



MODIFICATION REQUESTS:

***Pitt Town Concept Plan
(MP07_0140 MOD 3 and MP07_0140 MOD 4)***

***Proposed by Mr Shaun Cleary and Johnson
Property Group***

***Modification to residential subdivision layout
including modifications to roads, number of
allotments and allotment layout within the
Blighton Precinct.***

Secretary's
Environmental Assessment Report
Section 75W of the
Environmental Planning and Assessment Act 1979

December 2014

ABBREVIATIONS

CIV	Capital Investment Value
CMS	Conservation Management Strategy
Council	Hawkesbury City Council
Department	Department of Planning & Environment
EA	Environmental Assessment
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	Environmental Planning and Assessment Regulation 2000
EPI	Environmental Planning Instrument
LEP	Local Environmental Plan
LGA	Local Government Area
MD SEPP	State Environmental Planning Policy (Major Development) 2005
Minister	Minister for Planning
Part 3A	Part 3A of the <i>Environmental Planning and Assessment Act 1979</i>
PPR	Preferred Project Report
Proponent	Mr Phil Cleary (Mod 3) Johnson Property Group (Mod 4)
Secretary	Secretary of the Department of Planning & Environment

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1. BACKGROUND

The purpose of this report is to assess two modification requests to the Concept Approval (MP 07_0140 MOD 3 and MOD 4) for the development of the "Blighton Precinct" within the Pitt Town Concept Plan, in accordance with section 75W of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The modifications seek approval to modify the subdivision layout of Lots 11 and 12 in the Blighton Precinct to enable the lots to be developed independently. MP 07_0140 MOD 3 relates to Lot 12, which makes up the eastern half of the precinct (owned by Mr Cleary). MP 07_0140 MOD 4 relates to Lot 11, which makes up the western half of the precinct (owned by the Johnson Property Group) (refer to **Figure 2**). The two applications are assessed concurrently as subdivision layouts are currently interdependent.

1.1 Site Description

Pitt Town is located in the north-western sector of Sydney, 6km north-east of Windsor, and within the City of Hawkesbury Local Government Area. The Pitt Town Concept Plan relates to various parts of Pitt Town as shown in **Figure 1**.

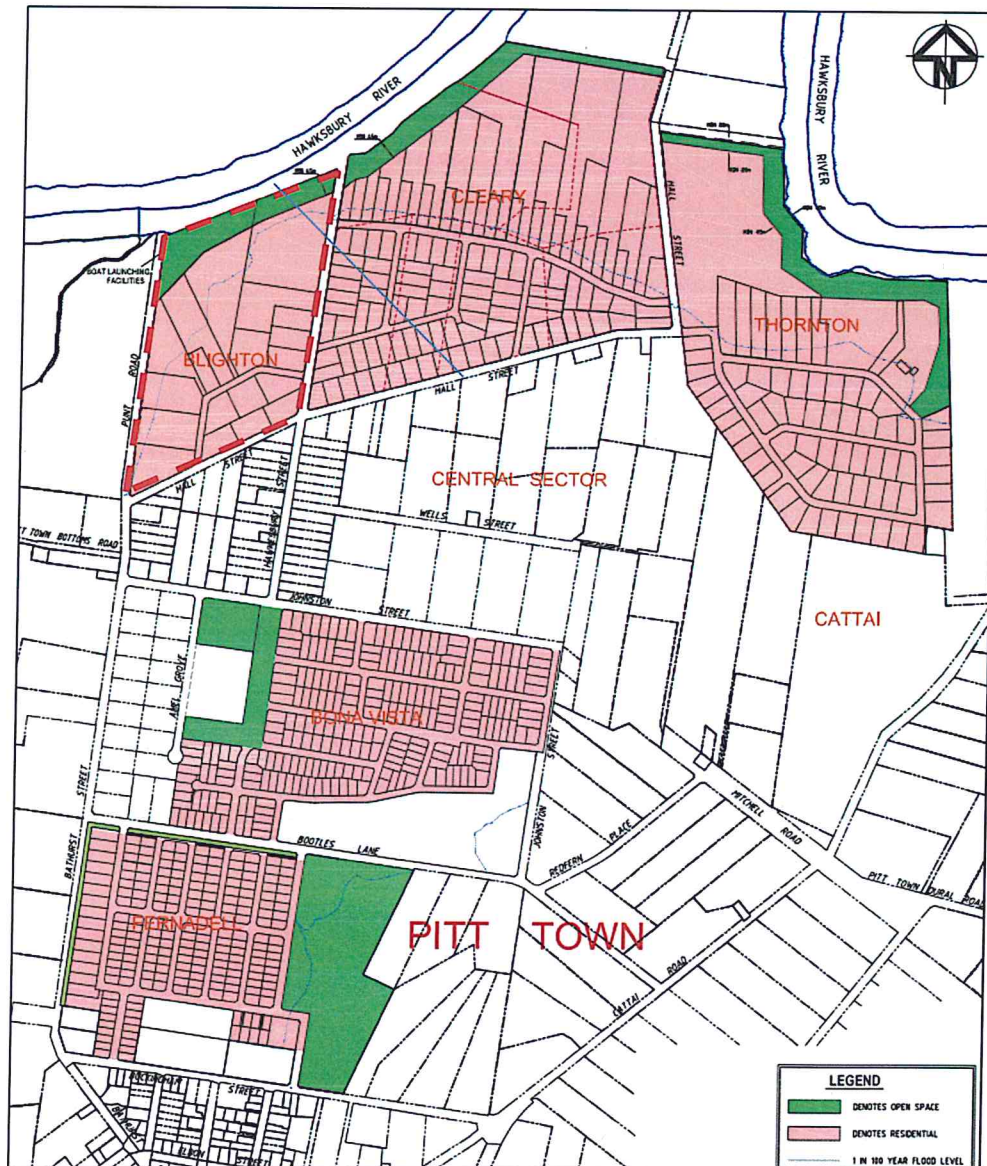


Figure 1: Pitt Town Concept Plan Site and Blighton Precinct outlined in red.

