

PERRAM & PARTNERS

PLANNING AND ENVIRONMENTAL CONSULTANTS

31 March, 2026

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Our Ref: 142/L02

Attention: Mr Patrick Copas

Dear Sir

**RE: ELF FARM SUPPLIES
MUSHROOM SUBSTRATE PLANT, MULGRAVE
RESPONSE TO SUBMISSIONS: MP08_0255-MOD 4**

Thank you for forwarding copies of submissions received following notification of the above MOD 4 application and your department's request for further information in your correspondence of 4 April 2025. This letter responds to the matters raised as detailed below and by reference to the following attachments:

- Attachment 1: noise advice (Acoustic Consulting Engineers)
- Attachment 2: flooding report (GRC Hydro)
- Attachment 3: revised stormwater report (Barker Ryan Stewart)
- Attachment 4: revised landscape plan (HUON Environmental Landscapes)
- Attachment 5: revised BDAR (Fraser Ecological)
- Attachment 6: advice re biofilter changeover requirements (The Odour Unit)
- Attachment 7: consideration of filling alternatives
- Attachment 8: diagram of proposed conveyor through former bioscrubber
- Attachment 9: revised plan showing unconstructed wall approved in MOD 3
- Attachment 10: landowner's consent for the mushroom farm site

An online meeting was held with your department in June 2025 to discuss the application and in particular the submission received from the CPHR group of the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW). At that meeting, having regard to the CPHR comments on flooding, your department expressed reservations regarding the extent of land filling required as part of MOD 4 and asked Elf Farm Supplies to consider amending the proposal to reduce the amount of filling.

In response to the department's request Elf Farm Supplies considered various possibilities and in August 2025 advised the department that it was pursuing a revision to the MOD 4 layout to reduce the amount of filling required. At the same time, expert advice regarding biofilter management was sought from *The Odour Unit*, being the air quality consultant that advised the company when it was developing the emissions control system proposed in MOD 1 that has since been successfully implemented at the Mulgrave facility. In addition *GRC Hydro* was commissioned to undertake fresh modelling using the latest flood model applicable to the area.

In consideration of the advice from *The Odour Unit* and the result of updated flood modelling, Elf Farm Supplies has come to the view that adoption of any of the alternatives could either result in poor environmental outcomes or compromise the future operation and management of the substrate plant. The company therefore believes the most practicable solution is to proceed with the application as submitted. Management of the biofilter using methods established since its commissioning in 2018 has proven to ensure compliance with odour goals.

A discussion of the filling alternatives is included in Attachment 7. Advice from *The Odour Unit* is provided in Attachment 6 and the flooding report is included as Attachment 2.

Issues raised in submissions have been itemised and summarised as shown in italics below. A response is provided to each issue, with reference where necessary to the attachments.

Department of Planning – request for further information

- a) *Clarify the intended use of the existing biofilter area including the reason for filling to 16 m AHD.*

The existing biofilter area is part of the operating platform of the substrate plant. After the new biofilter has been tested, commissioned and proven to be operating satisfactorily it is planned to decommission and demolish the existing biofilter. This land will remain part of the operating platform of the substrate plant and will subsequently be utilised for equipment storage or other purposes associated with substrate production.

The site of the existing biofilter is ideally located beside the existing ammonia scrubbers to be utilised during maintenance or refurbishment of the scrubbers. To effectively use this area and for greater flood protection it should be at the same level as the remainder of the plant.

It is logical to fill this area while other filling is ongoing to avoid the need for separate approval and the disruption of having to initiate a new episode of filling at a later date just to add 1.5 metres to this small section of the site.

- b) *Confirm whether the mothballed bioscrubber chimney will be removed.*

The chimney associated with the mothballed bioscrubber is not used and no longer forms part of the odour management system. It is not necessary to remove the chimney to recondition the mothballed tunnels in the building beneath. The conveyor proposed in MOD 4 to carry straw bales through the tunnel structure will pass through the former bioscrubber where the water chambers will be repurposed to form part of the bale wetting system. A diagram of this arrangement is attached.

Elf Farm Supplies is actively looking to sell the chimney and will remove it once a sale is confirmed.

