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ENVIRONMENT & PLANNING

RESPONSE TO SUBMISSIONS REPORT #2

Restart of the Redbank Power Station and use of Biomass (Excluding Native Forestry Residues from Logging) As a Fuel - SSD-56284960

Verdant Earth Technologies Limited

Prepared for Verdant Earth Technologies Limited

Jackson Environment and Planning Pty Ltd

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Acknowledgements
JEP Environment & Planning would like to thank all contributors that have informed this report. All recommendations and views in this report are attributable to JEP Environment & Planning unless otherwise stated.

We declare that
The report contains all available information that is relevant to the assessment of the Site and proposed development, activity or infrastructure to which the report relates, and the information contained in the report is neither false nor misleading.

This document has been prepared in accordance with the scope of services described in the contract or agreement between Jackson Environment and Planning Pty Ltd ACN 614 057 788 (Trading as JEP Environment & Planning) and the Client. This document is supplied in good faith and reflects the knowledge, expertise and experience of the advisors involved. The document and findings are subject to assumptions and limitations referred to within the document. Any findings, conclusions or recommendations only apply to the aforementioned circumstances and no greater reliance should be assumed or drawn by the Client. JEP Environment & Planning accepts no responsibility whatsoever for any loss occasioned by any person acting or refraining from action because of reliance on the document. The document has been prepared solely for use by the Client and JEP Environment & Planning accepts no responsibility for its use by other parties.

Version	Authors	Date	Reviewer	Approved for issue	Date
Draft	E. Larson	22/08/2024	Dr M. Jackson	Dr M. Jackson	22/08/2024
Final	E. Larson	23/08/2024	Dr M. Jackson	Dr M. Jackson	23/08/2024

Declaration

Project details	
Project name	Restart of Redbank Power Station and Use of Biomass (Excluding Native Forestry Residues from Logging) as a Fuel
Application number	SSD-56284960
Address of the land in respect of which the development application is made	112 Long Point Road West, Warkworth NSW 2330
Applicant details	
Applicant name	Verdant Earth Technologies Limited
Applicant address	GPO BOX 2537, Sydney NSW 2001
Details of persons by whom this RTS Report was prepared	
Name	Erik Larson and Dr Mark Jackson
Address	Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060
Professional qualifications	Erik Larson: B.Sc. Natural Resources Planning Dr Mark Jackson, Director and Principal Consultant, B.Sc (Hons), PhD, Grad. Cert. Mgmt., Exec. Masters Public Admin., Certified Environmental Practitioner CEnvP (1542), Impact Assessment Specialist (IA11071), NSW Registered Environmental Assessment Practitioner REAP (R80020).
Declaration by registered environmental assessment practitioner	
Name	Dr Mark Jackson
Registration number	R80020
Organisation registered with	Environment Institute of Australia and New Zealand (EIANZ)
Declaration	The undersigned declares that this EIS Report: • has been prepared in accordance with the *Environmental Planning and Assessment Regulation* 2021; • contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the report relates; • does not contain information that is false or misleading; • addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project; • identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments; • has been prepared having regard to the Department's State Significant Development Guidelines; • contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development; • contains a consolidated description of the project in a single chapter of the EIS Report; • contains an accurate summary of the findings of any community engagement; and • contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.
Signature	
Date	23/08/24

CONTENTS

1. Introduction

This Response to Submissions (RTS) report has been prepared on behalf of Verdant Earth Technologies Limited (Verdant Earth) (the Applicant) as part of its application to restart the Redbank Power Station using biomass (excluding native forestry residues from logging) at 112 Long Point Road West, Warkworth (Lot 450 DP 1119428).

Public exhibition of the Environmental Impact Statement for this state significant development (SSD-56284960) concluded on 11 April 2024. A number of submissions were received from government agencies, organisations and the general public.

An initial response to submissions report (Response to Submissions Report #1) was submitted on 5 July 2024 that identified issues requiring further clarification and addressed the comments received during the exhibition period. Public and agency submissions received during the EIS exhibition period were considered and addressed in detail in the report. No significant changes were considered required for the Proposal although some minor discrepancies were fixed and adjustments and additions to the mitigation measures were made to ensure the impacts of the Proposal are minimal or negligible.

This RTS report (RTS #2) responds directly to further comments received from agencies regarding RTS report #1.

The NSW Department of Planning, Housing and Infrastructure (DPHI) received a specific request for further information from Heritage NSW. Singleton Council and the NSW EPA separately provided their comments and recommended draft approval conditions. DPHI also requested that Verdant Earth provide additional information regarding the status of the Voluntary Planning Agreement (VPA) with Singleton Council.

In summary, the following matters have been considered:

- It is considered that the Proposal will have negligible potential to impact AHIMS site 37-6-1443. Mitigation measures outlined in the EIS are considered appropriate including staff and contractor inductions and implementation of an Unexpected Finds Procedure. A memo from Navin Officer Heritage Consultants dated 18th December 2006 describes the salvage works undertaken for the AHIP works and AHIMS site 37-6-3441. Based on this memo, historical aerial photography (showing disturbance over time) and a draft salvage report provided by Navin Officer, the AHIMS site in question is at least partially destroyed, if not completely destroyed (see Section 2.1 and Appendix A - McCardle Cultural Heritage Response to Heritage NSW Request for Information);
- It is noted that the EPA has reviewed the response to submissions report and considers that the matters raised in the EPA's Request for Further Information (RFI) dated 4 April 2024 have been adequately addressed. Verdant Earth accepts the majority of conditions as proposed by the NSW EPA (see Section 2.2). Some amendments to the noise conditions are proposed to be consistent with the noise assessment;
- Comments and proposed approval conditions from Singleton Council were provided to DPHI in a letter dated 19 August 2024. Verdant Earth has reviewed these and generally accepts the proposed conditions (see Section 2.3 and Table 2.3); and
- Verdant Earth and Singleton Council are in the final stages of seeking an in-principle VPA (see Section 2.4 and Appendices B, C and D). Once this is reached, Singleton Council will prepare a formal agreement to be signed and implemented by both parties.

This RTS responds directly to further comments received from agencies regarding the initial response to submissions report. These matters have been fully addressed in this RTS. The Proposal is a highly suitable project for the Redbank Power Station and is recommended for approval.

