the site.

Long Term Security

28. In its comments to AGL on 15 May 2023 on the LAD Closure Plan, Council Staff requested a security deposit for the long-term security of the LAD be paid to the State Government.

29. Likewise, a security deposit lodged with the State Government, to ensure the fulfilment of obligations relating to site remediation and management, would seem appropriate.

30. Areas use for waste disposal and subject to contamination will be required to be registered as an 88B on title and include references to the applicable management plans.

Visual

Staff have undertaken a review of viewpoints provided in the Landscape Character and Visual Impact Assessment for the Project. The location of viewpoints is provided in Figure 5.

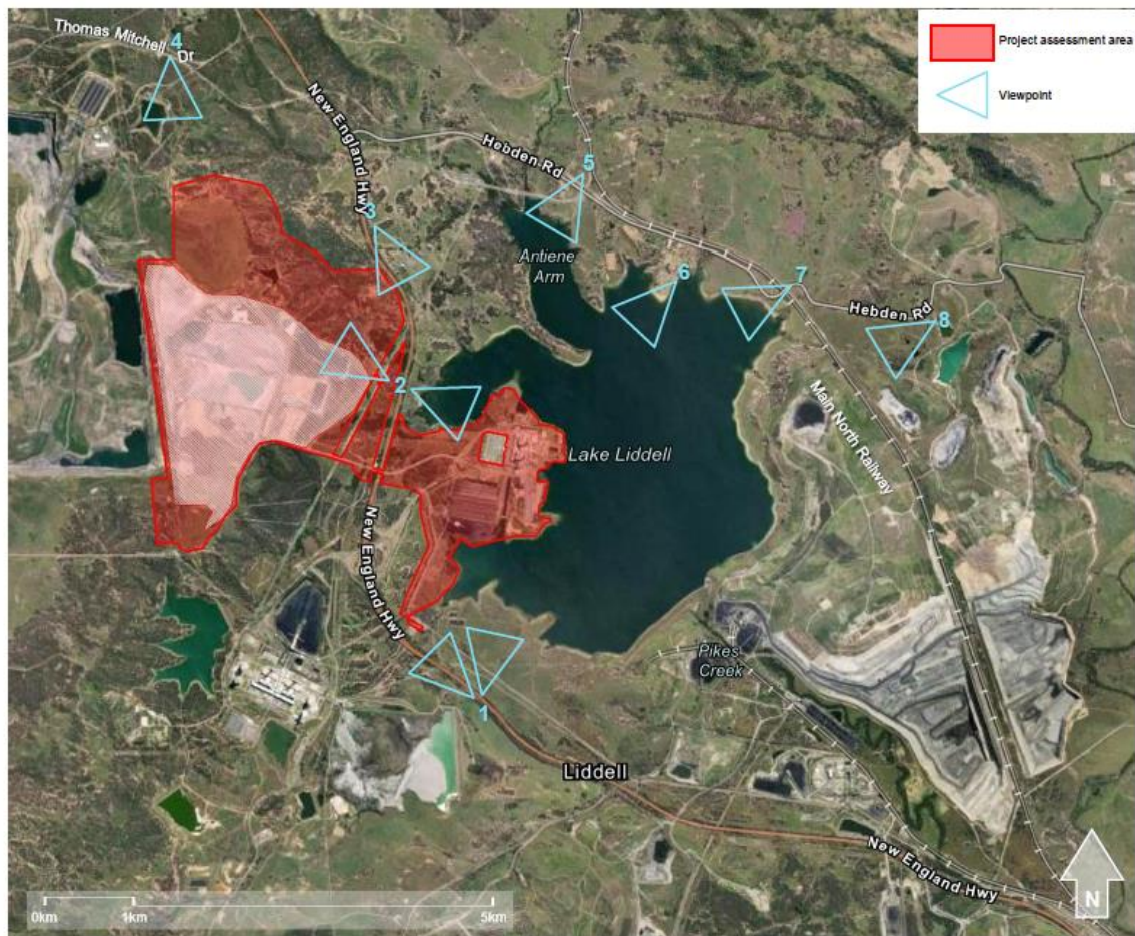


Figure 5 – Viewpoint Locations as shown in the Visual Impact Assessment

Viewpoint 2

31. The embankment of the LAD can be seen in the view west toward the LAD (see Figure 6). The area between the LAD and the NEH has been identified as “environmental corridors investigation precinct” in the Hunter Regional Plan 2041 (HRP), see Figure 4. Council staff would prefer additional plantings in this area to soften the view toward the LAD embankment.



Figure 6 – View from the New England Highway Looking West

View Point 6

32. Views from Lake Liddell Recreation Area are shown in Figure 7. Council Staff would prefer additional / infill plantings to be undertaken on the eastern shore of the Project area, adjacent Lake Liddell, to improve future visual amenity of proposed industrial landscape.