- c) *Will irrigation of process water be required following MOD 4 works?*

The frequency of irrigation will be reduced owing to a reduced volume of water being stored in the proposed tanks compared to the current dam, resulting from:

- the tanks receiving only process water overflow and not direct rainfall as occurs with the dam; and
 - the catchment area for the tanks being reduced owing to increased roofing over operational areas incorporated in MOD 4.
- d) *Clarify land ownership for the Londonderry mushroom farm and if not Elf Farm Supplies, then provide landowners' consent for the mushroom farm site.*

Elf Mushrooms is the proponent for the Londonderry mushroom farm development where the land is owned by DW Tolson Management Pty Ltd. Consent from this owner for the application to modify the project and concept plan is attached.

Elf farm Supplies is the proponent for the Mulgrave substrate plant where the land is owned by RN & NR Tolson. Consent from this owner was included in the application for MOD 4

- e) *Detailed plans submitted with the MOD 4 application do not show the small perimeter wall separating the bale storage area from the fuel tank and weighbridge approved as part of MOD 3.*

The approved perimeter wall has not been constructed to date. It was shown on figures 2 and 3 of the modification report. A revised copy of the detailed layout plan from Appendix D of the report is included as Attachment 9, showing this structure.

- f) *Clarify what fire protection measures will be implemented as part of the conveyor system for transporting bales from the storage area to the bale breaking shed.*

At the outset, should any evidence of fire be detected in a straw bale, the bale would not be loaded to the transfer conveyor.

Straw bales placed on the conveyor will immediately enter the former bioscrubber chamber where they will be fully immersed in a water bath to commence the bale wetting process. This will quench any undetected ignition and prevent it proceeding through to the bale-breaking building. A diagram showing the conveyor passing through the former bioscrubber is included as Attachment 8.

- g) *Detail additional noise mitigation measures for the bulk earthworks phase to minimise the effect of predicted 3 dB exceedance of the construction noise management level at residential receivers.*

The noise consultant *Acoustic Consulting Engineers* has contacted Elf Farm Supplies' filling contractor and received advice that at most, two items of plant will be operating at any one time. The predicted exceedance of 3 dB assumed that all equipment could operate simultaneously at maximum output which is therefore unlikely to occur. Based on this information the predicted exceedance will not occur. Advice to this effect from the noise consultant is included as Attachment 1.

- h) *How has operational noise associated with the biofilter storage area where tree stumps are screened, processed and recycled been considered within the noise model.*

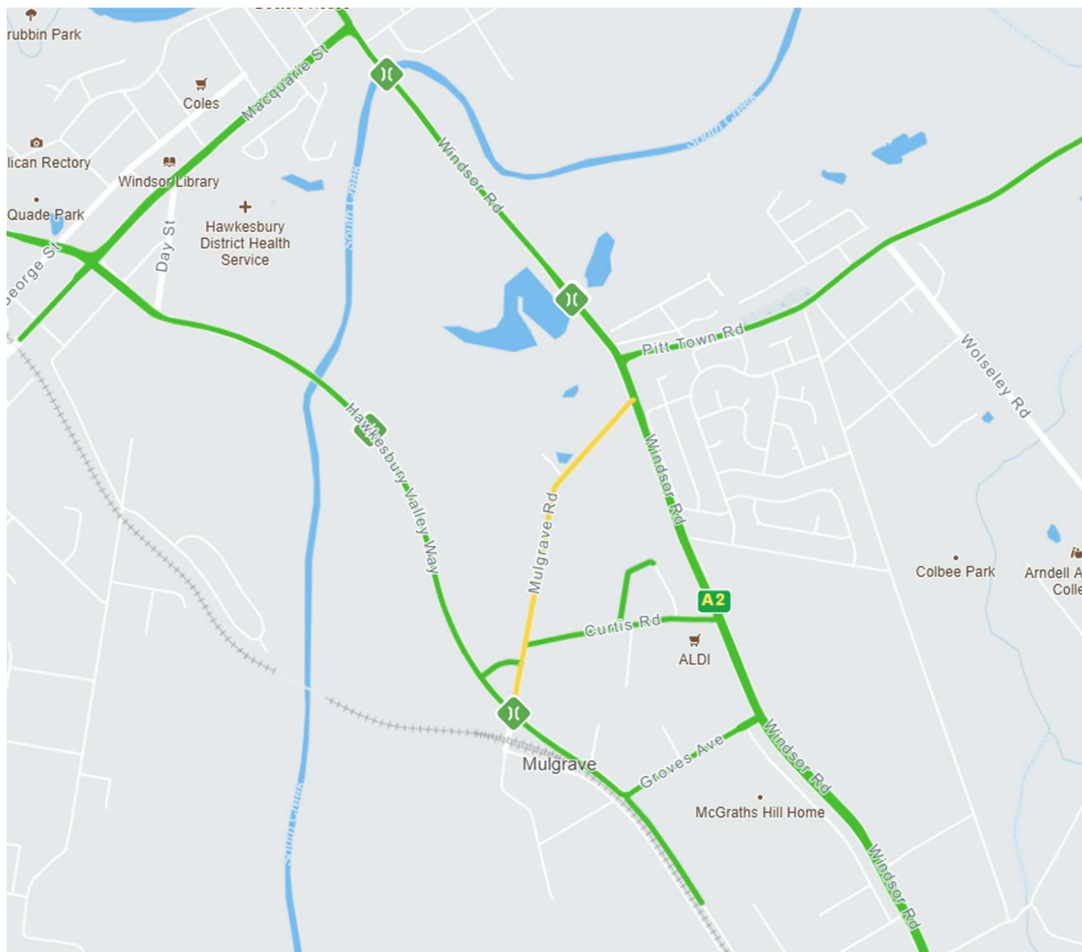
The noise consultant *Acoustic Consulting Engineers* has considered noise from processing/screening/recycling of biofilter material in the attached advice. Noting that the operation would take about four days after the changeover, occurs at five-year intervals and would utilise the same front-end-loaders already considered in the noise modelling, the noise would be insignificant compared to normal operation.