The proposed modifications relate to the Blighton Precinct of the Concept Plan. The precinct is bounded by the Hawkesbury River to the north, Hawkesbury Street to the east, Hall Street to the South and Punt Road to the west. The precinct is made up of two landholdings:

- Lot 11, DP 1021340, known as 1 Hall Street, makes up the western half of the precinct and is owned by the Johnson Property Group. The site has been cleared and includes no buildings on it. The northern and western parts of the site are low lying and subject to flooding.
- Lot 12, DP 1021340, known as 21 Hall Street, makes up the eastern half of the precinct and is owned by Mr Phil Cleary. The site includes a large dwelling in the northern part of the site and a farm building along the southern boundary with Hall Street. The northern part of the site adjacent to the river is affected by flooding.



Figure 2: Aerial view of Blighton Precinct (base source image: Nearmaps)

1.2 Previous Approvals

On 10 July 2008, the then Minister for Planning approved Concept Plan (MP 07_0140) for the subdivision of Pitt Town Residential Precinct into 659 allotments within five precincts for new residential dwellings and associated recreational facilities and infrastructure services. The Concept Plan was subsequently modified (MP 07_0140 MODS 1 and 2) on 23 February 2009 and 18 November 2009 including administrative modifications to the Thornton Precinct and adjusting the lot layouts within the Cleary Precinct.

The Concept approval allowed for the provision of 19 residential allotments within the Blighton Precinct, after taking into account Modification B2, which required the amalgamation of 6 allotments in the south-west corner of the precinct (Lots 1 – 6) to maintain the open vista of the land that was formally part of Governor Bligh's Model Farm, and facing the historically significant area known as the Pitt Town Bottoms (refer to discussion in **Section 5.2**). It also provided for land adjoining the river to be transferred to Council as open space, and the provision of a boat ramp and associated carpark within the open space area. Extracts from the approved plans relating to the Blighton Precinct are shown in **Figures 3 and 4**.