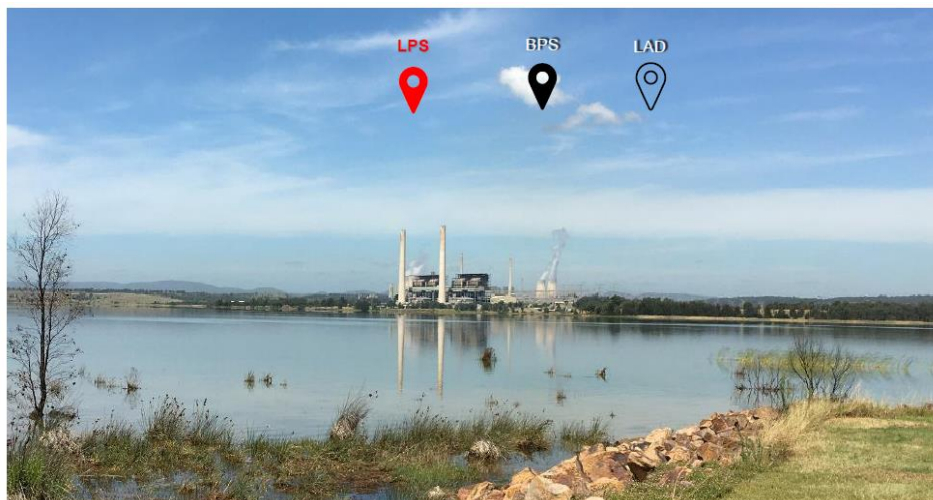


Figure 7 – View from the Liddell Recreation Area Looking West

Restoration and Research Projects

33. Mining SSD in the Shire undertake restoration and research projects to assist with environmental understanding, remediation effectiveness, development of innovative solutions, legacy site transformation and to improve knowledge sharing and collaboration.
34. It is disappointing that AGLM have not proposed any restoration or research programs for the site. These could include researching techniques to restore and enhance the ecological value of the site, such as re-vegetation programs or habitat restoration for native species.

Water

35. Muswellbrook Local Government Area is home to several projects with significant water licence allocations which places limitations on the ability to change the water sharing regime. It is assumed the LPS site holds a significant water licence allocation. Clarification is required on the timing and strategy for water licence surrender for the Project.

Liddell Ash Dam

It is noted that AGLM propose to consolidate DA 2011-01 for the Liddell Ash Dam (LAD) as part of this Project. Officers recently submitted comments on the LAD Closure and Rehabilitation Plan (dated Feb 2023) on 15 May 2023 and are awaiting feedback from AGLM.

36. Officers consider that comments provided to AGLM on 15 May 2023 will need to be considered and incorporated into the Project, in consultation with EPA, DPE and Dams Safety NSW, before Council can surrender DA 2011-01.

37. The works in connection with the closure and Rehabilitation of LAD required under development approval (DA) 1/2011, have not been included as part of the contamination assessment for the Project. Staff have communicated to AGL that there will need to be consensus on whether contamination (groundwater) is managed for the entire site as a whole or whether the LAD will be managed separately.

Waste

Indicative quantities of waste streams to be generated from demolition activities are provided in Table 6.

Staff note the commitment from AGLM to prepare a waste management plan that will include “systems to sort waste”.

Staff will continue to monitor waste loads originating from the Liddell AGL site.

38. Should any asbestos be transported on public roads, it will need to be in accordance with EPA’s Policies and Procedures.
39. Council recommends that measures be included in the waste management plan to monitor and report on waste generation, recycling rates and progress toward waste management objectives.

Table 6 – Indicative Waste Volumes

Type / material	Quantity (tonnes)	Management*
Ferrous metals	70,000	Recycling
Non-ferrous metals	2,800	Recycling
Concrete	110,115	Crushed and used as fill at the LPS
Brick	5,700	Crushed and used as fill at the LPS
General demolition waste	720	Disposed onsite or to Council landfill
Asbestos	15,624 (m ³)	Disposed to onsite landfill
Synthetic mineral fibre	12,918 (m ³)	Disposed to onsite landfill
PCB contaminated concrete	20	Disposed to onsite landfill

*Indicative management approach recycling maximised where possible.

Air Quality

Figure 5.4 of the Air Quality Impact Assessment (AQIA) shows two air quality monitoring stations south and southeast of the Liddell Ash Dam. These locations are inconsistent with those shown in the approved air quality management plan for the LAD.

40. An air quality monitor is required to the north of the LAD, as committed to in the approved air quality management plan.
41. The maximum 24-hour average predicted PM_{2.5} concentration will exceed 5 µg/m³ at R28 and R20. While it is appreciated that the National Environment Protection Measures standard is 8 µg/m³, the World Health Organisation standard is 5 µg/m³.
42. The LAD has not been included in the air quality modelling. Whilst Section 4.63(3) of the *Environmental Planning and Assessment Act 1979* is appreciated, excluding the LAD from the air quality assessment is considered negligent and is not acceptable.

43. Given the elevated PM_{2.5} and PM₁₀ background concentrations identified in the AQIA, Staff are disappointed that DPE have not developed cumulative management measures for industry in the Shire. Muswellbrook Shire regularly experiences poor air quality, and each SSD project simply states that their own incremental contributions are less than the criteria.

Traffic

Access to the site is via the State-owned New England Highway. As a result, there will be no traffic impacts to Local roads.

Council appreciates the opportunity to comment and would be pleased to provide additional information if requested. Should you need to discuss the above, please contact Theresa Folpp, Development Compliance Officer on 02 6549 3700 or email council@muswellbrook.nsw.gov.au.

Yours faithfully



Sharon Pope
Director Environment and Planning