



GRAINCORP BULK LIQUID TERMINAL REPURPOSING

Tom Thumb Road, Port Kembla

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Date of final issue: 4 March 2026

File Path: https://glnplanning.sharepoint.com/sites/GLNPlanning/Shared Documents/Projects/Active/12432 GrainCorp Port Kembla Bulk Liquid Storage Tanks Change of Stored Liquids/Reports/GLN12432_SEE_v2.docx

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Project Number: 12432

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Document History and Status

Version	Issue To	Qty	Date	Prepared by	Reviewed by
V1 Draft	GrainCorp Operations	1-e	22/10/25	BC/AD	KS
V2 Draft	GrainCorp Operations	1-e	31/10/25	BC/AD	KS
V3 Draft	GrainCorp Operations	1-e	5/02/26	KS	KS
V4 Final	GrainCorp Operations	1-e	10/02/26	KS	KS
V5 Updated Final	GrainCorp Operations	1-e	10/02/26	KS	KS
V6 Updated Final	GrainCorp Operations	1-e	4/03/26	KS	KS

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Executive Summary

GrainCorp seeks development consent to undertake modifications to the existing and approved Bulk Liquids Terminal (**BLT**) and associated infrastructure which forms part of the broader GrainCorp Port Kembla Shipping Terminal located on Tom Thumb Road at Port Kembla. The objective of the proposal is to facilitate the storage of liquids including Tallow, Used Cooking Oil (**UCO**) pending shipment overseas and other similar animal and vegetable based oils. To this extent, the proposal seeks to transition operations at the BLT to primarily support shipping exports whilst also retaining import functionality. By way of comparison, current BLT operations involve the storage of Mineral Oils which represent shipping imports.

The liquids proposed to be stored in the bulk liquid tanks will continue to consist of combustible liquids and in consequence will be the same materials class as the existing liquids stored on the site.

The proposed change in stored liquids necessitates changes to the development's existing infrastructure, including but not limited to, upgrades to the boiler system, modifications to the piping, installation of four additional pre-receival tanks and associated civil works.

In summary, the proposal seeks consent for alterations and additions including:

- Replacement of an existing 250 kW diesel-fired boiler with a 3.8 MW heating plant comprising a 2.5 MW hot water boiler and a 1.3 MW hot water boiler and provision of two x 21 metre high emission stacks.
- Upgrade the existing (Stage 1) and approved (Stage 2) outload stations to allow truck unloading (to facilitate export functionality) – modifying loading arms and pumps.
- Addition of pumps to the ships lines to also allow export functionality, including minor upgrades to some internal pipework.
- Existing shipping line and Stage 2 approved shipping line to be modified at berth manifold to enable export and tallow handling. Modifications include removal of non-return valve and modification of compressed air system to support line cleaning.
- Upgrades to the ten existing 1.25 ML tanks (Tanks TK-01 to TK-10) to allow for storage of both tallow and UCO by adding infrastructure such as:
 - heating coils;
 - external insulation and extending the cladding (splash guarding) all the way around to cover the insulation on all vertical surfaces; and
 - tank agitators.
- The same design modifications (detailed in the point above) to five of the approved 1.25 ML tanks to allow for storage of liquids such as tallow and UCO. The sixth approved 1.25 ML Stage 2 tank will be replaced with the four proposed pre-receival tanks. It is noted that approval for the construction of the Stage 2 tanks themselves is not sought in this Development Application as they are part of the previously approved Complying Development Certificate.
- Provision of four 100 kL tanks (three immediate, one future) for product pre-receival (Tanks DW-20 to DW-23) and provision of ancillary bunding.
- Establishment of heat tracing around pipework in proximity to tanks.
- Addition of a 20 kL hot water tank.

1 Introduction

This Statement of Environmental Effects (**SEE**) has been prepared on behalf of GrainCorp and accompanies a DA that seeks consent for alterations and additions to the existing and approved BLT and associated infrastructure at Tom Thumb Road, Port Kembla. The BLT forms part of the broader GrainCorp Port Kembla Shipping Terminal. The GrainCorp Port Kembla Shipping Terminal including the BLT utilises the shared user Berth 104. The land the subject of the DA is outlined in **Section 2** and comprises land referred to as the **Site**. The proposed alterations and additions will facilitate the storage of liquids including Tallow and UCO pending shipment overseas and other similar animal and vegetable based oils, and will transition BLT operations from importing to predominantly exporting.

This DA is accompanied by a suite of technical studies which demonstrate that the proposed alterations and additions do not significantly increase the environmental impacts of the approved and existing development.

1.1 Background and Site History

GrainCorp currently operates a BLT at its Port Kembla Shipping Terminal. The BLT was approved under a Complying Development Certificate (**CDC**) which was issued pursuant to the provisions of the former *State Environmental Planning Policy (Three Ports) 2013* (**Three Ports SEPP**) which provided a complying development pathway for the construction of bulk liquid storage tanks at Port Kembla.

Construction of the approved BLT has been staged as follows:

- Stage 1:
 - 10 x bulk liquid storage tanks,
 - 2 truck loadout gantries,
 - a slops tanks,
 - a diesel tank,
 - a triple interceptor oil and water separator,
 - a small steam boiler, and
 - a ships line to import the liquids from ships.
- Stage 2:
 - 6 additional bulk liquid storage tanks,
 - an additional truck loadout gantry, and
 - a second ship line to import the products from the ships.

To date Stage 1 of the works approved under the CDC have been delivered. Since the delivery of these works, GrainCorp has identified the need to undertake modifications to the BLT to facilitate the storage of liquids such as Tallow and UCO pending shipment overseas and other similar animal and vegetable based oils (instead of imported Mineral Oils), and to facilitate and permit the exporting

The proposal is excluded from the provisions of Section 5.27 as it has an EDC of less than \$100 million. Furthermore, it is not designated development by virtue of the operation of 48(1) of Schedule 3 of the EP&A Regulation. In consequence, the proposed alterations and additions do not meet the threshold for SSD. As a result, the works are to be assessed as development that requires consent pursuant to Part 4 of the EP&A Act. Section 5.6 of Chapter 5 of the T&I SEPP establishes that the Minister for Planning and Public Spaces is the relevant consent authority for Part 4 Development Applications on land within the Lease Area.

1.1.1 Existing and Proposed Site Operations and Activities

GrainCorp operates the BLT from its Port Kembla Shipping Terminal. The BLT is located in the northern part of the GrainCorp Port Kembla Shipping Terminal (to the west of the grain hopper) and is separated from the other storage silos that form part of the Terminal by Tom Thumb Road.

The existing BLT provides storage for mineral oils imported via the shared user berth utilised by GrainCorp. Product arrives via ship at the berth and is then piped to the bulk storage tanks within the BLT. It is then transferred to outbound tanker trucks for transport off-site to end users.

The proposal seeks to facilitate the storage of other liquids (such as Tallow and UCO) and the export of these liquids.

Flow diagrams illustrating the existing and proposed site processes are provided at **Appendix C**.

The internal circulation roads around the BLT are utilised by trucks accessing the BLT and trucks delivering grain to the grain hopper.

Access routes to/from the BLT will be unchanged from existing BLT access routes, with all trucks entering and departing the BLT via BLT Driveway 1.

Importantly, it is noted that GrainCorp is able to schedule all inbound trucks as opposed to the unscheduled arrivals of outbound trucks as currently occurs.

Under existing conditions, the trucks accessing the BLT arrive empty and load the imported mineral oils via the gantries. Under the proposed conditions, the trucks accessing the BLT will arrive loaded and will load the liquids (such as Tallow and UCO) via the gantries into the tanks. Prior to and after loading, the trucks will access GrainCorp's weighbridge off Farrer Road which is located a short distance from the BLT. Existing outbound trucks do not utilise the grain weighbridge.

The Traffic Impact Assessment provided at **Appendix E** has been updated to address the feedback provided by the Department of Planning, Housing and Infrastructure (**DPHI**) by email dated 14 November 2025 and concludes:

- That the number of inbound trucks per day and in a peak hour accessing the BLT will be essentially identical to the number of existing outbound trucks and there is more than enough queueing capacity prior to the unloading gantries to accommodate more than double the anticipated peak number of inbound trucks accessing the BLT at any one time.
- The number of additional inbound trucks utilising the grain weighbridge is minor, estimated at no more than 2 additional inbound trucks arriving at the grain weighbridge in a single hour. These inbound truck arrivals will be prioritised by GrainCorp such that they will not need to use the marshalling area prior to the grain weighbridge, but rather be able to immediately use the grain weighbridge both prior to unloading (at the GC BLT) and after

- The Proposal has essentially no potential to generate queues to port roads at either the BLT (Tom Thumb Road) or weighbridge (Farrer Road) as a function of the minor daily and peak hour inbound truck trips and the queuing space available for inbound truck trips prior to the BLT gantries and prior to the grain weighbridge.
- The Proposal will have no impact on the operation of the port or public roads.
- The potential exists that the GC BLT will generate a limited number of UCO truck trips during the Stage 1 construction works. The assessment of the operation of the road network under these conditions indicates that the Stage 1 construction trips – even if occurring while the GC BLT is partially operational at the same time - would have no impact on the operation of any port or public roads/intersections, nor is there any potential for queueing to extend to Tom Thumb Road from the GC BLT.
- As the timing of the Stage 2 construction works remains to be determined, the Stage 2 Construction Traffic Management Plan will need to consider future traffic conditions at the time of the Stage 2 works, including any local/sub-regional projects generating additional traffic to the road network at that time. Notwithstanding, it is noted that the Stage 2 construction trips will be very minor, and have little if any potential to impact any port or public roads/intersections at whatever time in the future the Stage 2 construction works occur.
- Significant space for construction staff parking and truck loading/unloading and material stockpiling is available within the BLT; no construction staff parking, materials handling or stockpiling would occur in Tom Thumb Road.
- A Draft Construction Traffic Management Plan (**CTMP**) has been prepared to ensure that the construction of the proposed BLT infrastructure can be undertaken safely and efficiently without impacting the public or port road networks. The CTMP will be finalised further to consideration of any future Conditions of Consent in a Development Application approval, and then implemented during both the Stage 1 and Stage 2 construction works.

- that there is no risk beyond acceptable limits to the BLT from the adjacent high pressure gas pipeline.
- as the gas pipeline is located underground at a depth of between 1.3m and 1.9m, there would be no impact to the pipeline from incidents at the BLT.
- the second pipeline will be installed from the BLT to the grain delivery silos and then through the existing grain conveyor tunnel. There is no requirement to excavate in the area of the Squadron Energy Pipeline and, hence, there is no interaction between the two pipelines during installation of the second shipping pipeline. Based on this there is no potential for impact to the Squadron Energy Pipeline as a result of the installation and operation of the second shipping pipeline.
- the route location of the gas pipeline which passes the BLT, does not result in a risk impact beyond the acceptable risk criteria published in HIPAP 4 (Ref.7) as an individual facility nor as a result of the cumulative risk in conjunction with the BLT.

1.1.2 Need and Justification for the Proposed Development

GrainCorp currently provides storage and handling of mineral oils at the BLT. GrainCorp has identified opportunities to consolidate its supply chain and utilise the tanks for storage of different products (such as UCO and Tallow) associated with the agri-energy and animal nutrition businesses owned by GrainCorp.

The alterations and addition to the existing and approved BLT are required to facilitate the storage of liquids such as Tallow and UCO pending shipment overseas and other similar animal and vegetable based oils and to facilitate and permit the exporting (instead of importing) of liquids. These amendments necessitate alterations and additions to the existing facility.

1.2 Pre-Application Advice

The Applicant has engaged in pre-lodgement consultation with DPHI who provided formal written correspondence dated 11 June 2015 in relation to the approval pathway and the assessment requirements.

As noted above, in this correspondence, the DPHI determined that the development application may be progressed as non-designated development pursuant to Part 4 of the EP&A Act and section 48 of Schedule 3 of the EP&A Regulation. The DPHI confirmed that the DA must address the minimum requirements set out in **Table 1**.

