



Elf Mushroom Farm & Substrate Plant Project

*Part 3A Modification
Assessment
(08_0255 MOD 3)*



December 2019

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Cover photo

Photomontage of the proposed noise barrier, seen from Mulgrave Road (Perram & Partners Pty Ltd 2018)

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Glossary

Abbreviation	Definition
AHD	Australian Height Datum
Council	Hawkesbury City Council
Department	Department of Planning, Industry and Environment
DP	Deposited Plan
EA	Environmental Assessment
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	Environmental Planning and Assessment Regulation 2000
EPA	Environment Protection Authority
FRNSW	Fire & Rescue NSW
Hawkesbury LEP	Hawkesbury Local Environment Plan
IN2	IN2 – Light Industrial
LEP	Local Environment Plan
LGA	Local government area
m	Metres
Minister	Minister for Planning and Public Spaces
MOD	Modification
NSW	New South Wales
Planning Secretary	Planning Secretary of the Department of Planning, Industry and Environment
Proponent	Elf Farm Supplies Pty Ltd
RTS	Response to Submissions
RU4	RU4 – Primary Product Small Lots
ST&OP Regulation	Environmental Planning and Assessment (Savings, Transitional and Other Provisions Regulation 2017)



Executive Summary

Introduction

This report provides an assessment of a request to modify the concept plan and project approval for the Elf Mushroom Farm and Substrate Plant Project (08_0255 Concept Plan and Project). The request was lodged on 8 May 2018 by Elf Farm Supplies Pty Ltd (the Proponent), pursuant to former section 75W of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The Elf Mushroom Farm and Substrate Plant Project (08_0255 Concept Plan and Project) provided approval for the following key works:

- the construction and operation of a new mushroom farm at 521 The Northern Road, Londonderry, located within the Penrith local government area (LGA)
- the expansion of an existing mushroom substrate plant at 108 Mulgrave Road, Mulgrave, located within the Hawkesbury LGA.

The Proponent's substrate plant has been in operation since 1981 under a number of consents issued by Hawkesbury City Council (Council) and, since 2012, the concept plan and project approval granted by the then Minister for Planning. It should be noted that while the project approval also permits the construction and operation of the Londonderry mushroom farm, the mushroom farm site is not subject to this modification request.

The substrate plant site is approximately 12.4 hectares (ha) in area, and comprises all of Lot 14 in Deposited Plan (DP) 1138749 and part of Lot 13 in DP 1138749. The site is bounded by Hawkesbury Valley Way to the north and east, the Richmond railway line to the south, and South Creek to the west. Land uses in the vicinity of the site include market gardens, turf farms, dairy farms, feedlots, grazing and sewage treatment. The nearest existing residential receiver is located approximately 200 metres (m) to the south of the site.

The Proponent is seeking to delete the two straw bale storage sheds from the approval and, in their place, construct a noise barrier and perimeter wall to demarcate the outdoor bale storage area. The modification request would also involve amendments to the substrate plant's stormwater management system (including the construction of a new detention basin and the redesign of Basin 2) and the retention of the western tree corridor.

Substrate Production

Mushroom substrate is the nutrient-rich growing medium used by mushroom farms for growing mushrooms. Raw materials used in substrate manufacture include wheaten straw, water, poultry manure, other recycled agricultural products, gypsum and dry stable bedding. Mushroom substrate production takes approximately six weeks, and comprises the following key stages:

1. **Bale Wetting** – Straw bales are sprayed with water to remove the waxy layer and increase water content
2. **Pre-Wet** – Wet straw bales are blended with raw materials and water
3. **Phase 1 Composting** – Pre-wet material is kept above 75° Celsius for at least 90 hours to complete the composting process
4. **Phase 2 Processing** – Pasteurisation process to kill unwanted spores and organisms in the finished compost product
5. **Phase 3 Processing** – Initial growth of mushroom spawn in the finished compost product.

Approval Authority

The then Minister for Planning was the approval authority for the original concept plan and project application. Consequently, the Minister for Planning and Public Spaces (the Minister) is the approval authority for the modification request.

However, as reportable political donations have been made by the Proponent in the two years prior to the lodgement of this modification, the request will be determined by the Independent Planning Commission (the Commission) in accordance with the Minister's Instrument of Delegation, dated 14 September 2011.

Environmental Assessment Requirements

Following submission of the Proponent's preliminary assessment on 8 March 2017, the Department prepared environmental assessment requirements (EARs) for the modification request. These requirements were issued to the Proponent on 4 April 2017, and prepared in consultation with Council, the EPA, the Department of Primary Industries (DPI) and Fire and Rescue NSW (FRNSW).

The EARs informed the preparation of the Proponent's Environmental Assessment (EA), which was lodged with the Department on 8 May 2018.

Engagement

The Department publicly exhibited the modification request from Monday 21 May 2018 until Monday 4 June 2018 (14 days). A total of five submissions were received, including one from Council, two from public authorities and two from the general public. Of the five submissions, one objected to the development.

Key issues raised by the general public related to the management of fill material, ongoing community consultation, fire safety, the storage and ongoing use of sulfuric acid (used in the substrate plant's odour management system) and the legal description of the substrate plant site.

Response to Submissions

The Proponent subsequently provided a Response to Submissions (RTS) to the issues raised by the Department, Council, the relevant public authorities and the general public. The RTS included additional details regarding the potential noise impacts of the modification request and the design of the stormwater management system.

The Proponent also amended the modification request to address concerns raised by Council and the relevant public authorities. The amendments included:

- an increase in the size of the southern noise barrier's setback (from 0.4 m to 1 m), to provide access for maintenance staff
- minor amendments to the design of the stormwater detention basins, following completion of additional MUSIC modelling
- inclusion of stormwater isolation valves within each stormwater detention basin, in accordance with the EPA's recommendation.

The RTS was provided to Council and the EPA to consider whether it adequately addressed the key issues raised during the exhibition period. The Department also undertook direct consultation with Sydney Trains at this time, following the recommendation made by Council in its original submission.

Evaluation

The Department has assessed the modification request in accordance with the relevant requirements of the EP&A Act, and considered the submissions made by Council, the relevant public authorities and the general public. The Department considers the modification request is appropriate on the basis that:

- the primary function and purpose of the approved project would not change as a result of the modification
- the approved production capacity of the substrate plant site would not change as a result of the modification
- the expansion and ongoing use of the outdoor bale storage area would ensure straw bales remain readily accessible by firefighting crews, should another fire occur
- the amended stormwater management system will continue to ensure peak stormwater pollutant loads and discharge rates from the substrate plant site do not exceed pre-project levels
- the western tree corridor will assist in improving the visual impact of the substrate plant by screening on-site buildings and structures when viewed from the west.

Consequently, the Department considers the modification request should be approved, subject to conditions.



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1. Introduction

This report provides an assessment of a request to modify the concept plan and project approval for the Elf Mushroom Farm and Substrate Plant Project (08_0255 Concept Plan and Project). The request was lodged on 8 May 2018 by Elf Farm Supplies Pty Ltd (the Proponent), pursuant to former section 75W of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The modification request seeks approval for minor alterations to the mushroom substrate plant's outdoor bale storage area, amendments to the stormwater management system, and retention of the western tree corridor.

The concept plan and project approval were originally approved under Part 3A (now repealed) of the EP&A Act. This means the project satisfies the definition of a 'transitional Part 3A project' under clause 2(1) Schedule 2 to the Environmental Planning and Assessment (Savings, Transitional and Other Provisions) Regulation 2017 (ST&OP Regulation), which came into effect on 1 March 2018.

Under the ST&OP Regulation, projects which are the subject of existing Part 3A approvals remain transitional Part 3A projects until they are transitioned to State significant development (clause 3(1)-(2), Schedule 2). Part 3A concept plans and project approvals may be modified under section 75W of the EP&A Act in certain circumstances if the request was made before the 'cut-off date' of 1 March 2018.

As the request to modify the concept plan and project approval was submitted before 1 March 2018, the provisions of clause 3 of Schedule 2 to the ST&OP Regulation apply. Consequently, this report has been prepared in accordance with the requirements of Part 3A and associated regulations, and the Minister for Planning and Public Spaces (or his delegate) can be satisfied that the concept plan and project approval may be modified under section 75W of the EP&A Act.