2. Response to Submissions

Section 2.1 provides responses to the issues outlined in Heritage NSW's request for additional in an email dated 30 July 2024. Section 2.2 provides responses to the comments and draft conditions outlined by NSW EPA in their letter to DPHI dated 8 August 2024. Section 2.4 addressed the letter from the DPHI dated 20 August 2024 requesting further information on a pending VPA agreement with Singleton Council.

Relevant documentation is referenced in the responses and provided in the Appendices to this report.

2.1. Heritage NSW

Comments from the Heritage NSW, received by the DPHI in an email dated 30 July 2024, have been addressed in Table 2.1. Other relevant documentation referenced in the responses can be found in the letter from McCardle Cultural Heritage Pty Ltd in Appendix A of this RTS report.

Table 2.1. Response to Heritage NSW request for information.

No	Comment	Response
1	Further information is required regarding Aboriginal site 'JP22' (AHIMS 37-6-1143) including confirmation of the current site status and whether the site has the potential to be impacted by the current project. Not enough information has been provided to confirm the location and extent of Aboriginal site 'JP22' (AHIMS 37-6-1143), nor the conclusion that the site has been completely destroyed. Heritage NSW understands that JP22 (AHIMS 37-6-1143) has been variously disturbed through fencing and track erosion and is listed on AHIMS as being included on a Consent to Destroy Application in association with the Wambo Rail Development. The listing of a site on a Consent to Destroy application, however, it not sufficient evidence to support the conclusion that the site has now been completely destroyed.	McCardle Cultural Heritage Pty Ltd (MCH) prepared a formal response to the RFI from Heritage NSW (see Appendix A). A memo from Navin Officer Heritage Consultants dated 18th December 2006 (Attachment 1 of Appendix A) summarises the results of the salvage undertaken in that area for the Wambo Rail Line. AHIMS site 37-6-1443 is situated outside the current project area on the south side of the existing chain link fence and has been significantly disturbed through works associated with clearing, creek realignment and the power plant. A Preliminary Site Investigation by Consulting Earth Scientists (see Attachment 2 of Appendix A) provides a series of historic aerial imagery showing disturbance to the site and surrounding areas over time. Navin Officer provided MCH with the draft salvage report (Attachment 3 of Appendix A). Based on the salvage memo and the draft salvage report, the AHIP works are understood to be completed, and AHIMS site 37-6-3441 is at least partially destroyed, if not completely destroyed. AHIMS site 37-6-3441 and areas identified as having potential subsurface deposits are demonstrated to be highly disturbed and located outside the current project area. Based on the investigation by MCH, it is considered that the Proposal will have negligible potential to impact AHIMS site 37-6-1443. Mitigation measures outlined in the EIS are considered appropriate including staff and contractor inductions and implementation of an Unexpected Finds Procedure.
2	The RtS cover letter prepared by McCardle Cultural Heritage Pty Ltd (MCH) additionally states that the site was located during two other surveys and "was confirmed to be located outside this study area" (pg. 4). While this may be the case, the AHIMS record for this site is not associated with any subsequent site card updates to this effect and the site remains valid on AHIMS as of July 2024.	AHIMS site cards have not been updated by the previous assessments by Silcox/Kuskie (1998), nor have they been updated since the AHIP was issued and works complete under the AHIP. MCH have also notified Navin Officer Heritage Consultants of this.

No	Comment	Response
3	We note that additional information regarding the site included in the report: Kuskie, P. (1998) An Archaeological Assessment of the Proposed Jerrys Plains Coal Terminal and Rail Line Between Warkworth and Mount Thorley, Hunter Valley, NSW (available as Attachment 6 of AHIMS report #104590), indicates that the extent of the site at the time of recording was unknown. The report states that, in addition to the large number of surface artefacts observed, "there is potential for in situ archaeological deposits on the low rises in this locality", "the site has a high potential for the occurrence of archaeological deposits with research value" and "that it is possible that the site extends … beyond the visible artefact scatter..." (pg.47). This report recommended registration and avoidance (pg.67).	Previous surveys conducted by Silcox/Kuskie (1998) have indicated that the subsurface extension of the site aligns with the basal slope along the creek, located to the south of its surface location. It has been observed that the extension does not extend north into current project area, which exhibits disturbed land. AHIMS site 37-6-1443 is situated outside the current project area on the south side of the existing chain link fence and has been significantly disturbed through works associated with clearing, creek realignment and the power plant. The existing power plant, immediately north of AHIMS 37-6-3441, has undergone complete land clearing and leveling to facilitate construction activities for the establishment of the power plant. Additionally, a well-established access track/road is immediately north of the AHIMS site along with excavation/moving/stockpiling associated with prior long-term coal storage and retrieval operations, water quality pond and sediment stockpile pond as well as the original earth works along the creek and project area boundary that resulted in an elevated boundary/landform along the eastern side of the creek. If AHIMS site 37-6-1443 did extend into the project area prior to any non-indigenous land uses, the various land uses within the project area, including clearing, leveling, access road construction, excavation, and grading, would have resulted in a significant impact on the site.
4	We further note that information provided in the report: Resource Strategies (2004) *Wambo Rail Development: Application for Permit under Section 87 and Consent Under Section 90 of the National Parks and Wildlife Act 1974* (AHIMS report #104590) prepared to support the Consent to Destroy Application indicates that the proposed management strategy for AHIMS ID 37-6-1143 was for the "*collection of a sample of surface artefacts and relocation to adjacent area away from construction zone"* and *"recovery of a sample of artefacts/Aboriginal objects from salvage excavation*" (pg.12). Assuming that these management activities did occur under a permit, this indicates a site status of only 'Partially destroyed'.	Based on the salvage memo from Navin Officer Heritage Consultants (Attachment 1 of Appendix A) and the associated draft salvage report (Attachment 3 of Appendix A), the AHIP works are understood to be completed, and AHIMS site 37-6-3441 is at least partially destroyed, if not completely destroyed.
5	With consideration of the above, we require the applicant to provide additional information/evidence regarding the extent and status of AHIMS ID 37-6-1143, including consideration for archaeological deposit to remain below any existing disturbance. Suitable evidence may include mapping and/or data from any reporting associated with the salvage program completed for the Wambo Rail Development under the Consent to Destroy Application listed against the site. Where it cannot be satisfactorily demonstrated that: (a) the site has been completely destroyed, and (b) the site does not have the potential to extend into the current project area, additional investigation in the form of test excavations may be required and/or suitable mitigation measures to ensure the area is avoided during the proposed works.	McCardle Cultural Heritage Pty Ltd (MCH) prepared a formal response to the RFI from Heritage NSW (see Appendix A). A memo from Navin Officer Heritage Consultants dated 18th December 2006 (Attachment 1 of Appendix A) summarises the results of the salvage undertaken in that area for the Wambo Rail Line. A Preliminary Site Investigation by Consulting Earth Scientists (see Attachment 2 of Appendix A) provides a series of historic aerial imagery showing disturbance to the site and surrounding areas over time. Navin Officer provided MCH with the draft salvage report (Attachment 3 of Appendix A).