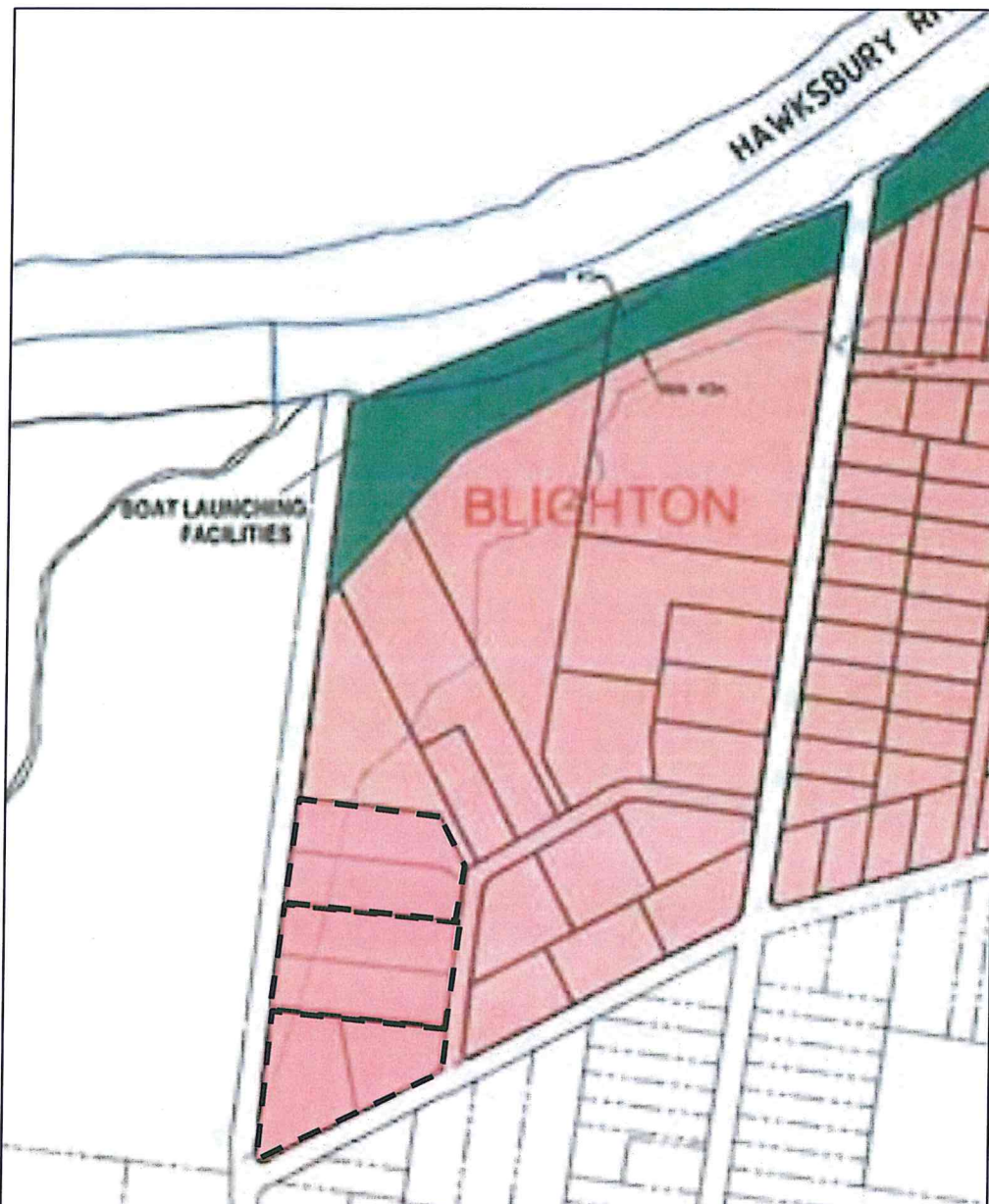


Figure 3: Approved Masterplan, as amended by condition B2 requiring amalgamation of the south-western allotments into 3 allotments.

2. PROPOSED MODIFICATION

2.1 Introduction

The applications seek to modify the Concept Approval by modifying the overall layout of the Blighton Precinct, including the road layout, allotment layout, and the number of allotments permitted within the precinct.

The proponents advise that the modifications arise primarily as the Blighton Precinct is held as two separate landholdings and the current approved design does not allow for the development of the landholdings independently. As the individual owners are not in a position to develop the land at the same time, an amended layout is proposed which allows for the independent development of the land.

2.2 Modification Description

The proposals include:

- amendments to the layout of the Blighton Precinct site including:
 - change to the internal road layout;
 - change to the layout of allotments; and
 - increase in the number of allotments from 19 residential allotments and one residual (open space) allotment to 21 residential allotments and three residual allotments (two open space allotments and one allotment for stormwater detention);
- allowance for possible future change to the area designated for public open space to be retained in private ownership and amalgamated with the adjoining residential allotment; and
- detail of proposed carpark and boat ramp layout.

Following public exhibition of the modification requests, the proponents each submitted a Response to Submissions (RtS) responding to public and agency submissions received during the exhibition, as well as issues raised by the Department. The modification for Lot 12 (Mod 3) also amended the proposed subdivision layout for the eastern half of the precinct.

The development as proposed in the RtS documents is set out in **Table 1**. A comparison of the approved and proposed subdivision layouts is provided in **Figures 4** and **5**.

Table 1: Summary of Proposed Modifications to Blighton Precinct

	Existing Concept Approval	Proposed Modifications to Concept Plan
Residential Allotments	<ul style="list-style-type: none"> • 19 residential allotments in the Blighton Precinct, equivalent to: <ul style="list-style-type: none"> - 8 allotments on Lot 11; and - 11 allotments on Lot 12 	<ul style="list-style-type: none"> • 21 residential allotments in the Blighton Precinct, being: <ul style="list-style-type: none"> - 10 allotments on Lot 11; and - 11 allotments on Lot 12
Allotment Size	<ul style="list-style-type: none"> • 4,000m² to 29,613m² 	<ul style="list-style-type: none"> • 4,000m² to 30,200m²
Road Layout	<ul style="list-style-type: none"> • One through road across both landholdings providing access to 12 properties. 	<ul style="list-style-type: none"> • One terminating road / cul-de-sac providing access to 10 properties entirely within Lot 11.
Open Space	<ul style="list-style-type: none"> • Provision of corridor at least 45m wide adjoining the river for use as open space. • Concept approval of provision of a boat ramp and associated parking area within open space area 	<ul style="list-style-type: none"> • Provision of corridor, but MOD 3 raises the possibility of the land being retained in private ownership and not transferred to Council. • Amended layout of boat ramp and parking area
Detention	<ul style="list-style-type: none"> • Constructed wetland over two allotments for stormwater detention. 	<ul style="list-style-type: none"> • Separate allotment proposed for wetland area.

