



**BARR PROPERTY  
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Continual Progress

# Statement of Environmental Effects for Use of existing structures as Port Facilities

38 Robertson Street, Carrington

Prepared by Barr Property and Planning  
For Newcastle Agri-Terminal  
September 2020

## Document Control

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Lot 1 DP 1218150  
Lot 1 DP 834572  
Job No. 19NEW0073  
Client: Newcastle Agri-Terminal

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# 1 Introduction

This Statement of Environmental Effects (Statement) has been prepared by Barr Property and Planning on behalf of Newcastle Agri-Terminal (NAT). It accompanies a Development Application (DA) lodged to the Minister of Planning, Industry and Environment (DPIE) pursuant to Section 4.12 of the Environmental Planning and Assessment Act 1979 (the EPA Act) for the approval for the use of four existing structures (silos) as port facilities.

## 1.1 Purpose of this Statement of Environmental Effects

The purpose of this statement is to support the development application seeking development consent for the use of four existing structures (silos) as port facilities located at Lot 1 DP 1218150 and Lot 1 DP 834572, No. 38 Robertson Street, Carrington.

## 1.2 Ownership

The site is currently owned by Port of Newcastle Lessor Pty Limited and leased by Port of Newcastle Operations Pty Limited (PON). Newcastle Agri Terminal (NAT) is a sub-lessee of PON. Owners consent from Port of Newcastle Lessor Pty Limited is provided with this application.

## 1.3 Consent Authority

The site is located within the Port of Newcastle Lease Area as identified by Lease Area Map (Sheet LES\_003) pursuant to the State Environmental Planning Policy (Three Ports) 2013 (Ports SEPP). The consent authority is the Minister of the DPIE in accordance with Part 1 clause 8 of the Ports SEPP.

## 1.4 Supporting Documentation

This Statement is supported by the following documentation:

| Document                                      | Author                             | Date              |
|---|------------------------------------|-------------------|
| Site Arrangement Plans                        | Lindsay and Dynan                  | 23 September 2020 |
| Manufactures Plans                            | Kotzur Pty Ltd                     | 21 November 2013  |
| Subsidence Advisory Approval                  | Subsidence Advisory                | 8 September 2020  |
| Building Information Certificate BC2020/00039 | City of Newcastle                  | 6 August 2020     |
| Letter from Operator                          | Newcastle Agri Terminal            | 14 September 2020 |
| Certificate of Structural Adequacy            | Andrew Baigent Consulting Engineer | 22 November 2018  |



## 2 Site and Context

### 2.1 The Site

The subject site is located at part Lot 1 in DP 1218150 and Lot 1 DP 834572, No. 38 Robertson Street Carrington.

The site is currently operational and is located within the Ports' Carrington Precinct. The site is located within the eastern portion of Carrington. Broadly to the north of the site is a mix of industrial uses and a residential area consisting of mainly one to two storey single dwellings. To the east of the site is the Hunter River. To the south of the site is a range of port related activities. To the west of the site is vacant industrial land contained within the Port Precinct. The site is within the Port of Newcastle Lease Area identified by Lease Area Map (Sheet LES\_003) and zoned by the Ports SEPP. The site is zoned SP1 – Special Activities.



Figure 1 Site outlined in white. (Source: Six Maps, 2020)

The site is in the Port of Newcastle (PON) Lease Area which comprises of port, port related and industrial activities.





Figure 2: Aerial view of the four existing structures (silos) (Source: ePlanning Spatial Viewer, 2020).

## 2.2 Background

NAT is an independent logistics and agricultural export company that commenced operations in 2014 in Newcastle, New South Wales. The company provides grain supply chain solutions for exporters and to increase farm gate returns for growers with a clear focus on facilitating efficient supply. The terminal is capable of:

- loading bulk export shipments;
- packing grain into containers;
- out loading grain to domestic customers;
- handling imported grain; and
- fumigation and blending of grain.

The site receives grain by road via trucks and by rail via the Hunter Valley Rail network to dedicated rail and road receival facilities. Grain is then stored in several different sized silos before being exported from the Port of Newcastle.