No	Comment	Response
		Based on the aerial imagery, salvage memo and the draft salvage report, the AHIP works are understood to be completed, and AHIMS site 37-6-3441 is at least partially destroyed, if not completely destroyed. It is considered that the Proposal has very little to negligible potential to impact AHIMS site 37-6-1443. Mitigation measures outlined in the EIS are considered appropriate including staff and contractor inductions and implementation of an Unexpected Finds Procedure.

2.2. NSW EPA

Comments and proposed approval conditions from the NSW EPA in letter to DPHI dated 8 August 2024 have been addressed in Table 2.2.

Table 2.2. Response to EPA Comments and Recommended Conditions.

No.	Aspect	Recommended Condition	Verdant Response
1	Waste and Resource Recovery	Availability of Biomass as a feedstock It is understood the Proposal will use up to 700,000 tonnes of dry equivalent biomass per annum (approximately 850,000 tonne per annum at 25% moisture) as a fuel. Given the quantity of biomass feedstock required and other developments within NSW proposing to use biomass as a feedstock, there may be risk surrounding the long-term viability of this feedstock.	Noted.
2	Waste and Resource Recovery	Eligible Waste Fuel The Proponent raises in their RtS that other biomass sources may be approved as eligible waste fuels. The RTS outlined that "Domestic Biomass Fuel (DBF) is not currently prescribed as an 'eligible waste fuel' under current EPA guidelines, though the Applicant will seek to demonstrate this prior to its use through a post-approval Specific Resource Recovery Order and Exemption application under Clause 93 of the Protection of the Environment Operations (Waste) Regulation 2014. In addition, the RtS states that "the proposed estimate of tonnes per year of biomass from approved land clearing is marginally more in Year 1 for the Proposal than estimated to be available, this equals a relatively small amount that could be easily accommodated via other fuel sources and does not compromise the Proposal." The above statements raise doubt about the Proposal's viability and its potential reliance on other fuel sources that have not been assessed or are not currently considered eligible waste fuels. Domestic Biomass Fuel is not an eligible waste fuel[1] and the approval pathway to enable it to be an eligible waste fuel[1] is not through a Specific Resource Recovery Order and Exemption. The EPA would like to highlight that the Proposal has been assessed using only standard fuels and eligible waste fuel and should not rely on changes to policies or legislation if the proposed feedstock becomes compromised.	Noted.
3	Waste and Resource Recovery	Standard Fuels The Proponent's RtS included a higher-order use study that assumes some biomass materials (with higher reuse potential) would be landfilled. For example, the proposed use of uncontaminated timbers as feedstock. Uncontaminated timbers often hold a higher order reuse as they can be recovered and remanufactured into new products such as plyboard. Another example is agricultural cropping residues such as wheat straw which is rarely landfilled. These residues are used as soil ameliorants, animal bedding, or left in place to add carbon to the soil for the next crop. Removing large quantities of straw from agricultural systems may reduce soil quality and increase the likelihood of soil erosion.	Noted.

No.	Aspect	Recommended Condition	Verdant Response
		Further, the EPA's RFI requested consideration of how low timber availability or increased prices might impact the Proposal. The Proponent responded that timber prices and availability should not affect purpose-grown fuel, as these markets serve different uses. The NSW Parliamentary inquiry in the long-term sustainability and future of the timber and forest products industry found growing demand and projected supply shortages for timber in NSW in the near future, worsened by the 2019/20 bushfires and lack of plantation expansion. Given the Proposal's reliance on plantations as a fuel source it is likely that competing demand, short supply and recent bush fires will have an impact on biomass feedstock availability that has not been addressed.	
4	Waste and Resource Recovery	Legislative changes It is also understood, the NSW Government recently published its response to the reviews of the *Biodiversity Conservation Act 2016* (BC Act) and the native vegetation provisions of the *Local Land Services Act 2013* (LLS Act). In this response, the NSW Government committed to amending the BC Act and the Land Management (Native Vegetation) Codes. Specifically in relation to the land management codes, the NSW Government is likely to make amendments to: a) Reinforce environmental protections to deplete the extent of land clearing, along with increasing the area of native vegetation preserved and managed permanently via set asides, b) Improve invasive native species management to decrease the likelihood of this being misused for clearing, and c) Remove set aside area discounts so that protected area extents are greater than cleared area extents. These pending legislative changes also bring risk relating to future biomass feedstock availability.	Noted.
5	Waste	Calorific Value The biomass proposed to be used will be variable in terms of calorific value as it is dependent on the composition/source of the biomass and the moisture content. Whilst the boiler can accommodate a wide range of fuel, the Proponent will need to ensure that the thermal efficiency criteria outlined in the Energy from Waste Policy are always met. This will require a controlled process to ensure fuel specifications and thermal efficiency criteria are met. Therefore, it is recommended that a condition be included that requires ongoing monitoring of performance to ensure that the energy recovery from the process meets the thermal efficiency criteria.	Accepted.
6	Waste	Biomass The facility must only operate on eligible waste fuels, as described in the *NSW Eligible Waste Fuel Guidelines* or Standard Fuels as described in the *Protection of the Environment Operations (Clean Air) Regulation 2022*. A Resource Recovery Order and Exemption must be applied for and be in place prior to use of these fuels following development consent. Given this, the below conditions are recommended to ensure ongoing compliance.	Accepted.

