

Lynda Newnam. 12/12/2021. laperouse@bigpond.com

Submission SSD Modification Chemical Industry Port Botany Opposite La Perouse and Phillip Bay

Terminals Bulk Liquids Storage Expansion Application No DA246/96-Mod-4 Location 45 Friendship Road, Port Botany Applicant Terminals Pty Ltd
<https://www.planningportal.nsw.gov.au/major-projects/project/43396>

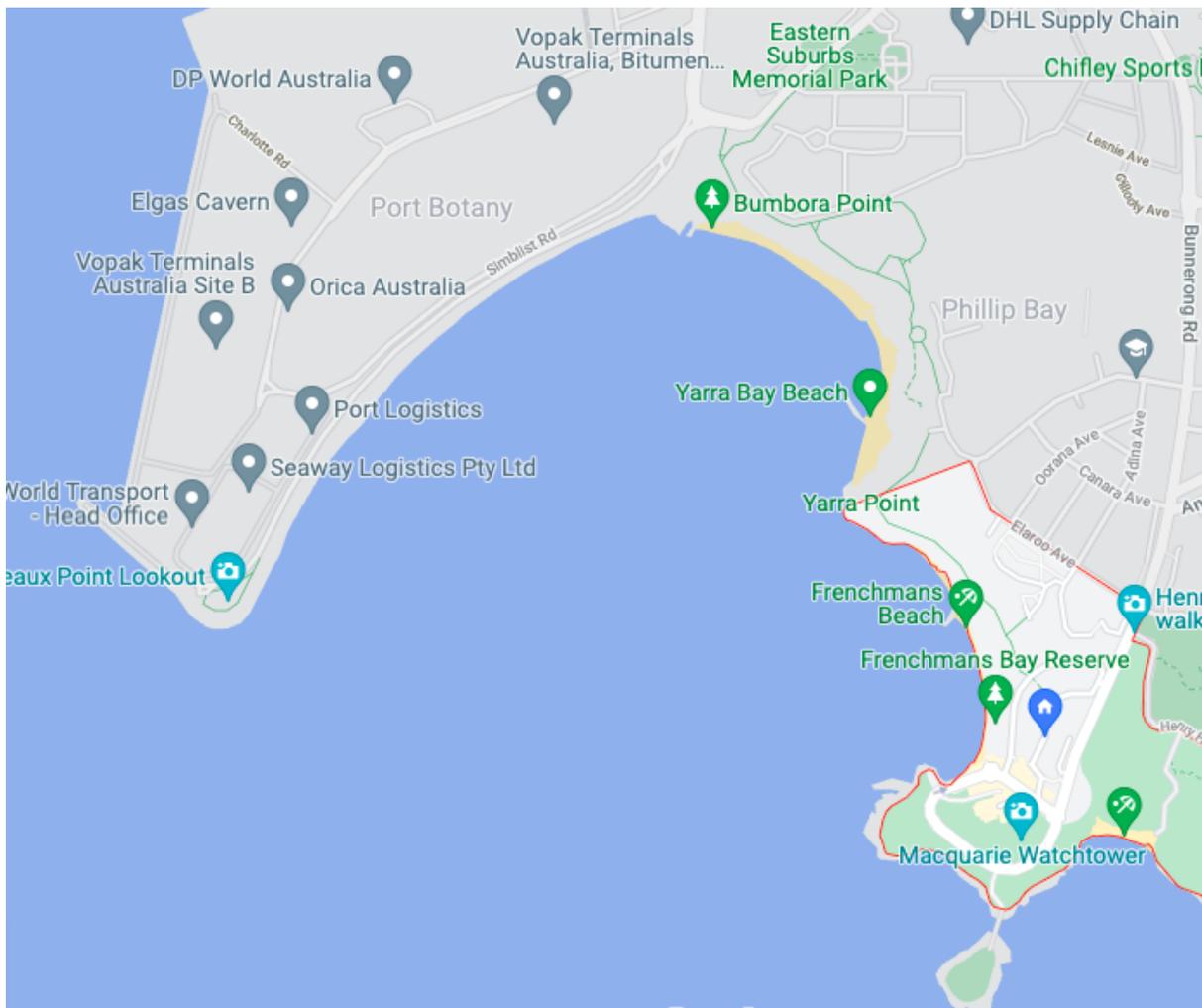
Expansion of an existing bulk liquid storage facility and development of associated infrastructure, comprising loading/unloading facilities, pipelines, safety systems, landscaping and fencing. The proposed modification seeks to install and operate a second thermal oxidiser and associated infrastructure. In addition, the proposed modification also seeks to remove an existing wastewater tank and repurpose an existing tank as a new waste tank.