Exportation occurs with ships being loaded by conveying systems and state-of-the-art ship loader. The site operates on a 24 hour a day 7 days a week basis.

### 2.2.1 Previous Approvals

The construction and operation of NAT was approved as a Part 5 activity by Newcastle Port Corporation in 2012. This activity approval allowed for the construction of five silos for grain storage with a total volume of 60,000 tonnes, the rail receival facility, conveyor system and ship loader.

The road receival facility terminal was approved in 2014 as a complying development and constructed in 2015, to connect into the existing conveyor system. Subsequently, four smaller silos (subject of this application) with an approximate total volume of 183m<sup>3</sup> were installed as temporary structures for grain storage. These four silos were classified as exempt development under clause 24 of the Ports SEPP and therefore did not require development consent.

Since this time, NAT have determined to retain the silos as permanent structures as part of their broader operations.



Figure 3: The for existing silos seeking approval for future use as a port facility (Source; Barr Property and Planning, September 2019)

In September 2019, DPIE was provided a letter by Barr Property and Planning which outlined the intention to regularise and gain development consent for the silos. DPIE advised that an appropriate planning pathway to change the four silos from a temporary to permanent use was to submit a DA. On the 9 December 2019, DA 10109 was lodged to DPIE seeking consent for “Four existing bulk dry storage silos from temporary to permanent structures”. This DA was assessed (to the extent that draft

conditions of consent were prepared) but later withdrawn as it was determined that development consent for existing structures could not be granted retrospectively.

A Building Information Certificate (BIC) has since been issued by City of Newcastle (CN) on 21 August 2020 (BC2020/00039) to regularise the structures and prevent the Council from making an order or seeking civil enforcement to require the structure to be demolished or altered, in accordance with Division 6.7 of the EPA Act.

As the BIC has now been obtained, and the silos are now not in use, the DA this Statement supports has been lodged to obtain approval for the silos as port facilities.

### 2.2.2 Response to previous Issues

The assessment of the previous application DA 10109 resulted in a Request for Information (RFI) from CN and Transport for New South Wales (TfNSW) with regards to flooding, structural integrity, environmental impacts and impact on the road network. These matters are addressed in Section 3.

## 2.3 Current Operations

Figure 4 illustrates the general operation of the site. The conveyor system starts to the north of the site at the rail receival facility. Grain is unloaded from each wagon into an underground storage bin that feeds grain directly into a drag conveyor. The drag conveyor transfers the grain onto the belt conveyors, that transports the grain to the south towards the silos. The grain is then directed to its destination being the large silos at the south of the site.

Any grain received via road is unloaded at the road receival facility west of the four silos. It is then placed in an elevator type conveyor which connects to the main conveyor system and is directed to the silos to the south. From the large southern silos any grain needed for making smaller quantity blends is then redirected towards the four smaller silos subject to this application.

These smaller silos provide the ability to store smaller quantities of grain prior to blending, mixing or shipping. They also provide the ability to fumigate smaller portions of grain, where large scale fumigation is not required. The silos were placed in their current position to utilise the existing fixed road terminal, unloading, and conveying infrastructure on site.





Figure 4: Operation of grain terminal (Source: Sixmaps, 2020).

### 3 Proposed Development

#### 3.1 Summary

The proposed application is for the use of four existing structures (silos) as port facilities.

#### 3.2 Works

The proposal does not include any building works.

#### 3.3 Building Design

The four silos are similar to those used on farms. The four stainless steel grain silos stand at 15 metres tall with an additional 1 metre for the overhead conveyor, and an approximate combined volume of 183m<sup>3</sup>. They are fixed to the ground by concrete footings and are attached to the existing conveyor system and road receival infrastructure. Provided with this application are manufacturers plans of the silos with elevations. These plans only contain the sketch of two of the silos as all four silos are manufactured exactly the same.

#### 3.4 Access and Parking

The current access and parking provisions on the site will continue to support the development and are not proposed to change. Currently, road trucks accessing the site for receival purposes is from a private section of Darling Street to the west of the facility. The trucks use the designated PON heavy vehicle route to and from the NAT facility. For visitors to the site, access is along the north end of the site via Robertson Street, this allows access to the office and carpark in the north west corner. The proposed use of the structures will not increase current truck movements or rail movements.