No.	Aspect	Recommended Condition	Verdant Response
7	Waste	The following conditions of approval are recommended to address waste related matters for the Proposal, if approved: d) Only Eligible Wastes Fuels as defined in the *NSW EPA Eligible Waste Fuel Guidelines* or Standard Fuels as described in the *Protection of the Environment Operations (Clean Air) Regulation 2022* are permitted to be used at the premises. e) All Eligible Waste Fuels used at the premises must have a Resource Recovery Order and Exemption in place prior to use. f) The facility must meet the thermal efficiency criteria and demonstrate that at least 25% of the energy generated from the thermal treatment of the material will be captured as electricity (or an equivalent level of recovery for facilities generating heat alone).	Accepted
8	Air Quality	To address issues raised by EPA in its RFI, an Addendum Air Quality report (prepared by EMM Consulting Pty Ltd dated 20 June 2024) was provided. A review of the report indicates the Proponent has adequately addressed the issues previously raised. The expected case scenario within the Air Quality Impact Assessment and subsequent Addendum report is based on emission estimates for typical operations utilising emission factors and composition data for naturally sourced biomass. This scenario predicted compliance with relevant assessment criteria. Like points raised with Waste and Resource Recovery, the air impacts relating to this Proposal are based on the use of only standard or eligible waste fuels (both being naturally sourced biomass). Changes to the feedstock could have adverse air quality impacts that have not been predicted or assessed as part of this Proposal.	Noted.
9	Air Quality	**Recommended Air Conditions** Should the Proposal be approved, the EPA recommends that the below conditions are included in the consent. If approved, the below conditions will also be added to the EPL prior to operation. It should be noted that the conditions include emission limits that are below the Group 6 standards contained in the *Protection of the Environment Operations (Clean Air) Regulation* (the Regulation). This is because the emission estimates in the air quality impact assessment show that during typical operations, emissions will be lower than the Group 6 limits. Therefore, recommend limits are lower than Group 6 to reflect the lower emissions that can be achieved and to reflect proper and efficient operation. Additionally, these recommended limits are lower than the existing limits on the EPL for operation on Beneficial Dewatered Tailings. The following conditions of approval are recommended to address air related matters for the Proposal, if approved:	Noted.
10	Air Quality	<u>Air Emission Limits</u> 1. Power station main stack emission limits (Relates to POINT 3 on the EPL)	Accepted.

<table>
<tr><th>No.</th><th>Aspect</th><th>Recommended Condition</th><th>Verdant Response</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><th>Pollutant</th><th>Units of Measure</th><th>100 Percentile concentration limit</th><th>Reference conditions</th><th>Oxygen correction</th><th>Averaging period</th></tr>
<tr><td>Solid Particles (total)</td><td>milligrams per cubic metre</td><td>25</td><td>Dry, 273 K, 101.3 kPa</td><td>7 %</td><td>1 hour, or the minimum sampling period specified in the relevant test method, whichever is the greater</td></tr>
<tr><td>Oxides of nitrogen as NO_2 equivalent</td><td>milligrams per cubic metre</td><td>300</td><td>Dry, 273 K, 101.3 kPa</td><td>7 %</td><td>1 hour</td></tr>
<tr><td>Sulphur dioxide</td><td>milligrams per cubic metre</td><td>100</td><td>Dry, 273 K, 101.3 kPa</td><td>7%</td><td>1 hour</td></tr>
<tr><td>Type 1 and 2 substances (in aggregate)</td><td>milligrams per cubic metre</td><td>0.5</td><td>Dry, 273 K, 101.3 kPa</td><td>7 %</td><td>1 hour, or the minimum sampling period specified in the relevant test method, whichever is the greater</td></tr>
<tr><td>Volatile organic Compounds (VOCs)</td><td>milligrams per cubic metre</td><td>40</td><td>Dry, 273 K, 101.3 kPa</td><td>7 %</td><td>1 hour</td></tr>
</table>
</td><td></td></tr>
<tr><td>11</td><td>Air Quality</td><td>
<u>Air Emission Monitoring Requirements</u>
2. Power station main stack monitoring requirements (Relates to POINT 3 on the EPL)
<table>
<tr><th>Pollutant</th><th>Units of Measure</th><th>Frequency</th><th>Sampling Method</th></tr>
<tr><td>Solid Particles (total)</td><td>milligrams per cubic metre</td><td>Continuous</td><td>CEM-11</td></tr>
<tr><td>Oxides of nitrogen as NO_2 equivalent</td><td>milligrams per cubic metre</td><td>Continuous</td><td>CEM-2</td></tr>
<tr><td>Sulphur dioxide</td><td>milligrams per cubic metre</td><td>Continuous</td><td>CEM-2</td></tr>
<tr><td>Type 1 and 2 substances (in aggregate)</td><td>milligrams per cubic metre</td><td>Special frequency 1</td><td>TM-12, TM-13, TM-14</td></tr>
<tr><td>Volatile organic Compounds (VOCs)</td><td>milligrams per cubic metre</td><td>Special frequency 1</td><td>TM-34</td></tr>
<tr><td>Hydrogen fluoride</td><td>milligrams per cubic metre</td><td>Special frequency 2</td><td>TM-10</td></tr>
<tr><td>Hydrogen chloride</td><td>milligrams per cubic metre</td><td>Special frequency 2</td><td>TM-8</td></tr>
</table>
Notes:
</td><td>Accepted.</td></tr>
</table>

<table>
<tr><th>No.</th><th>Aspect</th><th>Recommended Condition</th><th>Verdant Response</th></tr>
<tr><td></td><td></td><td>The sampling methods are those methods contained in the EPA's Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (2022).
Special frequency 1 means two rounds of post commissioning monitoring and every six months thereafter.
Special frequency 2 means two rounds of post commissioning monitoring.</td><td></td></tr>
<tr><td>12</td><td>Air Quality</td><td><u>Air Emission Verification Report</u>

3. Within 3 months of completing the post commissioning monitoring required under condition 2, the Proponent must submit to the EPA, an Air Emission Verification Report (the Report). The report must:
a) Include all analytical results and test reports for post commissioning monitoring as required under condition 2.
b) Include continuous emission monitoring data to demonstrate compliance with the emission limits contained in condition 1.
c) Include a comparison of air emission monitoring results in (a) and (b) with the air emission limits under condition 1.
d) Include a comparison of air emission monitoring results in (a) and (b) with the prescribed limits contained in the Protection of the Environment Operations (Clean Air) Regulation (the Regulation).
e) Nominate mitigation measures to achieve emission limits contained in this EPL should a comparison under (c) identify emission limits are not being complied with; and
f) Nominate mitigation measures to achieve compliance with the prescribed concentrations in the Regulation should a comparison under (d) identify that prescribed concentrations in the Regulation are not being complied with.</td><td>Accepted.</td></tr>
<tr><td>13</td><td>Noise</td><td>A Noise Impact Assessment (NIA) (prepared by Acoustic Logic dated 23 November 2023) was provided as part of the Proposal. The NIA has conducted an appropriate assessment of background noise levels in the area and have developed Project specific noise "trigger" levels consistent with the Noise Policy for Industry.