Delivery of biofilter material to the accumulation stockpile at an average of one delivery per week is also considered insignificant compared to normal operation.

- i) *Provide additional traffic mitigation measures to minimise vehicle movements associated with bulk earthworks causing further deterioration of the level of service at the existing Hawkesbury Valley Way/ Mulgrave Road intersection.*

This matter was referred to the traffic consultant, *pdc consultants*, who supplied the traffic impact assessment report included in the application. The consultant advised that the report includes a recommendation that an operational traffic management plan be prepared to among other things detail alternate routes to avoid peak hour congestion at Hawkesbury Valley Way / Mulgrave Road.

Responding to the specific issue the consultant advised the alternate routes would be the B-Double network to Windsor Road (extract below), including use of Mulgrave Road and Curtis Road



- j) *Review the discrepancy in the Biodiversity Development Assessment Report that shows areas of planting being retained that are considered likely to be impacted by construction of various sheds included in MOD 4.*

The BDAR has been updated and is included as Attachment 5. The extent of planting affected by the sheds is relatively minor.

- k) *Provide further clarity with regard to the timeframe for implementing, monitoring and maintenance of new landscaping arrangements forming part of MOD 4.*

The landscape plan has been updated to respond to this request and is included as Attachment 4.

- l) *Provide information to support the statement that the proposal will have no impact on the three nearby heritage items referred to in the assessment report.*

The three heritage items referenced in the assessment report are listed in Hawkesbury LEP, 2012 as being of local significance and include:

- *Tall Trees*, being the rural property immediately south of the railway;
- the station masters' residence on railway property immediately south of the site; and
- Mulgrave railway station.

The heritage significance of these items will not be impacted by the proposed MOD 4 development because:

- the three items already exist in proximity to an operating mushroom substrate plant, which will not change as a result of MOD 4;
- development on the substrate plant site proposed in MOD 4 will not be any closer to the heritage items than existing development on the site; and
- the proposed modification works are unlikely to significantly alter the view from the three heritage items owing to separation and screening by intervening structures and vegetation. In particular, two of the heritage items are fixed structures, being the railway station and the former station masters' cottage where vegetation screening, assisted by the approved noise barrier will severely restrict views into the site. The *Tall Trees* property extends beside the railway parallel to the southern site boundary where the interface comprises approved noise barrier, continuous walls of multiple existing buildings and screening vegetation, effectively blocking views of the proposed MOD 4 works.

Hawkesbury City Council

The Council submission detailed the development history of the site and the and restrictions of the current zoning noting that the application seeks modification to the approved concept plan to permit the development to occupy more of the RU4 zoned area where the development would ordinarily be prohibited.

