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SCOPING REPORT: PROPOSED MODIFICATION TO MP 06_0228 SHOALHAVEN STARCHES EXPANSION PROJECT - PROPOSED WAREHOUSE (MOD 33)

SHOALHAVEN STARCHES, BOLONG ROAD BOMADERRY

1. BACKGROUND

Shoalhaven Starches employs approximately 500 full-time employees and 400 contractors at its Nowra facility and thousands more indirectly across the supply chain.

Shoalhaven Starches manufacture wheat starch and its derivatives, as well as ethanol from wheat starch at the site. This is an energy and resource-intensive manufacturing process.

Shoalhaven Starches are currently seeking to upgrade facilities to capture and transform waste heat into usable energy to drive the ethanol, starch, and gluten manufacturing processes. The Manildra Group has recently been awarded a \$44.5m grant by the Federal Government, under the Powering the Regions Fund, for this suite of heat recovery projects at the Shoalhaven Starches site at Nowra.

The Powering the Regions Fund is delivering \$330 million to nine projects to keep Australian industry not just surviving but thriving, as demand for low emissions products grows around the world. These nine projects will create hundreds of new jobs during construction and secure existing regional roles that have supported Australian families and communities for generations.

Over the life of the assets, almost 2.4 million tonnes of CO₂ will be abated at the Shoalhaven Starches facility. These outcomes support Manildra's aims of lowering emissions from our operations, facilitating circular and zero-waste manufacturing, and protecting our natural resources. The investment will also assist our Nowra site to meet its obligations under the Safeguard Mechanism framework in the decade ahead.

In conjunction with these works, Shoalhaven Starches are also seeking to improve efficiencies to support its Bomaderry operations by providing onsite warehousing facilities to enable the storage of raw materials, chemicals, starch, glucose and gluten to replace third party storage which is currently undertaken off site in Sydney.

The purpose of this submission is to provide a brief outline of the proposed modification to the approved project; outline issues that such a modified proposal will raise; and which should be addressed in any Modification Application. Such has been prepared assist the Department in framing any requirements that it may have for this modification proposal.

2. MP06_0228 – THE APPROVED DEVELOPMENT (AS MODIFIED)

Project Approval MP06_0228 was granted by the Minister for Planning on the 28 January 2009 for the Shoalhaven Starches Expansion Project (SSEP). This approval also encapsulated previous approvals for the site into one overall approval for the site (at that time).

Since that time, several modifications have been approved to expand production to, amongst other things:–

- increase ethanol production to meet NSW Government’s former targets for the blending of ethanol in the total of volume of petrol sold,
- manufacturer beverage grade ethanol when ethanol targets were revised down following changes to NSW Government policy, and
- during the COVID pandemic following a request by the Federal Government’s Department of Industry, Sciences and Energy to produce more hand sanitizer alcohol.

The Minister for Planning has approved 25 modifications to the SSEP since 2009. All modifications from Modification 1 to 18 were approved by the Independent Planning under the Minister’s delegation as the Applicant and Modification 19 onwards were approved by the then Minister for Planning under delegation.

3. SUBJECT LAND

The subject land associated with the works being the construction of warehouse facilities is Lot A DP 384559 known as No 340 Bolong Road which is locally known as the former “Australian Pulp and Paper Mills site” which is approximately east of the main Shoalhaven Starches factory site.

The subject land is approximately 14.8ha in area and is within the E4 General Industrial zone of the Shoalhaven Local Environmental Plan (LEP) 2014. At present, the site is occupied by a number of industrial premises and administration buildings operated by the Manildra Group.

Figure 1 is an aerial image identifying each of the above parcels of land associated with this Modification Application.



Figure 1: The Subject Land

4. THE MODIFICATION PROPOSAL

Shoalhaven Starches employs approximately 500 full-time employees and 400 contractors at its Nowra facility and thousands more indirectly across the supply chain.

The proposal involves the construction of a warehouse at the site of the former Paper Mill. The warehouse is proposed to be sited behind the proposed Air Liquide CO2 plant when viewed from Bolong Road and would operate as an ancillary facility in support of main operations at the Shoalhaven Starches plant.

The warehouse is required to replace less efficient and costly third party external warehouse storage for raw materials (including packaging, chemicals and the like) and finished product goods from Shoalhaven Starches operations.