The EIS and NIA also included several mitigation and management measures to be implemented. Specifically, Table 13.7 within the EIS proposed the below mitigation measures:
<table><tr><td>NV1</td><td>Installation of a noise barrier as provided in Figure 13.2, constructed of a solid material with minimal gaps having a surface density not less than 8 kg/m2 with a gate leading to the access road (it may be left open between 7am and 10pm).</td></tr><tr><td>NV2</td><td>Undertake post commencement validation/verification measurements to confirm compliance. Should the post commencement validation indicate noise levels exceed the assessment criteria imposed in the approval, implement additional acoustic treatment (e.g. plant maintenance, additional treatment to the steam line or other alternatives).</td></tr></table>
It is expected that the inclusion of the barrier will be implemented as part of the Proposal. As a result, cumulative noise emissions at all receivers will meet compliance. This includes during deliveries and under weather enhancing conditions.</td><td>Noted.</td></tr>
</table>

<table>
<tr><th>No.</th><th>Aspect</th><th>Recommended Condition</th><th>Verdant Response</th></tr>
<tr><td></td><td></td><td>The NIA (and stated above in NV2) has sought to address noise risks through a proposed post commencement validation exercise and subsequently presenting contingency measures that could be applied to reduce noise levels from the existing plant if required. EPA acknowledges the suggestion of post commencement validation/verification. However, we still recommend the below conditions relating to noise be added to the consent, if approved. If post commencement validation is undertaken and the below noise conditions cannot be achieved (even after mitigation and contingency measures are implemented) a variation to the consent may need to be sought.</td><td></td></tr>
<tr><td>14</td><td>Noise</td><td>Recommended Noise Conditions

1. Noise generated at the premises must not exceed the noise limits at the times and locations in the table below. The locations referred to in the table below are indicated in the ‘Restart of Redbank Power Station and Use of Biomass (Excluding Native Forestry Residues from Logging) as Fuel - Noise Impact Assessment prepared by Acoustic Logic dated 23 November 2023 (Report No. 20211580.1/2311A/R5/VF).

<table>
<tr><td rowspan="2">Location</td><td colspan="4">Noise Limits in dB(A)</td></tr>
<tr><td>Day
$L_{Aeq(15\ minute)}$</td><td>Evening
$L_{Aeq(15\ minute)}$</td><td>Night
$L_{Aeq(15\ minute)}$</td><td>Night
L_{AFmax}</td></tr>
<tr><td>R1 and R2</td><td>40</td><td>36</td><td>36</td><td>52</td></tr>
<tr><td>Any other residential receiver</td><td>40</td><td>35</td><td>35</td><td>52</td></tr>
</table>

2. For the purposes of condition 1:
a) Day means the period from 7am to 6pm Monday to Saturday and the period from 7am to 6pm Sunday and public holidays.
b) Evening means the period from 6pm to 10pm.
c) Night means the period from 10pm to 7am Monday to Saturday and the period from 10pm to 7am Sunday and public holidays.</td><td>Revise.

Change the $L_{Aeq(15\ minute)}$ Noise Limits for Evening to be consistent with the Intrusiveness Criteria dB(A) in Table 7 Noise Emissions Criteria (NPI) of the Acoustic Logic noise assessment report (dated 23 November 2023 Report No. 20211580.1/2311A/R5/VF) as follows:

R1 and R2 – 37
Any other residential receiver – 36</td></tr>
<tr><td>15</td><td>Noise</td><td>3. Noise-enhancing meteorological conditions

a) The noise limits set out in condition 1 apply under the following meteorological conditions:
<table>
<tr><td>Assessment Period</td><td>Meteorological Conditions</td></tr>
<tr><td>Day</td><td>Stability Categories A, B, C and D with wind speeds up to and including 3m/s at 10m above ground level.</td></tr>
<tr><td>Evening</td><td>Stability Categories A, B, C and D with wind speeds up to and including 3m/s at 10m above ground level.</td></tr>
<tr><td>Night</td><td>Stability Categories A, B, C and D with wind speeds up to and including 3m/s at 10m above ground level; or
Stability category E and F with wind speeds up to and including 2m/s at 10m above ground level.</td></tr>
</table></td><td>Accepted.</td></tr>
</table>

No.	Aspect	Recommended Condition	Verdant Response
		b) For those meteorological conditions not referred to in condition 3(a), the noise limits that apply are the noise limits in condition 1 plus 5dB.	
16	Noise	4. For the purposes of condition 3: a) The meteorological conditions are to be determined from meteorological data obtained from the meteorological weather station identified as **[to be discussed/negotiated with proponent].** b) Stability category shall be determined using the following method from Fact Sheet D of the *Noise Policy for Industry* (NSW EPA, 2017): i. **[To be discussed/negotiated with proponent].**	Accepted. The Applicant agrees to discuss/negotiate details with EPA.
17	Noise	5. To assess compliance: a) with the LAeq(15 minutes) or the LAmax noise limits in condition 1 and 3, the noise measurement equipment must be located: i. approximately on the property boundary, where any residence is situated 30 metres or less from the property boundary closest to premises; or where applicable, ii. in an area within 30 metres of a residence façade, but not closer than 3 metres where any residence on the property is situated more than 30 metres from the property boundary closest to the premises; or, where applicable, iii. in an area within 50 metres of the boundary of a National Park or Nature Reserve at a sight or track used for active or passive recreation, iv. at any other location identified in condition 1 b) with the LAeq(15 minutes) or the LAmax noise limits in condition 1 and 3, the noise measurement equipment must be located: i. at the reasonably most affected point at a location where there is no residence at the location; or, ii. at the reasonably most affected point within an area at a location prescribed by condition 5 (a).	Revise. We note that 5(a) already applies to locations with or without residences. Therefore 5(b) should be revised to read as follows: *b) with the LAeq(15 minutes) or the LAmax noise limits in condition 1 and 3, the noise measurement equipment must be located:* ~~*i. at the reasonably most affected point at a location where there is no residence at the location; or,*~~ ~~ii.~~ *i. at the reasonably most affected point within an area at a location prescribed by condition 5 (a).*
18	Noise	6. A non-compliance of conditions 1 and 3 will still occur where noise generated from the premises is measured in excess of the noise limit at a point other than the reasonably most affected point at the locations referred to in condition 5(a) or 5(b). NOTE to condition 5 and 6: The reasonably most affected point is a point at a location or within an area at a location experiencing or expected to experience the highest sound pressure level from the premises.	Accepted.
19	Noise	7. For determining the noise generated from the premises, the modifying factor corrections in Table C1 in Fact Sheet C of the *Noise Policy for Industry* (NSW EPA, 2017) should be applied, if appropriate, to the noise measurements by the noise monitoring equipment.	Accepted.
20	Noise	8. Noise measurements must not be undertaken where rain or wind speed at microphone level will affect the acquisition of valid measurements.	Accepted.