Table 1. Response to Pre-DA Meeting Minutes

Requirement	Report Location
Detailed Description of Proposal: - An accurate history of the site, including DA consents, CDC certificates and the relationship to Environment Protection Licences. - Details of existing operations and activities carried out at the site - The need and justification for the proposed development. - Alternatives considered, including a description of feasible options which may include a layout options analysis. - Likely construction staging of the development - Likely interactions between the development and existing, approved and proposed operations at the site and in the vicinity of the site. - Details of how loading and unloading of bulk liquids will occur - Clear details of current storage limits, capacity and those proposed - Discussion of how all aspects of the existing and future operations will operate. Consideration should be given to surrendering existing planning approvals and operating under a single development consent.	Sections 1.1, 1.3, 1.4, 2.4, 3, 4 and 5.2 Section 1.1.1 Section 1.1.2 Section 4 Section 3.8 Section 1.1.1 Appendices A and E Section 3.3.1 Sections 1.1 and 3.7
Stakeholder Engagement Document and detail meaningful consultation with Wollongong City Council, the Port Authority of NSW, NSW Ports, the Port Kembla Gas Terminal pipeline owner / operator and the EPA.	Section 1.3

Requirement	Report Location
Detail how any issues raised during the consultation phase have been addressed.	
Risks and Hazards - Provide a preliminary risk screening completed in accordance with State Environmental Planning Policy No 33 – Hazardous and Offensive Development and applying SEPP 33 (Department of Planning (DoP), 2011) that includes a clear indication of class, storage and handling quantities and location of all dangerous goods and hazardous materials associated with the development. - Provide a Preliminary Hazard Analysis prepared in accordance with Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis (DoP, 2011) and Multi Level Risk Assessment (DoP, 2011), should the preliminary risk screening indicate that the project is 'potentially hazardous'. - Consider the risks associated with the approved (not yet constructed) gas pipeline for the Port Kembla Gas Terminal (CSSI-9471, as modified).	Sections 5.3 and 6 Appendix A Risk and Hazard Assessment
Air Quality - Provide an air quality impact assessment in accordance with the relevant EPA guidelines which includes: - Detail existing air quality impacts caused by existing operations, including how emissions are managed. - Provide an assessment of the predicated impacts on air quality, including consideration of cumulative impacts from the existing and proposed operations. - Detail of existing and proposed air quality management mitigation measures.	Section 6 Appendix F Air Quality Impact Assessment
Noise and Vibration - Include a quantitative noise impact assessment undertaken by a suitably qualified acoustic consultant in accordance with the relevant Environment Protection Authority guidelines and Australian Standards, including: - identification of impacts associated with construction, site emissions and traffic generation at noise affected sensitive receivers, including sleep disturbance impacts - the cumulative impacts of the development and all current operations of the site - Details and analysis of the effectiveness of proposed management and mitigation measures to adequately manage identified impacts, including a clear identification of residual noise following application of these measures and details of any proposed compliance monitoring programs	Section 6 Appendix G Noise and Vibration Assessment
Traffic and Transport A Transport Impact Assessment prepared in accordance with the Transport for NSW Guide to Transport Impact Assessment (GTIA) and Austroads guidelines, including:	Section 6 Appendix E Transport Assessment

Requirement	Report Location
- details of all daily and peak traffic volumes likely to be generated during construction and operation, including a description of key access, vehicle types and potential queuing impacts - an assessment of the predicted impacts of this traffic on road safety and the capacity of the road network, including consideration of cumulative traffic impacts - plans demonstrating how all vehicles likely to be generated during operation can be accommodated on the site to avoid queuing in the street network - details of existing and proposed traffic management and mitigation measures.	
Marine Movements Provide details of any changes required to frequency or vessel size and approval details that these movements operate under.	Section 6 Appendix H Marine Movements Statement
Soil and Water Management - Provide an assessment of potential soil, surface water and groundwater impacts (both quality and quantity) associated with construction and operation of the development. - Provide details of any soil, surface water or groundwater mitigation, management and monitoring activities and methodologies.	Sections 5.3 and 6 Appendix D Soil Water Management Plan
Flooding Include an assessment of flood risk in accordance with the Flood risk management guideline LU01 – Flood impact and risk assessment (2023)	Section 6 Appendix D Soil Water Management Plan
Planning Agreement / Development Contributions Demonstrate that satisfactory arrangements have been or would be made to provide, or contribute to the provision of, necessary local and regional infrastructure required to support the development.	Section 5.6

1.3 Stakeholder Engagement

The Applicant has undertaken stakeholder engagement with relevant authorities and agencies. The outcomes of this consultation are detailed in **Table 2**.

Table 2. Response to Consultation Outcomes

Consultation Item	Response
Wollongong City Council	
GrainCorp met with Wollongong City Council (Council) on a number of occasions throughout 2025.	8 April 2025 - teams meeting held with Darren Burke and Pier Panozzo to discuss the potential planning pathways as CDC/DA. The feedback provided by Council was for GrainCorp to seek legal advice regarding the appropriate planning approval pathway.

Consultation Item	Response
	20 October 2025 - the purpose of the meeting was to provide Council with a detailed understanding of the proposed alterations and additions. A copy of the minutes of the meeting issued by Council are attached at Appendix K. The matters raised by Council have been addressed in the DA submission. The following additional comments are provided: Council acknowledged that the updated Environment Protection License will address compliance matters related to on-site odour management and emergency spill management. With regard to odour emissions, the Air Quality Impact Assessment notes that breathing and working losses from the bulk liquid tanks occurring whilst storing tallow or UCO were considered to represent a potential minor odour source. Tallow and UCO arriving onsite has usually been cleaned and pre-processed. These products will be decanted into the storage tanks in liquid form and subsequently allowed to solidify during storage, thereby minimising odour emissions. Individual tanks will re-heated and agitated approximately ten days prior to shipping. Breathing losses are therefore assumed to be intermittent and minor. The four pre receipt tanks (DW-20 to DW-23) will only be in intermittent use and as such are not considered to represent a significant odour source. Furthermore, the risk assessment included an offensive operations assessment to confirm that there are no offensive operations involved in the proposed redevelopment (e.g. noise generating equipment, hazardous chemical releases to air/land/water, odour generating operations, etc.). The assessment concluded that air pollution is not considered an offensive operation at the repurposed BLT site. GrainCorp has provided the following incident response management plan details related to the Bulk Liquid Terminal operations. Incidents are categorised as follows: Incidents in transit – truck deliveries between other sites and the PK BLT Incidents on site at the PK BLT site <i>Incidents during transit</i> Truck deliveries between other sites and the PK BLT are managed by third party contractors. GrainCorp undertakes compliance verification when procuring delivery services or negotiating supply contracts that include review of safety and incident response management plans to ensure suitable systems are in place.

Consultation Item	Response
	<i>Incidents on site</i> GrainCorp has a Pollution Incident Response Management Plan that is updated annually in line with the requirements of the site Environmental Protection Licence (EPL). This Management Plan will be updated to satisfy the proposed development works and handling of the new products at the facility.
Arc Traffic & Transport (on behalf of the Applicant) prepared a summary of the Proposal, including the existing and future traffic characteristics of the GC BLT, as well as the preliminary outcomes of the traffic assessment. This brief was provided Council for review in July 2025.	The feedback provided by Council is detailed in Section 1.5.2 of the Traffic Impact Assessment attached at Appendix E. The issues raised by Council have all been specifically addressed in the Transport Assessment prepared by Arc Traffic & Transport for submission with the DA.
Transport for NSW	
Arc Traffic & Transport (on behalf of the Applicant) prepared a summary of the Proposal, including the existing and future traffic characteristics of the GC BLT, as well as the preliminary outcomes of the traffic assessment. This brief was provided to TfNSW for review in July 2025.	The feedback provided by TfNSW is detailed in Section 1.5.2 of the Traffic Impact Assessment attached at Appendix E. The issues raised by TfNSW have all been specifically addressed in the Transport Assessment prepared by Arc Traffic & Transport for submission with the DA.
Environmental Protection Agency	
Consultation with NSW EPA is ongoing.	7 March 2025 - site meeting held with Chris Kelly and Matt Davidson to review existing operations and proposed project scope. The Diesel boilers and waste classification were flagged by the EPA as matters to be addressed. 1 July 2025 - site meeting held with Matt Davidson, Chris Kelly and Greg Newman to review proposed project scope. Subsequent to this meeting, the EPA forwarded matters for GrainCorp to address to the DPHI dated 3 July 2025 and this was subsequently issued to GrainCorp. The EPA raised the potential need to vary the Environment Protection License and requested additional information regarding the waste classification to further inform their considerations. The EPA also requested justification for the provision of diesel boilers. GrainCorp has provided information regarding the waste classification to the EPA. Ongoing consultation with the EPA will inform any required amendments to the development's existing Environment Protection Licence (EPL) known as EPL (3693). 12 November 2025 – The EPA provided feedback to DPHI regarding the Draft DA submission in relation to the waste classification and requested a detailed options assessment and detailed justification for the

Consultation Item	Response
	use of diesel fuel and consideration of commitments to the use of renewable diesel fuel in the boilers. Refer to Table 3A and Section 4 which addresses the information requested. 19 December 2025 – GrainCorp met again with the EPA to further discuss the diesel boiler emissions (refer to Table 3A and Section 4).
NSW Ports (Port Lessor)	
Consultation with NSW Ports is ongoing.	GrainCorp has liaised extensively with NSW Ports throughout the pre DA phase of the project. 3 September 2024 – Rob Mingis (GrainCorp Mechanical Engineer) provided NSW Ports with a written project brief. 14 October 2024 – Gerry Palmiotto (NSW Ports) provided GrainCorp with a preliminary RFI. 14 January 2025 – Tim Guyatt (GrainCorp) met with Gerry Palmiotto (NSW Ports) to review the project proposal and clarify the required engagement with NSW Ports. 11 March 2025 – GrainCorp provided a response to NSW Ports RFI. 21 March 2025 – GrainCorp provided a further RFI response to NSW Ports RFI. 12 May 2025 – Additional RFI issued by NSW Ports. 16 June 2025 – GrainCorp provided a response to NSW Ports RFI. 15 July 2025 – GrainCorp provided further response to NSW Ports RFI. 6 August 2025 – NSW port RFI register updated along with letter of support. 31 October – Draft DA submission submitted to NSW Ports for feedback. 14 November 2025 – RFI register provided by NSW Ports in response to the draft DA submission regarding the following: • Transport assessment - provide further details around queuing capacity on site • Noted requirement to comply with applicable Australian Standards • Queried why slops disposal is by contract pump out truck instead of by trade waste connection • Queried details on the drainage works proposed including how the stage 2 works will integrate with the existing, and the DRAINS model. • Queried utilities demands

Consultation Item	Response
	- Queried details of hot water boilers and hot water tank. - Queried impact of second shipping line on Squadron Energy gas pipeline. GrainCorp has continued to liaise with NSW Ports to update the DA submission to comprehensively respond to the feedback provided by NSW Ports.
Squadron and Jemema (Port Kembla Gas Terminal Pipeline Operator)	
GrainCorp submitted written email correspondence to Squadron Energy and Jemena on the 23 July 2025 outlining the proposed works and requesting feedback.	Squadron Energy and Jemena provided written correspondence on the 4th and 20 th August 2025 outlining that the proposed works will have no impact on Jemena's section of the Port Kembla Pipeline. The site is proximate to Squadron's section of the Pipeline. A Risk and Hazard Assessment is included at Appendix A and confirms that the risks associated with the section of the pipeline adjacent to the proposed works will not exceed the acceptable risk criteria nominated by the <i>Hazardous Industry Planning Advisory Paper No. 4 – Risk Criteria and Land Use Safety Planning (Ref.7)</i> (HIPAP 4 (Ref.7)). The report also confirms that as the gas pipeline is located underground at a depth of between 1.3m and 1.9m, there would be no impact to the pipeline from incidents at the BLT.

1.4 Type of Development Application

This SEE seeks consent for alterations and additions to the existing and approved BLT and associated infrastructure at GrainCorp's Port Kembla Shipping Terminal. The proposal therefore constitutes 'development' pursuant to Section 1.5 of the EP&A Act.

The T&I SEPP designates the site as forming part of the Port Kembla Lease Area as indicated by the *Lease Area Map*. Section 5.6 of Chapter 5 of the T&I SEPP establishes that the Minister is the relevant consent authority for Part 4 Development Applications on land within the Lease Area.

The proposal is not Designated Development, nor is it SSD. However, referral under the *Protection of the Environment Operations Act 1997 (PoEO Act)* will be required. The PoEO Act requires an EPL for the carrying out of certain works. The BLT operates under an existing EPL held by GrainCorp in respect of their Terminal at Port Kembla, which as a consequence of the proposal is likely to be required to be modified. The proposal does not align neatly with the prescribed scheduled activities and liaison between the NSW EPA and GrainCorp is ongoing in this regard. As a result, the proposal is potentially integrated development pursuant to section 4.46 of the EP&A Act requiring referral to the NSW EPA for consideration pursuant to section 55 of the PoEO Act.

Section 64 of the *Water Management (General) Regulation 2025* establishes exemptions from the requirement to hold controlled activity approvals pursuant to section 91E(1) of the *Water Management Act 2000* (WMA). Section 48 of Part 6, Schedule 4 establishes that a controlled activity carried out in accordance with a lease, license, permit or other right in relation to land under the control of a port operator is exempt from the requirements of Section 91E(1) of the WMA if the

This section of the SEE describes the site's location, its existing development and surrounding context.

The existing BLT forms part of the broader GrainCorp Port Kembla Shipping Terminal located at Tom Thumb Road, Port Kembla (refer to **Figure 1**). The BLT is shown in **Figure 2**.

The BLT is located on Lot 20 DP 1046295 and the GrainCorp Grain Terminal (**GC GT**) is located on Lot 2001 DP 1030233. The shipping line corridor extends between the BLT site under Tom Thumb Road (Lot 12 DP 1182111) through the GC GT site to berth 104.

The land the subject of the DA is located within the port at Port Kembla which is a deep water harbour that supports a range of port-related uses including but not limited to steel, vehicle import, grain, coal, general cargo and bulk liquid related uses.

GrainCorp Port Kembla

Figure 1. Site Context Map

2.2 Site Description

The part of the GrainCorp Shipping Terminal that comprises the BLT has an area of approximately 1.9ha and is irregular in configuration (refer to **Figure 2**). The existing BLT accommodates infrastructure including 10 bulk liquid storage tanks, 2 truck loadout gantries, a slops tank, a diesel tank, a triple interceptor oil and water separator as well as a small steam boiler.

The shipping line corridor extends from the BLT under Tom Thumb Road and through the GC GT to Berth 104 and is used to import liquids from incoming ships.



Source: GLN Planning & Nearmap

Figure 2. Site Location Map



Source: GLN Planning & Nearmap

Figure 3. Aerial Location Map of BLT

2.3 Surrounding Locality

The land the subject of the DA is located within the Illawarra region which is approximately 80km south of Sydney. The broader surrounds include the Illawarra Escarpment to the west, Lake Illawarra to the South and Port Kembla Beach to the south east.

In the more immediate context, the surrounding development can be characterised as a mix of industrial and port related land uses.

2.4 Background

The GC BLT was approved under a CDC (issued 21 January 2014). Construction of the approved BLT has been staged as follows:

- **Stage 1** – 10 bulk liquid storage tanks, 2 truck loadout gantries, a slops tank, a diesel tank, a triple interceptor oil and water separator, a small steam boiler and a ships line.
- **Stage 2** – 6 additional bulk liquid storage tanks, an additional truck loadout gantry and a second ship line to import the products from ships.

Stage 1 has been constructed, and Stage 2 is yet to be delivered. This subject application seeks to modify the existing and approved development as described in **Section 3**.