1.1 Background

The Elf Mushroom Farm and Substrate Plant Project (08_0255 Concept Plan and Project) provided approval for the following key works:

- the construction and operation of a new mushroom farm at 521 The Northern Road, Londonderry, located within the Penrith local government area (LGA)
- the expansion of an existing mushroom substrate plant at 108 Mulgrave Road, Mulgrave, located within the Hawkesbury LGA.

The mushroom farm site is operated by Elf Mushrooms, while the mushroom substrate plant site is operated by the Proponent. Both companies are separate and are owned by members of the Tolson family, who have been producing mushrooms in western Sydney for more than 40 years. Family members also operate two other mushroom farms located in Vineyard and Glossodia respectively, as well as a packing and distribution company (co-located with the Vineyard mushroom farm).

The Proponent's substrate plant has been in operation since 1981 under a number of consents issued by Hawkesbury City Council (Council) and, since 2012, the concept plan and project approval granted by the then Minister for Planning. It should be noted that while the project approval also permits the construction and operation of the Londonderry mushroom farm, the mushroom farm site is not subject to this modification request.

1.1.1 Substrate Plant Site

The Proponent currently operates the mushroom substrate plant at 108 Mulgrave Road, Mulgrave, in the Hawkesbury LGA (see **Figure 1**). The site is approximately 12.4 hectares (ha) in area, and comprises all of Lot 14 in Deposited Plan (DP) 1138749 and part of Lot 13 in DP 1138749.

The site is bounded by Hawkesbury Valley Way to the north and east, the Richmond railway line to the south, and South Creek to the west. Land uses in the vicinity of the site include market gardens, turf farms, dairy farms, feedlots, grazing and sewage treatment. The nearest existing residential receiver is located approximately 200 metres (m) to the south of the site (see **Figure 2**).

The site is part of a wide band of rural land within the South Creek floodplain, and has been filled to a level of 16 m Australian Height Datum (AHD).

1.1.2 Substrate Production

Mushroom substrate is the nutrient-rich growing medium used by mushroom farms for growing mushrooms. Raw materials used in substrate manufacture include wheaten straw, water, poultry manure, other recycled agricultural products, gypsum and dry stable bedding. Mushroom substrate production takes approximately six weeks, and is detailed in **Table 1** below.

Table 1 | Stages of mushroom substrate production

Stage	Process description
1. Bale Wetting	Straw bales are sprayed with water in the bale wetting area for several days to remove the waxy layer and increase water content. Water draining from the bales is collected, filtered, aerated and re-circulated via the sprayer system.
2. Pre-Wet	The wet straw bales are laid out in rows in the pre-wet building and blended with raw materials and water.
3. Phase 1 – Composting	<p>The pre-wet material is placed into a Phase 1 tunnel (a concrete structure some 50 metres long by 8 metres wide). The material must remain above 75° Celsius for at least 90 hours to enable the process to reach completion. Part way through the process the tunnel is emptied and the contents placed in a hopper. Water is then added to the hopper, and the mix is returned by conveyor to an empty tunnel.</p> <p>The finished Phase 1 product is then either loaded into trucks for delivery (as Phase 1 substrate), or transferred to the Phase 2/3 tunnel building for further processing.</p>
4. Phase 2 – Processing	Phase 2 is a pasteurisation process undertaken at high temperature on finished compost, to kill unwanted spores and organisms.
5. Phase 3 – Processing	Phase 3 is the initial growth of mushroom spawn from introduced mycelium, undertaken in controlled atmospheric conditions.

1.1.3 Current Modification Request

The Proponent is seeking to delete the two straw bale storage sheds from the approval and, in their place, construct a noise barrier and perimeter wall to demarcate the outdoor bale storage area. The modification request would also involve amendments to the substrate plant's stormwater management system (including the construction of a new detention basin and the redesign of Basin 2) and the retention of the western tree corridor. The modification request is described in further detail in **Section 2** below.

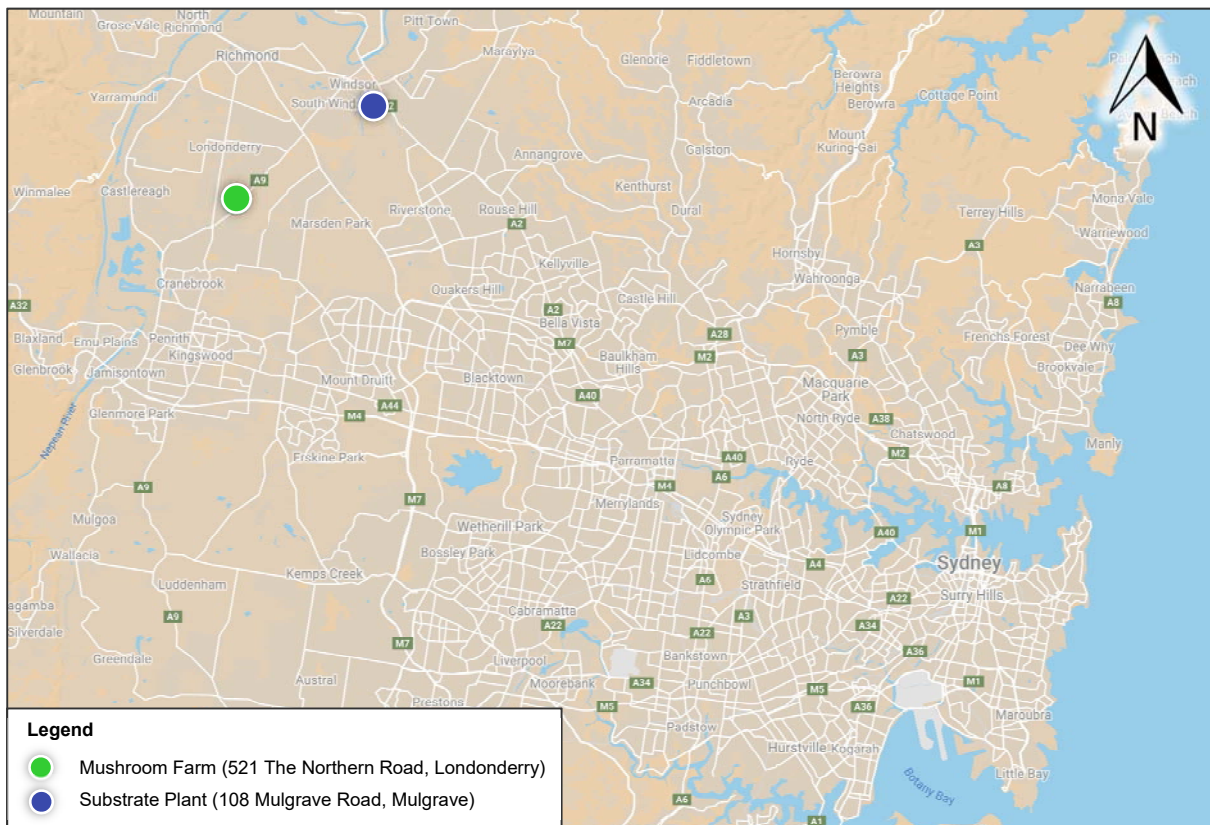


Figure 1 | Site context – Mushroom farm and substrate plant



Figure 2 | Site location – Substrate plant

1.2 Approval History

1.2.1 Concept Plan

On 11 January 2012, a concept plan was approved by the then Acting Deputy Director-General, as delegate of the then Minister for Planning, for the expansion of the existing Mulgrave substrate plant. At the time, the substrate plant site was zoned Rural Living under the Hawkesbury Local Environment Plan (LEP) 1989, which prohibited the construction and operation of rural industries within this zone. Consequently, the concept plan facilitated the continued use of the site, and its subsequent expansion under the project approval.

The Hawkesbury LEP 1989 was repealed on 21 September 2012, and the portion of the Mulgrave site containing the substrate plant is now zoned Light Industrial (IN2) under the Hawkesbury LEP 2012. Rural industries, including mushroom substrate plants, are permissible with consent in the IN2 zone.

On 14 March 2016, a section 75W modification to the concept plan was granted by the then Planning Assessment Commission, as delegate of the Minister for Planning. The modification facilitated the expansion of the substrate plant site (for two new biofilters), onto land zoned Primary Product Small Lots (RU4), as rural industries are prohibited in the RU4 zone.