No.	Aspect	Recommended Condition	Verdant Response
21	Noise	9. Where direct measurement of noise from the premises at locations required by conditions 1 to 6 is not possible, alternative means of demonstrating compliance may be negotiated with the EPA.	Accepted.
22	Noise	Requirement to Monitor Noise 10. Attended noise monitoring must be undertaken in accordance with Condition 5 at the nearest and most affected residential receiver location and must: a. occur annually in a reporting period; and b. occur during each day, evening and night period as defined in the *Noise Policy for Industry*.	Accepted.
23	Noise	Reporting Conditions 11. A noise compliance assessment report must be submitted to the EPA within 30 days of the completion of the annual monitoring. The assessment must be prepared by a competent person and include: a. an assessment of compliance with noise limits presented in Condition 1 and 3; and b. an outline of any management actions taken within the monitoring	Accepted.
24	Noise	Definitions • Noise Policy for Industry - the document entitled "*Noise Policy for Industry*" published by the NSW Environment Protection Authority in October 2017. • Noise – 'sound pressure levels' for the purposes of conditions 1 to 8. • LAeq (15 minute) - the value of the A-weighted sound pressure level of a continuous steady sound that, over a 15 minute time interval, has the same mean square sound pressure level as a sound under consideration with a level that varies with time (Australian Standard AS 1055:2018 *Acoustics: description and measurement of environmental noise*). • LAFmax – the maximum sound pressure level of an event measured with a sound level meter satisfying Australian Standard AS IEC 61672.1-2013 *Electroacoustics - Sound level meters - Part 1: Specifications* set to 'A' frequency weighting and fast time weighting.	Noted.
25	Water Quality	**Water Quality** A Soil and Water Impact Assessment (Prepared by Sustainability Workshop Ltd dated 21 November 2023) was provided as part of the EIS. It notes that all wastewaters will be captured onsite except for managed overflows during major rainfall events. In general, the EPA supports the key design elements of the assessment, however it is important that any activities undertaken at the premises (including the management of water) is undertaken in such a way as not to cause pollution to surface or groundwater and complies with Section 120 of the *Protection of the Environment Operations Act 1997*. **Considerations for the Environment Protection Licence** A proposed biomass fuel delivery/storage area will use the existing coal tailing stockpiling area with existing water discharge controls. The Soil and Water Impact predicts three runoff events in 40.5 years (MUSIC model), or less than 1 runoff event every 10 years. The model predicts 99.7% of all runoff will be retained and reused on the site. The 0.3% of runoff that is discharged occurs during the most extreme rainfall events to Dights Creek. The biomass stockpile area has no proposed	Noted.

No.	Aspect	Recommended Condition	Verdant Response
		"controlled" discharges and therefore current licence concentration limits are not relevant. New concentration limits will not be required for discharges from the biomass stockpile area as there are now only "managed overflow" discharges. Managed overflow licence conditions will, however, be needed to regulate the required storage capacity, freeboard management; any other operational controls; and monitoring of managed overflow volume, frequency and quality. Therefore: A future licence variation will be required to address conditions for the management of overflows including: a) a specified sizing of the runoff capture basin (including rainfall depth and Annual Exceedance Probability criteria) b) freeboard marker arrangements and management procedures to restore freeboard capacity c) operational management measures to monitor and minimise the volume and potential water quality impacts of manage overflows. Brine from the process of making de-ionised water used in the boilers to make steam, is stored on premises in a 50 ML lined wastewater dam and discharged to the Hunter River as part of the Hunter River Salinity Trading Scheme (HRSTS). To discharge the brine, credit must be purchased, and river flows must be sufficiently high to dilute the brine. Relevant EPL conditions relating to Brine discharge will also be reviewed prior to operation to ensure the Proposal remains consistent with the original assessment under the HRSTS.	
26	Water Quality	**Recommended Water Conditions** 1. Except as may be expressly provided in any other condition of the Environment Protection Licence, there must be no discharge of any leachate or leachate affected stormwater from the premises. 2. If effluent is reused onsite such as for irrigation, then surface water runoff/discharge risks associated with those irrigation reuse areas must be appropriately assessed and any potential risks mitigated. 3. The capacity of the premises leachate management system (including for the biomass fuel delivery/storage area and ash handling areas), for all stages, must be designed and maintained in accordance with the Soil and Water Impact Assessment provided in the EIS (Prepared by Sustainability Workshop Ltd dated 21 November 2023) and the *Department of Conservation NSW - Composting and Related Organics Processing Facilities Guideline (2004).* 4. An operational surface and groundwater monitoring program must be developed prior to operation in consultation with the EPA. The monitoring program must account for the relevant risk factors in managed overflow discharges, including but not limited to: • potential physical impacts of biomass material/particles in runoff • potential biochemical oxygen demanding (BOD) material and leachates • tannins and lignin that typically leach from wood-based biomass, which can be toxic to aquatic organisms • any residues in or on the biomass such as herbicides or from a range of other chemicals in contaminated wood products	Accepted.