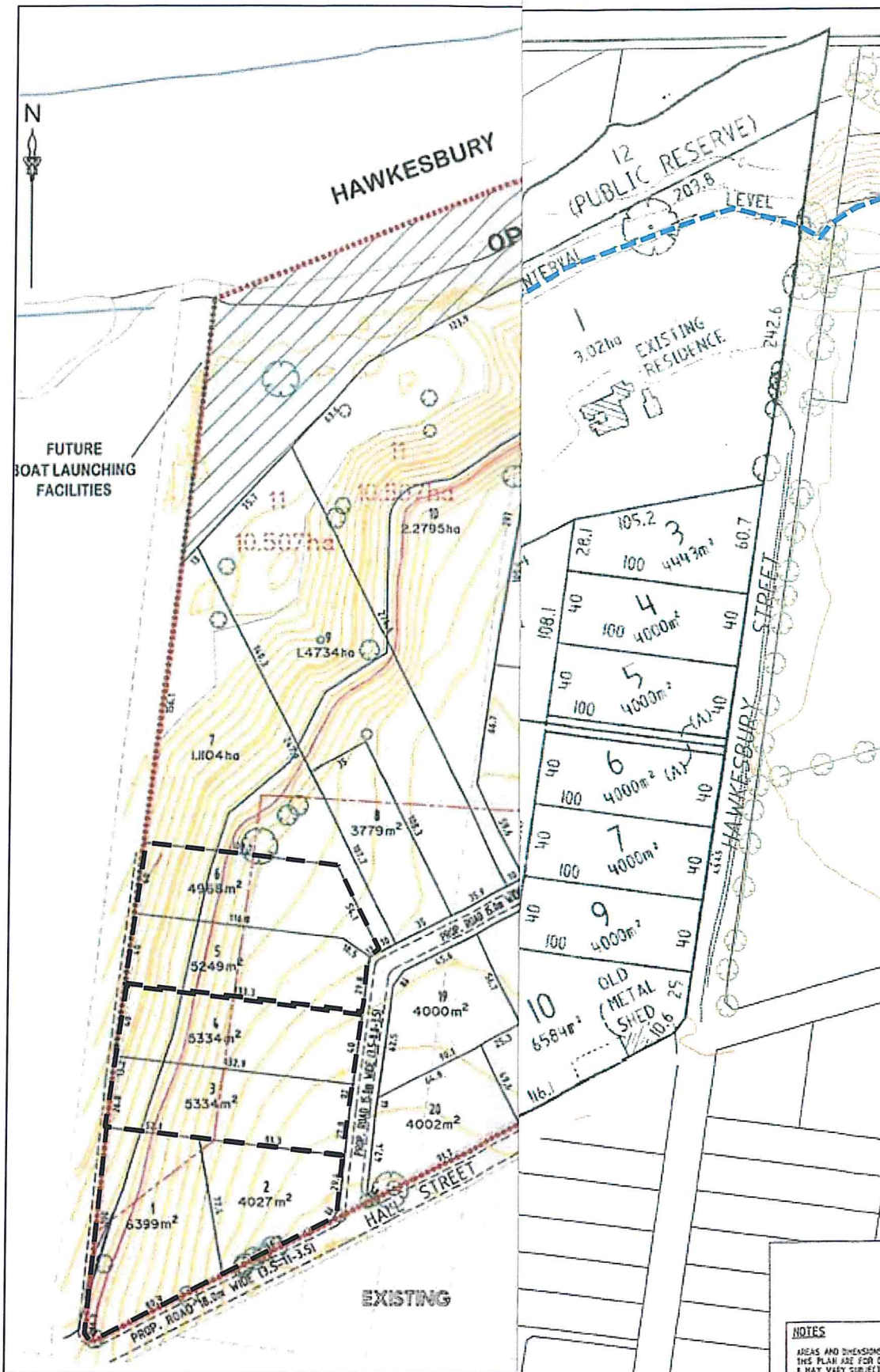


Figure 4: Approved Precinct Plan, as amended by Chthon Precinct (100 year floor level shown in blue) Lots 1 - 6 into 3 allotments.

3. STATUTORY CONTEXT

3.1 Continuing Operation of Part 3A to Modify Approvals

In accordance with clause 3 of Schedule 6A of the EP&A Act, section 75W as in force immediately before its repeal on 1 October 2011, continues to apply for the purpose of modification of concept plans approved before the repeal of Part 3A.

Concept Plan MP 07_0140 was approved prior to the repeal of Part 3A. Consequently, this report has been prepared in accordance with the requirements of Part 3A and associated regulations, and the Minister (or the Minister's delegate) may approve or disapprove the modifications of the Concept Plan under section 75W of the Act.

3.2 Modification of the Minister's Approval

Section 75W of the EP&A Act provides that a proponent may request the Minister to modify the Minister's approval of a project. The Minister's approval is not required if the approval of the project as modified would be consistent with the original approval. However, in this instance, the proposals seek to modify requirements of the approved Concept Plan, which require further assessment, and therefore the modifications will require the Minister's approval.

3.3 Environmental Assessment Requirements

No additional environmental assessment requirements were issued with respect to the proposed modifications, as sufficient information has been provided to the Department in order to consider the applications and the issues raised remain consistent with the key assessment requirements of the original Concept Plan.

3.4 Delegated Authority

In accordance with the Minister for Planning's delegation, the Executive Director, Infrastructure and Industry Assessments, may determine the applications as:

- the relevant local council has not made an objection;
- a political donation disclosure statement has been made, but only in respect of a previous related application (the original Concept Plan application); and
- there are less than 10 public submissions in the nature of objections.

4. CONSULTATION AND SUBMISSIONS

4.1 Exhibition

Under Section 75W of the EP&A Act, a request to modify an approval does not require public exhibition but under Section 75X(2)(f) of the Act, the Secretary is required to make the modification request publicly available.

With regard to Modification 3, the Department:

- publically exhibited it from 21 November to 4 December 2013 (14 days) on the Department's website, at the Department's Information Centre, and at Hawkesbury City Council;
- advertised the public exhibition in the Sydney Morning Herald; Daily Telegraph and Hawkesbury Gazette on 20 November 2014; and
- notified adjoining landowners and relevant state and local government authorities in writing.

With regard to Modification 4, the Department:

- made the application publically available on the Department's website; and
- notified landowners and relevant state and local government authorities in writing.

4.2 Submissions

Eight submissions were received from public authorities including Hawkesbury City Council and one public submission was received in response to exhibition of Modification 3. One submission was received from Hawkesbury City Council in response to the notification of Modification 4.

