

Shoalhaven Starches Pty Ltd
A Subdiary Of Manildra Group Pty Ltd 6 Frank St
GLADESVILLE NSW 2111

REFERENCE

DE-2021/185

Date

19 August 2022

Dear Sir/Madam

Wollongong Council submission

Development	Bulk Liquid Terminal - State Significant Development Request to provide advise on EIS - SSD-33042483
Location	Lot 1 DP 122721 Lot 1 Foreshore Road PORT KEMBLA NSW 2505

Thank you for providing Council with the opportunity to respond to the Environmental Impact Statement (EIS) for the proposed Manildra – Port Kembla Bulk Liquid Terminal, a State Significant Development recently notified on the NSW Planning Portal. This follows on from the previous Secretary's Environmental Assessment Requirements (SEARS) for the same project, to which Council responded on 21 December 2021.

We have reviewed the EIS dated 24 June 2022 ref 20399 which outlines Manildra's proposal to install and operate six (6) x 4ML Potable Ethanol Storage tanks, with a combined capacity of approximately 24ML and related infrastructure associated with the Shoalhaven Starches facility in Bomaderry. This is in relation to the Shoalhaven Starches Expansion Project originally granted by the Minister for Planning in 2009 which has been modified on multiple occasions to implement further capabilities of the facility in response to expanding markets.

The purpose of this storage facility is to facilitate storage and export of Shoalhaven Starches Beverage Grade Ethanol produced at its Bomaderry facility. The proposed Bulk Liquids Facility provides additional storage and shipping capacity within the port.

Council supports the economic benefits associated with the proposal and provides the following comments for consideration:

Transport

The Transport Study – Route Selection report identifies two options for transport between Shellharbour and the site. Option 1 would follow the M1 motorway and exit onto Five Islands Road, then Old Port Road. Option 2 would exit the M1 motorway at Shell Cove and travel through Shellharbour, Barrack Heights, Warilla, Lake Illawarra, Windang, Primbee and Warrawong to Five Islands, Darcy and then Old Port Road. Both routes are noted as being approved for B-Doubles and whereas only Option 1 is approved for the A-Doubles vehicles (32m long) proposed to be used to transport the ethanol (See figures 3.3 and 3.4 of Transport Impact Assessment dated 26 April 2022 prepared by ttp Transport Planning). Both routes use classified roads which Transport for NSW are the authority for.

The report contains an assessment of a variety of factors for each route with Option 1 being identified as the most preferred. However, both options are indicated as being available as alternatives to the other in the event of disruption such as accident or delay.

Whilst the utility and desire for an alternate travel route is understood, Option 2 presents increased environmental risks due to this route travelling through residential areas. Ethanol is a Dangerous Good Class 3, Packing Group 2 flammable liquid and an incident such as a tanker pollution event in or around the Windang Bridge and Lake Illawarra would have a devastating effect on the environment resulting from spillage as well as other chemicals or fire extinguishment and clean up. Transport related noise would also have a greater effect on more sensitive receivers in the Option 2 route.

It is unclear under what circumstances trucks would utilise Option 2 and how that would be monitored or regulated. Further, if an A-double tanker is enroute and discovers option 1 to be congested, that tanker would not appear to be able to utilize option 2 due to the limitations on road freight identified above.

While the project is proposed to operate 24 hours per day, any truck movements would be expected to be prohibited on Sundays, public holidays.

Another concern for Council relates to the associated noise, risk and general traffic impacts on affected roads in the Wollongong Local Government Area (LGA) from heavy vehicle traffic travelling between the site and the Bomaderry facility. In particular, any increase in road freight as part of this application is not supported as the road network within the LGA is at or near capacity. There is increasing industrial demand for manufacturing (including predicted hydrogen expansion), resulting in a gradual increase in pressure on the surrounding network over the coming years.

Any expansion of the Port can only be supported where it is in conjunction with a clear strategic development plan that is consistent with the Illawarra Shoalhaven Regional Plan that protects and supports the use of freight and encourages the use of off-road freight to reduce the impact on the local road network. Ideally, freight movement should be directed to rail to mitigate congestion and other undesirable impacts on local roads.

Environmental factors

The proposal will require an NSW Environment Protection Agency (EPA) environment protection licence (EPL) to operate. Therefore, the NSW EPA as the appropriate regulatory authority (ARA) will provide a comprehensive assessment and Council will rely on their review and assessment of the on-site environmental documentation. The following concerns are however identified:

- The Erosion and Sediment Control does not account for the possibility of mobilisation of contaminated sediments - standard options should not apply.
- Council will require further information regarding the proposed sampling and analysis of site-specific chemical and physical parameters that will be submitted for Council review/approval of discharge of rainwater accumulations and/or groundwater. Council's current specifications will NOT apply to this site due to its contaminated nature. Furthermore, Council will need the proposed methodology to be utilised for all dewatering processes.

Heritage matters

The Heritage Impact Statement (HIS) by Apex Archaeology dated May 2022 was reviewed. The HIS assesses the potential for "relics" to be present under the NSW Heritage Act 1977 as low. Heritage NSW is the authority for historic archaeological impacts under the Act and should provide comment on whether this is adequate.

The wooden wharf appears to date to 1908-1919. Consideration of the impacts to the remaining wooden structure should be considered.

Opportunities should be investigated to make the proposed 6 large white storage facilities more visually recessive or options for alternative siting to minimise visual impact.

It is recommended comment be sought from Heritage NSW with regards to visual impacts and any implications this might have on surrounding heritage items/locations..

An Aboriginal Consultation Report has been prepared Apex Archaeology dated June 2022. It is noted ILALC commented on the site as having cultural value, however recognised its disturbance and low potential for archaeology. The Report does not recommend any additional archaeological investigation. Heritage NSW should provide comment on the outcomes of the report. It is noted there are no recommendations to manage impacts to the cultural significance of the site.

Wollongong City Council declared a Climate Emergency in August 2019.

Council recognises urgent action is needed from all levels of government to address and combat climate change. Council plays an important leadership role in helping the community move towards the 'new normal' of a zero-carbon future. Council is reducing its' greenhouse gas emissions to net zero by 2030 and supporting the community to do the same by 2050. Council encourages Manildra to adopt similar targets in relation to this proposal.

Thank you again for providing Council with the opportunity to have input into the EIS. I trust that the above advice is of assistance.

Please contact Nigel Lamb, Planner, on (02) 4227 7111 should you have any questions in relation to this matter.

This letter is authorised by

Pier Panozzo

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