No.	Aspect	Recommended Condition	Verdant Response
		• nutrients that may cause eutrophication of waterways.	
27	GHG	**Greenhouse Gas Emissions** The GHG Mitigation Plan and Climate Change Plan (prepared by EMM Consulting Pty Ltd dated February 2024) and Addendum GHG Assessment (prepared by EMM Consulting Pty Ltd dated 20 June 2024) has been reviewed and the updated reports have addressed the matters raised by the EPA in its RFI and these are now resolved. The GHG assessment addressed the relevant emission sources and scopes, primarily scope 1 emissions from the combustion of biomass to generate electrical energy. Scope 2 emissions were excluded as the Proposal generates electricity and on-site consumption is minimal. Scope 3 emissions were included for indirect emissions from on-site diesel consumption as well as third party processing and transport of the biomass. As biomass is considered a biogenic fuel under 2006 *IPCC Guidelines for National Greenhouse Gas Inventories* and DCCEEW guidelines, the scope 1 CO2 emissions are zero although emissions of methane and nitrous oxide are counted. This is because of a simplifying assumption that the CO2 released during the combustion of the biomass completely balances the CO2 absorbed by the biomass during its growth via photosynthesis. The emissions and removal of CO2 are accounted for in the land use, land use change and forestry sector through changes in the gross biomass stock in NSW. The resulting scope 1 emissions intensity of the biomass-fuelled power station is a low 0.018 tonnes CO2-e/MWh. Given of the use of biomass, the maximum scope 1 emissions for the Proposal are relatively low at 21,240 t CO2-e/year. On this basis, the Proposal will not trigger the NGER facility reporting requirements and is well below the Safeguard Mechanism threshold. In terms of the Proposal's impact on NSW emissions, it will contribute approximately 0.03% of the NSW state emissions in 2030 relative to NSW 2022 current policy projections. The contribution is 0.08% in 2050. As proposed in the GHG assessment the EPA encourages the Proponent to undertake ongoing monitoring and recording of energy and fuel consumption. This information should be used to report and benchmark annual GHG emissions against estimations provided for assessment purposes. Additionally, the EPA recommends that the GHG mitigation plan is formalised and implemented onsite. If the Proposal is approved it will be subject to the EPA's *Climate Change Policy and Action Plan*, including upcoming actions which will impact on the proponent if a licence is granted. DPHI may wish to provide the proponent the EPA's fact sheet available at: https://www.epa.nsw.gov.au/your-environment/climate-change/policy-and-action-plan/information-for-proponents	Noted.
28	GHG	**Climate Change Adaptation Plan** To address issues raised by EPA in its RFI an Addendum Climate Change Adaptation plan (prepared by EMM Consulting Pty Ltd dated 20 June 2024) was provided. A review of the plan indicates the Proponent has adequately addressed the issues previously raised. The EPA	Noted.

No.	Aspect	Recommended Condition	Verdant Response
		recommends that the Climate Change Adaptation plan is formalised and implemented onsite and reviewed regularly.	
29	HHRA	**Human Health Risk Assessment** The EPA has previously commented on the Human Health Risk Assessment (HHRA) (prepared by Environmental Risk Sciences, 27 November 2023) at exhibition. In our second submission letter (dated 16 April 2024) we advised on the outcomes of this review and that the HHRA generally met the requirements outlined within EPAs issued Secretary's Environmental Assessment Requirements (dated 29 August 2023). The EPA advises that the Proposal is predicted to contribute a very small component of particulate matter (annual average PM2.5) to the ambient air quality of the region. However, the baseline ambient air quality data noted in the HHRA and reported in the AQIA demonstrate background concentrations of PM2.5 are already elevated above the National Environment Protection (Ambient Air Quality) Measure annual average guideline value. The increase in PM2.5 from the Proposal do not indicate an unacceptable risk to human health.	Noted.

2.3. Singleton Council

Comments and proposed approval conditions from Singleton Council in letter to DPHI dated 19 August 2024 have been addressed in Table 2.3.

Table 2.3. Response to Singleton Council comments and proposed conditions.

No	Aspect	Comment	Response
1	Retention of existing conditions	Sections 1.8 and 1.9 of the EIS indicate the applicant's intention to maintain existing conditions within the consent DA183/93 (as modified). Council seeks additional clarity on how these conditions align with the proposed development, accompanied by detailed justifications for each. Providing a comprehensive breakdown of how these conditions are pertinent to the project's specific goals and operations will aid in enhancing transparency and understanding between the applicant, Council, and the broader community. **The response to Submission document has confirmed that there would be no conditions from the previous consent or in any new consent allowing the use of run-of-mine (ROM) or coal tailings at Redbank. A condition prohibiting this should be included in any consent.**	Accepted.
2	Housing & Affordability	It is unclear in the Social Impact Assessment, how potential impacts from short term housing requirements incurred by this proposal (short-term contractors) will be addressed, particularly in relation to the effect on affordable rental accommodation and Singleton's Tourism industry. **The Recommendations from the SIA for ongoing monitoring and management of impacts arising from this development should be made a condition of consent. The mitigation measures proposed in the Document "Revised Mitigation Measures" should also be conditioned in any consent.**	Accepted.
3	Traffic and Transport	The original consent provided for coal waste to be supplied via a pipeline from the nearby Warkworth mine (later changed to conveyor belt). In contrast, the proposal involves transporting biomass from an unspecified 300+ km supply zone with a fleet of at least 56 trucks under continuous operation. While the road network capacity has been addressed in the TIA, the substantial impact on the amenity, additional maintenance cost and safety of the regional road network should be considered in further detail. **Council requests the following conditions be included in any consent:** • **Vehicles that exceed the mass or dimensions limits of the existing pre-approvals in place on Long Point Road West must not travel on the road without applying for, and receiving a permit to travel, under the Heavy Vehicle National Law.**	Accepted.