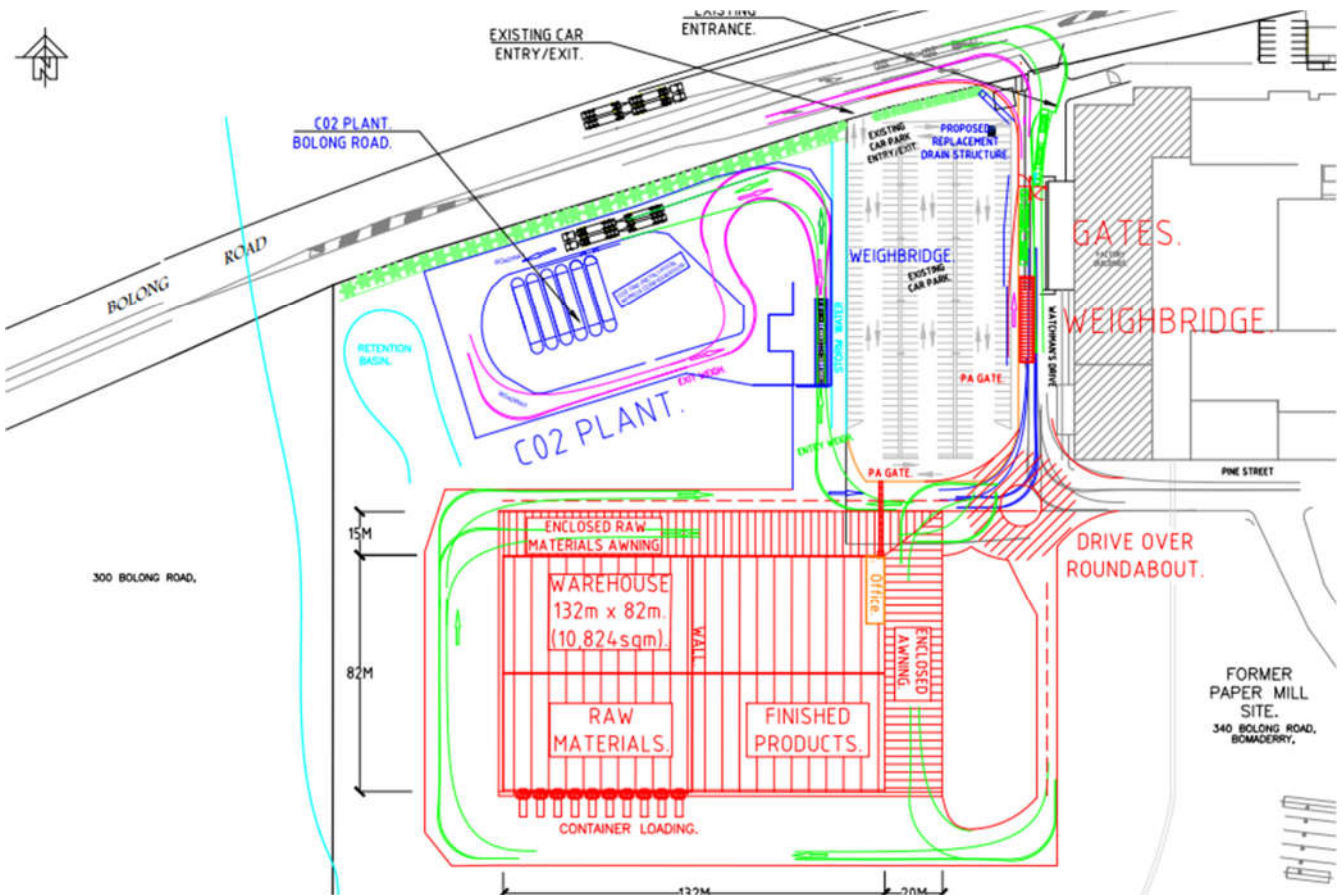


Figure 2: Site Plan of Proposed Warehouse (Source: Manildra Group)