Agency Submissions

The issues raised in the agency submissions are outlined in **Table 2**.

Table 2: Summary of Agency Submissions

Hawkesbury City Council	
Modification 3 (Lot 12)	Hawkesbury City Council has no in principle objection to the proposal, but made the following comments: <ul style="list-style-type: none"> • further information is needed regarding the impact of the proposed changes on the subdivision layout on Lot 11, and any associated impacts arising from potential changes to the layout Lot 11 (including compliance with minimum lot size requirements and traffic and road layout implications); and • although the modification application did not include a heritage assessment or contamination assessment, these will be required as part of any future development application as set out in the commitments of the Part 3A approval.
Modification 4 (Lot 11)	Raises a concern that the proposal does not address how proposed Lot 11 (the detention basin) can be subdivided under the <i>Hawkesbury Local Environmental Plan 2012</i> as it is part of the public reserve and does not meet minimum lot size requirements.
Office of Environment and Heritage (OEH)	
Modification 3 (Lot 12)	OEH does not support the proposed incorporation of the land identified for dedication as a public reserve (the Hawkesbury River Buffer Area) into a residential lot. The land should be dedicated to Council for open space, or if Council does not want the land, it should be rezoned for conservation. The revised layout is acceptable in that it will not have increased impacts to Aboriginal cultural heritage.
Environment Protection Authority (EPA)	
Modification 3 (Lot 12)	The EPA raises no objections and provided some general guidance for the Department to consider in its assessment, relating to: <ul style="list-style-type: none"> • land use conflict; • waterways and stormwater management; • noise; • contaminated land; and • waste.
Transport for NSW (TfNSW)	
Modification 3 (Lot 12)	TfNSW raised no objections as the proposal will have very marginal differences in traffic generation. TfNSW also commented that the Council should seek written confirmation from the Department of Planning regarding arrangements for contributions to State Infrastructure prior to the issue of a future approval by Council for the

	subdivision of the land
Roads and Maritime Services (RMS)	
Modification 3 (Lot 12)	RMS raises no objection.
Department of Primary Industries (DPI): NSW Office of Water, Fisheries NSW, Crown Lands and Agriculture NSW	
Modification 3 (Lot 12)	DPI raises no objection.
State Emergency Services	
Modification 3 (Lot 12)	The SES advised that previous comments in relation to flooding provided at the time of the original Concept Plan remain relevant to the site.
NSW Trade and Investment – Mineral Resources Branch	
Modification 3 (Lot 12)	The Mineral Resources Branch raises no objection.

Public Submissions

Two public submissions were received in response to the exhibition of Modification 3 (Lot 12). One submission from a local resident raised concern about traffic impacts of the proposal on the broader regional road network.

4.3 Response to Submissions

Following issues raised during the notification periods, both proponents submitted a RtS (**Appendix A**). These resulted in amendments to the layout of Lot 12 and the provision of additional information including Heritage assessments. The Department is satisfied that the issues raised in the submissions have been addressed through the RtS', this report, and the recommended conditions of consent.

5. ASSESSMENT

The Department considers the key issues for consideration to be:

- density and lot size;
- heritage;
- flooding;
- traffic and road layout; and
- open space provision.

5.1 Density and Lot Size

Residential Density

The proposed modifications result in two additional residential allotments within the Blighton Precinct (an increase from 19 approved residential allotments to 21 residential allotments). In the context of the entire Concept Approval which allows for 659 residential allotments, the increase in density is minor, will not result in any perceptible change to demand for services and infrastructure, and can be supported providing no adverse impacts arise from the modifications. In considering the appropriateness of density on the site, the key issues in this case are:

- heritage and visual impacts;
- flooding; and
- traffic impacts.

These issues are assessed in this report (see **Sections 5.2, 5.3 and 5.4**). In each case the assessment concludes that that no unacceptable impacts arise. On this basis the site can support the proposed changes to permit the small increase in residential density.

Lot Size

The Concept Approval included lots ranging in size from 3,779m² to 29,630m² within the Blighton Precinct, but generally lots were around 4000m² or 10,000m². The smaller lots were concentrated in the south-eastern corner of the precinct to reflect heritage and flooding constraints. Following approval of the Concept Plan, the Hawkesbury LEP was amended to reflect the approved layout and includes minimum lot size requirements of 4000m² in the south-east corner of the precinct and 10,000m² elsewhere (refer **Figure 6**).

The modification request adopts a similar format, with smaller allotments (minimum size of 4,000m²) in the south east-corner of the site and larger allotments with a minimum size of 10,000m² elsewhere. However, due to the changes arising from the new road location and design and the rationalisation of the allotment layouts, the modified layout would not strictly comply with the LEP controls (which were based on the approved layout) (compare **Figures 6 and 7**). The variation is able to be considered on its merits under Part 3A.

Therefore, despite the variation from the minimum lot size controls in the LEP, the proposed modifications have been designed to address the heritage and flooding constraints that gave rise to the approved layout (refer to detailed discussion in **Sections 5.2 and 5.3** below) and are consistent with the relevant objective of the control which is to ensure lots contain a suitable area for the erection of a dwelling house.

On this basis the proposed changes to the lot sizes and layout are acceptable.