3 Proposed Development

The proposed development seeks consent for alterations and additions to the existing and approved BLT and associated infrastructure including:

- Replacement of an existing 250 kW diesel-fired boiler with a 3.8 MW heating plant comprising a 2.5 MW hot water boiler and a 1.3 MW hot water boiler and provision of two x 21 metre high emission stacks.
- Upgrade the existing (Stage 1) and approved (Stage 2) outload stations to allow truck unloading (to facilitate export functionality) – modifying loading arms and pumps.
- Addition of pumps to the ships lines to also allow export functionality, including minor upgrades to some internal pipework.
- Existing shipping line and Stage 2 approved shipping line to be modified at berth manifold to enable export and tallow handling. Modifications include removal of non-return valve and modification of compressed air system to support line cleaning.
- Upgrades to the ten existing 1.25 ML tanks (Tanks TK-01 to TK-10) to allow for storage of both tallow and UCO by adding infrastructure such as:
 - heating coils;
 - external insulation and extending the cladding (splash guarding) all the way around to cover the insulation on all vertical surfaces; and
 - tank agitators.
- The same design modifications (detailed in the point above) to five of the approved 1.25 ML tanks to allow for storage of liquids such as tallow and UCO. The sixth approved 1.25 ML Stage 2 tank will be replaced with the four proposed pre-receival tanks. It is noted that approval for the construction of the Stage 2 tanks themselves is not sought in this DA as they are part of the previously approved Complying Development Certificate.
- Provision of four 100 kL tanks (three immediate, one future) for product pre-receival (Tanks DW-20 to DW-23) and provision of ancillary bunding.
- Establishment of heat tracing around pipework in proximity to tanks.
- Addition of a 20 kL hot water tank.
- Repurposing of an existing slops tank for use as a diesel storage tank containing boiler fuel.
- Repurposing of an existing diesel storage tank for use as a slops tank.
- Construction of a new laboratory and sample storage facility.

Minor site preparatory work / excavation is required to facilitate the construction of the pre-receival tanks and the construction of a new hot water tank, and a site laboratory.

The proposal is illustrated in the Architectural Plans at **Appendix C**.

3.1 Change of Liquid

The liquids proposed to be stored in the bulk liquid tanks will continue to consist of combustible liquids and in consequence will be the same materials class as the existing liquids stored on the site.

The existing BLT is used to store mineral oils which is a type of C2 Combustible Liquid following importation by ship. The proposal seeks consent for the storage of Tallow and UCO in the existing and approved bulk liquid storage tanks which is also a type of C2 combustible material pending shipment overseas. The amendment necessitates modifications to the tanks which are discussed in **Section 3.3.**

3.2 Pre-Receipt Tanks

The proposal seeks consent for the construction of four pre-receipt tanks. The tanks will be used to facilitate the separation of water and oil in the Tallow. Once separated, the Tallow will be transferred from the pre-receipt tanks to the bulk liquid storage tanks.

3.3 Changes to Bulk Liquid Storage Tanks

The existing tanks located within Stage 1 are proposed to be modified to incorporate heating infrastructure such as insulation, cladding on the sides, hot water heating coils and mechanical agitation. Similarly, the five additional Stage 2 tanks will also incorporate this heating infrastructure. The proposed amendments facilitate the repurposing of the tanks for the heating of liquids. In addition, the proposal will introduce a hot water system for the cleaning of the bulk liquid storage tanks.

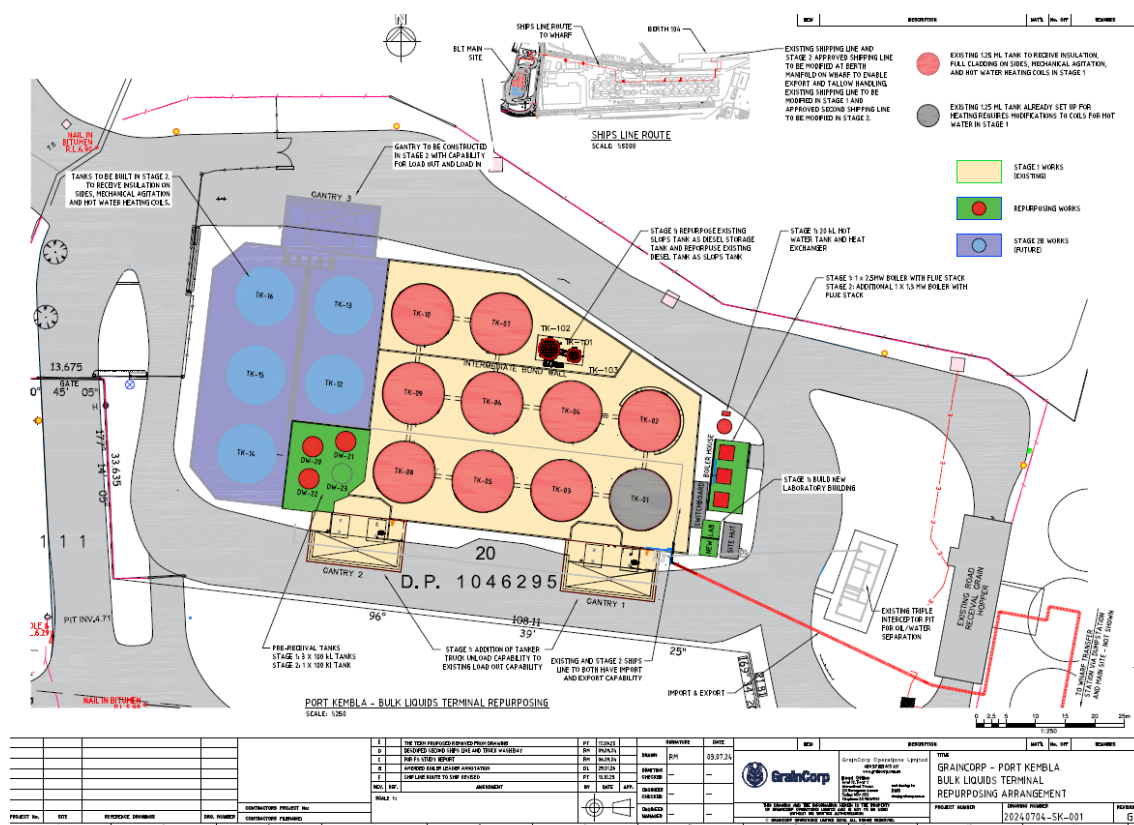
The location of the tanks subject to the proposed physical changes is shown below in **Figure 4.**

As noted previously, approval is sought in this DA for the upgrades to the Stage 2 tanks (but not for their construction as this has been approved in the CDC). The Applicant requests that the CDC approval and associated conditions be incorporated into any development consent issued in respect of the subject application to give rise to one operative consent. The Applicant's intention would be to rely on this newly issued development consent to construct the Stage 2 works (as modified by the works proposed in this development application) in due course with the timing determined by market demand.

3.3.1 Reduction in Bulk Storage Tank Capacity

The approved BLT comprises 16 x 1.25 ML bulk storage tanks. The capacity of the approved bulk liquid tanks will be reduced as follows:

- The proposal involves replacing one of the approved but not yet constructed 1.25 ML Stage 2 bulk storage tanks with four 100 kl pre-receipt tanks; and
- The proposed infrastructure upgrades will also result in an inconsequential reduction in the storage capacity of each of the 10 existing and 5 approved bulk liquid tanks in the order of 1.5m³.



Source: GrainCorp Operations Limited (refer to Drawing 20240704-SK-001 provided at **Appendix C**)

Figure 4. Proposed Physical Changes, Location of Tanks and Staging

3.4 Amendments to Operations

The existing operations involve the importation of liquids to the site received from overseas. The proposal seeks consent to transition the BLT's operations from the importing of liquids to predominantly one of exporting. It is proposed that all liquids be received via truck and then transferred via gantry to the tanks.

The transition to include exportation necessitates changes to the shipping lines, whereby liquids will need to flow in an alternative direction. To facilitate this, and change the shipping line in reverse, modifications include new ships line pumps and non-return valves in the pipes

3.5 Modifications to the Boiler Shed

The proposal seeks consent to replace the existing 250 kW diesel-fired boiler with a 3.8 MW heating plant comprising a 2.5 MW diesel powered boiler and a 1.3 MW diesel powered boiler and provision of two x 21 metre high emission stacks.

3.6 Berth 104

The existing shipping line and Stage 2 approved shipping line is to be modified at the berth manifold to enable export and tallow handling. Modifications include removal of non-return valve and modification of compressed air system to support line cleaning.

3.7 Development Consent

As noted above, the existing development was delivered under a CDC issued pursuant to the provisions of the former Three Ports SEPP which provided a complying development pathway for the construction of bulk liquid storage tanks within the Port Kembla Area. GrainCorp requests that the existing consent be incorporated into the new development consent associated with the modified BLT and associated infrastructure. In particular, the existing consent as it relates to the yet to be constructed "Stage 2" works is requested to be consolidated into the new development consent with no further conditions imposed.

GrainCorp further requests in relation to the bunding associated with bulk liquid storage, that no condition be imposed requiring the ten existing Stage 1 bulk liquid tanks comply with AS1940:2017. Detailed commentary in this regard is provided in **Section 4** below.

GrainCorp requests the opportunity to review any draft proposed conditions of consent prior to finalisation.

3.8 Proposed Construction Staging of BLT Facility Upgrade

3.8.1 Construction Staging

Construction of the BLT facility upgrade is proposed to be undertaken in stages generally as outlined below. The works outlined are provided for background context. Drawing 20240704-SK-001 – GrainCorp Port Kembla Bulk Liquids Terminal Repurposing Arrangement should be relied upon.

The Stage 1 works generally include:

- Provision of new 2.5 MW hot water boiler
- Provision of one x 21 metre high emission stack.
- Upgrade the existing truck gantries to allow truck unloading (to facilitate export functionality) – loading arms and pumps.
- Addition of pumps to the shipping line to also allow export functionality, including minor upgrades to some internal pipework.
- Existing shipping line to be modified at berth manifold to enable export and tallow handling. Modifications include removal of non-return valve and modification of compressed air system to support line cleaning.
- Upgrades to the ten existing 1.25 ML tanks (Tanks TK-01 to TK-10) to allow for storage of both tallow and UCO by adding infrastructure such as:
 - heating coils;

- external insulation and extending the cladding (splash guarding) all the way around to cover the insulation on all vertical surfaces; and
- tank agitators.
- Establishment of heat tracing around pipework in proximity to tanks.
- Provision of three x 100 kL pre- receival tanks (Tanks DW-20 to DW-22) and provision of ancillary bunding.
- Addition of a 20 kL hot water tank.
- Repurposing of an existing slops tank for use as a diesel storage tank containing boiler fuel.
- Repurposing of an existing diesel storage tank for use as a slops tank.
- Construction of a new laboratory and sample storage facility.
- Minor site preparatory work / excavation is required to facilitate the construction of the pre-receival tanks and the construction of a new hot water tank, and a site laboratory.

The Stage 2 works generally include:

- Construction of five previously approved 1.25 ML bulk storage tanks including the design modifications (the subject of this DA) required to allow for storage of tallow and UCO and associated pipework and bunding.
- Construction of one x 100 kL pre- receival tank (DW-23) – the subject of this DA.
- Provision of new 1.3 MW hot water boiler – the subject of this DA.
- Provision of one x 21 metre high emission stack.
- Provision of second previously approved shipping line including the design modifications (the subject of this DA) to have import and export functionality.
- Design of the second previously approved shipping line to be modified at berth manifold to enable export and tallow handling (as proposed in this DA). Modifications include removal of non-return valve and modification of compressed air system to support line cleaning.
- Construction of third previously approved truck gantry (modified to facilitate truck unloading as proposed in this DA), pumps and associated pipework.
- Site specific fire equipment.

3.8.2 Concurrent Construction and Operation

Following works to the existing tanks, pipework, truck gantry and services and while the construction process for the remainder of the Stage 1 upgrade is ongoing, GrainCorp seeks the ability to commence receiving UCO via one truck gantry and storing it in three of the existing BLT's (noting that UCO does not require heating).

The construction of Stage 2 is intended to be carried out while Stage 1 is operational.

These possible scenarios involving simultaneous operation and ongoing construction are considered in the traffic and noise impact assessments.

4 Options Analysis

The DPHI has requested an analysis of the alternative considered. The options considered are listed and discussed in **Table 3**.

Table 3. Options Analysis

Option	Comment
Option 1 – Do Nothing	The 'do nothing' option entails leaving the site in its current state. This option would render it unsuitable for the preferred operations which principally include the storage of tallow and UCO in lieu of mineral oils. In light of this, the 'do nothing' alternative would significantly hinder GrainCorp's operations and is considered unfeasible.
Option 2 – Alternative Location of the Lab (Drawing 20240704 – SK-002 Rev B)	Option 2 entails the construction of a Lab adjacent to the existing triple interceptor pit. This option was discounted because it required that the lab be physically separated from other on-site facilities, including the site hut and switchboard. The option which forms the subject of this application co-locates the lab with the switchboard and the site hut. This is considered to represent a more efficient design as it enables site personnel to more efficiently move between facilities.
Option 3 – Alternative Location for the Pre-Receive Tanks (Drawing 20240704 – SK-003 Rev B)	Option 3 provides an alternative location for the pre-receive tanks. The pre-receive tanks facilitate the separation of water and oil in the Tallow. The location of the tanks is considered to result in an inferior design outcome as they are separated from the bulk liquid storage tanks. Under the proposed design option, the pre-receive tanks are positioned adjacent to the bulk liquid storage tanks, thereby allowing for the efficient transfer of materials.
Option 4 – Bund Expansion (Drawing 20240704-SK-004)	The existing development complies with the Australian Standard applicable at the time for bulk liquid storage, being AS1940:2004. In 2017, AS1940 was updated with a new requirement for a bund compound to have capacity for the greater of 25% of the total volume of liquid stored or 110% of the largest tank volume. GrainCorp proposes to comply with AS1940:2017 for the newly proposed tank infrastructure – the PRT tanks and bund and for the bund protecting the 5 Stage 2 tanks. However, for the bunds protecting the 10 existing bulk liquid tanks, compliance with AS1940:2017 is technically complex and cost prohibitive and introduces considerable hazards to the facility as detailed below. Option 4 includes the installation of a linked bund (14mx17mx6.8m deep) with a capacity of 1,600m³ adjacent the interceptor pit and raising the existing bund height to 1.5 metres to achieve compliance with AS 1940:2017. This option has been deemed unsuitable for the following reasons: i. Deep bund creates confined space issues to be managed ii. Deep bund likely to create hazards impacting surrounding infrastructure and foundations.