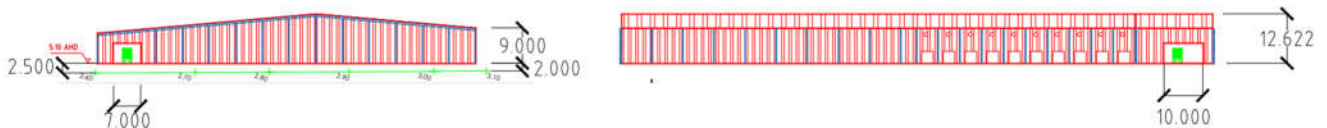


Figure 3: West (left) and South (right) Elevations of Proposed Warehouse (Source: Manildra Group)

The warehouse is to house inbound goods and finished goods from Shoalhaven Starches, truck unloading and loading activities as follows:

- Raw Material Storage: 3000 Pallet Spaces 4 high – Racking
- Bunded Storage (Chemicals etc): 500 Pallets comprising a variety of food-grade ingredients/raw materials/chemicals (non-hazardous) such as:



- Sodium Tri-Meta Phosphate (STMP)
- Sodium TriPolyPhosphate (STPP)
- Sodium Sulfate
- Dry Yeast
- Sodium Chloride
- Calcium Chloride
- Magnesium Oxide
- Starch Storage: 5500 Pallets 4 high – Racking
- Glucose Storage: 500 Pallets 4 High – Racking with Starch
- Gluten Storage: 3500 Pallets 4 high – Racking – Allergen
- Packing Material Storage: 6000 Pallets 4 high – Racking

No hazardous chemicals are proposed to be stored in the warehouse. We are not planning to store liquids.

The proposed warehouse measures 132 m by 82 m (10, 824 m²) and has a height of 12.62 m. Furthermore, enclosed awnings having widths of 15 m and 20 m are proposed along the northern and eastern elevations respectively.

In terms of truck movements, we propose 4 truck movements per hour (this will be confirmed as part of the traffic impact assessment).

A transportable weighbridge is proposed, located adjacent the existing access and car parking area.

The warehouse will contain a modest lunch room and amenities to support the employees involved in its operation.

It is expected that the warehouse will operate 24 hours a day, 7 days a week.

The warehouse will involve the employment of 4 persons in a fulltime capacity once operational, and 20 persons are to be employed in the construction.

In conjunction with the warehouse use, plant and equipment involved in this undertaking will include forklifts for unloading and loading of trucks.

The proposed warehouse is required to replace existing third party storage which is currently undertaken in Sydney, making the operations more efficient and less reliant on external infrastructure.

5. SECTION 4.55(1A) OF THE EPA ACT

The Shoalhaven Starches Expansion Project was a 'transitional Part 3A Project' for the purposes of Schedule 6A of the Environmental Planning and Assessment Act 1979 (EPA Act).

Originally, Section 75W governed the modification of major projects approved under the now-repealed Part 3A of the EPA Act.

As of the 1 March 2018 the transitional arrangements for former Part 3A projects were discontinued. The discontinuation of the transitional arrangements for Part 3A projects means that modifications are assessed through the State Significant Development (SSD) pathway. As such, this Modification Application is made pursuant to Section 4.55 of the EPA Act.

This modification proposal would be made pursuant to Section 4.55(1A) of EPA Act.

Section 4.55(1A) of the EPA Act reads:

4.55 Modification of consents—generally

(1A) *Modifications involving minimal environmental impact* A consent authority may, on application being made by the applicant or any other person entitled to act on a consent granted by the consent authority and subject to and in accordance with the regulations, modify the consent if—

- (a) *it is satisfied that the proposed modification is of minimal environmental impact, and*
- (b) *it is satisfied that the development to which the consent as modified relates is substantially the same development as the development for which the consent was originally granted and before that consent as originally granted was modified (if at all), and*
- (c) *it has notified the application in accordance with—*
 - (i) *the regulations, if the regulations so require, or*
 - (ii) *a development control plan, if the consent authority is a council that has made a development control plan that requires the notification or advertising of applications for modification of a development consent, and*
- (d) *it has considered any submissions made concerning the proposed modification within any period prescribed by the regulations or provided by the development control plan, as the case may be.*

Subsections (1), (2) and (5) do not apply to such a modification.

Fundamentally, an application made pursuant to Section 4.55(1A) must demonstrate that the development to which the consent as modified relates will have minimal environmental impact; and is substantially the same development as the development for which consent was originally granted and before that consent as originally granted was modified.