The Council requests that the department consider the permissibility of the proposed expansion onto the RU4 zoned portion of the site with specific reference to the following:

a) *Flooding and evacuation capacity*

The council observes that the site has been identified as flood prone land and directs attention to the Hawkesbury-Nepean River Flood Study 2024 that classifies flood risk. Assessment against Council's Flood Policy 2020 is also recommended.

The flood assessment prepared by *GRC Hydro* and incorporated in the modification report considered the 2019 flood study and Council's 2020 flood policy.

Further advice from *GRC Hydro* has been obtained and is included as Attachment 2. The previous assessment has been updated in light of the 2024 Hawkesbury-Nepean Flood Study noting that the flood affectation at the site remains consistent with the 2019 study. The proposed works have been assessed in response to council's flood policy leading *GRC Hydro* to conclude that the proposed works are compliant with the relevant clauses and controls.

b) *Proposed filling*

The council notes that the proposed filling may change flood behaviour and affect stormwater management on the site which should be a key consideration when determining the modification application.

The advice from *GRC Hydro* in Attachment 2 indicates the proposed filling will not adversely affect surrounding properties or change flood behaviour.

c) *Odour and air pollution*

The Council refers to odour issues that existed in the past and stated that odour complaints are ongoing. Given the potential for increased air pollution, the council recommends the department should refer the application to the EPA.

It is noted that the department has referred the application to the EPA which has made a submission referenced later in this response. Odour issues have not been mentioned in that submission although conditions relating to air quality are intended to be included in the EPA's advice during the response to submissions stage. Elf Farm Supplies has not been notified of any complaints being received by the council in recent years.

d) *Noise pollution*

The council requests that potentially increased noise levels be considered by the department.

Additional advice from the noise consultant for consideration by the department is included as Attachment 1 in this response.

e) *Visual amenity*

The application seeks approval for new buildings and sheds adjacent to Hawkesbury Valley Way. The design should consider the context of its setting and include suitable built form and landscaping on the site.

The application has considered the visual impact of the proposed modification and incorporated ameliorating measures including building form and colour and landscaping.

f) *Additional traffic generation*

The council notes that the application is likely to create increased traffic movements on Mulgrave Road and lead to increased impacts to the road network in the locality.

Operational traffic for the substrate plant at full production level was approved as part of the original project approval. Construction traffic associated with MOD 4 has been assessed in the application. The department has requested that additional traffic mitigation measures be provided to minimise vehicle movements associated with bulk earthworks causing further deterioration of the level of service at the existing Hawkesbury Valley Way/ Mulgrave Road intersection. This matter will be addressed in the operational traffic management plan.

g) *Stormwater management*

The council states that the existing stormwater system will likely be altered by the proposed MOD 4 development and given the flood liability of the site, requests that stormwater management be considered as a key issue when determining the application.

The application includes a stormwater management report which has been updated and included as Attachment 3 in this response.

3. Submission from the Department of Climate Change Energy the Environment and Water-DCCEE- (Conservation Programs, Heritage and Regulation group-CPHR)

Part 1 - Flooding

a) *Flood risk has not been duly considered*

The submission from CPHR questions the appropriateness of the development for the site, referring to both the proposed modification and the existing substrate plant which the submission suggests may already be exposed to an unacceptable level of flood risk. The submission states that the MOD 4 proposal would increase development intensity into a highly active part of the flood plain including high hazard and a likely floodway. In its unfilled state, the western part of the MOD 4 development site has been mapped as an area of maximum hazard for vehicles and people with buildings in that locality vulnerable to failure. Even after filling, the new structures would be at 16 m AHD rather than the current planning level of 17.3 m AHD, which CPHR considers inadequate.

The proposed high-level storage shed on the eastern side is a reasonable response to flood constraints on the site and may reduce flood risk for the existing development. Recommended actions include:

- Substantially revise or reconsider the proposed modification to reduce flood risk;*
- Indicate the increase in staff associated with the modification;*
- Consider filling the high-level storage shed site to above 17.3 m AHD to provide freeboard above the 1% AEP flood level.*

Advice from *GRC Hydro*, included as Attachment 2, is that the land affected by MOD 4 is not a highly active part of the flood plain. Flooding in this area is governed by the dominant backwatering effects from the Hawkesbury River with a contribution from flooding of South Creek. Should South Creek be affected by flooding at a time when tailwater levels in the Hawkesbury River are low, *GRC Hydro* advises flood flow would

be conveyed beneath the railway viaduct. The substrate plant, including the additional area affected by MOD 4, is outside of this floodway in the lee of the railway embankment. *GRC Hydro* advises the potential for overland flow across the railway embankment onto the site can be discounted.