#### 3.5 Justification for the Proposal

The proposed use of the four silos as port facilities will make use of the existing structures within the Port Precinct that are not currently used. This ensures the economic and efficient use of existing infrastructure for a port purpose, being the storage of freight (grain) prior to export.

See Appendix E for Statement from the Operator as to the silos current use.



## 4 Strategic Context

### 4.1 Hunter Regional Plan 2036

The Hunter Regional Plan (HRP) 2036 will guide the NSW Government's land use planning priorities and decisions for the Hunter for over the next 20 years. The HRP provides the strategy necessary to deliver the vision for the Hunter region. The PON is described as a global gateway within the HRP 2036.

Within the HRP 2036 food and agribusiness is identified as an emerging industry. NAT is an agribusiness which provides an efficient distribution of grain from farmers to the customer via the PON. Use of the four smaller silos as port facilities provides NAT to ability to store, blend, and fumigate smaller quantities of grain rather than using the larger silos which is an efficient use of resources and maintains an important supply chain. The proposal is considered consistent with HRP 2036 in particular Direction 10:

***Direction 10: Protect and enhance agricultural productivity***

- *10.1 Protect locations that can accommodate agricultural enterprises from incompatible development, and facilitate the supply chain, including infrastructure, distribution areas, processing facilities and research and development in local plans.*

The proposed facilities are located on land currently operating for the receipt and shipping of grain within the PON, adding to the efficient supply chain for the agricultural sector in the Hunter region and New South Wales.

### 4.2 Greater Newcastle Metropolitan Plan 2036

The Greater Newcastle Metropolitan Plan (GNMP) 2036 helps to achieve the vision set in the HRP 2036. The proposal is consistent with GNMP 2036 in particular the proposal meets the following direction and underlying action:

- Increase domestic and global trade capabilities at Newcastle Port

The proposal is improving efficiency and operations at the NAT site in Newcastle Port, which will benefit local and domestic trade. The GNMP 2036 notes that coal represents 91% of the value of exports and that the capacity for manufactured goods and primary products to be exported will be expanded by diversifying port activities to enable agricultural businesses in the Hunter and wider NSW to more easily and efficiently export directly to Asia. NAT will be able to store, blend, and fumigate smaller quantities of grain which is more efficient than using the large silos. This will allow their operations to continue effectively.

### 4.3 Port of Newcastle, Port Master Plan 2040

The Port of Newcastle is the global gateway for the Hunter Region and New South Wales. It is the largest port on the East Coast, and Australia's third largest port by trade volume. It is well-placed to



support the predicted doubling of Australian freight over the next 20 years and beyond. The Port Master Plan aims to communicate the broad and strategic approach of the port. The proposal is consistent with the Port Master Plan 2040 by utilising port land for port facilities, and growing business and industry within the PON.



## 5 Statutory Assessment

### 5.1 Environmental Planning and Assessment Act 1979

This report assesses the proposal against the relevant statutory requirements of the EPA Act, and other legislation, plans, and policies as applicable. Section 4.15 of the Act outlines the relevant heads of consideration that must be considered when assessing a development proposal.

The following considerations have been made under section 4.15(1)(a):

- Environmental planning instruments, proposed instruments and development control plans that are relevant to the site or development are considered below;
- There are no known planning agreements applicable to the site; and
- The Environmental Planning and Assessment Regulation 2000 (the Regulation) has been considered below.

The remaining matters for consideration under section 4.15(1)(b), (c), (d) and (e) are considered within sections 5, 6, 7 and 8 of this Statement.

### 5.2 Objects of the Act

The objects of this Act are as follows:

- (a) to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,*
- (b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,*
- (c) to promote the orderly and economic use and development of land,*
- (d) to promote the delivery and maintenance of affordable housing,*
- (e) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,*
- (f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),*
- (g) to promote good design and amenity of the built environment,*
- (h) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,*
- (i) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,*
- (j) to provide increased opportunity for community participation in environmental planning and assessment.*

The proposed development supports the objects of the EPA Act, in particular object (c). The proposal promotes the orderly and economic use and development of land as the subject silos are already existing and approving the use as a port facility is economically beneficial rather than the do nothing approach. The proposal is an orderly and economic use of land as it is for port facilities in a port.