Option	Comment
	iii. Significant capital costs associated with developing a large, below-ground void, including ground stabilisation and foundations support for nearby structures. In addition to considering the link bund option as detailed above to achieve compliance with AS 1940:2017, GrainCorp investigated raising the bund wall height from 1 metre (existing) to 2.7 metres. This option was deemed unsuitable for the following reasons: i. Entire bunded area becomes a confined space. Controls and procedures required to manage this impose significant operational burden to mitigate hazards. ii. Visual confirmation of valve positioning impeded increasing risks relating to spills and product losses. iii. Significant capital costs associated with new foundations and wall construction. GrainCorp propose that on consideration of the risks associated with retaining the existing bunding versus expanding the bund capacity, that AS1940:2017 isn't conditioned as a requirement for the bunds associated with the 10 existing bulk liquid storage tanks. In this regard, GrainCorp notes that there is no increase to the storage volume of the existing bulk tanks and the stored liquid classification is unchanged. GrainCorp commissioned Beca to undertake a risk assessment of the existing bulk liquid storage tanks at the BLT which were assessed as being compliant with <i>AS 1940:2004</i>. The risk assessment notes that the 10 existing bulk liquid tanks do not meet the additional requirements included in the 2017 version of the standard, specifically the requirements for bund capacity. A copy of the Bunding Risk Assessment prepared by Beca is provided at Appendix L. The risk assessment considers the existing tank farm and any risks posed by non-conformance of the bund with the current version of AS1940. New works under the project are excluded from this assessment as they will be compliant with relevant standards and regulations. Potential failure scenarios were identified and assessed against the risk of a spill or leak exceeding the bund capacity, resulting in an uncontrolled loss of containment and contamination of the local environment. The majority of scenarios were assessed as having a Very Low / Negligible risk level, which was considered to be acceptable. The primary mitigation for these scenarios is the bund having sufficient capacity to contain the spill volume. The two scenarios identified which could exceed the bund capacity were; • Failure of multiple bulk storage tanks simultaneously • Failure of a single bulk storage tank during a heavy rainfall event which exceeds 1hr 1% AEP. Both scenarios were assessed as have a Medium risk level, based on the extreme consequence of a loss of containment. This was considered to be acceptable following SFAIRP principles, on the basis that the likelihood is Rare which is the lowest possible rating.

Option	Comment
	For all scenarios any potential additional mitigations were identified, regardless of the assessed risk rating. It is recommended that all mitigations identified are implemented, on the basis they are likely to be low cost /complexity and the consequence of a failure is significant. Pre-DA lodgement consultation has been undertaken with SafeWork NSW and the DPHI regarding the proposal to maintain compliance with <i>AS 1940:2004</i> for the 10 existing bulk liquid storage tanks. DPHI has advised GrainCorp that the advice of SafeWork NSW will be followed. SafeWork NSW has advised that their position will be provided when the DA is formally exhibited to the relevant stakeholders.
Option 5 – Heat Plant Technology Options	Refer to the detailed information provided below and in Table 3A .
Preferred Option	The preferred design is the outcome of iterative design testing and has been selected as it represents the most feasible solution capable of achieving GrainCorp’s desired planning, environmental and operational outcomes. It allows site personnel to efficiently move between facilities and permits the most efficient transfer of liquids. The proposal for the bulk liquid tanks to remain compliant with Australian Standard AS 1940:2004 (rather than upgrade to achieve compliance with AS 1940: 2017) mitigates considerable hazards and costs to the facility. The diesel boiler has been selected following a rigorous cost benefit analysis and was found to be preferable from a capital perspective and because it provides pathways for reducing emissions beyond what an LPG boiler can achieve through the use of renewable diesel. It is also the same technology as is currently used on site.

The various layout options are documented within the Architectural Plans at **Appendix C** (Dwg. SK002, SK003, and SK004).

Heat Plant Technology Options

The storage and handling of Tallow as a bulk material triggers a project requirement to provide temperature control to the product. The Tallow will be stored in the insulated tanks without requiring heat regulation, however will require heating to specification prior to shipping. The process of bringing the temperature up requires an internal heating element to be installed, connected to a closed circuit of water, heated by a boiler.

The proposed development involves installation of 2.5 MW heat plant, future expansion of the site would require additional heating capacity (0.25MW per tank), requiring the future provision of a secondary 1.3MW boiler. The selection of technology has to be efficient, reliable (24 hr operation, for 5 days continuous), and scalable.

Alternatives to using hot water/steam circulations for bulk material heating are electric immersion heaters which are a higher energy solution that would also have a greater power draw. Electrical elements are typically not seen at this volume of bulk materials due to the size of elements required for the level of heat transfer required. Due to this reason, it was decided to investigate heat plant technology over electrical elements.

Table 3A. Heat Plant Technology Options Analysis

Option	Site Considerations	Final Decision
Solar/Electric Hybrid	Use of new onsite solar infrastructure to assist in peak energy use Site would require large infrastructure upgrades to install solar panels, battery storage and transformers to provide electrical supply Would still require a feed from main power grid as a back up for high energy use periods- this would trigger major electrical infrastructure upgrades	Costs of infrastructure upgrades made project unviable
Electric	• Increase electrical infrastructure • Transformer upgrades x 2 (Transformer for main step down from grid, and second transformer to feed heat plant) • Large impacts of outage on greater port complex – greater impacts to others • Cost of boiler is comparable • Technology susceptible to ambient temperature	Costs of infrastructure upgrades made project unviable
Bio-mass	• Stockpile of bio-mass products requires storage, handling and procurement. • No local feedstocks supply chain established • Waste stream generated by burner • Biomass technology cost range of install quoted at \$1.5m-\$2.0m for size requirement • Not easily scaled up to meet future requirements.	Due to capital investment needed for infrastructure, combined with land requirements, this was seen as unfeasible.
Gas (natural)	• Closest connection point Springhill Rd • Cost prohibitive for infrastructure • Boiler tech cost comparable to selected	Costs of infrastructure upgrades made project unviable
Gas (LPG)	• Requires 3-5 deliveries per month of LPG to meet fuel demands • Requires development of a storage area, additional infrastructure (concrete slab, bollards and roadways) to not inhibit existing operations • Emission factor is lower than diesel, however no pathway exists to reduce/ eliminate carbon emissions.	Viable option for project.
Diesel	• Requires 1-2 Deliveries per month • Can use existing infrastructure onsite • Alternative blends of Diesel like “Ampol R100” or “Amplify R20 Diesel” offer pathways to effectively eliminate carbon emissions.	Viable option for project.

The GrainCorp Project Steering Committee endorsed the selection of the diesel fueled boiler for the purpose of a design basis. The condition of this approval, which would increase the scope 1 emissions of GrainCorp's Port Kembla terminal was to review all alternative pathways to net zero in line with company policies.

GrainCorp has an embedded energy management system standard which is aligned to ISO50,001 Energy Management System. GrainCorp's standard is underpinned by the following four elements:

- Know more - Better understand how energy is used across the business by tracking and analysing energy consumption in high resolution
- Use less - Focus on operational efficiency through policy and system development and capital investment
- Decarbonise - Develop a renewable energy strategy and develop science-based target commitments around carbon reduction
- Pay less - Focus on strategic energy procurement and demand management

Justification for the selection of a diesel fueled heat plant for the current operation, and future operations.

- Know more - GrainCorp has assessed multiple fuel options (electric, natural gas, hybrid, LPG, diesel) and analysed lifecycle costs, emissions, and feasibility.
- Use less - Diesel boilers offer high thermal efficiency and operational reliability for large-scale heating, minimizing energy waste compared to less efficient alternatives.
- Decarbonise - While diesel is a fossil fuel, it provides a transition pathway to renewable diesel, which significantly reduces carbon intensity and supports long-term decarbonization.
- Pay less - Diesel represents a cost-effective capital investment compared to electric or hybrid systems, which were prohibitively expensive.

Justification as it relates to GrainCorp's Science Based Target Initiative (SBTI) commitments

- GrainCorp has committed to reducing scope 1 emissions by 42% by 2030.
- Diesel boilers allow for future conversion to renewable diesel, which can reduce the majority of the lifecycle emissions.
- This approach ensures compliance with SBTi targets over time while maintaining operational feasibility today.

What is renewable diesel

"Ampol Renewable Diesel is a chemically similar drop-in for regular mineral diesel fuel that, compared with regular mineral diesel, can depending on the engine, equipment, operating conditions and feedstock source, deliver on a lifecycle basis immediate greenhouse gas reductions (GHG) across mobile and fixed plant diesel powered equipment.

Ampol R100 Renewable Diesel is an important transition fuel as electrification and/or hydrogen solutions may take time to substitute diesel applications in difficult to abate industry sectors.

Ampol-sourced renewable diesel is manufactured by hydrotreating waste feedstocks including UCO and tallow, and provide carbon emissions reduction on a life cycle basis.*

On a total life-cycle basis*, R100 Renewable Diesel can, compared to regular mineral diesel, significantly reduce CO2 emissions. The actual amount of CO2 emissions reduction depends on factors such as the engine, equipment, operating conditions, feedstock source and calculation methodology. Additional emission reduction benefits including particulate matter, CO and NOx, are also evident due to the paraffinic nature of the renewable diesel compared to regular mineral diesel. Due to the lower density of renewable diesel, there may be a slight increase in overall fuel consumption when using R100 Diesel compared to regular mineral diesel.” Source <https://www.ampol.com.au/business/products-and-services/fuels-solutions/renewable-diesel>

Factors influencing GrainCorp’s transition to renewable diesel

High cost of products at Port Kembla due to the current supply chain importing fuels from overseas, into Brisbane Ports and utilising road transport to distribute. Pricing of fuels received at the time of preparing cost analysis was \$4.00/L. This cost dramatically affected the internal rate of return of the project.

A factor that will reduce the cost of products and make R100 a more viable option to use in the boiler is the development of the Australian domestic fuel industry.

The Australian industry is still developing an effective supply chain. Timelines for availability of a domestic supply (based on Ampol’s Brisbane renewable fuels project <https://www.ampol.com.au/about-ampol/powering-next/future-energy/brisbane-renewable-fuels>) would be post project completion in 2029. GrainCorp’s proposed UCO and Tallow storage project is being developed to support the growth of the Australian renewable diesel fuel industry.

Path to transitioning to renewable fuels

GrainCorp through SBTI commitments and previously mentioned embedded energy management system, will continue to monitor actual use of fuels, prices of fuels (both R100 and conventional) as well as alternatives. There is no pre-defined benchmark or price floor when GrainCorp will transition. It will be at the determination of the relevant business leaders (nominated under embedded energy management system).

5 Statutory Assessment

This section of the SEE assesses the proposed development against the planning framework and planning controls applicable to the site and the proposed development, including:

- Threatened species matters (Section 1.7 of the EP&A Act)
- Integrated development matters (Section 4.46 of the EP&A Act)
- Matters for consideration relating to DAs (Section 4.15 of the EP&A Act). Refer also to Sections 6 – 9 of the SEE.

5.1 Biodiversity and Threatened Species Impact

Section 1.7 of the EP&A Act requires consideration as to whether a proposed development will have a significant impact on threatened species, populations or ecological communities relating to terrestrial and/or aquatic environments as required under Part 7 of the *Biodiversity Conservation Act 2016* (**BC Act**) and Part 7A of the *Fisheries Management Act 1994* (**FM Act**). Commonwealth legislation is also required to be considered with regard to biodiversity impacts.

Biodiversity Conservation Act 2016

In accordance with the BC Act, consideration as to whether the proposed development is likely to significantly affect threatened species or ecological communities, or their habitats is required in accordance with the test outlined in Section 7.3 of Part 7 of the BC Act. The proposal does not seek consent for vegetation removal or dam dewatering, and in turn will have no impact on flora or fauna.

The Green and Golden Bell Frog is known to frequent urban and industrial areas with water bodies including land in proximity to the Port Kembla Coal Terminal, Port Kembla Steelworks and Greenhouse Park which are all well separated from the site. This species is listed as endangered under the BC Act. The BLT which forms part of the GrainCorp Shipping Terminal is located on highly disturbed land in a modified maritime industrial environment. The BLT site does not appear to be in proximity to Green and Golden Bell Frog movement corridors identified in the Biodiversity Development Assessment Report prepared by GHD in relation to the Port Kembla Gas Terminal dated November 2018. The proposal is not expected to give rise to a change in surface contamination, light intensity or frequency of truck movements to and from the BLT. Accordingly, the proposed alterations and additions to the existing and approved development are not expected to give rise to material adverse impacts on the Green and Golden Bell Frog or its habitat. Notwithstanding, to raise awareness and understanding amongst staff and truck drivers accessing the BLT, the Environmental Management Plan and site induction training is proposed to be amended to include information on the Green and Golden Bell Frog and to incorporate identification training.

As such, a detailed assessment of the proposal against the BC Act is not required.

Fisheries Management Act 1994

The FM Act contains provisions for the protection of fish habitat and threatened species. It aims 'to conserve, develop and share the fishery resources of the State for the benefit of present and future generations'.

The proposed development does not propose any works that would cause harm to any threatened species, populations or ecological communities listed under the FM Act.