The western part of the MOD 4 development affects land that is currently up to 10 metres below the operating level of the substrate plant. This is consistent with current flood hazard mapping referred to in the submission from CPHR. However, raising the land to the same height as the rest of the substrate plant as proposed in MOD 4 would be expected to render this area no more hazardous than the existing operational area of substrate plant. In summary, the proposal includes the remedy to the mapping issue.

The existing development including the proposed MOD 4 expansion is considered appropriate for the site because Elf Farm Supplies has designed the installation and adopted management procedures to accommodate and manage the possibility of major flooding in the area. The existing plant is a state significant development and holds approval to remain on the site, undertake further development and expand its output. MOD 4 seeks only to alter the manner in which the further development takes place.

The three recommended actions from CPHR are responded to as follows:

- The flood risk at the site is being managed and is considered manageable into the future. MOD 4 will increase the resilience of the operation to flood damage and loss of output;
- When plant production reaches the approved upper limit, there will be no increase in staff associated with the modification beyond that which has already been approved in the original project approval. MOD 4 does not propose any increase in staff; and
- Elf Farm Supplies would consider raising the high-level storage shed if required, but the shed is an industrial structure designed to store machinery and mobile plant. Site personnel would be evacuated before water levels reached the 17.3 m level because the rest of the site is at 16 m. The company may place pallet racking in the shed to raise water sensitive equipment.

b) Climate change is predicted to increase flood levels along the river

A floodplain risk management study, published in 2025 after the modification report had been prepared, predicts the 1% AEP flood level of 17.3 m AHD could rise to over 19 m by 2060 and near 21 m by 2090. Recommended actions include:

- *Consider the impact of climate change on the proposed development*
- *Consider the feasibility of raising the high-level storage shed*

The 2024 Hawkesbury-Nepean Flood Study has been used for the latest flood impact modelling for the proposed development included in the attached advice from *GRC Hydro*. The consultant reported that the study included analysis that predicted the impact of cumulative development on future flood behaviour under climate change conditions.

The matter of raising the high-level storage shed is addressed in item *a)* above.

c) *Flood impacts*

CPHR believes the quantitative assessment of flood impacts included in the MOD 4 application should be considered preliminary as it is based on a superseded flood model compared to the latest flood study now available. Furthermore, the assessment does not consider the possibility of South Creek flooding without the presence tailwater effects from the Hawkesbury River. CPHR believes the proposed volume of fill is significant and requires numerical modelling assessment to confirm that the impact would not be significant. However, CPHR does not believe this modelling should be undertaken because the land is not considered appropriate for the development as indicated in item a) above.

It is recommended the location of the recycled water tanks should be reconsidered as they may become floating debris in even small flood events.

Advice from *GRC Hydro* (see Attachment 2) includes consideration of the 2024 Hawkesbury-Nepean River Flood Study and the result of fresh modelling undertaken using the flood model associated with that study. The following conclusions have been drawn:

- The flood affectation of the site appears to have remained consistent with the 2019 study referenced in the MOD 4 application;
- The fresh modelling confirms that the proposed filled landform does not adversely affect flood levels on surrounding properties; and
- The hydraulic categorisation of the 1% AEP event confirms that the extent of floodway on the property is contained between the western site boundary and the proposed western filling area.

Elf Farm Supplies will design the recycled water tanks so that when the external water level exceeds the level inside, flood water will enter the tanks to overcome the risk of buoyancy.

d) *Emergency management*

The emergency response strategy for the site should be compatible with NSW State Emergency Service local flood plans. Any issues with flood emergency management should be co-ordinated with SES and resolved prior to determination of the modification.

CPHR does not believe that the presence of a flood emergency response plan for the site should enable the decision maker to overlook the appropriateness of the site for the development.

The proponent should consider appropriateness of the development, residual risk and emergency management having regard to the above

Elf Farm Supplies accepts responsibility for managing emergency flood response on the property with the following hierarchy of principles:

- safeguarding human life;
- minimising damage to the property, including infrastructure and machinery;
- maintaining operation of the substrate plant or if disrupted, restoring production as soon as possible;
- restoring any flood damage to infrastructure, plant and equipment; and
- restoring the property including cleaning up flood debris.