### 5.3 Integrated Development

Integrated development is outlined in Section 4.46 of the EPA Act. This development requires the following integrated referrals.

- Coal Mine Subsidence Compensation Act 2017, Section 22 applies to development which requires:

*approval to alter or erect improvements, or to subdivide land, within a mine subsidence district*

The development is located within the mine subsidence district of Newcastle. Approval from the Subsidence Advisory for the structures is provided with this application. See Appendix C.

### 5.4 Environmental Planning and Assessment Regulations

The proposed development will be assessed in accordance with the relevant requirements of Part 6 of the Regulation, being Procedures relating to development applications.

### 5.5 State Environmental Planning Policies

State Environmental Planning Policies (SEPPs) are environmental planning instruments administered under the EPA Act. SEPPs deal with issues considered to be of significance for the State and the people of NSW. In the determination of the development application, the consent authority will consider these matters pursuant to section 4.15(a)(i) of the EPA Act. The SEPPs relevant to the proposed development, and the land on which the development is situated, are considered below.

#### 5.5.1 State Environmental Planning Policy (Three Ports) 2013

The development site is mapped within the Port of Newcastle Port SEPP Lease Area.

The relevant aims of this Policy are as follows:

- (a) *to provide a consistent planning regime for the development and delivery of infrastructure on land in Port Botany, Port Kembla and the Port of Newcastle,*
- (b) *to allow the efficient development, re-development and protection of land at Port Botany, Port Kembla and the Port of Newcastle for port purposes,*
- (c) *to identify certain development within the Lease Area as exempt development or complying development,*

- (d) to specify matters to be considered in determining whether to grant consent to development adjacent to development for port purposes,
- (e) to provide for development at Port Botany that does not, by its nature or scale, constitute an actual or potential obstruction or hazard to aircraft,
- (f) to identify certain development as State significant development or State significant infrastructure,
- (g) to ensure that land around the Lease Area is maintained for port-related and industrial uses, including heavy industry on land around Port Kembla.

The development of port facilities aligns with the aims of Port SEPP by utilising port zoned land for port related activities. This development benefits from being located on the NAT site close to port activities and enhances NATs current operations as a port facility.