Environment Protection and Biodiversity Conservation Act 1999

The Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (**EPBC Act**) provides a legal framework for the protection and management of nationally and internationally important flora, fauna, ecological communities and heritage places, defined in the EPBC Act as Matters of National Environmental Significance (**MNES**). MNES identified in the EPBC Act include:

- World heritage properties
- National heritage places
- Wetlands of international importance (listed under the RAMSAR Convention)
- Threatened species and communities
- Migratory species protected under international agreements
- Commonwealth marine areas
- The Great Barrier Reef Marine Park
- Nuclear actions (including uranium mines).

In accordance with Sections 67 and 67A of the EPBC Act, any works that have the potential to result in an impact on any MNES or on Commonwealth land are considered controlled actions' and require a referral to the Federal Minister for the Environment and Water for approval.

The Green and Golden Bell Frog is listed as vulnerable under the EPBC Act. As noted above, the proposed alterations and additions to the existing and approved development are not expected to give rise to material adverse impacts on the Green and Golden Bell Frog or its habitat.

5.2 Integrated Development

Section 4.46 and s4.47 of the EP&A Act requires a review of whether the proposed development would trigger an approval under other environmental or related legislation. This development is categorised as 'integrated development'. A summary outlining whether any integrated approvals are required is provided within **Table 4**.

Table 4. Summary of Integrated Development Approvals

Integrated Development	Comments	Approval Required?
<i>Coal Mine Subsidence Compensation Act 2017</i> Approval is required to alter or erect improvement, or to subdivide land, within a mine subsidence district.	The site is not situated within a mine subsidence district.	No
<i>Fisheries Management Act 1994</i> Requires a permit for the carrying of certain works which may damage or destroy marine vegetation or restrict the free passage of fish.	The site does not contain any permanent water bodies, nor is it located within 'Key Fish Habitat'. The proposed development will therefore not harm marine vegetation.	No

Integrated Development	Comments	Approval Required?
<i>Heritage Act 1977</i> Approval is required in respect of doing or carrying out an act, matter or thing as referred to within s57(1) relating to an interim heritage order or listing on the State Heritage Register.	The site is not identified as a State or locally listed Heritage Item and is not located in proximity to a heritage item.	No
<i>Mining Act 1992</i> Requires an approval to the granting of a mining lease	This DA does not seek approval for a mining DA.	No
<i>National Parks and Wildlife Act 1974</i> Requires an approval under s90 for an Aboriginal Heritage Impact Permit (AHIP)	The site is approved to support a port facility and does not contain any known Aboriginal objects or sites.	No
<i>Petroleum (On-shore) Act 1991</i> Requires an approval to the granting of a production lease	No production lease is being sought as part of this DA.	No
<i>Protection of the Environment Operations Act 1997</i> This Act requires an environmental protection licence for the carrying out of certain works.	Ongoing consultation with the EPA will inform any required amendments to the development's existing EPL (3693). The proposal is therefore potentially integrated development pursuant to section 4.46 of the EP&A Act requiring referral to the NSW EPA for consideration in accordance with section 55 of the PoEO Act.	Yes
<i>Roads Act 1993</i> Approval is required for works in, on or over a public road including connecting to a classified road and pumping water into a public road.	The proposed works will not impact a public road.	No
<i>Rural Fires Act 1997</i> Authorisation is required in respect of bush fire safety of subdivision of land that could lawfully be used for residential or rural residential purposes or development of land for special fire protection purposes.	The proposal does not seek consent for subdivision and does not occupy bushfire prone land. Therefore, the proposal does not require referral to the NSW RFS under the RF Act.	No
<i>Water Management Act 2000</i> Approval is required under s89, s90 and s91 for certain water related uses and activities.	The <i>Water Management (General) Regulation 2025</i> establishes exemptions from the requirement to hold a controlled activity approval. Section 48 of Part 6, Schedule 4 establishes that a controlled activity carried out in accordance with a lease, license, permit or other right in relation to land under the control of a port operator is exempt from the requirements of Section 91E(1)	No

The AIE Port Kembla Pipeline connects with the Eastern Gas Pipeline operated by Jemena approximately 1.5 kms to the west of the site at Masters Road and Springhill Road. It is understood that the Eastern Gas Pipeline is licensed under the *Pipelines Act 1967* (license reference No. 26).

SQUADRON ENERGY

PORT KEMBLA PIPELINE
Route Map

PORT KEMBLA GAS TERMINAL

UNCONTROLLED
100 MARCH 2018

LEGEND

- AIE PORT KEMBLA PIPELINE
- PORT KEMBLA GAS TERMINAL
-

Bulk Liquids Terminal

Scale: 0 250 500 m

Figure 5. Location of Liquefied Natural Gas Pipeline

Consistent with the requirements of Section 2.77, the potential safety risks or risks to the integrity of the pipeline that are associated with the development to which the application relates have been identified in the Hazards and Risk Assessment submitted with the DA. The assessment concluded that the requirements of the risk criteria of the *Hazardous Industrial Planning Advisory Paper No. 4 – Risk Criteria for Land Use Safety Planning* (**HIPAP 4**) can be complied with. Further discussion is provided in Section 4.5 of the Hazards and Risk Assessment. The notification requirements referred to at Section 2.77 will need to be met by the consent authority.

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Chapter 5 of the T&I SEPP provides a consistent planning regime for land at Port Botany, Port of Newcastle and Port Kembla. It aims to ensure that land within each port lease area is maintained for port-related uses and specifies the matters to be considered when granting consent to development in proximity to port-related uses. A detailed compliance assessment against the relevant provisions of the Chapter is provided in **Table 5**.

Section	Provision	Compliance
5.3	Land to Which this Chapter Applies The Chapter applies to land identified on the <i>Land Application Map</i>.	The land the subject of the DA is located on land identified on the Land Application Map and the provisions of the Chapter apply.
5.6	Consent Authority The land the subject of the DA is mapped as being located in the Port Kembla Lease Area.	The Minster is the nominated consent authority.
5.12(1)	The land the subject of the DA is zoned SP1 Special Activities and the following development is permitted with and without consent or prohibited: Permitted without Consent Jetties; Moorings; Roads Permitted with Consent Capital dredging; Environmental facilities; Environmental protection works; Food and drink premises; Maintenance dredging; Navigation and emergency response facilities; Neighbourhood shops; Port facilities; Wharf or boating facilities; Any other development not specified in item 2 or 4. Prohibited Agriculture; Air transport facilities; Airstrips; Amusement centres; Animal boarding or training establishments; Artisan food and drink industries; Camping grounds; Caravan parks; Cemeteries; Centre-based child care facilities; Commercial premises; Community facilities; Correctional centres; Crematoria; Early education and care facilities; Eco-tourist facilities; Educational establishments; Entertainment facilities; Exhibition homes; Exhibition villages; Extractive industries; Farm buildings; Forestry; Function centres; Funeral homes; Health services facilities; Highway service centres; Home businesses; Home occupations; Home occupations (sex services); Industrial retail outlets; Mortuaries; Open cut mining; Places of public worship; Recreation facilities (indoor); Recreation facilities (major); Recreation facilities (outdoor); Registered clubs; Residential	Complies The BLT forms part of GrainCorp's shipping terminal at Port Kembla which is defined as Port Facilities as it comprises facilities for the loading or unloading of freight onto and from vessels and freight receipt, processing, land transport and storage facilities. The proposed alterations and additions to the approved Port Facilities are permissible with consent.

Section	Provision	Compliance
	accommodation; Respite day care centres; Restricted premises; Rural industries; Sex services premises; Tourist and visitor accommodation; Veterinary hospitals; Wholesale supplies.	
5.12(2)	Zoning Objectives SP1 Special Activities zone objectives are as follows: • To provide for special land uses that are not provided for in other zones. • To provide for sites with special natural characteristics that are not provided for in other zones. • To facilitate development that is in keeping with the special characteristics of the site or its existing or intended special use, and that minimises any adverse impacts on surrounding land. • To maximise the use of waterfront areas to accommodate port facilities and industrial, maritime industrial, freight and bulk storage premises that benefit from being located close to port facilities. • To enable the efficient movement and operation of commercial shipping and to provide for the efficient handling and distribution of freight from port areas through the provision of transport infrastructure. • To provide for port related facilities and development that support the operations of Port Botany, Port Kembla and the Port of Newcastle. • To facilitate development that by its nature or scale requires separation from residential areas and other sensitive land uses. • To encourage employment opportunities.	Complies The proposal is consistent with the objectives of the SP1 zone in that it will: • provide for port facilities that are not provided for in other zones. • provide for a site with special natural and strategic locational characteristics, being waterfront land. • comprise development that is in keeping with the industrial characteristics of the Port and that has been designed to minimise adverse impacts on the surrounding land. • optimise the use of waterfront land for port facilities that need to be located adjacent the berth for ship loading/unloading. • comprise development that by its nature needs to be located within a Port and separated from residential areas and other sensitive land uses. • employment opportunities will be associated with both the construction and operation phases of the project.
5.17(1)	Port Operator to be Notified of Certain Development Applications This section applies to development on land identified on the Referral Area Map	N/A The BLT site is not identified on the Referral Area Map. Referral to the Port Operator may be made given the use of the shared berth (104).
5.20(2)	Earthworks Development consent is required for earthworks unless—	Complies The earthworks consist of minor site preparation / excavation. They are ancillary to the construction of the pre-receival

Figure 6 identifies the location of the BLT within the SP1 Special Activities zone.

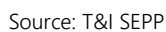


Figure 6. Zoning Map: Location within SP1 Special Activities Zone

The *State Environmental Planning Policy (Resilience and Hazards) 2021 (R&H SEPP)* provides a consolidated instrument to manage risks and build resilience in the face of hazards.

Chapter 2 - Coastal Management includes provision to facilitate the management of development within a coastal zone. The coastal management areas defined by the policy include coastal wetlands, littoral rainforests, the coastal vulnerability area, the coastal environment area and the coastal use area.

Division 1 of the policy applies to land identified as being 'coastal wetlands' or 'littoral rainforest'. The mapping that accompanies the policy does not identify the site as relating to 'coastal wetlands' or littoral rainforests nor is it located in proximity to these areas. In turn, the proposal will have no impact on the biophysical, hydrological or ecological integrity of these areas.

Division 2 of the policy applies to land within a coastal vulnerability area. The site is not identified as being located within a coastal vulnerability area and is therefore not antithetical to the provisions nominated by the division.

Division 3 relates to land that is within a 'coastal environment area'. The associated mapping identifies the site as forming part of a coastal environment area. Section 2.10 identifies that development consent must not be granted to development that is likely to adversely impact the area. A detailed assessment against the provisions of the section is provided in **Table 6**.

S 2.10 Development on Land Within the Coastal Environment Area	
a) The integrity and resilience of the biophysical, hydrological (surface and groundwater) and ecology environment,	The proposed works are wholly contained within the existing BLT site and will have no material impact on land designated as forming part of the coastal environment area.
b) Coastal environmental values and natural coastal processes,	Supporting technical studies, including the Air Quality Impact Assessment and the Soil and Water Management Plan (SWMP), confirm that the proposed works will not compromise coastal environmental values. Specifically, the SWMP confirms that appropriate erosion and sediment control measures and dewatering protocols will be implemented to ensure compliance with the EPA and Sydney Water's requirements. The Air Quality Impact Assessment demonstrates that the proposal will not give rise to site-specific or cumulative adverse air quality impacts.
c) The water quality of the marine estate, in particular the cumulative impacts of the proposed development on any sensitive coastal lakes identified in Schedule 1.	The SWMP indicates that no new below-ground works or drainage changes are proposed which could alter recharge or contamination pathways. The existing soil water separator and stormwater system will continue to adequately manage surface water and will prevent runoff. As a result, the proposal will not impact the water quality of the marine estate or coastal lakes in the broader

S 2.10 Development on Land Within the Coastal Environment Area	
	surrounds. This conclusion is supported by MUSIC modelling which confirms that the proposal will comply with the applicable water quality targets. Further discussion is provided in <i>Section 6.2</i> of the SWMP. In addition, DRAINS modelling confirms that the proposal will not increase water runoff. It is anticipated that the volume of water draining into Council's network will actually decrease in the post development phase. Further discussion is provided in <i>Section 6.1</i> of the SWMP.
d) Marine vegetation, native vegetation and fauna and their habitats, undeveloped headlands and rock platforms,	The proposed works are wholly contained within the site which is devoid of vegetation. In turn, the proposal will have no direct impact on marine vegetation, native vegetation or fauna and their habitats.
e) Existing public open space and safe access to and along the foreshore, beach, headland or rock platform for members of the public, including persons with a disability,	The proposal is wholly contained within the BLT and will have no impact on existing access arrangements relating to the shore, beach, headland or public open space.
f) Aboriginal cultural heritage, practices and places	The site itself has been extensively developed for port facilities and is not known to be of Aboriginal Cultural. The site has been extensively developed for port facilities and is not known to contain any Aboriginal Cultural heritage. An Aboriginal Heritage Information Management System (AHIMS) search confirms that no known Aboriginal places or objects are located within a 1km radius of the site. Further assessment of Aboriginal cultural heritage values is not considered necessary.
g) The use of the surf zone.	The proposal is located inland and will have no impact on existing surf zones.

In light of the above, the Consent Authority can be satisfied that the proposal will avoid adverse impacts to the coastal environment area to which it relates.

Division 4 pertains to development on land within the coastal use area. The policy's associated mapping indicates that the site forms part of a coastal use area. The policy establishes that development consent must not be granted to development on land within a coastal use area unless the consent authority has considered the requirements set out in **Table 7**.