1.2.2 Project Approval

On 11 January 2012, project approval was also granted by the then Acting Deputy Director-General, as delegate for the Minister for Planning, for the construction and operation of the Londonderry mushroom farm and the staged expansion of the existing Mulgrave substrate plant. As discussed in **Section 1.1** above, the mushroom farm site is not subject to this modification request.

At the substrate plant site, the project approval permits the following works:

- extension of the pre-wet building
- two additional Phase 1 tunnels
- two storage sheds for baled straw
- a second bale wetting area
- a second Phase 2/3 tunnel building containing 22 tunnels and a storage tunnel
- a second bio-scrubber with chimney dedicated to treating air exhausted from the pre-wet building
- other alterations and additions, including a conveyer to transport pre-wet material to the Phase 1 tunnels, site access upgrades, parking and drainage systems (see **Figure 3**).

The project approval included the construction of two straw bale storage sheds in the south-eastern portion of the substrate plant site (see **Figure 3**). These sheds have not been constructed to date, with straw bales instead being stored in the open air within the footprint of the approved sheds.

1.2.2.1 Substrate Plant Production Capacity

The project approval permits the progressive expansion of the substrate plant's production capacity over four stages, with each stage being subject to the approval of the Planning Secretary:

- **Stage 1:** 1,000 tonnes of substrate per week (initial production capacity)
- **Stage 2:** 1,600 tonnes of substrate per week (approved 11 July 2013)
- **Stage 3:** 2,400 tonnes of substrate per week (current production capacity)
- **Stage 4:** 3,200 tonnes of substrate per week.

On 31 October 2019, a request by the Proponent to increase substrate production to 2,400 tonnes per week was approved in accordance with the conditions of the Minister's approval.

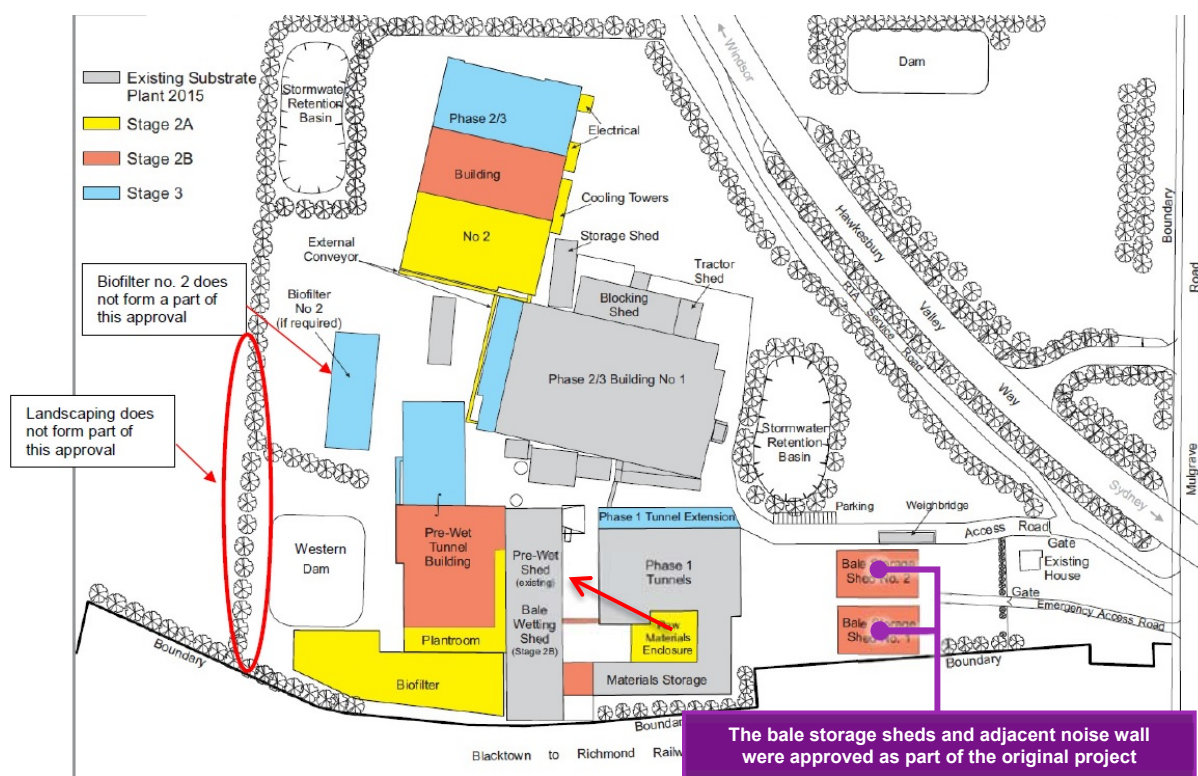


Figure 3 | Overview of the approved project (as modified)

1.2.2.2 Modifications to the Project Approval

The project approval has been the subject of two previous modifications to improve the operational efficiency of the substrate plant and the mushroom farm. A summary of each modification is provided in **Table 2** below.

Table 2 | Summary of modifications to the project approval

MOD Number	Summary of Modifications	Approval Date
MOD 1	<p>The modification related to the substrate plant site, and permitted:</p> <ul style="list-style-type: none"> a new odour management system, including a biofilter and six ammonia scrubbers six additional phase 2/3 tunnels continued use of fill associated with the biofilter pad (see Figure 3). 	14 March 2016
MOD 2	<p>The modification related to the mushroom plant site, and included:</p> <ul style="list-style-type: none"> reconfiguration and expansion of the approved mushroom growing building redesigned truck access routes, water storage management, effluent disposal, landscaping areas, and parking spaces amendment of the approved staging plan, from five to six stages. 	4 November 2019



2. Modification Request

On 8 May 2018, the Proponent lodged a modification request under the former section 75W of the EP&A Act for the Elf Mushroom Farm and Substrate Plant Project (08_0255 MOD 3). The modification request is described in full in the Environmental Assessment (EA) included in **Appendix B** and is illustrated in **Figure 4** to **Figure 7** below.

The modification request proposes the following:

- deletion of the two straw bale storage sheds from the project approval, and the subsequent expansion of the existing outdoor bale storage area
- design amendments to the approved southern noise barrier
- construction of a new perimeter wall to separate the outdoor bale storage area from the site's weighbridge and fuel storage tank
- amendments to the substrate plant's stormwater management system, including the construction of a new detention basin and the redesign of Basin 2
- retention of the existing western tree corridor.

The changes proposed under the subject modification request are described in further detail below.

2.1 Outdoor Bale Storage Area

Under the project approval, the original design of the substrate plant included the construction of two straw bale storage sheds in the south-eastern portion of the site, adjacent to the weigh bridge (see **Figure 3**). Neither shed has been constructed to date, and straw bales are currently stored in the location of the approved sheds pending their use in the substrate production process.

In November 2016, a fire occurred in the outdoor bale storage area. Following the conclusion of the fire, the Proponent noted firefighting efforts would have been significantly hampered had the bales been stacked in the approved storage sheds. Consequently, the Proponent is seeking to delete the two straw bale storage sheds from the approval and instead expand the existing outdoor bale storage area.

The expansion would require the importation of up to 2,250 m³ of fill to raise the south-western corner of the site to the finished floor level of the storage area (16 m AHD). Once complete, the expanded bale storage area would have a hardstand area of approximately 6,720 m² (see **Figure 4**).

The expansion and ongoing use of the outdoor bale storage area would also require the construction of an amended southern noise barrier and northern perimeter wall. These modifications are described in further detail in **Sections 2.1.1** and **2.1.2** below.

2.1.1 Southern Noise Barrier

Under the project approval, the original design of the substrate plant included the construction of a 7 m high noise wall along the southern boundary of the site, designed to mitigate potential noise impacts associated with the use of the bale wetting area. This noise wall is no longer required, as 08_0255 MOD 1 permitted the relocation of the bale wetting area to the existing pre-wet shed.

However, as a result of the deletion of the two straw bale storage sheds, the Proponent proposes to construct a new noise barrier along the southern and eastern boundaries of the outdoor bale storage area. The Proponent has advised the new noise barrier is required to ensure any potential noise impacts associated with the use of the bale storage area are appropriately mitigated.