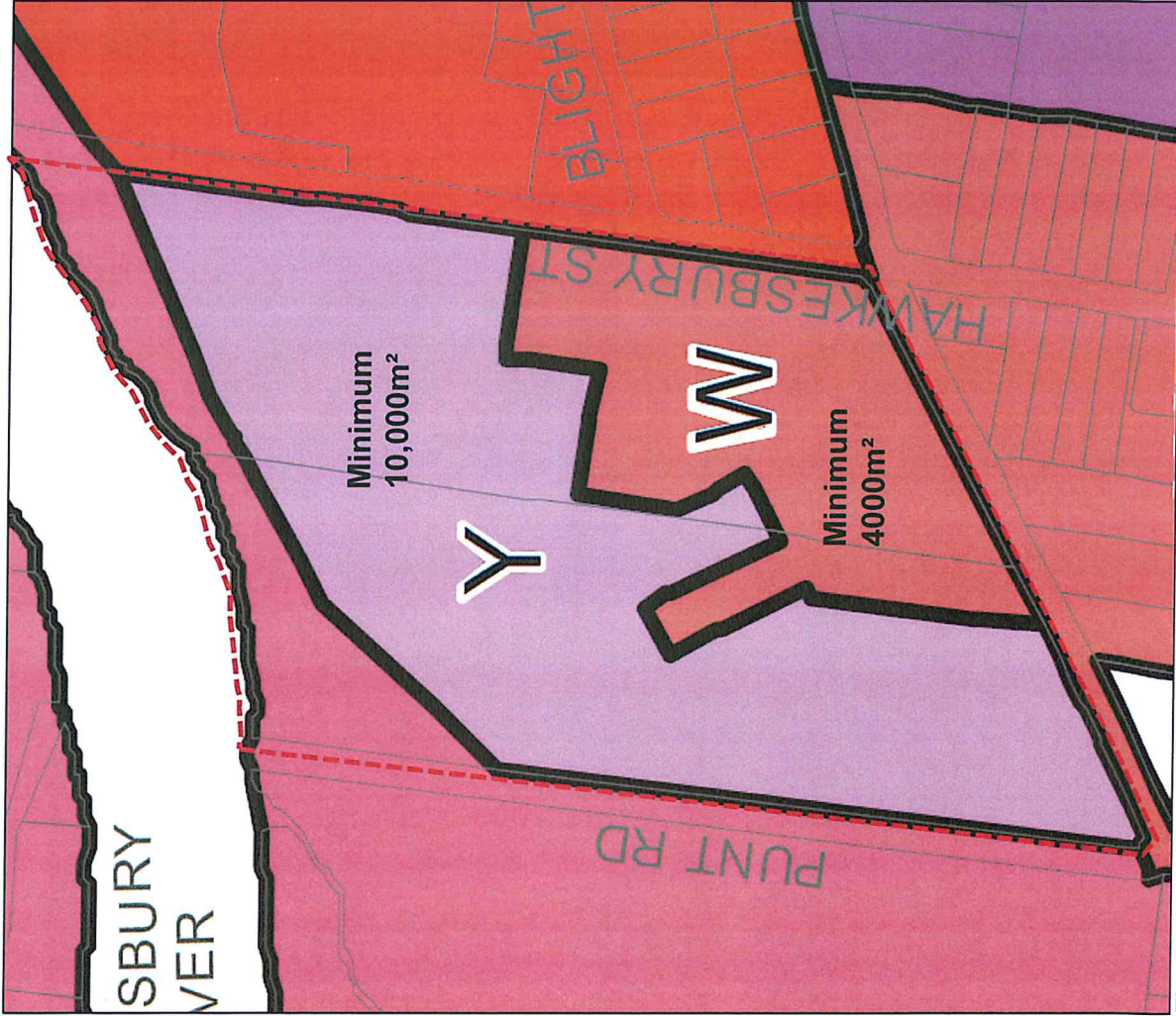


Figure 6: Extract from Hawkesbury LEP 2012 Minimum lot size controls



Figure 7: Proposed plans indicating minimum lot sizes (note: proposed Lot 11 in Lot 11 does not meet the lot size but is not proposed for residential use)

5.2 Heritage

When considering the subdivision layout of the Concept Plan, the Department gave detailed consideration to a Conservation Management Strategy (CMS) prepared by Graham Brooks & Associates in December 2005 which was carried out to guide the future conservation management and further development of the parcels of land within the Blighton and Clearly Precincts.

The CMS found that for conservation management purposes, the site could be divided into different areas each with differing heritage values as shown in **Figure 8**.



Figure 8. Extract from Conservation Management strategy showing proposed Conservation Zone (grey); Open Space Conservation Zone (orange) and Housing Zone (pink)

In summary the CMS recommended:

- **Open Space Conservation Zone** (refer orange area in **Figure 8**): The low-lying river flats land is important for its surviving open landscaped character and may have Aboriginal associational values.
- **Conservation Zone** (refer grey area in **Figure 8**): The high ground has Aboriginal, historical archaeological and historic cultural landscape values and should be managed in a manner that protects the heritage values and the outlook.
- **Housing Zone**: (refer pink area in **Figure 8**): The open ground in the southern portions of the precinct has very limited Aboriginal or Historical Archaeological value and only limited Historic Cultural Landscape value.

It was on this basis that the proposed subdivision layout was derived, concentrating the smaller allotments in the south-east corner of the site, consistent with the housing zone, and arranging layouts so that most allotments within the conservation zone included an area within the housing zone, where any future dwelling would be located.

The most significant areas of the site in heritage terms have now been incorporated into a conservation area under Hawkesbury LEP 2012 as shown in **Figure 9**.