Such an assessment would typically need to appreciate both the qualitative and quantitative aspects of the development being compared in its proper context as described by Bignold J at paragraphs 54 to 56 in *Moto Projects (No. 2) Pty Ltd v North Sydney C [1999] NSWLEC 280*. This judgment includes the following comments:

- 54. The relevant satisfaction required by s 96(2)(a) to be found to exist in order that the modification power be available involves an ultimate finding of fact based upon the primary facts found. I must be satisfied that the modified development is substantially the same as the originally approved development.
- 55. The requisite factual finding obviously requires a comparison between the development, as currently approved, and the development as proposed to be modified. The result of the comparison must be a finding that the modified development is “essentially or materially” the same as the (currently) approved development.
- 56. The comparative task does not merely involve a comparison of the physical features or components of the development as currently approved and modified where that comparative exercise is undertaken in some type of sterile vacuum. Rather, the comparison involves an appreciation, qualitative, as well as quantitative, of the developments being compared in their proper contexts (including the circumstances in which the development consent was granted).

The *Modifying an Approved Project* draft guidelines produced as part of the Draft Environmental Impact Assessment Guidance Series by the NSW Department of Planning and Environment in June 2017, provides some guidance when assessing modifications of State Significant Development (SSD):

For SSD, a proponent must demonstrate that the change, if carried out, would result in a development that would be substantially the same development as the original development. In order to draw this conclusion, a proponent must have regard to the following considerations, which have been established through decisions of the NSWLEC:

“Substantially” means “essentially or materially” or “having the same essence.”

- A development can still be substantially the same even if the development as modified involves land that was not the subject of the original consent (provided that the consent authority is satisfied that the proposal is substantially the same).
- If the development as modified, involves an “additional and distinct land use”, it is not substantially the same development.
- Notwithstanding the above, development as modified would not necessarily be substantially the same solely because it was for precisely the same use as that for which consent was originally granted.
- To determine whether something is “substantially the same” requires a comparative task between the whole development as originally approved and the development as proposed to be modified. In order for the proposal to be “substantially the same”, the comparative task must:
 - o result in a finding that the modified development is “essentially or materially” the same;
 - o appreciate the qualitative and quantitative differences in their proper context; and
 - o in addition to the physical difference, consider the environmental impacts of proposed Modification Applications to approved developments.

“Substantially” means “essentially or materially” or “having the same essence.”

Comment

It is considered the modification proposal is substantially the same as that approved and is development that could be considered “materially the same as that previously approved”. Furthermore, it is considered that the modifications proposed are of the same ‘essence’ as the approved development given that:

- The Modification Proposal arises from a need to temporarily store raw materials and finished product goods from Shoalhaven Starches operations as part of ongoing factory process optimisation.
- The proposal maintains the current land use approved at the site and does not seek to alter the over-riding character of development.
- The proposed built form is substantially the same as that already approved, in that development is to consist of industrial buildings, plant and equipment located within the general confines of the approved Shoalhaven Starches facility and will not increase approved height limit.
- The proposed modifications do not represent an expansion of the of Shoalhaven Starches’ footprint and the modifications will be located within the areas of the site that already contain approved development.
- The proposed buildings maintain the same form as that approved with due consideration given in the Modification Application to relevant issues pertaining to traffic management, noise and flood impacts; and
- The proposal does not seek to increase overall production from the site, nor will it involve the generation of any additional significant environmental impacts.

A development can still be substantially the same even if the development as modified involves land that was not the subject of the original consent (provided that the consent authority is satisfied that the proposal is substantially the same).

Comment:



The Modification Proposal arises to from a need to temporarily store raw materials and finished product goods from Shoalhaven Starches operations as part of ongoing factory process optimisation.

The incorporation of the use of the Former Shoalhaven Paper Mill site for storage in support of the Shoalhaven Starches factory was approved as part of Modification 14 which was a modification application made before 1 March 2018.

The proposal does not involve land that was not the subject of the approval which was in place at the time that the Shoalhaven Starches Expansion Project site transitioned from the Transitional Part 3A provisions to being assessed as State Significant Development.

If the development as modified, involves an “additional and distinct land use”, it is not substantially the same development.

Comment:

The proposal does not involve an “additional and distinct land use”. The proposed modification to permit warehouse storage is an ancillary function that support the existing land use will not represent an additional distinct land use

Notwithstanding the above, development as modified would not necessarily be substantially the same solely because it was for precisely the same use as that for which consent was originally granted.