The noise barrier would have a height of 4 m above the finished surface of the outdoor bale storage area. Given the land adjacent to the substrate plant site is lower than the storage area, the noise barrier would appear up to 8 m high when viewed from the south and east. The noise barrier would be constructed using pre-cast concrete panels inserted between steel columns, and would also act as a retaining wall.

2.1.2 Northern Perimeter Wall

The modification request also proposes the construction of a northern perimeter wall to separate the outdoor bale storage area from the adjacent weighbridge and fuel storage tank (see **Figure 4**). The perimeter wall would be approximately 50 m in length, and would be separated by a distance of 2 m to the weighbridge and 6 m to the fuel storage tank. For consistency, the wall would be of an identical height and design to the proposed southern noise barrier (see **Section 2.1.1** above).

The Proponent has advised the perimeter wall will ensure straw bales are separated from the weighbridge and fuel storage tank to reduce the risk to these assets in the event of another fire.

2.2 Stormwater Management System

The substrate plant site is divided into five stormwater catchments which drain:

- west, to South Creek
- south, under the Richmond railway line
- north-east, under Hawkesbury Valley Way.

Stormwater captured in the central hardstand area of the site is drained to a recycling pit and then reused during normal plant operations. Under the project approval, the original design of the stormwater management system included the conversion of two existing sediment basins into stormwater detention basins (known as Basin 1 and Basin 2), the construction of a bio basin (adjoining Basin 2) and the installation of a reed bed adjoining the north-eastern farm dam. As of December 2019, the approved stormwater management system has not yet been constructed.

As outlined in **Section 2.1** above, the additional fill used in the south-eastern corner of the outdoor bale storage area will increase the amount of handstand within the southern stormwater catchment. In addition, changes made to the substrate plant site layout as part of MOD 1 have resulted in a reduction in the size of the north-western catchment, and a subsequent increase in the size of the western catchment.

In order to ensure stormwater flows from the substrate plant site do not exceed the pre-project discharge rate, the Proponent is seeking to:

- reduce and reconfigure Basin 2, incorporating a bio filter, on-site detention basin and sedimentation basin into one structure
- construction of a new south-western basin (Basin 3), incorporating a discharge control pit, bio filter and sedimentation basin (see **Figure 5**).

The Proponent has advised that the amended stormwater management system would reduce pollutant loads from the site and direct a greater volume of stormwater to the western discharge point. This would subsequently improve the balance of stormwater directed to each catchment area and reduce the length of stormwater piping required to service the substrate plant site.