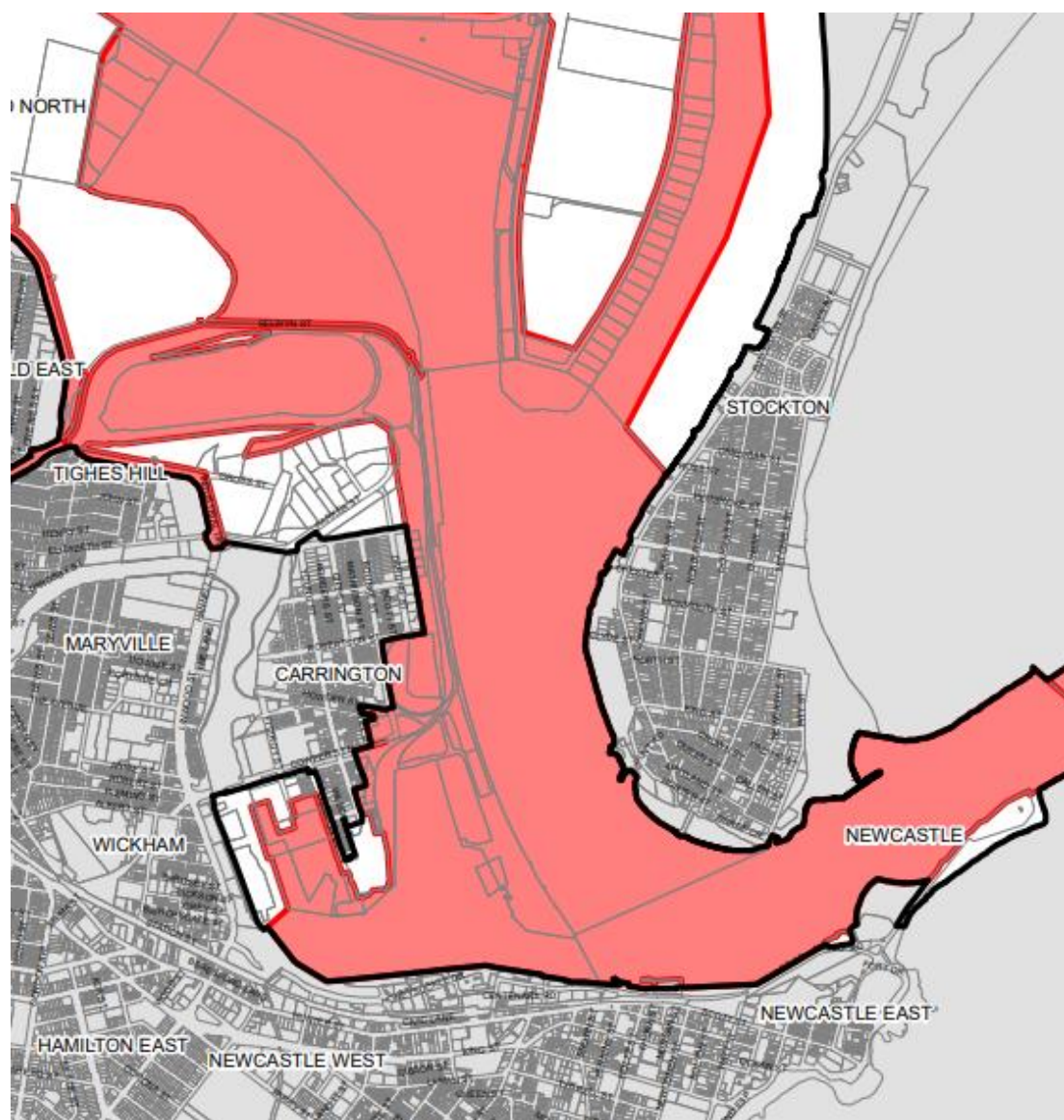


Figure 5: Lease Area map in Port SEPP (NLEP 2012).

The subject site is zoned SP1 Special Activities under the Port SEPP according to Land Zoning Map (LZN\_003). The objectives of the SP1 Zone is to maximise the use of the waterfront areas to accommodate port facilities and industrial, maritime industrial and bulk storage premises that benefit from being located close to port facilities. In the SP1 zoning 'port facilities' are permissible with consent and defined as (emphasis added):

**port facilities** means facilities on land in the Lease Area used in connection with the carrying of freight and persons by water from one port to another for business or commercial purposes, and includes any of the following—

- (a) facilities for the embarkation or disembarkation of passengers onto or from any vessels, including public ferry wharves,
- (b) facilities for the loading or unloading of freight onto or from vessels and freight receipt, processing, land transport and storage facilities.
- (c) wharves for commercial fishing operations,
- (d) refuelling, launching, berthing, mooring, storage or maintenance facilities for any vessel,
- (e) sea walls or training walls,
- (f) administration and port operations buildings and facilities,
- (g) communication, security and safety facilities,
- (h) utilities and services, road and rail infrastructure, pipelines and car parks.

The proposal is defined as development for the purpose of port facilities. The existing silos are storage facilities on land within the Lease Area and used in connection with the carrying of freight (grain) from one port to another. Use of the silos as port storage facilities will allow storage of grain and the ability to blend and fumigate smaller quantities prior to their shipment via sea.

#### 5.5.2 State Environmental Planning Policy No. 33 – Hazardous and Offensive Development

The development is associated with grain handling. According to the Hazardous and Offensive Development Application Guidelines, under Appendix 3 grain handling is an industry that may fall within SEPP 33.

The relevant policy aims are as follows:

- (d) to ensure that in determining whether a development is a hazardous or offensive industry, any measures proposed to be employed to reduce the impact of the development are taken into account, and
- (e) to ensure that in considering any application to carry out potentially hazardous or offensive development, the consent authority has sufficient information to assess whether the development is hazardous or offensive and to impose conditions to reduce or minimise any adverse impact, and

As part of a Review of Environment Factors (REF) prepared by Umwelt in September 2011 to approve the construction and operation of the original grain processing terminal facility an assessment under



SEPP 33 was made. The report concluded that the qualitative risk screening assessed that the terminal is below the screening thresholds for onsite storage and that a further quantitative risk assessment was not required under SEPP 33. The proposal is not considered a hazardous or offensive industry pursuant to SEPP 33.