Comment:

The modification proposal does not seek to change the nature of the approved use of the site, it will remain as originally approved. Rather the modification proposal arises from more detailed design and the need for warehouse storage to support the factory complex.

To determine whether something is “substantially the same” requires a comparative task between the whole development as originally approved and the development as proposed to be modified. In order for the proposal to be “substantially the same”, the comparative task must:

- o ***result in a finding that the modified development is “essentially or materially” the same***
- o ***appreciate the qualitative and quantitative differences in their proper context***
- o ***in addition to the physical difference, consider the environmental impacts of proposed Modification Applications to approved developments.***

Comment:

Quantitatively, the proposal does not represent any increases in production in the terms of processing of flour and starch / gluten or overall ethanol production.

The qualitative elements of the proposal demonstrate that the environmental and amenity impacts of the modification proposal are limited and justifies this proposal being considered as a modification.

This proposal will not expand the overall footprint of the approved Shoalhaven Starches factory. The proposed modification is located within the site that have existing or approved development. The proposed development will have a limited additional visual impact. The bulk, character and scale of the structures associated with this modification application will not be dissimilar to that of other industrial type development associated with the existing factory site. Furthermore, the proposed works will be sited within proximity of similar structures of a similar nature. The works will be sited in the midst of the existing factory complex and will be viewed within this context.

The proposed modification is unlikely to raise additional air quality or noise impacts over those already considered as part of the Project as approved.



The works associated with this modification application do not represent an additional and or distinct land use as all proposed modifications facilitate and improve the existing approved production processes.

The proposal will not comprise any qualitative or quantitative changes in overall production from the site. The proposal essentially seeks to ensure that the site will be able to temporarily store raw materials and finished product goods to accommodate the demand of the approved (as modified) development.

The modified proposal represents a scale of development that will be commensurate with the bulk, scale and character of the approved development.

It is our view that the proposed modification will have minimal environmental impacts and the modified development is substantially the same as approved Project. As such the modification proposal is considered consistent with provisions of Section 4.55(1A) of the Act in this instance.

6. KEY ISSUES ARISING FROM PROPOSED MODIFICATION

The following is a brief summary of the main issues arising in relation to this specific proposal.

5.1 Traffic

The proposal involves works on the southern side of Bolong Road and which include a truck staging area, access to the proposed warehouse and internal alterations to access arrangements. The traffic impacts including a description of key access and haul routes and predicted impacts of this traffic on road safety traffic volumes likely to be generated during construction and operation require assessment.

5.2 Visual Impacts

The former Paper Mill is situated on Bolong Road to the east of the main complex which forms the gateway to Bomaderry. The immediate locality currently contains a mix of industrial land uses, whilst lands to the north and east have a rural character. These different land uses contrast with each other and result in a mixed visual character.

The rural areas, much of which comprises the Shoalhaven Starches Environmental Farm, are generally flat to gently undulating and planted with pasture grasses. These areas have a typical rural/agricultural character, common throughout the region. To the north and forming a background to the rural landscape are the timbered slopes of the Cambewarra escarpment.

The Shoalhaven Starches factory complex to the east is characterised by typical industrial structures with an overall bulk and scale that dominates the surrounding locality. The main factory complex, despite being partially screened by vegetation along Bolong Road, the Shoalhaven River and Abernathy's Creek visually dominates the locality. The overall complex is particularly exposed to view along Bolong Road.

The proposed warehouse development and toilet/lunchroom building will be visible from Bolong Road, although the larger warehouse is situated behind the CO2 Plant, and amongst other existing buildings associated with the former Paper Mill land use. Overall, the appearance of the site is typical of an industrial facility of this nature.

The visual impact of the proposed works will need to be taken into consideration in context of existing development on this site, surrounding landowners and the setting of the site within the broader landscape both to the north across rural lands, as well as to the south across the Shoalhaven River. Details of any proposed measures to minimise any impacts will also need to be considered.

5.3 Flooding

The subject site is mapped as being flood liable, being located below the Flood Planning Area.