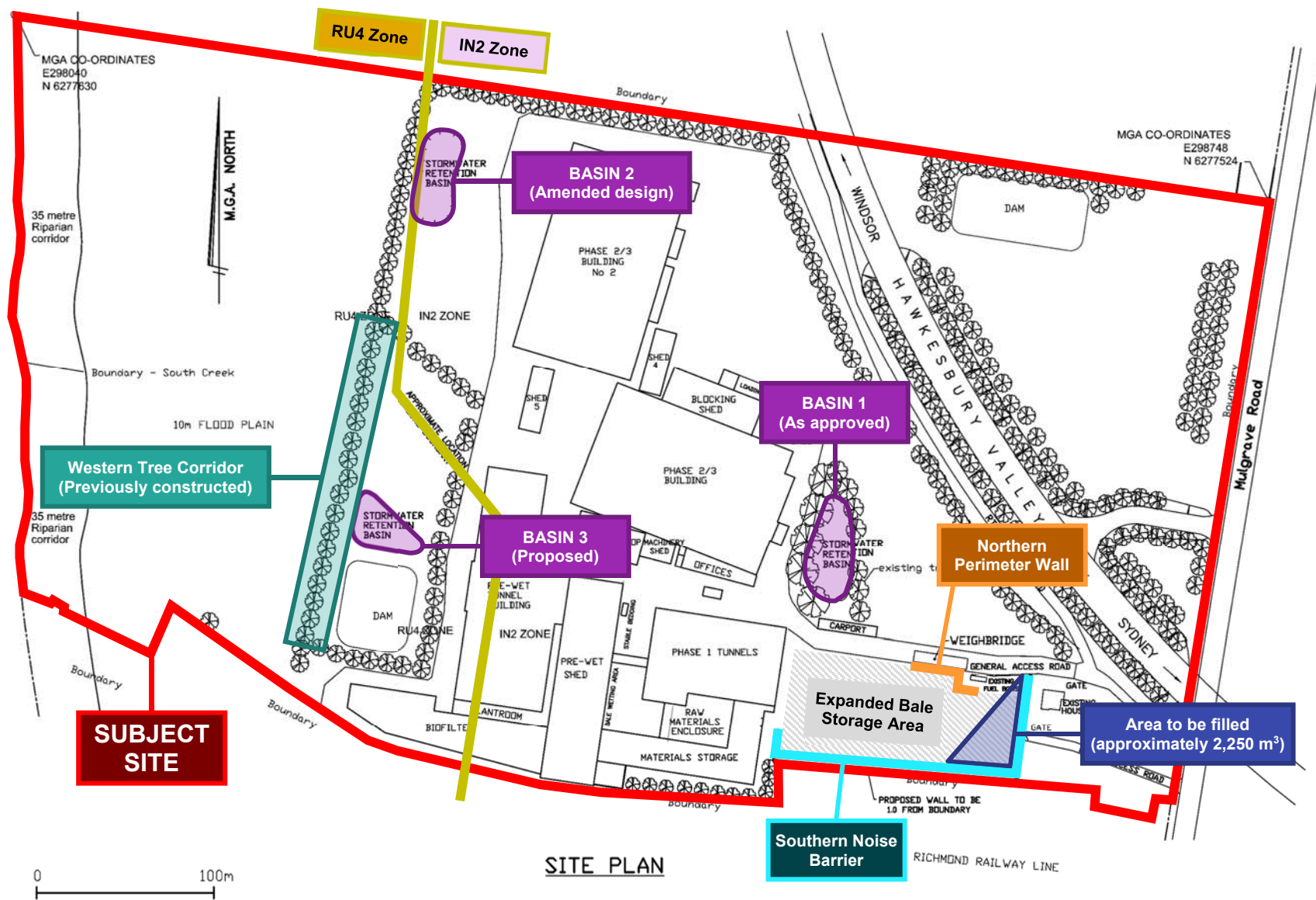


Figure 4 | Overview of proposed modifications to the substrate plant site

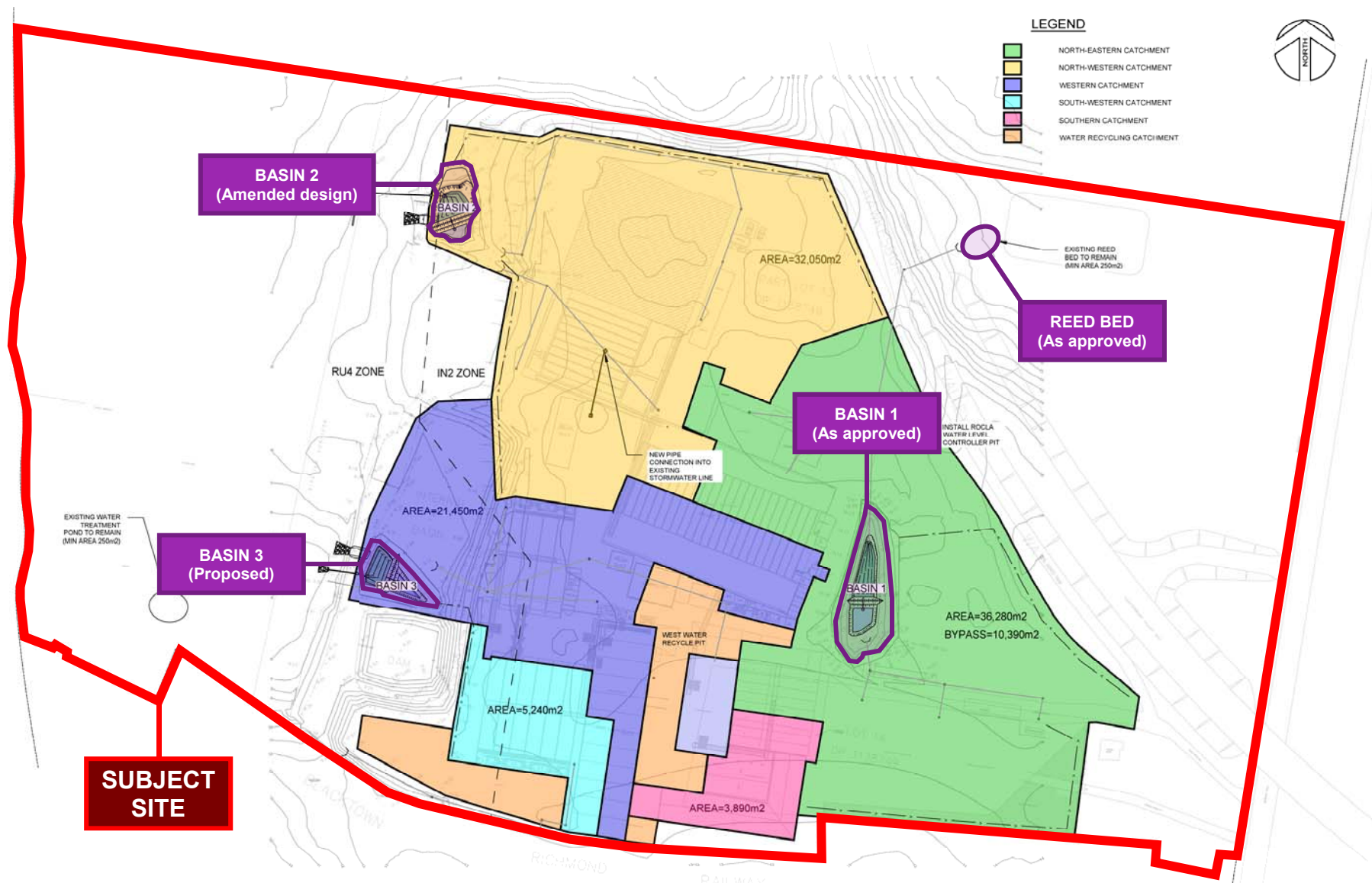


Figure 5 | Overview of proposed stormwater management system

2.3 Western Tree Corridor

In February 2015, the Proponent commenced construction of a mounded tree corridor located along the western boundary of the substrate plant site (see **Figure 4**). The corridor was designed to reduce the visibility of batters and structures approved under 08_0255 MOD 1, and to complement existing screening already established in the north-western section of the site. The Proponent is subsequently seeking approval for the western tree corridor as part of the subject modification request.

The tree corridor comprises a raised mound approximately 10 m wide by 110 m long, and was constructed using approximately 4,100 m³ of excavated natural material sourced from a development site in Breakfast Point. The corridor was planted with approximately 2,000 tubestock plants and incorporates trees and shrub species which are typically found in a riparian zone.

Vehicular access is available along the crest of the corridor to service the landscaped area and the adjoining dam. A swale is located at the northern end of the corridor to allow the area to drain naturally, while stormwater from the western discharge point passes through a 150 millimetre (mm) pipe beneath the mound. This pipe would be replaced with a 240 mm pipe during construction of Basin 3 (see **Section 2.2** above).



Figure 6 | Looking east, towards the tree corridor



Figure 7 | Species planted in the tree corridor

2.4 Amendments to the Concept Plan

Under the Hawkesbury LEP 2012, the mushroom substrate site is zoned IN2 – Light Industrial and substrate production is permissible with consent. However, the western tree corridor, the new stormwater detention basin (Basin 3) and the redesigned Basin 2 are located on land zoned RU4 – Primary Production Small Lots (see **Figure 4**). Rural industries are not permissible with consent in the RU4 zone.

Under the former section 80(1) of the Environmental Planning and Assessment Regulation 2000 (the EP&A Regulation), approval for the carrying out a project which is partially prohibited can only be given where there is a concept plan in place.

Consequently, the Proponent is seeking to modify the concept plan to permit the use of the stormwater management system and the retention of the western tree corridor within the RU4 zone.



3. Strategic Context

3.1 Greater Sydney Region Plan

The vision of the Greater Sydney Region Plan 2018, *A Metropolis of Three Cities* falls within the integrated planning framework for Sydney (see **Figure 8**) and seeks to meet the needs of a growing and changing population by transforming Greater Sydney into a metropolis of three cities – the Western Parkland City, the Central River City and the Eastern Harbour City. It brings new thinking to land use and transport patterns to boost Greater Sydney’s liveability, productivity and sustainability by spreading the benefits of growth.

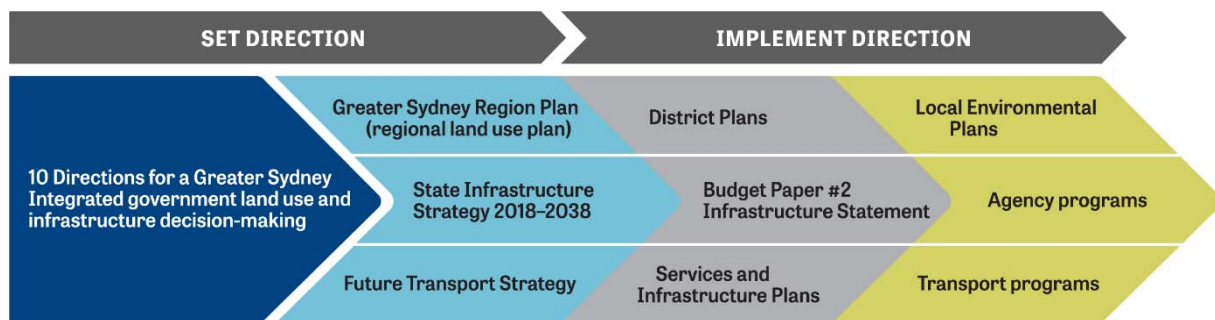


Figure 8 | Integrated Planning for Greater Sydney

The modification request would continue to support the directions and objectives of the Plan by ensuring:

- the site is retained and managed as a mushroom substrate production plant (see Objective 23)
- agricultural production jobs are retained within the Metropolitan Rural Area (see Strategy 23.1)
- the substrate plant site is not compromised by encroachment from incompatible land uses (see Strategy 24.3).

3.2 Western City District Plan

The Greater Sydney Commission has released six district plans encompassing Greater Sydney, which will guide the delivery of *A Metropolis of Three Cities*. The substrate plant site is located in the Western City District, which is the central and major component of the Western Parkland City.

The modification request is consistent with the priorities and actions set out in the Western City District Plan as the site would continue to:

- be retained and managed as a mushroom substrate production plant (see Planning Priority W10 and associated actions)
- support the Hawkesbury region’s ongoing role as the centre of Sydney’s mushroom-growing industry (see Planning Priority W17 and associated actions).



4. Statutory Context

4.1 Scope of Modifications

The concept plan and project approval were originally approved under Part 3A (now repealed) of the EP&A Act. This means the project satisfies the definition of a 'transitional Part 3A project' under Schedule 2, clause 2(1) to the ST&OP Regulation, which came into effect on 1 March 2018.

Under the ST&OP Regulation, the power to modify transitional Part 3A projects under former section 75W of the EP&A Act as in force immediately before its repeal on 1 October 2011 is being wound up – but as the request for this modification was made before the 'cut-off date' of 1 March 2018, the provisions of Schedule 2, clause 3 continue to apply.

The Department notes that:

- the primary function and purpose of the approved project would not change as a result of the modification
- the modification is of a scale that warrants the use of former section 75W of the EP&A Act
- the approved production rates of substrate would remain unchanged as a result of the modification
- any potential environmental impacts would be appropriately managed through the existing or modified conditions of approval.

Therefore, the Department is satisfied the modification request is within the scope of former section 75W of the EP&A Act and does not constitute a new development application. Accordingly, the Department considers that the request should be assessed and determined under former section 75W of the EP&A Act rather than requiring a new development application to be lodged.

4.2 Approval Authority

The then Minister for Planning was the approval authority for the original concept plan and project application. Consequently, the Minister for Planning and Public Spaces (the Minister) is the approval authority for the modification request.

However, as reportable political donations have been made by the Proponent in the two years prior to the lodgement of this modification, the request will be determined by the Independent Planning Commission (the Commission) in accordance with the Minister's Instrument of Delegation, dated 14 September 2011.