Table 7. Assessment Against Section 2.11 of the R&H SEPP

S 2.11 Development on Land Within the Coastal Use Area	
(1) Development consent must not be granted to development on land that is within the coastal use area unless the consent authority— (a) has considered whether the proposed development is likely to cause an adverse impact on the following—	The proposed works are wholly contained within the existing and approved BLT which is located on land not known to contain any Aboriginal places or objects. The proposal will have no impact on Aboriginal heritage.
(iv) Aboriginal cultural heritage, practices and places,	
(i) existing, safe access to and along the foreshore, beach, headland or rock platform for members of the public, including persons with a disability,	The proposal is wholly contained within the BLT and will not impede the public's access to the foreshore area, beach, headland, or rock platforms.
(ii) overshadowing, wind funnelling and the loss of views from public places to foreshores,	The physical works proposed by the application include the installation of pre-receival tanks and mechanical equipment such as pumps and hot water systems. These works relate to the existing and approved BLT which is located in Port Kembla amongst port related land uses. On the basis of the extent of proposed work and the context it is to be carried out within, the proposal is not expected to give rise to material adverse overshadowing, wind funnelling or view loss impacts.
(iii) the visual amenity and scenic qualities of the coast, including coastal headlands,	The proposal relates to a site within Port Kembla that is surrounded by port related maritime activities. The proposal is considered to be entirely in keeping with the character of the Port.
(v) cultural and built environment heritage, and	The proposal is not expected to impact any cultural or built environment heritage.
(b) is satisfied that— (i) the development is designed, sited and will be managed to avoid an adverse impact referred to in paragraph (a), or	The proposed works involve modifications to the existing and approved BLT located within the Port at Port Kembla which are not expected to give rise to adverse impacts as outlined above.
(ii) if that impact cannot be reasonably avoided—the development is designed, sited and will be managed to minimise that impact, or	
(iii) if that impact cannot be minimised—the development will be managed to mitigate that impact, and	
(c) has taken into account the surrounding coastal and built environment, and the bulk, scale and size of the proposed development.	The proposed works involve modifications to the existing and approved BLT located on heavily disturbed land in Port Kembla and are considered

S 2.11 Development on Land Within the Coastal Use Area	
	to be entirely in keeping with the character of the Port.

Chapter 3 – Hazardous and Offensive Development

Chapter 3 sets out the provisions for hazardous and offensive industries and provides that developments must consider measures to minimise or reduce potential impacts. The chapter defines potentially hazardous industry as any development that, without employing any measures, would pose a significant risk to human health, property or the biophysical environment. The process for identifying and assessing potentially hazardous and offensive industries is set out in *Hazardous and Offensive Development Application Guidelines Applying SEPP 33* (NSW Government 2011) (**SEPP 33 Guidelines**).

Hazards and risks posed by the project have been assessed by Riskcon in the Risk and Hazards Report provided at **Appendix A**. The assessment has been prepared in accordance with the requirements of the SEPP 33 Guidelines. As noted above, the site is in proximity to a section of the Port Kembla Looping Lateral high pressure gas pipeline. The section of the pipeline has been constructed by Squadron Energy for the Port Kembla Gas Terminal and is called the AIE Port Kembla Pipeline. The assessment results confirm that the risks associated with the site’s location in respect of this pipeline do not exceed the acceptable risk criteria nominated by the HIPAP 4. In consequence, the risks fall within an acceptable level.

The screening assessment concluded that the liquids proposed to be stored in the bulk liquid tanks continue to consist of combustible liquids and in consequence are the same materials class as the existing liquids stored on the site. The assessment concludes that the liquids consist of a type of Class C2 Combustible liquid and are not classified as a Dangerous Good under the SEPP 33 Guidelines. Due to this, the proposal is not subject to the provisions of the R&H SEPP and the preparation of a Preliminary Hazards Analysis is not required.

The assessment has also considered whether the proposal has the potential to generate ‘potentially offensive’ operations and concludes that the proposal does not amount to a potentially offensive development.

The site is subject to an existing EPL. It is anticipated that this licence will be updated to address the proposed amendments to the type of liquids to be stored on site. In issuing the revised licence, the EPA will consider any applicable pollution measures which will be implemented to prevent functions which would categorise the site as being a ‘potentially offensive’ operation.

The assessment has considered the cumulative risks associated with the development. The assessment findings note that the proposal remains largely unchanged, with Tallow and UCO having a classification consistent with that of the approved development. The assessment concludes that the cumulative risk does not exceed the acceptable risk criteria nominated by the HIPAP 4.

Chapter 4 – Remediation of Land

Chapter 4 – Remediation of Land provides a State-wide planning approach to remediation and aims to promote the remediation of any contaminated land to reduce the risk of harm to human health and/or the environment. It establishes that a consent authority must not consent to the carrying out development unless it has considered whether the land is contaminated, and, if it is contaminated, whether it is suitable for development in its current state or requires remediation.

SMEC has prepared a SWMP which is included at **Appendix D**. It reviews the findings of the previous Contamination Certificate Assessment which was prepared for the site by Environmental Resources Management (**ERM**) in 2013. The assessment concluded that the site was not affected by contamination which would render it unsuitable for accommodating the BLT. The findings of the assessment are summarised as follows:

- The results associated with the groundwater testing confirmed minor exceedances of arsenic, copper and zinc, however, this is indicative of the site's historic industrial setting and is not a consequence of widespread on-site contamination.
- The results did not confirm the presence of asbestos. Notwithstanding, given the site's reclamation history, it cannot be confirmed that asbestos is not contained within underlying fill.

It is considered that the assessment results continue to remain applicable to the proposal given the extent of the proposed works and that no changes to the approved land uses are sought.

State Environmental Planning Policy (Biodiversity and Conservation) 2021

The *State Environmental Planning Policy (Biodiversity and Conservation) 2021* (**B&C SEPP**) includes provisions that aim to protect, manage and enhance biodiversity and the conservation of land.

Chapter 2 Vegetation in Non-Rural Areas

Chapter 2 Vegetation establishes that the clearing of vegetation independent of a development requiring consent must not be carried out in a non-rural area without a permit. The provisions of the Chapter apply to the site given that it is located within a non-rural area within an SP1 Special Activities zone. Notwithstanding, the site does not contain vegetation that requires a permit or approval, and in turn the provisions of the chapter do not apply.

Chapter 3 Koala Habitat Protection 2020

Chapter 3 aims to encourage the proper conservation and management of areas of natural vegetation that support koala habitat. The site is located in an SP1 Special Purpose Zone and in turn the provisions of the chapter do not apply to the site.

Chapter 4 Koala Habitat Protection 2021

Chapter 4 aims to encourage the conservation and management of areas of natural vegetation that accommodate koala habitat. It applies only to the koala management areas specified in Schedule 2. The Wollongong LGA contains the *South Coast Koala Management Area* which is listed under Schedule 2. The proposal is not located within this koala management area and accordingly the provisions of the chapter do not apply.

Chapter 6 applies to land within the Sydney Drinking Water Catchment, the Sydney Harbour Catchment, the Georges River Catchment and the Hawkesbury-Nepean Catchment. The site is located outside of these catchments and therefore its provisions do not apply.

Wollongong Local Environmental Plan 2009 (the **LEP**) sets out the environmental planning provisions and development standards for the Wollongong LGA. It is noted that land within the Port at Port Kembla is regulated by the provisions of Chapter 5 of the T&I SEPP. Notwithstanding, by way of background context only, an assessment against the provisions of the LEP is included in the table below.

Clause	Requirement	Comment	Compliance
1.3	Land Application Map	The land is not mapped on the land application map.	N/A Land within the Port at Port Kembla is regulated by the provisions of Chapter 5 of the T&I SEPP. Accordingly, the information in Table 8 is provided for background context only.
2.3	Zone Objectives and Land Use Table	Prescribed land use zones which govern the permissibility of future development.	The Land Zoning Map indicates that the site is subject to the land use zoning provisions prescribed by the T&I SEPP.
2.6	Subdivision – Consent Requirements	Development consent required for subdivision.	This application does not seek consent for subdivision
2.7	Demolition Requirements	Development consent is required for demolition works	Minor demolition works are proposed and are illustrated on the Architectural Plans at Appendix C .
4.1	Minimum Subdivision Lot Size	Applies a minimum subdivision lot size.	The site is not subject to a minimum lot size.
4.3	Height of Buildings	Applies a maximum height limit.	The site is not subject to a height of buildings development standard.
4.4	Floor Space Ratio	Applies a maximum floor space ratio.	The site is not subject to an FSR development standard.
5.10	Heritage Conservation	Outlines processes to conserve European and Aboriginal heritage.	The site does not contain known Aboriginal objects or sites. The site is not a heritage item nor is it located within a heritage conservation area.

Clause	Requirement	Comment	Compliance
5.11	Bush Fire Hazard Reduction	Establishes that bush fire hazard reduction work authorised by the <i>Rural Fires Act 1997</i> is permitted on land without consent.	The proposal does not seek consent for bush fire hazard reduction work.
5.21	Flood Planning	Outlines the processes for minimising flood related impacts.	As outlined in <i>Section 4.2</i> of the SWMP, the proposed development is unlikely to alter flood behaviour or introduce additional flood risk.
7.1	Public Utility Infrastructure	Seeks to ensure appropriate utility services are available for the future development.	The site is appropriately serviced.
7.2	Natural Resource Sensitivity – Biodiversity	Applies to land identified as ‘Natural Resource Sensitivity – Biodiversity’ and sets out the processes for protecting native vegetation and habitat.	The site does not occupy land identified as being ‘natural resource sensitive – biodiversity’.
7.5	Acid Sulfate Soils	Applies to land containing acid sulfate soils and aims to ensure that development does not disturb, expose or drain acid sulfate soils or cause environmental damage.	During pre-lodgement consultation, Council advised that the site is mapped as being affected by Classes 3 and 4 Acid Sulfate Soils. The proposal relates to alterations and additions to the existing and approved BLT. The associated earthworks required are minor in extent. <i>Section 7.2.1</i> of the SWMP provides the following relevant commentary: <i>The BLT site is situated within the reclaimed Tom Thumb Lagoon area, historically characterized by low-lying estuarine environments of swampy ground and mangrove flats. This area underwent significant reclamation works during the 1980s to support the construction of the Grain Terminal, which involved the placement of dredged sands and estuarine soils as fill material, along with slag and coal wash (Coffey, 2013a; Coffey, 2013b).</i> <i>The 2013 Coffey Geotechnical Investigation confirmed that the subsurface conditions comprised:</i>

Clause	Requirement	Comment	Compliance
			<i>* Fill (0–3.5 m depth) - Predominantly clayey sand and gravelly sandy clay containing minor foreign inclusions (e.g., concrete, slag).</i> <i>* Alluvial and Estuarine Soils (3.5–26 m) - Silty sands, clayey silts, and silty clays of low to medium plasticity, consistent with estuarine deposition. Soils within this unit are generally loose to soft at shallow depths, grading to stiff or hard clay layers below ~15 m.</i> <i>Highly Weathered Rock (~26–28 m) - Pale grey sandstone (Budgong Sandstone), transitioning to slightly weathered to fresh sandstone below ~28 m (Coffey, 2013b).</i> <i>The 2013 Coffey Waste Classification Report further characterized stockpiled materials on site (sourced from historic dredging and site stripping works) as gravelly clayey sands and sandy clays, free of significant contamination and classified as General Solid Waste (non-putrescible). Acid sulfate soil testing indicated no exceedances of the Acid Sulfate Soil Management Advisory Committee (ASSMAC) criteria, confirming low acid sulfate potential (Coffey, 2013a).</i> <i>As of 2025, no significant redevelopment or additional subsurface works have occurred at the site since these investigations. The soil and geological conditions described in 2013 remain consistent with regional mapping (Geoscience Australia, 2025), which continues to classify the area as Quaternary alluvium overlying Budgong Sandstone. This stability is further supported by the absence of site works altering ground levels (below the fill mound) or subsurface conditions since the original studies.</i> <i>The site remains fully sealed by hardstand concrete, further</i>

Clause	Requirement	Comment	Compliance
			<i>limiting direct interaction with subsurface soils or groundwater. As such, the existing soil profile continues to support low infiltration potential and limited risk of soil exposure or disturbance under the proposed repurposing works.</i>
7.6	Earthworks	Seeks to ensure that proposed earthworks will not have a detrimental impact on the environmental functions and processes of the site and surrounding land.	The proposal relates to alterations and additions to the existing and approved BLT. The earthworks required are minor and will not impact surrounding sites. As outlined in <i>Section 5</i> of the SWMP, appropriate erosion and sediment controls will be implemented during the construction phase to ensure excavation works do not impact surrounding land uses.
7.9	Airspace Operations	Aims to ensure that future development does not compromise the operation of the Illawarra Regional Airport.	Council has advised that the Limitation or Operations Surface associated with the airport does not apply to the site.
7.18	Design Excellence in Wollongong City Centre and at Key Sites	The design excellence requirements nominated by the clause apply only to 'key sites'.	The site is not designated as being a 'key site'.

5.4 Draft Environmental Planning Instruments (s4.15(1)(a)(ii))

There are no draft environmental planning instruments relevant to the proposed development.

5.5 Development Control Plan

The Wollongong Development Control Plan 2009 (**DCP**) applies to all land within the Wollongong LGA. However, advice has been received from NSW Ports that the DCP is understood not to apply to the land because Section 3.43 of the EP&A Act provides that only a 'relevant planning authority' may prepare a development control plan applicable to any given land. A relevant planning authority is defined at Section 3.41(1) as follows:

"in relation to any matter, means the council of the area to which the matter relates or the Planning Secretary. However, the council is not the relevant planning authority in relation to a SEPP and the Planning Secretary is not the relevant planning authority in relation to a LEP for which a council is the planning proposal authority under Division 3.4."