The construction of any works on the floodplain will cause a loss of temporary floodplain storage and a loss of hydraulic conveyance. The resulting increase in flood levels will depend upon the magnitude of these losses. Given that the floodplain storage area of the Shoalhaven River floodplain is of the order of 100 km², the loss of temporary floodplain storage due to the works is generally too small to be accurately evaluated. The main issue from a flooding perspective is whether the construction of an additional building will impede flow from the Shoalhaven River crossing the site to enter the northern floodplain (i.e. reduce the hydraulic conveyance through the site and potentially raise flood levels elsewhere).

It will be necessary that any Modification Application is supported by a Flood Assessment detailing the potential impacts that the proposed works will have on flood waters within the locality, and to examine measures that are proposed to mitigate such impacts. In addition, the Flood Assessment will need to provide an assessment of the proposed works associate with this Modification Application against the relevant matters for consideration as outlined within Chapter G9: Development on Flood Prone Land of the Shoalhaven Development Control Plan 2014.

5.4 Bushfire

The subject site is partially mapped as being bushfire prone. Consideration against the requirements of Planning for Bushfire Protection 2019 (PBP) will require consideration. Whilst PBP and the National Construction Code do not provide bushfire specific performance requirements for the class of building the subject of this matter, consideration is required for compliance with relevant objectives including access, water supply and services, and emergency and evacuation planning.

Consideration of these matters will be required in a separate Bushfire Protection Assessment that assesses the proposal against the relevant requirements of PBP.

5.5 Noise and Vibration

Existing Project Approval

Project Approval for Application No. 06_0228, states: -

“Condition 2

The applicant shall carry out the development generally in accordance with the:

- a) EA and associated site plans (see Appendix 2).

Condition 2A

The applicant shall carry out the development generally in accordance with the:

- b) Statement of commitments,
- c) Conditions of this consent, and
- d) Revised statement of commitments for Appendix 6.”

The original Project Approval incorporates noise mitigation measures recommended in the ‘Acoustical Assessment, Proposed Ethanol Upgrade, Shoalhaven Starches’ – prepared by The Acoustic Group Pty Ltd dated 26 June 2008. This document forms part of the EA and statement of commitments and it is implicit that the noise control recommendations within this document are required to be implemented as part of the Project Approval.



Schedule 3, Conditions 11 to 14 inclusive of the Project Approval, also refer to noise emission and are summarised as follows:

- Condition 11 relates to restricted hours of construction activities.
- Condition 12 reiterates the noise limits contained with Environment Protection Licence 883.
- Condition 13 requires that all feasible and reasonable noise mitigation measures must be implemented during the construction phase of the project.
- Condition 14 required the preparation of a noise management plan (see Section 3.3 below).

NSW EPA's Environment Protection Licence

Shoalhaven Starches operates under Environment Protection Licence 883 issued by the NSW Environment Protection Authority.

“L5.1 the LAeq (15min) * sound pressure level contribution generated from the premises must not exceed the following levels when measured at or near the boundary of any residential premises:

- a) 38 dBA at locations in Terara on the south side of the Shoalhaven River.
- b) 38 dBA at locations in Nowra on the south side of the Shoalhaven River.
- c) 42 dBA at locations in Meroo Street, Bomaderry.
- d) 40 dBA at other locations in Bomaderry.”

These noise limits apply to the overall operation of the Shoalhaven Starches complex.

Site Wide Noise Model

A site wide noise model for general factory noise emissions from the existing site has been conducted by Day Design (report No. 7425-3.1R dated 30 September 2022) and presents a baseline for calculation of noise impacts from future Modifications. It is expected that any further noise assessment will be informed by the site wide noise model.

Construction Noise Criteria

The NSW EPA published the Interim Construction Noise Guideline in July 2009. While some noise from construction sites is inevitable, the aim of the Guideline is to protect the majority of residences and other sensitive land uses from noise pollution most of the time.

The Guideline presents two ways of assessing construction noise impacts; the quantitative method and the qualitative method:

- The quantitative method is generally suited to longer term construction projects and involves predicting noise levels from the construction phase and comparing them with noise management levels given in the guideline.
- The qualitative method for assessing construction noise is a simplified way to identify the cause of potential noise impacts and may be used for short-term works, such as repair and maintenance projects of short duration.



The construction phase may take several months although significant noise producing aspects, such as piling, if required, will last a shorter period of time. Consideration will need to be given to the potential for noise impact from construction activities on residential receptors.