5. Engagement

5.1 Environmental Assessment Requirements

Following submission of the Proponent's preliminary assessment on 8 March 2017, the Department prepared environmental assessment requirements (EARs) for the modification request. These requirements were issued to the Proponent on 4 April 2017, and prepared in consultation with Council, the EPA, the Department of Primary Industries (DPI) and Fire and Rescue NSW (FRNSW).

The EARs informed the preparation of the Proponent's Environmental Assessment (EA), which was lodged with the Department on 8 May 2018.

5.2 Consultation

Under the former section 75W of the EP&A Act, the Department is not required to notify or exhibit the modification request. However, due to the potential for public interest in the proposal, the Department exhibited the request from **Monday 21 May 2018** until **Monday 4 June 2018**:

- on the Department's website
- at the Department's Sydney office (Pitt Street, Sydney)
- at all NSW Service Centres
- at Council's offices (George Street, Windsor).

The modification request was advertised in the Penrith Western Weekender and the Hawkesbury Gazette. Previous submitters were notified of the modification request and invited to make a submission. The modification request was also referred to Council, the EPA, the Department of Industry – Crown Lands and Water (DICLW) and FRNSW for comment.

During the exhibition period, a total of five submissions were received, including one from Council, two from public authorities and two from the general public. Of the submissions received, one objected to the request. A summary of the issues raised in the submissions is provided below, with a copy of each submission included in **Appendix B**.

5.3 Submissions

5.3.1 Council and Public Authorities

Council did not object to the modification request, but raised concerns in relation to construction within the floodplain, stormwater and wastewater management, noise and odour impacts, visual impacts, heritage impacts, payment of developer contributions, provision of a performance, damage and defects bond and impacts to Council's road network.

Council also recommended the Department consult with Sydney Trains and the Federal Department of Defence, given the substrate plant is located adjacent to the Richmond railway line and under the flight path of the Richmond Air Force Base.

The **EPA** emphasised that the Proponent must ensure any fill material brought to the substrate plant site is sourced and applied in accordance with the relevant requirements of the EP&A Act and the *Protection of the Environment Operations Act 1997*. The EPA also recommended the amended stormwater system incorporate stormwater

isolation valves to facilitate the capture of accidental spills, including those which may occur in the vicinity of workshop areas and the on-site fuel storage tank.

The **DICLW** did not object the modification request, but recommended the Proponent prepare a vegetation management plan for the rehabilitation of riparian vegetation along South Creek. The Department notes the Proponent is no longer proposing to alter the riparian corridor (as outlined in its January 2017 request) and, as such, consideration of such a plan is outside the scope of this assessment.

In addition, the project approval requires the Proponent consult with Greater Sydney Local Land Services (formerly the Hawkesbury-Nepean Catchment Management Authority) during the establishment of the riparian corridor, to ensure appropriate species and best practice techniques are implemented.

FRNSW did not provide a response.

5.3.2 General Public

During the exhibition period, the Department received two submissions from the general public, one of which objected to the modification request.

Key issues raised by the general public related to the management of fill material, ongoing community consultation, fire safety, the storage and ongoing use of sulfuric acid (used in the substrate plant's odour management system) and the legal description of the substrate plant site.

5.4 Response to Submissions

The Proponent provided a Response to Submissions (RTS) to the issues raised by the Department, Council, the relevant public authorities and the general public. The RTS included additional details regarding the potential noise impacts of the modification request and the design of the stormwater management system.

The Proponent also amended the modification request to address concerns raised by Council and the relevant public authorities. The amendments included:

- an increase in the size of the southern noise barrier's setback (from 0.4 m to 1 m), to provide access for maintenance staff
- minor amendments to the design of the stormwater detention basins, following completion of additional MUSIC modelling
- inclusion of stormwater isolation valves within each stormwater detention basin, in accordance with the EPA's recommendation.

The RTS was provided to Council and the EPA to consider whether it adequately addressed the key issues raised during the exhibition period. The Department also undertook direct consultation with Sydney Trains at this time, following the recommendation made by Council in its original submission.

The responses received from Council and the relevant public authorities are summarised as follows:

- **Council** reiterated its concerns in relation to construction within the floodplain, payment of developer contributions, provision of a performance, damage and defects bond and impacts to Council's road network.
- **Sydney Trains** raised concerns regarding the potential impacts of the modification request upon the Richmond railway line. The authority subsequently recommended conditions to ensure the project does not impact upon the rail corridor and its associated easements.
- The **EPA** did not provide a response.



6. Assessment

The Department has assessed the merits of the modification request. During this assessment, the Department has considered the:

- EA and RTS provided to support the modification request (see **Appendix B**)
- assessment reports for the original project and subsequent modification requests
- existing conditions of approval (as modified)
- submissions received from Council, the relevant public authorities and the general public (see **Appendix B**)
- relevant environmental planning instruments, policies and guidelines
- requirements of the EP&A Act, including the objects of the EP&A Act.

As the modification request is primarily minor in nature and does not seek to change the production capacity of the site, the original studies assessed as part of the original project and subsequent modifications are considered to remain valid for this modification request.

6.1 Visual impact

The proposed amendments to the southern noise barrier and the ongoing use of the western tree corridor have the potential to increase the visual impact of the substrate plant.

The Department notes visual impact was assessed as part of the original project and MOD 1, both which concluded the new buildings to be constructed at the site would be commensurate to the existing facility and, as such, would result in minimal change to the visual impact of the substrate plant on surrounding residences. To mitigate potential visual impacts associated with MOD 1, the Department recommended the Proponent establish landscaping around the site of the biofilter as soon as practicable.

In support of the amendments to the southern noise barrier and the ongoing use of the western tree corridor, the Proponent's EA included an updated assessment of the substrate plant's visual impact. The Proponent's assessment concluded:

- the 4 m high southern noise barrier would have a reduced visual impact when compared to the original project, as the bale storage sheds it will replace would have had a roof height of 10 m and a wall height of 7.3 m
- the western tree corridor would have a reduced visual impact when compared to the original project, as it will help to screen the substrate plant's buildings and structures when viewed from the west.

During the exhibition period, Council raised concerns regarding the visual impact of the southern noise barrier on the overall appearance of the locality and on adjoining land uses.

The Proponent's RTS included photomontages comparing the approved bale storage sheds with the proposed southern noise barrier (see **Figure 9** and **Figure 10**). The RTS subsequently reiterated that the southern noise barrier would have a reduced visual impact when compared to the taller and more dominant bale storage sheds which were approved under the original project. Council did not provide any further comments in relation to visual impact.

The Department is satisfied the modification request will assist in improving the visual impact of the substrate plant, given the southern noise barrier would be less than half the height of the approved bale storage sheds. In addition,

potential visual impacts associated with the project will continue to reduce over time as the western tree corridor reaches maturity.

The Department’s assessment concludes the visual impacts of the proposed amendments are negligible and can be managed through the development’s Construction Environmental Management Plan (CEMP) and Operational Environmental Management Plan (OEMP). The Department has also recommended a condition of consent to ensure the western tree corridor is maintained for the life of the project.



Figure 9 | Photomontage from the property boundary, comparing the approved bale storage sheds (left) with the proposed southern noise barrier (right)



Figure 10 | Photomontage from the intersection of Mulgrave Road and Railway Road South, comparing the approved bale storage sheds (left) with the proposed southern noise barrier (right)

6.2 Other Issues

The Department’s assessment of other issues is provided in **Table 3** below.

Table 3 | Assessment of other issues

Assessment	Recommendation
Flooding	
<ul style="list-style-type: none">The substrate plant site is part of a wide band of rural land within the South Creek floodplain, and has been filled to a level of 16 m AHD.In its submission, Council raised concerns regarding the importation of fill material to construct the western tree corridor and the expansion of the outdoor bale storage area.	<p>Require the Proponent:</p> <ul style="list-style-type: none">use flood-compatible materials during the construction of any structures built

Assessment	Recommendation
<ul style="list-style-type: none"> The Department notes flooding impacts were assessed as part of the original project, which concluded the expansion of the substrate plant's footprint by approximately 1.6 ha would not increase flood levels at adjacent properties. The Proponent's EA included an addendum flood assessment by GRC Hydro, which concluded the area of filling required to facilitate the project, including the additional fill required to construct the western tree corridor and the expansion of the outdoor bale storage area, would not exceed 1.6 ha. Given the above, the Department is satisfied the additional filling required to facilitate the modification request, including the fill material previously used in the construction of the western tree corridor, would not increase flood levels at adjacent properties. In its submission, Council also recommended a condition requiring the use of flood-compatible materials during the construction of any structures built below the 100-year average recurrence interval (ARI) flood level. The Department has incorporated Council's request into the recommended conditions. The Department's assessment concludes the potential flooding impacts of the modification request are negligible, subject to the implementation of the recommended conditions of approval. 	below the 100-year ARI flood level.