#### 5.5.3 State Environmental Planning Policy (Infrastructure) 2007

The development is a facility for the loading or unloading of freight onto or from vessels and associated receival, land transport and storage facilities, and is such defined as a port facility under the Standard Instrument. State Environmental Planning Policy (Infrastructure) 2007 Part 3 Division 13 Port, wharf or boating facilities 67A Application of Division states:

*This Division does not apply to land within the Lease Area within the meaning of State Environmental Planning Policy (Three Ports) 2013.*

SEPP (Infrastructure) 2007 is not applicable for this development because it is classified as a port, wharf or boating facility and is located within the Port of Newcastle Port SEPP Lease Area.

#### 5.5.4 State Environmental Planning Policy (Coastal Management) 2018

The development is located in the coastal zone, however part 1 clause 7 states:

*(2) This Policy does not apply to land within the Lease Area within the meaning of State Environmental Planning Policy (Three Ports) 2013.*

SEPP (Coastal Management) 2018 is not applicable for this development because of its location within the Port of Newcastle Port SEPP Lease Area.

#### 5.5.5 State Environmental Planning Policy No. 55 – Remediation of Land

The object of this Policy is to provide for a State-wide planning approach to the remediation of contaminated land. Contamination and remediation of land must be considered in determining a DA under Clause 7 of this SEPP.

- (1) A consent authority must not consent to the carrying out of any development on land unless:*
- (a) it has considered whether the land is contaminated, and*
  - (b) if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and*
  - (c) if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.*

The site has historically been used for industrial development. The site is currently operational for industrial purposes and is proposed to continue to be used as a site for industrial purposes. Given that

the proposed development does not include any excavation or disturbance of the soil, the land is considered suitable in its current state for continuation of industrial land use. A contamination investigation is not required.

#### 5.6 Newcastle Local Environmental Plan 2010

This development is located within the Port of Newcastle Lease Area pursuant to the Port SEPP. Accordingly, the Newcastle Local Environmental Plan (LEP) 2010 is not applicable to the site and does not apply.

#### 5.7 Proposed environmental Planning Instruments

There are no known proposed Environmental Planning Instruments.

#### 5.8 Newcastle Development Control Plan 2010

This development is located within the Port of Newcastle Lease Area pursuant to the Port SEPP. The Newcastle Development Control Plan (DCP) 2010 applies to the development of land to which the Newcastle LEP 2010 applies or land within the Ports SEPP that is not included in the Port Lease area. Therefore, the Newcastle DCP 2010 does not apply. There are no other DCPs that apply to the site.

## 6 Likely Impacts of the Development

### 6.1 Environmental Impacts

This section addresses all the likely impacts of the development in the locality, including impacts arising from the development, and impacts on the development in accordance with Section 4.15(1)(b) of the EPA Act.

As there is no construction proposed, only the environmental impacts of ongoing operation and use of the silos has been assessed.

#### 6.1.1 Access and Traffic

Although the site address is No. 38 Robertson Road, Carrington, operational access to the site by truck is via the approved heavy vehicle port access route via Elizabeth and Darling Streets. The DA is not seeking to increase current truck movements or rail movements or alter the current operation of the site. The application is only for the approval of existing infrastructure.

Grain is delivered to the four existing silos, via the existing conveyor system.

This conveyor system was approved as part of the original activity approval and is linked to the rail receival facility and road facility.

These silos are used to contain smaller quantities of grain for blending special orders of smaller quantity grain. The silos are not intended to increase the storage capacity of the site, rather provide for the flexibility to manage smaller quantities of grain for specific purposes.

The development is not proposing any additional infrastructure to what is already included on site and proposes no additional increase in traffic movements to and from the site. Due to this, a traffic report is not required to support the proposal.