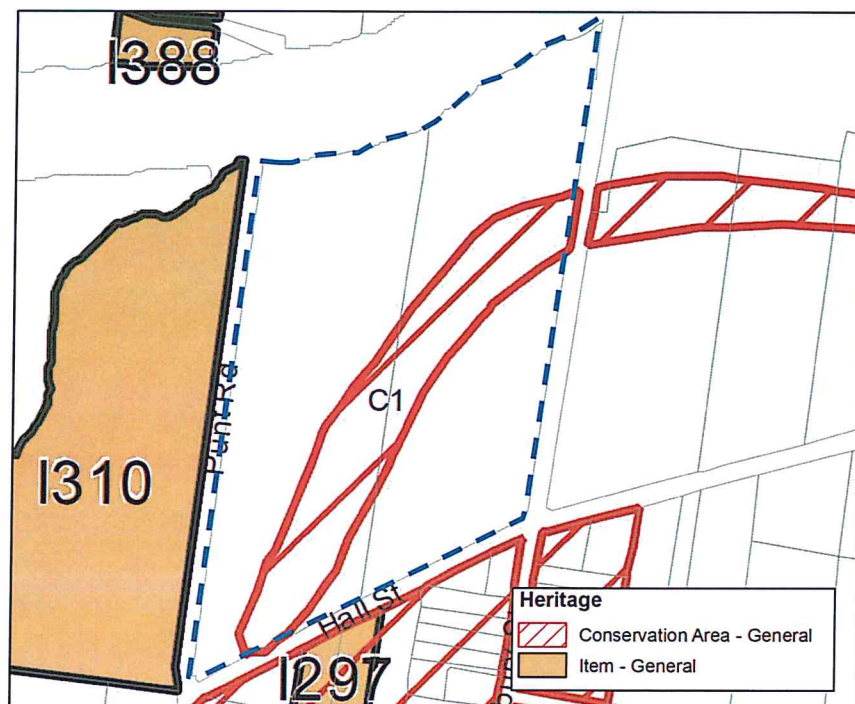


Figure 9: Extract from Hawkesbury LEP 2012 heritage map

At the time of the assessment of the original Concept Approval, the NSW Heritage Office recommended that the number of lots bordering on the western boundary of Blighton, facing the historically significant area known as the Pitt Town Bottoms (to the west of the site) be reduced from six lots (as proposed) to three lots to maintain the open vista of land that was formally part of Governor Bligh's Farm. This was implemented through Condition B2 imposed on the approval (refer to **Figures 3 and 4**).

Graham Brooks and Associates prepared a heritage assessment of the modification for Lot 12 and Archnex Designs prepared a Statement of Heritage Impact for the modification to Lot 11. Both assessments concluded that the change to the subdivision layout will have no material impacts on the heritage values of the area.

The proposed amended layout adopts an approach that is consistent with the heritage values of the original layout as approved in that:

- the smaller allotments are located in the south-east corner of the precinct, generally consistent with the housing zone recommended by the CMS;
- allotments fronting Punt Road are large allotments (at least 10,000m²) and there is no increase to the number of allotments fronting Punt Road, such that there would be no change to the 'open vista' of the area as compared to the approved layout; and
- as with the approved layout, the majority of allotments include some part of the land within the housing zone where future dwellings could be located.

The Statement of Commitments with the Concept Approval includes a number of commitments to heritage conservation including pursuing a Voluntary Conservation Agreement, preparation of a Heritage Interpretation Plan, and where necessary, archaeological salvage works. The modifications do not propose to amend any of the commitments.

Further, as with the existing approved layout, future applications under the modified scheme will need to give detailed consideration to the heritage impacts of the proposals and impacts to archaeological relics, and appropriate management and mitigation measures can be incorporated as part of those future applications.

The OEH does not raise a concern with the revised layout.

On this basis, the proposed change to the subdivision layout will not result in any unacceptable impacts to the heritage values of the precinct or the conservation area. The Department also recommends that Condition B2 be deleted as the modified layout provides 3 lots along the western boundary of Lot 11, consistent with the Heritage Council recommendation in the original Concept Approval.

5.3 Flooding

The approved subdivision layout ensures that all lots contain developable land above the 100 year flood level. Further, the statement of commitments included a commitment that all dwellings be located above the 100 year flood level of 17.3m.

The proposed modified subdivision layout also ensures that all residential allotments have a developable area for a dwelling to be built above the above the flood level. Flood free access is also provided to every allotment.

The modified proposal therefore will not result in any unacceptable flooding impacts.

5.4 Traffic and Road Layout

The proposed modifications will result in two minor changes in terms of traffic:

- an increase in local vehicle movements as a result of the two additional residential allotments (21 additional local vehicle movements per day, and 3 additional peak hour movements); and
- change in vehicle traffic flows on Hall Street and Hawkesbury Street as a result of the change from a through road to a cul-de-sac arrangement and increase in the number of allotments accessed solely from Hawkesbury Street (from four to nine).

One public submission raised concerns in relation to the regional road network including the need for the proposed by-pass to be initiated before any further development take place. The proposed modifications do not change the total area of land to be developed under the Concept Approval and the proposed increase in the number of allotments by 2 lots would have negligible impacts on the regional road network.

The Department has also assessed the impact on the immediately surrounding streets.