Stormwater management

<ul style="list-style-type: none"> In support of the amendments to the approved stormwater management system, the Proponent's EA included a Stormwater Management Report (SMR) for the substrate plant site. During the exhibition period, Council requested further information regarding the water quality control measures to be implemented, while the EPA recommended the Proponent incorporate stormwater isolation valves into the design of the stormwater management system. Following the completion of additional MUSIC modelling as part of its RTS, the Proponent undertook minor amendments to the design of the stormwater detention basins, including the provision of stormwater isolation valves into each basin in accordance with the EPA's requirements. The Proponent's RTS concluded the amended stormwater management system would achieve the stormwater quality targets established in Council's development control plan. Council and the EPA did not provide any further comments in relation to stormwater. The Department is satisfied the amended stormwater management system is appropriate on the basis that: <ul style="list-style-type: none"> the amended system would have sufficient stormwater detention capacity to cater for a 1 in 100-year storm event the amended system would ensure peak stormwater discharge rates do not exceed pre-project levels 	<p>Require the Proponent:</p> <ul style="list-style-type: none"> update the substrate plant's WMP to reflect the amended stormwater management system.
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Assessment	Recommendation
<ul style="list-style-type: none"> o the updated MUSIC modelling shows pollutant loads from the site would achieve Council's stormwater quality targets. • The Department's assessment concludes the amended stormwater management system has been designed in accordance with the requirements of Council and is adequate for the management and treatment of flows from the site. • The Department has recommended the Proponent update the substrate plant's Water Management Plan (WMP) to reflect the amended stormwater management system. 	

Modification of the concept plan

<ul style="list-style-type: none"> • The modification request seeks to amend the concept plan to permit the use of the stormwater management system and the retention of the western tree corridor within the RU4 zone. • The Department has considered the potential impacts associated with both the western tree corridor and the amended stormwater system (see above) and is satisfied the: <ul style="list-style-type: none"> o western tree corridor will help to screen the substrate plant's buildings and structures when viewed from the west o amended stormwater management system will ensure pollutant loads and stormwater flows from the substrate plant site do not exceed pre-project levels. • In addition, the Department notes the modification request is consistent with the objectives of the RU4 zone, as it will assist in minimizing conflict between the substrate plant and residential zones in the surrounding area, while also ensuring the project does not adversely impact upon the adjacent South Creek water catchment. • Consequently, the Department is satisfied the modification to the concept plan is appropriate and consistent with the objectives of the IN2 and RU4 zones. 	<ul style="list-style-type: none"> • Amend the concept plan to reference the substrate plant's updated layout and staging plans.
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Fire safety

<ul style="list-style-type: none"> • In November 2016, a fire occurred in the outdoor bale storage area. • Following the conclusion of the fire, the Proponent noted firefighting efforts would have been significantly hampered had the bales been stacked in the approved storage sheds. • Consequently, the Proponent is seeking to delete the two straw bale storage sheds from the approval and instead expand the existing outdoor bale storage area. • During the exhibition period, one submission from the general public raised concerns in relation to fire safety. Sydney Trains also recommended conditions 	<p>Require the Proponent ensure straw bales:</p> <ul style="list-style-type: none"> • straw bales are readily accessible by firefighting crews
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Assessment	Recommendation
<p>to ensure the substrate plant site does not impact upon the rail corridor in the event of another fire in the outdoor bale storage area.</p> <ul style="list-style-type: none"> FRNSW did not provide a response to the modification request. The Department has considered the potential fire safety impacts associated with the modification request, and is satisfied: <ul style="list-style-type: none"> straw bales stored in the outdoor bale storage area will be readily accessible from all sides the northern perimeter wall will ensure straw bales are separated from the fuel storage tank and weighbridge area the southern noise barrier and northern perimeter wall will shelter stored bales from strong winds the design of the outdoor bale storage area will ensure any runoff generated during a fire event is directed into the stormwater management system. The Proponent has also prepared an Environmental Management Strategy and Fire Safety Procedure for the substrate plant site, which detail the fire management procedures put in place to minimise the risk of fire in the outdoor bale storage area. Notwithstanding the above, the Department notes the concern raised by Sydney Trains regarding the potential risk to the rail corridor in the event of another fire in the outdoor bale storage area. The Department has subsequently recommended conditions requiring the Proponent ensure: <ul style="list-style-type: none"> Sydney Trains is consulted during the preparation of the substrate plant's updated CEMP straw bales stacked immediately adjacent to the rail corridor do not exceed the height of the southern noise barrier. The Department's assessment concludes the expansion and ongoing use of the outdoor bale storage area would not adversely impact fire safety at the substrate plant site, subject to the implementation of the recommended conditions. 	<ul style="list-style-type: none"> straw bales are separated from buildings and other assets to prevent a fire spreading straw bales stacked immediately adjacent to the rail corridor do not exceed the height of the southern noise barrier.

Noise

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| <ul style="list-style-type: none"> In support of the new southern noise barrier and the expansion of the outdoor bale storage area, the modification request included an updated Noise Impact Assessment (NIA) for the substrate plant site. The NIA noted the original 7 m high noise wall was intended to provide structural support to the bale wetting boom system, and that the height of this wall was not driven by acoustic requirements. In addition, it was noted that the front end loaders currently used in the bale storage area have a lower operating noise level than the loader model which was in use during the assessment of the original project. | <ul style="list-style-type: none"> Manage through the existing conditions of consent and the substrate plant's OEMP. |
|--|---|

Assessment	Recommendation
<ul style="list-style-type: none"> • The NIA concluded the 4 m high noise barrier would ensure the substrate plant continues to comply with the noise limits outlined in the project approval and the Proponent's EPL. • The Department is satisfied the Proponent's NIA is conservative, and that operational noise generated during the use of the outdoor bale storage area would comply with the relevant noise criteria at the nearest sensitive receivers. • The Department's assessment concludes the potential noise impacts associated with the modification request are negligible, and can be appropriately mitigated through the existing conditions of approval and the ongoing implementation of the substrate plant's OEMP. 	

Impacts to the rail corridor

<ul style="list-style-type: none"> • In its submission, Sydney Trains raised concerns regarding the potential impacts of the modification request upon the Richmond railway line. • Sydney Trains subsequently recommended conditions to ensure: <ul style="list-style-type: none"> ◦ the authority it is appropriately consulted on the construction works ◦ no works are undertaken within the rail corridor, except with the prior approval of Sydney Trains ◦ stormwater and excess soil do not enter the rail corridor. • The Department notes the concerns raised by Sydney Trains, and has incorporated the authority's requirements into the recommended conditions. The Department has also recommended the Proponent update the substrate plant's Construction Environmental Management Plan (CEMP) in consultation with Sydney Trains. • The Department is satisfied the modification request would not impact upon the Richmond railway line, subject to the implementation of the recommended conditions of approval. 	<p>Require the Proponent:</p> <ul style="list-style-type: none"> • update the substrate plant's CEMP in consultation with Sydney Trains • ensure no construction or maintenance works occur in the rail corridor • ensure no stormwater or fill associated with MOD 3 enters the rail corridor.
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Impacts to Council Assets