No	Aspect	Comment	Response
		• **Any works within Singleton Council's road reserve requires consent from the Council under Section 138 of the NSW Roads Act (1993) before the works can commence.** • **All works within Singleton Council's Road reserve must fully comply with Council's Engineering Design Guidelines.**	
4	Greenhouse Gas Assessment and Climate Change	The EIS has provided a Lifecycle Assessment that identifies the predominant reduction garnered from the proposed operations is via the growth phase of the feedstocks, it does not appear to adequately address how this can be directly attributed to this project to create near zero emissions as claimed. Comparisons between biomass and coal have been provided but additional alternatives for energy production have not been included. As previously advised; – Given the time lag between carbon emissions and offset measures, further information should be provided around the accuracy of these assumptions when future scenarios are largely unknown. – Alternative uses of the proposed biomass should be considered to gain an accurate calculation of the opportunity costs of being used as fuel for electricity generation. Noting the comparison to continued mining has been provided that is an unlikely scenario. **The LCA provided in appendix L includes a number of future initiatives that provide opportunity for the project to further reduce their impacts, implementation of these should form a requirement within a certain time period and be included as a condition of consent.** **Further the assumptions that have been relied upon in both the Lifecycle and Higher Order Use assessments should be monitored and a subsequent analysis undertaken in the future to determine the accuracy of the assessments and provide opportunity for rectification if further impacts are identified.**	Accepted in principle. The Applicant acknowledges there is potential for using future initiatives to further drive down greenhouse gas emissions from the Proposal. The Applicant wishes to reserve a variety of options for reducing the emissions associated with feedstock production, processing, and transport using appropriate means. We note that the EPA is the agency regulating compliance with GHG emission requirements to meet the emissions reduction targets for NSW and Australia's commitments to the Paris Agreement. The applicant is committed to ongoing monitoring of fuel sources to ensure these biomass resources continue to be appropriate into the future.
5	Voluntary Planning Agreement	Council acknowledges and notes that the Applicant has made an initial letter of offer regarding entering into a Voluntary Planning Agreement with Council. **Council and the Applicant have not reached agreement and ongoing consultation is required prior to determination of the development.**	Noted and accepted.
6	Air Quality	In addition, the EIS compares the impacts on air quality to those of coal as a means to justify the Project. The Air Quality Impact Assessment states that, for biomass firing compared to tailings firing scenarios, the concentration of PM10 and PM2.5 were substantially the same. Given there is no intention of using tailings as part of the proposed Project, the comparison seems odd. The air quality impact assessment should exclude comparative references to	Accepted.

No	Aspect	Comment	Response
		tailings as a fuel and emission source to enable a meaningful assessment of the impacts on the local community. **Council would like to have a condition included in any consent explicitly prohibiting the use of BDT as a fuel source.**	

2.4. Voluntary Planning Agreement

A letter from the DPHI dated 20 August 2024 requests additional information regarding the terms of the Voluntary Planning Agreement (VPA) with Singleton Council and provide evidence of agreement of the terms.

An initial VPA offer letter, dated 17 April 2024, was provided by Verdant Earth Technologies to Singleton Council. The letter (see Appendix B) outlines that a monetary contribution in an amount equivalent to 1.5% of the capital investment value of the development, consistent with Council's current *Planning Agreement Policy* (POL/10069.2 Version 2).

A letter response, dated 20 June 2024, was provided by Singleton Council requesting minor alterations to the VPA offer (see Appendix C).

An amended VPA offer letter, dated 22 August 2024, was subsequently provided to Singleton Council in consideration of their request.

Verdant Earth and Singleton Council are in the final stages of seeking an in-principle agreement. Once this is reached, Singleton Council will prepare a formal VPA to be signed and implemented by both parties.

3. Conclusion

This Response to Submissions (RTS) report has been prepared on behalf of Verdant Earth Technologies Limited (Verdant Earth) (the Applicant) as part of its application to restart the Redbank Power Station using biomass (excluding native forestry residues from logging) at 112 Long Point Road West, Warkworth (Lot 450 DP 1119428).

Public exhibition of the Environmental Impact Statement for this state significant development (SSD-56284960) concluded on 11 April 2024. A number of submissions were received from government agencies, organisations and the general public.

An initial response to submissions report (Response to Submissions Report #1) was submitted on 5 July 2024 that identified issues requiring further clarification and addressed the comments received during the exhibition period. Public and agency submissions received during the EIS exhibition period were considered and addressed in detail in the report. No significant changes were considered required for the Proposal although some minor discrepancies were fixed and adjustments and additions to the mitigation measures were made to ensure the impacts of the Proposal are minimal or negligible.

This RTS report (RTS #2) responds directly to further comments received from agencies regarding RTS report #1.

The NSW Department of Planning, Housing and Infrastructure (DPHI) received a specific request for further information from Heritage NSW. Singleton Council and the NSW EPA separately provided their comments and a recommended draft approval conditions. DPHI also requested that Verdant Earth provide additional information regarding the status of the Voluntary Planning Agreement (VPA) with Singleton Council.

In summary, the following matters have been considered:

- It is considered that the Proposal will have negligible potential to impact AHIMS site 37-6-1443. Mitigation measures outlined in the EIS are considered appropriate including staff and contractor inductions and implementation of an Unexpected Finds Procedure. A memo from Navin Officer Heritage Consultants dated 18th December 2006 describes the salvage works undertaken for the AHIP works and AHIMS site 37-6-3441. Based on this memo, historical aerial photography (showing disturbance over time) and a draft salvage report provided by Navin Officer, the AHIMS site in question is at least partially destroyed, if not completely destroyed (see Section 2.1 and Appendix A - McCardle Cultural Heritage Response to Heritage NSW Request for Information);
- It is noted that the EPA has reviewed the response to submissions report and considers that the matters raised in the EPA's Request for Further Information (RFI) dated 4 April 2024 have been adequately addressed. Verdant Earth accepts the majority of conditions as proposed by the NSW EPA (see Section 2.2). Some amendments to the noise conditions are proposed to be consistent with the noise assessment;
- Comments and proposed approval conditions from Singleton Council were provided to DPHI in a letter dated 19 August 2024. Verdant Earth has reviewed these and generally accepts the proposed conditions (see Section 2.3 and Table 2.3); and
- Verdant Earth and Singleton Council are in the final stages of seeking an in-principle VPA (see Section 2.4 and Appendices B, C and D). Once this is reached, Singleton Council will prepare a formal agreement to be signed and implemented by both parties.

This RTS responds directly to further comments received from agencies regarding the initial response to submissions report. These matters have been fully addressed in this RTS. The Proposal is a highly suitable project for the Redbank Power Station and is recommended for approval.

Appendix A – McCardle Heritage Response to Heritage NSW Request for Information

Appendix B – Verdant Earth Technologies Voluntary Planning Agreement (VPA) Offer to Singleton Council (dated 17 April 2024)

Appendix C – Singleton Council Letter (dated 20 June 2024)

Appendix D – Verdant Earth Technologies Amended VPA Offer to Singleton Council (dated 22 August 2024)