

NSW Department of Planning and Infrastructure  
23 - 33 Bridge Street  
Sydney NSW 2000

24<sup>th</sup> October 2012

Dear Sir / Madam,

### **10\_0185 Northbank Enterprise Hub Subdivision Proposed Industrial and Business Park**

We wish to make comment on the above proposed industrial subdivision development at Tomago. Tomago Aluminium operates a primary aluminium smelter within the industrial zone at Tomago and supports initiatives to attract further employment opportunities to the Tomago industrial area. However we also have a significant stake in the potential cumulative environmental impacts that could be amplified through development of new, yet to be defined, industrial activities.

The area of the proposed Northbank Enterprise Hub development lies within the Tomago Aluminium Buffer Zone, a designated environmental management zone established via the original development consent for the aluminium smelter in 1981 and expanded in 1991.

Over time, Tomago Aluminium acquired and consolidated a considerable landholding on the southern side of Tomago Road as part of this formal environmental buffer zone. In 2001 the NSW state government sought to purchase this landholding for the purpose of establishing a new steel mill (the Austeel project). As a condition of sale of the property Tomago Aluminium sought to have the potential environmental impacts from current and future increased metal production capacity recognised as a constraint on the surrounding air shed capacity. In response to this, the NSW government, through what was then known as Planning NSW and facilitated by the Premier's Department, commissioned a Cumulative Environmental Impact Study for the Tomago industrial area, finalised in 2003. The intent of this study was to establish the strategic context for future environmental assessment of subsequent industrial development proposals within the aluminium smelter buffer zone.

The study concluded that cumulative emissions from expanded smelter operations and the new steel mill could co-exist, although recognising that the emission data for the steel mill was not well defined. The study also accounted for potential emissions from the proposed Tomago Gas Fired Power Station project.

Subsequent to this study, the steel mill proposal did not proceed, and management of the landholding was passed over from the Premiers Department to the Regional Land Management Corporation (RLMC). Around 2007 a significant portion of the site was rezoned from Rural to General Industrial. Tomago Aluminium is not aware whether the existing or future constraints on the associated airshed were considered in this rezoning exercise. Ownership of the land subsequently passed on to the Hunter Development Corporation (HDC) and was sold on to WEPL Investments in 2010.

In the environmental assessment consultation process conducted for the Northbank Enterprise Hub development, Tomago Aluminium sought again to highlight the existence of the formal environmental buffer zone associated with the smelter, requesting WEPL Investments to be

mindful of current constraints of fluoride and sulphur dioxide emissions, and noise. The Environmental Assessment Report for the project does not appear to explore these constraints in any detail. Importantly, it does not identify the location and extent of the Tomago Aluminium Buffer Zone.

Movement in the management and ownership of the landholding since Tomago Aluminium first (reluctantly) sold it to the NSW government has been considerable. It is our view that the original intent of the Tomago Cumulative Environmental Impact Study has not been well represented by NSW government departments and instrumentalities during more recent ownership transfers and zoning changes.

Tomago Aluminium's current production level is approximately 540,000 tonnes per year. The smelter has existing development consent to increase production capacity to 575,000 tonnes per year, with potential to again expand beyond this level.

We ask that the assessment and approval conditions of this new industrial subdivision take into account the intent of the Tomago Cumulative Environmental Impact Study and that future prospective industrial / commercial tenants are adequately informed of the existing and future environmental constraints that arise from Tomago Aluminium's operations within the Tomago industrial zone.

Please feel free to contact the undersigned should you wish to discuss the above information in greater detail.

Regards,



**Warren Brooks**  
**Manager External Relations**