NSW EPA LICENSE: 1048

<https://apps.epa.nsw.gov.au/prpoeoapp/ViewPOEOLicence.aspx?DOCID=199472&SYSUID=1&LICID=1048>

Licence holder:	TERMINALS PTY LTD
	Trading as: QUANTEM
Premises:	TERMINALS PTY LTD 45 AND 51 FRIENDSHIP ROAD, PORT BOTANY, NSW, 2036 LGA: RANDWICK Catchment: Sydney Coast & Georges River
Administrative fee:	\$9,035.00
Licence status:	Issued
Activity type:	Petroleum products and fuel production Shipping in bulk Chemical storage waste generation Waste storage - hazardous, restricted solid, liquid, clinical and related waste and asbestos waste Petroleum products storage
Licence review:	Complete date 31 Mar 2021 Complete date 05 Apr 2016 Complete date 05 Apr 2011 Complete date 05 Apr 2006 Complete date 20 Jun 2002 Due date 31 Mar 2026
Pollution incident management plan:	Last tested 28 Oct 2019
Current Environmental Risk Level:	Level 3

I live at La Perouse south of the Elaroo-Grose Street Traffic pinch point. This is the only entry and exit to the La Perouse Headland. On busy days traffic grinds to a standstill and it is difficult to get in and out as a resident or visitor. On a recent occasion a helicopter was brought in for an emergency as vehicles couldn't access in a timely fashion. Visitors outnumber residents on such days at least 50:1. Visitors in particular are generally unaware of the significance of the DP Terminal and that the waters between La Perouse and the DP Terminal act as a buffer for the Major Hazard Facilities.



There has been no briefing of residents of the cumulative risk posed and how this incremental change will impact. According to the EPA license for both premises the current environment risk is rated as Level 3 and I note there is only one other Level 3 facility in the area (Qenos on the BIP). The DPIE 'instruction' to consult with community has not been addressed. (See page 16 <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachmentRef=DA246/96-MOD-4%2120211118T232559.807%20GMT> Nonetheless, it the DPIE and EPA that need to consult with community not the developer and that consultation needs to be ongoing because of the extent of the industry in this area – 25 licensed premises 9 of which are Major Hazard Facilities.

I note that the EPA did raise questions about this Modification but I can't find correspondence on the Planning page.

I also note that Planning is currently processing an SSI Development affecting the buffer area between La Perouse and DP World Terminal <https://mpweb.planningportal.nsw.gov.au/major-projects/project/34291> and there is no recognition of the significance of the buffer zone and why it is not suitable for major commercial tourism development. This is a project pushed by the MPs from Sutherland Shire Mark Speakman and Scott Morrison. Further details in my submission at this link - <https://laperousemuseum.files.wordpress.com/2021/09/lynda-newnam-submission-ferry-wharves-compressed-2.pdf>

NSW Ports have recently released this video on the importance of the port and industrial activities <https://youtu.be/8BwrLAN2ln4> It appears to be response to a developer driven review of Industrial Lands, firstly through the Productivity Commission and now the GSC. The Local Government Association have rightly supported the status quo.

The buffer zone between La Perouse and DP is used for low impact recreation. Randwick City Council in its Frenchman's Bay Plan of Management 2002 recognised this. Recreation includes snorkelling, scuba, windsurfing, paddleboarding, kayaking, kite surfing, wingsurfing, sailing, and fishing. If major development is approved around the La Perouse coastline it will push other activities closer to the Banks Revetment Wall. Low impact recreation along with low residential development is compatible with Port and allied activities at DP World Terminal. Residents tolerate the impacts of these activities as a trade-off. Encroachment is bad for both industry and existing residents. However, what is being proposed by Transport and in the case of the Kamay wharves also National Parks is totally incompatible. Transport have even amended the 2056 Transport Plan, without community consultation, to include a Metro Station at La Perouse. Container shipping was moved from Sydney Harbor and concentrated at Port Botany and Banksmeadow along with an intensification of bulk liquids to allow major commercial tourism and residential on Sydney Harbour. To then intensify the buffer area around the Port in Botany Bay is irresponsible and potentially dangerous.

I alert you to this because the Terminals modification is within the current planning context where one Government Agency prompted by others – Industry (Tourism) and NPWS – is ignoring the long-standing planning priorities for this region. The NSW Auditor-General recently highlighted the poor planning performance of Transport in the review of Port Botany Freight – see <https://www.parliament.nsw.gov.au/tp/files/80563/Auditor-General%20-%20Rail%20freight%20and%20Greater%20Sydney.pdf>

This is a growing problem borne of wilful stupidity and going under the radar because of general ignorance. The ignorance will continue unless Planning in partnership with the EPA, SafeWork Bayside and Randwick Councils and Emergency Services educate communities of the risk profile and its management. There should be an accessible dedicated site.

In Summary:

1. Please consider the broader context of this SSD Modification and in determination make clear the importance of the 3 Ports SEPP and the danger of encroachment for both safety and productivity reasons and recommend education starting with a dedicated Planning site for management of the SEPP and buffer.
2. Please upload correspondence from the NSW EPA and any other relevant information.
3. Please communicate with Planning Minister Stokes about the concerns of residents living on the La Perouse Headland south of Grose-Elaroo. The streets north of the Grose – Elaroo intersection have other entry/exit points. There has not been any Hazard Risk education as required under the NSW Emergency Management Act. Container growth is uncapped and only reached a fraction of projected capacity to date. Other tenants continue to expand, like Terminals, but also Qenos, Vopak, Elgas.