The substrate plant is a commercial operation that is equipped to manage the consequences of flooding. Earth moving equipment is present on site. The company has not required SES assistance during any previous flood and does not anticipate any requirement in the future. During and following a flood emergency Elf farm Supplies may be in a position to assist the SES in the local area.

Part 2 - Biodiversity

The CPHR submission has made seven comments regarding biodiversity. Five of the comments request modifications to the biodiversity assessment report and one comment requests amendment to the landscape plan. The BDAR and landscape plan have been amended as requested except as noted below.

a) Impacts on western tree corridor

The proposal requires the western tree corridor to be completely removed. CPHR believes that the western tree corridor should not be impacted or if unavoidable, trees with medium and high retention values should be identified and retained.

The western tree corridor was planted by Elf Farm Supplies approximately ten years ago with the intent of screening the development from view from the west. The tree corridor has effectively achieved this function. Some of the planted trees are suggested by CPHR to have high retention value.

It is not feasible to retain any part of the western tree corridor because the raised area of land will be needed for the new biofilter and its material processing area. This area is already considered confined as the total area of the bio-filter has been increased. This is in part to ensure that when one half of the bio-filter is being replaced there remains sufficient in-service air-flow capacity to maintain compliance with Work Health & Safety requirements for the personnel working inside the processing building.

During changeover, all of the biofilter material needs to be removed and screened before the bio-filter can be returned to service because the screened material is reused for the upper layer of the bio-filter.

Elf Farm Supplies has demonstrated that it is capable of establishing and maintaining a screening corridor of maturing trees which the company will do again as part of the MOD 4 development.

e) Biodiversity Offsets and Agreement Management System (BOAMS) access

The ecological consultant is requested to add 'Greater Sydney-Compliance and Regulation' as a case party in BOAMS and upload the digital files.

The ecological consultant, *Fraser Ecological*, will seek to comply with this request using the relevant website.

f) BDAR – PCT identification

The BDAR does not provide justification for the best-fit Plant Community Type (PCT). The BDAR should rectify this and provide justification as to whether the vegetation on the site is a threatened ecological community.

Fraser Ecological has addressed this matter in the revised BDAR included in Attachment 5.

g) *BDAR – avoid and minimise*

Consideration should be given to reducing the area proposed to be filled to avoid impacts to the existing tree corridor along the western edge of the site.

This matter has been addressed in item a) above. It will be necessary to remove the western tree corridor to achieve sufficient operating area for the new biofilter. The corridor will be re-established with new plantings when earthworks are complete.

h) *BDAR – mitigate and manage impacts*

Where existing stormwater basins are proposed to be filled, the BDAR should be updated to include a dewatering/fauna relocation strategy for wildlife that may be present at the time.

Fraser Ecological has addressed this matter in the revised BDAR included in Attachment 5.

i) *BDAR – mitigate and manage impacts*

The BDAR should include a requirement for a vegetation management plan to manage weeds and maintain the proposed plantings for five years.

Fraser Ecological has addressed this matter in the revised BDAR included in Attachment 5.

j) *Landscape plan*

The landscape plan should be updated to provide plantings within and surrounding the proposed western stormwater basin using locally native species including grasses shrubs and trees.

An updated landscape and revegetation plan is included in Attachment 4. Basin vegetation has been considered having regard to the request from the Department of Defence to minimise the likelihood of bird strike in the flight path.

4. Submission from the Department of Climate Change Energy the Environment and Water-DCCEEW- (Water group)

a) *Water licensing – post approval*

The proponent should review the design and operation of the proposed sediment basins to determine if an exemption for water licensing is applicable. Should an exemption not be available, sufficient water entitlement will need to be held in a water access licence prior to any water take occurring.

This matter should not arise as it is not proposed to utilise sediment basins to capture water for use on the site. The purpose of sediment basins is to treat rainfall runoff that flows from the developed area during rain events.

b) *Works on waterfront land – post approval*

Stormwater outlets discharging towards South Creek are considered works on waterfront land. The Water group requests that such works comply with its guidelines for controlled activities on waterfront land.

Elf Farm Supplies will comply with the guidelines.