The proposed silos will not increase current traffic. Vessels, trains and truck numbers will remain as they are. The site operates under a Traffic Management Plan (TMP) which outlines the heavy vehicle routes. This will continue to adequately support the development.

#### 6.1.2 Air and Microclimate

The NAT site has an Operational Environmental Plan (OMP) to manage air quality. The proposed use of the existing silos are not changing the current environment as these proposed structures are enclosed storage facilities. The sites OMP can be revised to include reference to the four silos once approved as permanent structures. Environmental Protection License (EPL) No. 20116 outlines the management systems in place to control air quality and mitigate air pollution.

### 6.1.3 Flooding

The subject site is mapped as flood prone on CN 'Know Your Flood Risk' flood mapping. Due to the site being within the Lease Area of the Port of Newcastle in the Port SEPP, the Newcastle LEP and DCP do not apply. There is no consideration required under the Port SEPP for flooding on the site.

The silos are, however, raised above ground on support structures which enables the unimpeded flow of potential flood waters on site. By obtaining a BIC for the silos, CN has agreed that there is no reason to demolish, alter, add to or rebuild these structures. The structures have also been provided with a Certificate of Structural Adequacy by a qualified engineer See Appendix F.

### 6.1.4 Flora and Fauna

There is no impact on flora and fauna due to the already disturbed nature of the location and the lack of existing ecological value.

### 6.1.5 Visual Impact

The proposal has minimal visual impact as it is located within an industrial precinct with similar industries and built structures. The proposed silos are not able to be viewed from a public space, as they are smaller than current surrounding structures.

### 6.1.6 Acoustic Impact

The development will not create any additional negative acoustic impacts as they are storage facilities. NATs EPL No.20116 includes noise limits to manage acoustic impacts.

### 6.1.7 Waste Management

The proposal is not an activity that creates waste.

### 6.1.8 Surface Water/ Stormwater Management

The proposal will not change the current stormwater regime and will not alter or impact upon the stormwater management plan that was provided when the NAT site was approved as a Part 5 activity by Newcastle Port Corporation in 2012.

## 6.2 Social Impacts

This development will have no known negative social impacts.

## 6.3 Economic Impacts

The approval of this development will have a positive economic impact on the local economy. NAT is a locally owned and operated business and this proposal will allow them to continue to function efficiently.

## 7 Suitability of the Site

This section addresses the development in accordance with section 4.15(1)(c) of the Act. The site is considered suitable for the development for the following reasons:

- The development is located on the NAT site which is an established port facility with pre-existing infrastructure. Use of the four silos as port facilities will make use of existing infrastructure and compliment the current operations;
- Port of Newcastle Port SEPP Lease Area is zoned SP1 Special Activities. The development meets the objectives of SP1 zoning, which is to maximise and accommodate for port facilities including bulk dry storage for shipping;
- The development ensures that land in the Port of Newcastle Port SEPP Lease Area is being maintained for port-related and industrial uses; and
- The silos are already existing on the NAT site.

## 8 Submissions

This section addresses the development in accordance with section 4.15(1)(d) of the Act. It is understood this development application will be notified. We welcome the opportunity to address any submissions provided during this period.

## 9 Public Interest

This section addresses the development in accordance with section 4.15(1)(e) of the Act. This development is considered to be in the public interest as it expands and supports a locally owned and operated business in the grain industry.





## 10 Conclusion

This DA is for the approval for the use of four existing structures (silos) as port facilities on the NAT site. This Statement has assessed the development against the requirements of Clause 4.15 of the Act and considers the development to be consistent with the applicable policies and plans.

It is considered that NAT's port facility will have a positive impact on the Port of Newcastle and is consistent with the aims and objectives of Port SEPP. Accordingly, it is recommended that this application be assessed and approved by the Minister for Planning.



## 11 Appendices

- 11.1 Appendix A – Site Arrangement Plans
- 11.2 Appendix B – Manufacturers Plans
- 11.3 Appendix C – Subsidence Advisory Approval 8 September 2020
- 11.4 Appendix D – Building Information Certificate BC2020/00039 6 August 2020
- 11.5 Appendix E – Letter from NAT on silo use
- 11.6 Appendix F - Certificate of Structural Adequacy