<ul style="list-style-type: none"> • The modification request has the potential to impact upon Council assets (including local roads) during the construction of the outdoor bale storage area and the stormwater management system. • The Department notes the potential impacts of construction works at the substrate plant site were assessed as part of the original project, which concluded such impacts would be appropriately managed through the preparation and implementation of a Construction Environmental Management Plan (CEMP). • In its submission, Council requested the Proponent undertake a dilapidation survey and lodge a performance, damage and defects bond to cover any repairs required to local roads following the completion of construction works. The Department has incorporated Council's request into the recommended conditions. 	<p>Require the Proponent:</p> <ul style="list-style-type: none"> • prepare a dilapidation report for all public infrastructure in the vicinity of the site, prior to the commencement of construction works • repair, or pay the full costs associated with repairing, any
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Assessment	Recommendation
<ul style="list-style-type: none"> The Department's assessment concludes the potential impacts of the modification request upon Council's assets are negligible and can be appropriately managed through the recommended conditions and the substrate plant's CEMP. 	<p>public infrastructure that is damaged by carrying out the construction works.</p>
Community consultation	
<ul style="list-style-type: none"> During the exhibition period, two submissions received from the general public requested the establishment of a Community Consultative Committee (CCC) for the project. The Department notes that under the project approval (as modified), the Proponent is required to prepare and implement a comprehensive Community Consultation Strategy for the substrate plant site, in order to keep the community informed regarding current construction works and the site's ongoing environmental performance. In addition, since the completion of the emissions treatment system approved under MOD 1, odour complaints received by the Proponent and the EPA relating to the substrate plant site have dropped 94% (one complaint was received in 2019). The Department is satisfied the existing conditions of approval provide a comprehensive and robust framework to keep the community informed of, and engaged with, the project. Accordingly, the establishment of a CCC for the substrate plant site is not warranted at this time. 	<ul style="list-style-type: none"> No additional conditions are required.
Hazards and risk	
<ul style="list-style-type: none"> During the exhibition period, one submission raised concerns regarding the storage and ongoing use of sulfuric acid at the substrate plant site. Diluted sulfuric acid is used in the substrate plant's emissions treatment system to remove ammonia from processed air, prior to its treatment within the biofilter. The Department notes the potential impacts associated with the storage and use of sulfuric acid at the substrate plant site were assessed as part of MOD 1, which concluded such impacts would be appropriately managed through compliance with the relevant Australian Standard and the updating and ongoing implementation of the substrate plant's OEMP. In response to the EARs, the Proponent's EA included a preliminary risk assessment for the modification request, which demonstrated the substrate plant is equipped with sufficient safety measures to ensure any risk associated with sulfuric acid will remain within the site boundary. The Department's assessment concludes the potential impacts associated with the storage and ongoing use of sulfuric acid can be appropriately managed through the existing conditions of approval and the substrate plant's OEMP. 	<ul style="list-style-type: none"> Manage through the existing conditions of consent and the substrate plant's OEMP.

Assessment	Recommendation
Administrative amendments	
<ul style="list-style-type: none"> As part of MOD 2, Schedule 4, conditions 3 and 3A of the project approval were amended to require submission of the project's: <ul style="list-style-type: none"> Annual Review (AR) within six months of the commencement of operations Independent Environmental Audit (IEA) within six months of the approval of MOD 2. The Department notes the intent of the amendments made by MOD 2 was to ensure the submission of the project's AR and IEA was linked to the construction and operation of the mushroom farm. However, these amendments did not account for the fact that conditions 3 and 3A are 'active' conditions and are intended to apply to both the: <ul style="list-style-type: none"> expansion and ongoing operation of the substrate plant the construction and operation of the mushroom farm. To date, the Proponent has prepared four ARs and two IEAs for the substrate plant site in accordance with the requirements of the project approval. The next AR is due to be submitted by the end of September 2020, and the next IEA is due to be submitted by the end of March 2021. Given the above, the Department has recommended Schedule 4, conditions 3 and 3A of the project approval be updated to reinstate the submission deadlines currently adhered to by the Proponent. These updates will not conflict with the intent of the amendments made by MOD 2, as the Proponent will still be required to consider the mushroom farm site in the next iteration of the AR and IEA. 	<ul style="list-style-type: none"> Schedule 4, Condition 3 is to be updated to require submission of the next AR by 30 September 2020. Schedule 4, Condition 3A is to be updated to require submission of the next IEA by 31 March 2021.

Contributions	
<ul style="list-style-type: none"> In its submission, Council requested the Proponent pay developer contributions for the additional construction works resulting from the modification request. Under the <i>Hawkesbury Section 94A Contributions Plan 2015</i>, developer contributions do not need to be paid where the proposed cost of carrying out the works does not exceed \$100,000. In its RTS, the Proponent advised the cost of the additional works proposed under the modification request would not exceed \$100,000. Accordingly, the provisions of the <i>Hawkesbury Section 94A Contributions Plan 2015</i> do not apply to the modification request, and the Department is satisfied no contribution is required for the subject modification. 	<ul style="list-style-type: none"> No additional conditions are required.



7. Evaluation

The Department has assessed the modification request in accordance with the relevant requirements of the EP&A Act, and considered the submissions made by Council, the relevant public authorities and the general public. The Department considers the modification request is appropriate on the basis that:

- the primary function and purpose of the approved project would not change as a result of the modification
- the approved production capacity of the substrate plant site would not change as a result of the modification
- the expansion and ongoing use of the outdoor bale storage area would ensure straw bales remain readily accessible by firefighting crews, should another fire occur
- the amended stormwater management system would continue to ensure peak stormwater pollutant loads and discharge rates from the substrate plant site do not exceed pre-project levels
- the western tree corridor will assist in improving the visual impact of the substrate plant by screening on-site buildings and structures when viewed from the west.

Following on from its assessment, the Department considers the modification request is approvable, subject to the modification conditions outlined in **Appendix D**. This assessment report is hereby presented to the Commission for determination.

Patrick Copas
Planning Officer
Industry Assessments


Chris Ritchie
Director
Industry Assessments
20/12/19


Anthea Sargeant 9/1/20
Executive Director
Key Sites and Industry Assessments



Appendices

Appendix A List of Documents

The Department has relied upon the following key documents during its assessment of the development:

Modification Request

- Preliminary Assessment titled 'Mushroom Substrate Plant – Modification to Approved Project', prepared by Compaction & Soil Testing Services Pty Limited, dated December 2016 and all attachments
- Environmental Assessment titled 'Mushroom Substrate Plant – Project Modification No 3', prepared by Perram & Partners, dated May 2018 and all attachments.

Response to Submissions

- Response to Submissions letter, prepared by Perram & Partners, dated 13 November 2018 and all attachments
- Addendum Response to Submissions letter, prepared by Perram & Partners, dated 30 January 2019.

Submissions

- all submissions received from Council, the relevant public authorities and the general public.

Strategic Documents

- Greater Sydney Region Plan, A Metropolis of Three Cities – Connecting people, prepared by the Greater Sydney Commission, dated March 2018
- Our Greater Sydney 2056, Western City District Plan – Connecting communities, prepared by the Greater Sydney Commission, dated March 2018.

Statutory Documents

- relevant environmental planning instruments, policies and guidelines
- relevant requirements of the EP&A Act.

Other Documents

- Environmental Assessment titled 'Mushroom Industry Expansion in Western Sydney', prepared by Perram & Partners, dated December 2010 and all attachments
- Major Project Assessment: Elf Mushroom Farm and Substrate Plant (08_0255), prepared by the then Department of Planning and Infrastructure, dated December 2011
- Environmental Assessment titled 'Mushroom Substrate Plant – Modification to Approved Project', prepared by Perram & Partners, dated February 2015 and all attachments
- Section 75W Modification Assessment: Modified Odour Management System (MP 08_0255 MOD 1 and CP 08_0255 MOD 1), prepared by the then Department of Planning and Environment, dated 19 February 2016
- Determination Report: Elf Mushroom Farm & Substrate Plant Modifications (CP 08_0255 and MP 08_0255 MOD 1), prepared by the then Planning Assessment Commission, dated 14 March 2016
- existing conditions of approval in 08_0255 (Concept Plan and Project, as modified).

Appendix B Relevant Supporting Information

The relevant supporting information for the modification request may be found on the Department's website at:

1. Modification Request

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=9319
http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8211.

2. Submissions

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=9319
http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8211.

3. Response to Submissions

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=9319
http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8211.

Appendix C Consolidated Consents

The consolidated consent for the concept plan modification may be found on the Department's website at:
http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=9319

The consolidated consent for the project approval modification may be found on the Department's website at:
http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8211

Appendix D Recommended Modifying Instruments

The recommended modifying instrument for the concept plan may be found on the Department's website at:
http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=9319

The recommended modifying instrument for the project approval may be found on the Department's website at:
http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8211