The site is covered by the provisions of the T&I SEPP and not the LEP. Therefore, NSW Ports has advised that the DCP is not applicable. Notwithstanding, for additional context, this section discusses the following parts of the DCP:

- Chapter A02 – Ecologically Sustainable Development
- Chapter B – Industrial Development
- Chapter E7 – Waste Management
- Chapter E10 – Aboriginal Heritage
- Chapter E19 – Earthworks
- Chapter E20 - Contaminated Land Management
- Chapter E22 - Soil Erosion and Sediment Control

Table 9. Assessment Against the Wollongong DCP 2009

Clause	Requirement	Comment
Chapter A02– Ecologically Sustainable Development		
3.2	Waste Reduction	
i)	Develop a Waste Management Plan for demolition and construction works to minimise landfill waste.	Refer to the Waste Management Plan submitted with the DA and included at Appendix I .
3.3	Biodiversity Protection	
i)	Retain and provide suitable buffers to vegetation that has existing biodiversity value and increase tree canopy coverage and native vegetation.	The proposed works relate to alterations and additions to an existing port facility. The site occupied by the facility is not known to contain biodiversity values. Furthermore, it does not interface with vegetation. In turn, there is no opportunity to retain existing biodiversity values or provide vegetation buffers.
3.8	First Nations Knowledge and Care of Country	
i)	Undertake appropriate due diligence for projects located near or on an Aboriginal significant site.	The proposal relates to an existing port facility. The proposed works are wholly contained within the existing and approved BLT-which is not known to contain Aboriginal places or objects.
Chapter B5: Industrial Development		
21.2.2	Flood Impact Assessment	
1.	Any development upon a site which is identified as “flood hazard – affected” on Council’s Property system must also comply with the requirements of the Floodplain Management Chapter in Part E	The SWMP included at Appendix D confirms that the proposed development is unlikely to alter flood behaviour or introduce additional flood risk.

Clause	Requirement	Comment
Chapter E7: Waste Management		
5.8	Industrial Development	
1.	A completed Site Waste Minimisation and Management Plan (SWMP) shall accompany the Development Application.	Refer to the Waste Management Plan submitted with the DA and included at Appendix I .
Chapter E10: Aboriginal Heritage		
2 Areas of Potential Aboriginal Archaeological / Cultural Heritage Significance		
1.	Aboriginal archaeological and cultural heritage assessment.	The BLT is an existing approved land use located on heavily disturbed land that has been previously developed with port facilities.
Chapter E19 – Earthworks		
1.	It is the responsibility of the developer undertaking earthworks to ensure such works do not adversely impact on stormwater drainage, groundwater, surface water quality or land stability. Note: It is an offence to pollute waters under the <i>Protection of the Environment Operations Act 1997</i> .	The SWMP confirms that the proposal will not increase water runoff and will not impact water quality. A detailed discussion is provided in Table 10 .
2.	Erosion and Sediment control infrastructure must be installed as soon as practical and where possible at the onset of any earthworks.	The SWMP confirms that erosion and sediment control measures will be implemented during the construction phase. These measures include sediment fences, use of stockpiles, topsoil management.
Chapter E20: Contaminated Land Management		
2.	Under SEPP 55, Council is required in determining a Development Application to consider whether land is contaminated and whether the proposed remediation of any identified contamination site will satisfactorily render the land suitable for the intended land use upon the site	The site's contamination assessment is addressed within the SWMP. The findings conclude the site is suitable for the proposed development. A detailed discussion is provided in Table 10 .
Chapter E22: Soil Erosion and Sediment Control		
4.1	Site Preparation	
	Sediment and erosion control measures are to be implemented prior to the commencement of any construction works.	Sediment and Erosion Control Measures will be implemented in accordance with the SWMP included at Appendix D . The detailed findings are assessed in Table 10 .

5.6 Development Contributions

No Voluntary Planning Agreements apply to the site.

Contributions in respect of development carried out in Wollongong LGA towards the provision of local infrastructure are to be made to Council in accordance with the *Wollongong City-Wide Development Contributions Plan 2024*. The Plan levies contributions under Section 7.12 of the EP&A Act as a percentage of the cost of carrying out the development.

However, as per Section 7.17 of the EP&A Act (cf previous s 94E), the Minister may direct a consent authority as to the maximum amount of contributions that are to be paid under Section 7.11 (cf previous s 94) and the maximum percentage of levy to be imposed under Section 7.12 (cf previous s 94A). As such, the *Environmental Planning and Assessment (Local Infrastructure Contributions – Port Botany and Port Kembla) Direction 2013* (the **Direction**) will prevail over the *Wollongong City-Wide Development Contributions Plan 2024*.

The Direction states that a condition may not be imposed under Section 94 of the EP&A Act in relation to development on land within the Port Kembla Lease Area. As such, the maximum amount of payable contributions for the proposed development is nil. The Direction also states that a condition may not be imposed under Section 94A of the EP&A Act in relation to development on land in the Port Kembla Lease Area. Accordingly, given the Site is located in the Port Kembla Lease Area, contributions to local infrastructure are not to be levied due to the Direction.

In addition to contributions to local infrastructure, contributions to fund the delivery of State infrastructure in high growth areas in NSW area are levied under the Housing and Productivity Contributions (**HPC**) ministerial order. This applies to development within the Lower Hunter, Central Coast, Sydney, and Illawarra-Shoalhaven regions. Development in the Port Kembla Lease Area is noted as being exempt from payment of levies under the HPC.

5.7 Environmental Planning and Assessment Regulation 2021

Under Schedule 3, the proposal seeks consent for alterations and additions which do not significantly increase the environmental impacts associated with the approved and existing development.

Section 48(1) of Schedule 3 of the EP&A Regulation prescribes the following:

Development involving alterations or additions to development, whether existing or approved, is not designated development if, in the consent authority's opinion, the alterations or additions do not significantly increase the environmental impacts of the existing or approved development.

The suite of technical studies which accompany the subject DA demonstrate that the proposed alterations and additions will not significantly increase the environmental impacts of the existing or approved development.

Pursuant to section 48(2) of Schedule 3, in forming its opinion, a consent authority must consider the following—

(a) *the impact of the existing development, including the following—*

(i) previous environmental management performance, including compliance with the conditions of any consents, licences, leases or authorisations by a public authority and compliance with any relevant codes of practice,

Comment - In relation to the proposed repurposing of existing base mineral oil tanks to facilitate shipping (export) of tallow and UCO, it is noted that GrainCorp has maintained compliance with relevant licence conditions and has not had any compliance issues associated with the use or maintenance of the tanks.

(ii) rehabilitation or restoration of any disturbed land,

Comment - The BLT is an established port facility located on highly disturbed land. Given the operational nature of the site and its strategic location within the port precinct, this sub-section is not considered applicable.

Notwithstanding, GrainCorp remains committed to environmental stewardship and to ensuring that any site works involving soil disturbance are appropriately managed to prevent erosion, sedimentation, and off-site impacts. The proposal involves limited ground disturbance for enabling infrastructure.

(iii) the number and nature of all past changes and their cumulative effects,

Comment - The existing BLT has been operating under the original consent which has not been modified.

(b) the likely impact of the proposed alterations or additions, including the following—

(i) the scale, character or nature of the proposal in relation to the development,

Comment - The proposed development is enabling works to handle different products (tallow and UCO) within the existing and approved tanks and to facilitate exportation of the products as opposed to importation of the currently stored products. The enabling infrastructure is of the same nature as the existing infrastructure to facilitate temporary storage of bulk liquids pending / following shipment.

(ii) the existing vegetation, air, noise and water quality, scenic character and special features of the land on which the development is, or will be, carried out and the surrounding locality,

Comment - The scale and nature of the proposed alterations are relatively minor but entirely in keeping with the context of the broader port operations.

The existing characteristics and features of the land have been considered in the specialist consultant studies prepared to accompany the DA.

GrainCorp is actively progressing an emissions reduction strategy across its operations, with a focus on energy efficiency, low-emission alternatives, and transition planning. Emissions from this activity will be incorporated into existing monitoring and reduction frameworks, with opportunities to optimise boiler use and assess lower-emission alternatives over time.

The area in which the existing and approved tanks are located is purpose built for handling oils and similar products. It is fully bunded to prevent environmental release, and all surface water within the bunded area is directed to an interceptor pit, ensuring effective management of potential contaminants and protection of water quality. There are no anticipated impacts on existing vegetation, scenic character, or special landscape features, as the activity remains confined within a heavy industrial setting with no expansion into undeveloped areas.

Comment - The potential environmental impacts can be predicted with a high degree of certainty. GrainCorp operates tallow storage and handling facilities in New Zealand, and this operational experience provides a strong foundation for understanding the material's characteristics, storage requirements, and associated environmental risks.

Comment - The receiving environment at Port Kembla site is a heavily modified, industrialised port precinct with existing infrastructure and land use dedicated to bulk storage and handling activities. As such, it has a high capacity to accommodate the minimal changes in environmental impacts associated with the proposed repurposing of tanks for tallow and UCO storage pending shipment overseas and other similar animal and vegetable based oils.

Comment - GrainCorp will mitigate environmental impacts by using existing bunded infrastructure with controlled drainage to an interceptor pit, ensuring effective containment and runoff management. Air emissions from diesel boilers used to heat tallow will be quantified and integrated into the company's broader emissions reduction strategy. Operational procedures, based on our New Zealand tallow operations, along with staff training and routine maintenance, will ensure residual risks are effectively managed.

Comment - GrainCorp will ensure ongoing compliance with operational procedures aligned with the conditions of the EPL. All activities associated with the repurposed tanks, including storage, heating, and transfer, will be carried out in accordance with the requirements of the EPL and any applicable EPA or DPHI conditions.



There are no additional matters nominated by the EP&A Regulations which have not already been considered in this report.



6 Assessment of Significant Likely Impacts

The likely environmental impacts of the proposed development have been discussed in the previous sections of this SEE. As previously discussed, the proposed development is not considered likely to result in any material adverse impacts provided that the mitigation measures addressed in the supporting technical studies are implemented.

Table 10 provides a summary of the assessment of significant likely impacts provided by the consultant team. Supporting technical studies confirm that the proposal will not significantly increase the environmental impacts of the existing or approved development.

Table 10. Assessment of Significant Likely Impacts

Discipline	Assessment of Significant Likely Impacts
Risks and Hazards	A Risk and Hazards Assessment included at Appendix A confirms that Tallow Oil and UCO are a type of combustible liquid which remains consistent with the classification assigned to the existing liquids held on site. In consequence, the proposal does not significantly alter the BLT's existing operations, with the storage material class remaining unchanged. Combustible liquids are not subject to the R&H SEPP and therefore a Preliminary Hazard Analysis is not required and the project is not considered potentially hazardous. In addition, the proposed works will not result in potentially offensive operations. The assessment considers whether the site's proximity to the Port Kembla Gas Terminal (PKGT) gas pipeline, which is located to the south, will present additional risks. A second pipeline will be installed from the BLT to the grain delivery silos and then through the existing grain conveyor tunnel. There is no requirement to excavate in the area of the Squadron Energy Pipeline and, hence, there is no interaction between the two pipelines during installation of the second shipping pipeline. Based in this there is no potential for impact to the Squadron Energy Pipeline as a result of the installation and operation of the second shipping pipeline. The assessment concludes that there would be no impact to the pipeline from incidents at the BLT and furthermore that the PKGT pipeline adjacent the BLT does not result in a risk impact beyond the acceptable risk criteria published in the HIPAP 4 as an individual facility nor as a result of the cumulative risk in conjunction with the BLT. In addition to the abovementioned site specific risk assessment, it is noted that In 2022, the NSW Department of Planning & Environment (DP&E) engaged Arriscar Pty Ltd (Arriscar) to undertake a broader Port Kembla wide Land Use Safety Study to estimate the cumulative risk from the industrial facilities and operations (existing, approved or under consideration by the DP&E) to determine the appropriateness of bulk liquid storage tank development being re-enabled by the complying development framework under the T&I SEPP) at Port Kembla. The Port Kembla LUSS issued by Arriscar on 9 October 2023 was supportive of the reintroduction of the complying development provisions relating to bulk liquid storage tanks at Port Kembla subject to detailed recommendations. In December 2025 the T&I SEPP was amended

Discipline	Assessment of Significant Likely Impacts
	to re-introduce the complying development provisions to bulk liquid storage tanks in certain areas of Port Kembla including the GrainCorp BLT site.
Traffic	A Transport Assessment prepared by Arc Traffic and Transport included at Appendix E demonstrates that the proposed development is supportable. The assessment has considered the traffic generation likely to result from the proposal. It has also addressed potential cumulative impacts associated with nearby projects. The report notes that the future Port Kembla Gas Terminal located in proximity of the site will generate up to 25 light vehicle trips and 1 heavy vehicle trip in the AM and PM peak hours. Other key projects include, but are not limited to, the BlueScope Project and No 6 Blast Furnace Reline; Jemena Lateral Looping Pipeline; and the NSW Ports Outer Harbour Expansion. Importantly, the assessment opines that these projects are all located in the central and southern parts of Port Kembla, and as such would likely generate very few trips to Springhill Road and its intersection with Tom Thumb Road, even if they were to commence construction/operation by 2026. Therefore, the potential for any of these projects to have commenced prior to the end of the GC BLT construction period is minimal. SIDRA modelling has been used to assess the traffic baseline conditions in the pre-development phase. Key intersections subject to assessment include the following: • Springhill Rd & Tom Thumb Rd • Tom Thumb Rd & Yampi Wy • Tom Thunb Rd & BLT • Tom Thumb Rd & Farrer Rd The Proposal will have no impact on the traffic operation of port or public roads/intersections, simply as a function of there being essentially no additional truck trips north of the BLT, and only a minor number of additional truck trips south of the BLT, when compared with the approved operation of the BLT. Access to the BLT – during both the construction and operation of the proposed BLT infrastructure will be provided via roads and intersections that have all been appropriately designed and approved by the NHVR to accommodate the maximum sized vehicles travelling to/from the BLT. Moreover, the routes used by inbound trucks will be identical to the approved routes used by outbound trucks. Access within the BLT for inbound trucks will be unchanged from the approved access provided for outbound trucks, and a 25m/26m B-Double will continue to be the largest vehicle accessing the BLT gantries. Further to a detailed review of all available data, there will essentially be no change in the average number of daily and peak hour inbound trucks travelling between Springhill Road and the BLT compared with the approved number of outbound trucks travelling between Springhill Road and the BLT