Project Specific Noise Goals

The most relevant criteria are as follows:

Development Noise Limits :

- 38 dBA (Leq, 15 minute) at locations in Terara on the south side of the Shoalhaven River;
- 38 dBA (Leq, 15 minute) at locations in Nowra on the south side of the Shoalhaven River;
- 42 dBA (Leq, 15 minute) at locations in Meroo Street, Bomaderry;
- 40 dBA (Leq, 15 minute) at other locations in Bomaderry.

It is proposed that the Modification Application be supported by a Noise Impact Assessment which will need to demonstrate how the proposed modified development will be able to satisfy relevant Project noise goals, particularly given the 24 hour operation proposed, as well as:

- Construction noise and vibration impacts on sensitive receptors.
- Determining and assessing operational noise and vibration impacts (NSW Industrial Noise Policy) and utilising the site wide noise model for entire site noise predictions, in terms of the Modification Proposal and existing site conditions to demonstrate whether the noise from the proposed modification combined with existing premises noise can still achieve the noise limits.
- Examine noise mitigation strategies and handling of complaints.
- Consideration of cumulative noise impacts on sensitive receptors.

5.6 Hazard Analysis

As the proposal involves storage of raw materials associated with a warehouse, including up to 500 pallets of food-grade ingredients associated with Shoalhaven Starches plus other raw materials, the proposal is not considered to trigger the provisions of Chapter 3 “Hazardous and Offensive Development” of State Environmental Planning Policy (Resilience and Hazards) 2021. A Preliminary Hazard Analysis is therefore not needed to accompany the Modification Application.

5.7 Soil, Water and Geotechnical Conditions

Assess potential impacts on soil resources and riparian lands on and near the site, including soil erosion, salinity and acid sulfate soils. Detailed measures will need to be provided to demonstrate how water quality impacts during construction and operation, including erosion and sediment controls and stormwater management will be addressed.

5.8 Site Contamination

The land where the warehouse is to be constructed is currently undeveloped and comprises grazing pasture. Notwithstanding this, considering the historic industrial use of the Subject Site, appropriate measures to avoid disturbance of contaminated soils and / or procedures will be



undertaken as part of construction management works as required in the existing consent as modified.

5.9 Heritage

The subject site is not identified by the Shoalhaven LEP 2014 as containing an item of environmental heritage. Taking into account the disturbed industrial use of the Subject Site, an Aboriginal Heritage Information Management System (AHIMS) search was undertaken on 3 February 2025 which identified that no Aboriginal items are located within the project site. As a result, a Due Diligence Aboriginal Cultural Heritage Assessment is recommended to accompany the future application.

5.10 Biodiversity Assessment

The proposed warehouse would be sited within a previously disturbed area of the site clear of vegetation and will not increase the impact on biodiversity values. Therefore, the modification proposed is unlikely to trigger the need for a Biodiversity Development Assessment Report (BDAR) is not required to accompany the modification application.

5.11 Servicing

Investigations will be required concerning the adequacy of existing essential infrastructure to support the proposed warehouse development having regard to:-

- Power,
- Water, and
- Wastewater disposal.

7. CONSULTATION

In addition to consulting with the Department to seek its requirements for the preparation of the Modification Report that will support this Modification Application for this project, it is also proposed that consultation will be undertaken with the following government agencies to ascertain any issues that they may also wish to be addressed as part of this Modification Application:

- NSW EPA;
- Shoalhaven City Council;
- Fire & Rescue NSW; and
- TfNSW – Roads.

8. CONCLUSION

Shoalhaven Starches are proposing to develop a warehouse on the former Shoalhaven Paper Mill site to support their Bomaderry operations. The warehouse is required to replace less efficient and costly third party external warehouse storage for raw materials (including packaging, chemicals and the like) and finished product goods from Shoalhaven Starches operations, which is currently undertake in Sydney.

The proposed modification will result in minimal environmental impacts beyond the approved facility and not increase in any overall production rates associated with the site operations nor will it significantly increase the size, scale or density of the facility and its operations.

The purpose of this submission is to seek any requirements or issues that the Department consider will need to be addressed as part of any Modification Application submission.



We trust that the above and attached documents will be sufficient to enable the Department to supply any requirements it may have in relation to this matter. If you require any clarification in connection with this matter, please do not hesitate to contact us.

Yours faithfully,

Sebastain Tauni

Director
BUrbRegPlan RPIA
Allen Price Pty Ltd