Hawkesbury Street is classified as a local street designed to carry a peak hour volume of 300 vehicles per hour. The traffic assessment submitted in conjunction with Modification 3 concludes that Hawkesbury Street will continue to operate below capacity (estimated at approximately 28 peak hour vehicle movements). In this regard, the Department notes that an additional six vehicles per hour (caused by the revised lot layout and increased number of lots with frontage to Hawkesbury Street) can be accommodated in Hawkesbury Street without any adverse impacts.

Hall Street is also a local street with a peak hour capacity 300 vehicles per hour. Hall Street is estimated to have a daily peak of more than 170 vehicle movements per hour after the area is developed. The minor increase in peak hour vehicle movements (an additional 2.6 vehicles per hour) as a result of these modifications would not be perceptible.

Therefore the proposal results in no material impacts to traffic.

The revised road layout also results in no adverse impacts. A small cul-de-sac arrangement is appropriate as only 10 allotments are serviced by the roadway. The road intersects with Hall Street at a similar location and at a similar angle to the approved road layout so that no additional issues arise with regard to safety. The final design will be subject to a future approval which will include detailed intersection design plans to the satisfaction of Council.

5.6 Open Space, Boating Facilities and Detention / Wetland Area

Transfer of Land for Open Space

The proposed modification to Lot 12 (Modification 3) seeks to create proposed Lot 12 as a public reserve consistent with the Concept Approval where it was designated as Open Space. However, the proponent also seeks that the public reserve lot be retained in private ownership and incorporated into adjoining Lot 1 (to be transferred at a later date if agreed with Council). The proponent advised this was because it is not known whether Council requires the land, or if Council will be able to maintain it.

The Office of Environment and Heritage raised concerns with this approach as the acquisition of this land formed part of the s94 contribution arrangements, the land provides an important buffer to the Hawkesbury River, it forms part of a riparian corridor and is proposed to be public open space.

The Department does not support any change to the designation of the land as Open Space under the Concept Approval as:

- the Council has not given any indication that they do not want to acquire the land;
- the Council's s94 contributions plans specifically makes provision for the land acquisition; and
- the land forms an important buffer and corridor along the Hawkesbury River providing environmental and public recreation benefits.

Therefore the recommended instrument does not include any changes to the Open Space designation.

Council have not advised that they want the allotment to be transferred to Council. There would be some appreciable cost and responsibility associated with maintaining the sediment basin and wetland. If Council does not want the sediment basin and wetland, it should be incorporated into the adjoining residential allotment/s, so that positive covenants can be imposed to ensure the maintenance and upkeep of the sediment basin and wetland.

The Department therefore recommends that proposed Lot 11 either be incorporated into the adjoining Lot 12, (the open space area) to be transferred to Council, subject to Council agreeing to this approach, or otherwise the land be incorporated into adjoining residential allotment/s.

5.7 State Infrastructure Contributions

Transport for NSW recommends that prior to the issue of a future approval by Council for the subdivision of the land, Council should seek written confirmation from the Department of Planning regarding arrangements for contributions to State Infrastructure. This is a current requirement under Hawkesbury LEP 2012 Clause 6.8, which applies to new lots less than 10,000m² and provides that

(4) Development consent must not be granted for the subdivision of land to which this clause applies unless the Director-General has certified in writing to the consent authority that satisfactory arrangements have been made to contribute to the provision of designated State public infrastructure in relation to that land.

The modification requests do not seek to amend this requirement and therefore it will be a requirement for Council to satisfy as part of the assessment of any future application for subdivision of the land.

6. CONCLUSION

The proposals seek to modify the Concept Approval to allow for a revised layout to the Blighton Precinct to allow each half of the precinct to be developed independently. The proposed modifications result in changes to road layout and allotments layouts as well an increase in residential density with two additional residential allotments on the site.

The Department has assessed the modifications on their merits and concludes that the changes to the allotment and road layouts, and the minor increase in density are acceptable. The modified layout has been designed to take account of the heritage and flooding constraints of the site and will not result in any adverse impacts in terms of traffic, infrastructure provision or any material impacts to the locality.

However the Department does not support changes to open space designation, or the proposed creation of a separate allotment for stormwater detention. These aspects of the modifications have therefore not been incorporated into the recommended conditions of approval.

The proposed modifications will enable the development of the Blighton Precinct to proceed in circumstances where the two separate landholders do not wish to, or are not able to develop their land in conjunction with one another.

It is therefore recommended that the modifications be approved in accordance with the modification instruments.

7. RECOMMENDATION

It is recommended that the Executive Director, Infrastructure and Industry Assessments:

- **consider** the findings and recommendations of this report;
- **approve** the modifications, subject to conditions, and;
- **sign** the attached instruments of modification at Appendix C.

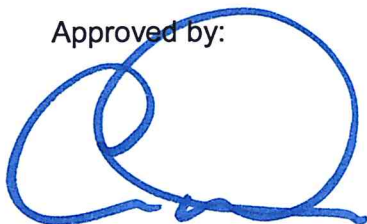
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Endorsed by:

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Amy Watson
Team Leader
Metropolitan Projects

Approved by:



19.12.14

Chris Wilson
Executive Director
Infrastructure and Industry Assessments

APPENDIX A MODIFICATION REQUESTS

See the Department's website at

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=6155

and

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=6447

APPENDIX B SUBMISSIONS

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APPENDIX C RECOMMENDED MODIFYING INSTRUMENTS