Discipline	Assessment of Significant Likely Impacts
	The only section of road where any significant number of additional truck trips will be generated is in Tom Thumb Road and Farrer Road between the BLT and the Grain Terminal weighbridge given that inbound trucks will be required to utilise the grain weighbridge prior to and after unloading. However, this small number of additional trips would have no impact on the operation of this section of the port roads network. The Proposal in and of itself has essentially no potential to generate queues to port roads at either the BLT (Tom Thumb Road) or Grain Terminal (Farrer Road) simply as a function of the minor daily and peak hour inbound truck trips, and the queuing space available for inbound truck trips prior to the BLT gantries; and prior to the grain weighbridge. It is the case that a significant number of grain trucks can at times be generated to the grain hopper and Grain Terminal weighbridge; however, these peaks are provided for in current approvals for both sites, and strictly managed by GrainCorp to ensure that they do not result in queuing to any port roads. As importantly, the separate access route within the BLT for inbound trucks accessing the gantries means that inbound trucks would not impact, or be impacted by, potential grain truck queues during these peak grain truck periods. The assessment of the Stage 1 construction works indicates that the Stage 1 construction trips would have no impact on the operation of any port or public roads/intersections, even if occurring during a period with there will also be limited operational activity at the GC BLT (3 storage tanks). With regard to the Stage 2 construction works, while background traffic conditions (at the time of the Stage 2 construction works) will be reviewed as part of the preparation of the Stage 2 CTMP, there is little if any potential for the Stage 2 construction to impact the operation of any port or public roads/intersections. Significant space for construction staff parking and truck loading/unloading and material stockpiling is available within the BLT; no construction staff parking, materials handling or stockpiling would occur in Tom Thumb Road. A Draft CTMP has been prepared to ensure that the construction of the proposed BLT infrastructure can be undertaken safely and efficiently without impacting the public or port road networks. The CTMP will be finalised further to consideration of any future Conditions of Consent in a Development Application approval, and then implemented during both the Stage 1 and Stage 2 construction works. Bicycle parking will be provided adjacent to the GC GT car park to provide for any future staff cycling demand. Swept path analysis has been prepared showing the movement of B-Doubles through the BLT unloading areas further to the Proposal, and confirms that these movements can be appropriately accommodated in accordance with Australian Standards requirements.
Air Quality	An Air Quality Impact Assessment has been prepared by Air Environment and is included at Appendix F. The assessment has been prepared in accordance with the NSW EPA Approved



Discipline	Assessment of Significant Likely Impacts
	Methods. It examines the emissions from the proposed diesel boilers and the repurposed diesel storage tank which was determined to represent a minor emission source with all pollutant concentrations well below 2% of their respective criteria. The assessment accounts for the worst-case scenario which assumes that both boilers operate concurrently at their peak load. Breathing and working losses from Tanks TK-01 to TK-15 occurring whilst storing tallow or UCO, and the four pre receipt tanks (DW-20 to DW-23), were considered to represent minor odour sources and were therefore not assessed. The air quality impact assessment demonstrates that GrainCorp's proposed BLT upgrade can proceed without significant adverse air quality impacts. The comprehensive assessment approach, conservative assumptions, and detailed analysis provide confidence that the facility will operate in compliance with all applicable air quality standards. Predicted pollutant concentrations for the proposed BLT upgrade were compared against those for the existing consent sources. The investigation determined that the proposed alterations and additions will not significantly increase the environmental impacts.
Noise and Vibration	Acoustic Logic have prepared a Noise and Vibration Impact Assessment which is included at Appendix G. It assesses the proposal's operational noise emissions and impacts to nearby receivers. It also considers the anticipated noise and vibration emissions from construction activities. The assessment has been updated to address the feedback provided by DPHI in their email dated 14 November 2025. The surrounding receivers include two residential receivers, a public school and commercial receivers located to the north west on the far side of Springhill Road. Key generating noise sources associated with the proposal considered in the assessment consist of heavy rigid trucks and on-site equipment. The results of the assessment confirm that noise emissions generated by the site will not exceed the NPI's noise emission criteria. Construction noise impacts will result from activities related to the cutting of steel, the dismantling of existing machinery and the delivery and installation of equipment. The anticipated noise levels during the construction phase are capable of complying with the criteria nominated by the NSW DECC Interim Construction Noise Guideline (ICNG). Vibration may arise from excavation activities undertaken with the use of piling rig. However, given the distance attenuation between existing residential receivers and the project site, the impact at the surrounding properties will be negligible. The assessment also included a comparison between approved and proposed operating conditions which concluded that there will not be any significant increase in noise impacts associated with the proposed development. Acoustic Logic note that while the site will remain in operation during the construction stage, the noise emission criteria for the above two activities are different and independent. As detailed in Section 6.2 of the Noise and Vibration Assessment report, noise

Discipline	Assessment of Significant Likely Impacts
	emission criteria for the operation of the project site were developed based on NSW Environmental Protection Authority <i>Noise Policy for Industry</i> (NPI) 2017 while construction noise management levels are established in Section 9.1 based on the NSW DECC <i>Interim Construction Noise Guideline</i> (ICNG) 2009. To provide an indication of the potential combined noise impact on the residents, comparison between predicted operational noise levels and construction noise levels has been made. Results show that noise generated by operational activities are generally 10dB(A) below construction noise levels. In general, noise that is 7-10dB(A) below the dominant noise level is considered inaudible and does not contribute to any increase above and beyond the higher noise level (per logarithmic addition), in this case, the predicted construction noise levels. Combined noise levels will hence be driven by construction activities while still complying with the construction management levels and daytime operational noise criteria.
Soil and Geotechnical	A SWMP has been prepared by SMEC and is included at Appendix D. It provides an assessment of the proposal's potential impacts to soil, surface water and groundwater (both quality and quantity) during the construction and operational phases. <u><i>Flooding</i></u> The SWMP confirms that the portion of the site to which the works relate is not impacted by flooding. However, Tom Thumb Road to the south is affected by the 1% AEP event. DRAINS modelling confirms that the proposal is unlikely to impact existing flood behaviours or expose the surrounding area to additional flood related risks. <u><i>Erosion and Sediment Control</i></u> The report is accompanied by a Concept Erosion and Sediment Control Plan which will be implemented by a suitably qualified contractor during the construction phase. It will apply measures in accordance with the <i>IECA Best Practice Erosion and Sediment Control Guidelines</i>. Measures include sediment fences, use of stockpiles, topsoil management as detailed in <i>Section 5.2.3.1</i>. <u><i>Water Quantity and Runoff</i></u> SMEC undertook a comparison of the pre and post-development 1% AEP flow rates to determine if the proposal will increase post development flows. The assessment relied on DRAINS modelling and the results conclude that it will not impact water volumes. Specifically, during the pre-development phase all stormwater flows drain into Council's network. However, during the post development phase all stormwater flows will instead drain into the oil water separator. In turn, the volume of drainage into Council's network will decrease which represents an improved outcome relative to the existing scenario. <u><i>Water Quality</i></u> The SWMP provides an assessment of water quality impacts using MUSIC modelling. The results confirm that the proposal is capable of complying with the water quality targets for total suspended solids, phosphorus, nitrogen and gross pollutants.

Discipline	Assessment of Significant Likely Impacts
	<u>Groundwater Impacts</u> The results confirm that the proposed works will not alter the groundwater quality nor will they increase the quantity of groundwater. Construction-related groundwater impacts are anticipated to be short-term, low-risk, and reversible. This is due to the mitigation strategies proposed and the sealed nature of the existing site. The mitigation strategies associated with the Construction Certificate Phase include the aforementioned erosion and sediment control measures, the use of bunding and the implementation of a Construction Environmental Management Plan.
Contamination	The SWMP addresses the site's contamination and draws upon the findings of the Contamination Certificate Assessment prepared by Environmental Resources Management (dated 2013). The assessment concludes that the site is not affected by significant contamination issues and is suitable for its current use. The proposed works will not alter the findings of the assessment given that it involves only minor ground-intrusive works. In turn, the risk of further contamination exposure is low. The report recommends the implementation of an unexpected finds protocol in accordance with the SNW EPA Guidelines to manage any unidentified contaminants should these be identified during the construction phase.
Marine Movements	The BLT's existing operations supports the following: • Vessel Deadweight: 7,000 to 12,000 metric tonnes • Annual Vessel Frequency: Approximately 9 to 10 vessels The proposal requires the use of larger vessels and necessitates the following amendments: • Vessel Deadweight: 21,020 to 25,000 metric tonnes • Annual Vessel Frequency: Approximately 10 vessels The Marine Movements Statement at Appendix H confirms that the berth utilised by the site has the capacity to support the proposed increase to the size of the vessels and the annual vessel frequency of approximately 10.

7 Suitability of the Site

Having regard to the characteristics of the site and its location, the proposed development is considered suitable for the site for the following reasons:

- The site is zoned SP1 Special Activities by the T&I SEPP and the proposed alterations and additions to the existing BLT are permissible with consent.
- The proposed works will not intensify the site's existing operations.
- Supporting technical studies that accompany this DA confirm that the associated environmental impacts are minor and can be mitigated.
- The site is located in a port / maritime industrial setting and the proposed works are compatible with the character of the surrounding development.
- The proposal will assist GrainCorp achieve its commercial objectives and will positively contribute to the economic performance of Port Kembla's commercial sector.
- The proposal is the outcome of iterative design testing which has been undertaken to ensure the development minimises environmental impacts to the greatest extent possible.

8 Submissions

The DA is expected to be notified and publicly exhibited. The Applicant requests the opportunity to review and comment on any submissions received.

9 Public Interest

There are no known matters in relation to the public interest relevant to the development of the site that have not been canvassed in this report and the accompanying specialist reports. However, as noted above, DPHI is expected to notify the application for public comment as part of its assessment.

The development of the site is considered to be in the public interest for the following reasons:

- It is consistent with the objects of the *EP&A Act* in that it will encourage the economic and orderly development of the land.
- It is consistent with the provisions of the T&I SEPP and other key legislation as detailed in this assessment.
- The proposal will contribute positively to the ongoing viability of the Port by adapting the existing and approved BLT to respond to commercial demand to export Tallow and UCO and other similar animal and vegetable based oils.
- The proposal can be delivered without giving rise to unacceptable environmental impacts.

10 Conclusion

The proposal involves alterations and additions to facilitate improvements to GrainCorp’s existing and approved BLT. The proposed works will improve its existing operations and support the commercial viability of the development which will contribute positively to Port Kembla’s industrial and commercial sector.

The alterations and additions will be delivered on a site which is highly disturbed and has historically accommodated port facilities. Supporting technical studies confirm that it will not significantly increase the environmental impacts of the existing or approved development.

The proposal has been carefully designed and sited to minimise environmental impacts. The proposed design is the outcome of design testing and consultation with specialist experts and government agencies.

The proposal is consistent with the objects of the EP&A Act as it promotes the orderly and economic use of land and for the reasons outlined above is in the public interest.

11 Glossary

Abbreviation	
BC Act	<i>Biodiversity Conservation Act 2016</i>
B&C SEPP	<i>State Environmental Planning Policy (Biodiversity and Conservation) 2021</i>
BLT	Grain Corp’s Bulk Liquids Terminal
CBD	Central Business District
Council	Wollongong City Council
CDC	Complying Development Certificate
DA	Development Application
DCP	Wollongong Development Control Plan
Direction	Environmental Planning and Assessment (Local Infrastructure Contributions – Port Botany and Port Kembla) Direction 2013
DP	Deposited Plan
DPHI	Department of Planning, Housing and Infrastructure
EDC	Estimated Development Cost
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2021</i>
ERM	Environmental Resources Management
EPL	Environmental Protection Licence
FM Act	<i>Fisheries Management Act 1994</i>
GFA	Gross Floor Area
GC GT	GrainCorp Grain Terminal
HIPAP 4	<i>Hazardous Industrial Planning Advisory Paper No. 4 – Risk Criteria for Land Use Safety Planning</i>
HPC	Housing and Productivity Contributions
ICNG	NSW DECC Interim Construction Noise Guideline
Km	Kilometres
LEP	<i>Wollongong Local Environmental Plan 2009</i>



Abbreviation	
LGA	Local Government Area
Minister	Minister for Planning and Public Spaces
MHWM	Mean High Water Mark
MNES	Matters of National Environmental Significance
Planning Systems SEPP	<i>State Environmental Planning Policy (Planning Systems) 2021</i>
PoEO Act	<i>Protection of the Environment Operations Act 1997</i>
R&H SEPP	<i>State Environmental Planning Policy (Resilience and Hazards) 2021</i>
SEE	Statement of Environmental Effects
SEPP 33 Guidelines	<i>Hazardous and Offensive Development Application Guidelines Applying SEPP 33</i> (NSW Government 2011)
Site	BLT at Port Kembla Lot 20 in DP 1046295 (BLT site); Lot 2001 in DP 1030233 and Lot 12 in DP 1182111 (pipeline between bulk liquid storage facility and berth 104) and Lot 70 in DP 1182824 (berth 104).
SSD	State Significant Development
SWMP	Soil and Water Management Plan
T&I SEPP	<i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i>
Three Ports SEPP	<i>State Environmental Planning Policy (Three Ports) 2013</i>
UCO	Used Cooking Oil
WMA	<i>Water Management Act 2000</i>

APPENDIX A: RISK AND HAZARDS ASSESSMENT

APPENDIX B: SURVEY PLAN

APPENDIX C: PLANS

APPENDIX D: SOIL WATER MANAGEMENT PLAN

APPENDIX E: TRANSPORT ASSESSMENT

APPENDIX F: AIR QUALITY IMPACT ASSESSMENT

APPENDIX G: NOISE AND VIBRATION IMPACT ASSESSMENT

APPENDIX H: MARINE MOVEMENTS STATEMENT

APPENDIX I: WASTE MANAGEMENT PLAN

APPENDIX J: COMPLYING DEVELOPMENT CERTIFICATE

APPENDIX K: MINUTES OF PRE-DA MEETING WITH WOLLONGONG CITY COUNCIL

APPENDIX L: BUNDING RISK ASSESSMENT REPORT

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