5. Submission from the Department of Defence - Security and Estate Group

Defence expects the applicant to undertake all necessary measures to ensure that wildlife (birds) are controlled on the site. The site is in an area mapped by Defence as “Birdstrike Zone B” where land uses that have the potential to attract wildlife should be avoided as they will potentially increase the risk for aircraft operation from RAAF Base Richmond. In particular:

a) *Design of detention basins and revegetation works*

The design of detention basins and revegetation works should consider minimising bird habitat opportunities. Bird activities should be monitored following completion.

The request from Defence has been considered in the updated landscape plan.

b) *Organic waste storage/commercial bins*

Outdoor storage of organic waste including bins should be managed to minimise attractiveness to birds.

Outdoor storage is utilised for straw bales and biofilter material. Neither of these materials has been observed to attract flocks of birds. Any unsold substrate may be temporarily placed in outdoor storage for a limited time, but the sterilised nature of this material provides no attractiveness for birds. All other organic material including waste is contained in enclosed bins or storage areas. Elf Farm supplies will be mindful of the need to maintain the site in a manner that is unattractive for birds.

6. Submission from the NSW Environment Protection Authority (EPA)

a) *Water management*

The EPA notes that there are no water discharge points on the existing licence, EPL 6229, and recommends that a Water Discharge Impact Assessment be provided to characterise the discharges from the stormwater management system.

In relation to this matter the stormwater consultant, *Barker Ryan Stewart*, has advised:

- The basins are intended solely for the treatment and management of runoff from roof and hardstand areas associated with the development;
- The design achieves the required pollutant reduction targets in accordance with the Western Sydney Design Manual, ensuring that environmental risks are appropriately managed, and compliance is maintained with activities on waterfront land — with specific emphasis on bank stability, erosion control, and water quality protection; and

- Production and operational water generated from business activities is separately collected and managed via dedicated holding tanks, consistent with previous approvals, and is not discharged to or treated via the proposed stormwater basins.

Barker Ryan Stewart has amended the stormwater report to clarify the points of discharge and treatment of stormwater runoff. The amended report is included as Attachment 3.

b) *Waste storage limit*

The EPA recommends that the amount of surplus substrate to be stored on the site at any one time be clarified. The existing licence, EPL 6229, limits such storage to 150 tonnes.

The MOD 4 proposal will not require any adjustment to the storage limit for surplus substrate in the licence.

7. Submission from Transport for NSW – Sydney Trains

Transport for NSW – Sydney Trains has provided a list of 16 bullet points for implementation post approval. These matters relate to the issue of the construction certificate and requirements to be implemented during construction.

Noted. Elf Farm Supplies will comply with conditions of approval.

8. Submission from Transport for NSW – Transport Planning, Planning Integration and Passenger Division

Transport for NSW - Transport Planning, Planning Integration and Passenger Division has reviewed the application and provides no further comment as the development is unlikely to impact the classified road network.

Noted

9. Submission from DPHI – Crown Lands

As no Crown land, roads or waterways are included in the proposal, Crown Lands has no comments.

Noted

10. Submission from Mr Bill Sneddon

The submission from Mr Sneddon is mostly positive to the MOD 4 proposal with one concern: there is no reference to the decommissioned bioscrubber and chimney.

Mr Sneddon's positive comments are noted. With regard to the bioscrubber and chimney the following information is provided:

The chimney associated with the mothballed bioscrubber is not used consistent with the current licence issued by the EPA. It is not necessary to remove the chimney to recondition the mothballed tunnels. The conveyor proposed in MOD 4 to carry straw bales through the tunnel structure will pass through the former bioscrubber where the water chambers will be repurposed to form part of the bale wetting system.

11. Submission from Mr Steven Neirincks

Mr Neirincks lives nearby and has raised two concerns:

a) *The impact of the proposal on the congested road network*

The modification report contained a traffic assessment prepared by *pdc consultants*. This report concluded that operational traffic will have little to no impact on the local and broader public road network and that during construction, intersection modelling shows that peak hour traffic generation will also have little or no impact on the broader traffic network.

b) *The need to protect the environment from imported fill containing contamination.*

The modification report states that imported fill 'will be excavated natural material certified to be free of contamination, or other material approved by the EPA for the intended purpose'. EPA requirements will be followed to ensure that the material is suitable and does not introduce contamination to the site.

I trust this information responds adequately to the matters raised by the Department and in submissions. Should you require any further information or clarification please give me a call.

Yours Faithfully
for Perram & Partners

Terry Perram
Principal