MILFORD PLANNING

MP ref: M2349-MCU-1
DA ref: MCU24/0109
QA: ms.mc

4 December 2024

Assessment Manager
Townsville City Council
PO Box 1268
TOWNSVILLE QLD 4810
Via: *TOLS*

Attention: Taryn Pace – Planning and Development

Dear Taryn,

Re: Response to Information Request
Development Application seeking a Development Permit for Material Change of Use – Special Industry (Battery Anode Manufacturing Demonstration Plant) on land described as Lot 4 on RP901581 and Lot 5 on SP221657 and located at 39-45 Crocodile Crescent, Mount St John

On behalf of the Applicant, Milford Planning refer to the abovementioned development application and to correspondence dated **27 November 2024**, being the formal Information Request issued by Townsville City Council (Council) (refer **Attachment 1**).

In response to Council's Information Request, and in accordance with Section 13.2 of the Development Assessment Rules, we hereby provide a response to all of the information requested as detailed in **Table 1** below.

Table 1 – Response to Information Request

Item	Response
Item 1 Updated Plans	This item requested updated site plans confirming the location of all relevant infrastructure and allotment boundaries. In response to this item, an amended site plan has been prepared as provided at **Attachment 2** (Revision E dated 2 December 2024). The amended site plan confirms the intent to use Lot 5 on SP221657 as a laydown yard, and confirms the location of the existing access to Crocodile Crescent and the extent of established vegetation.

07 4724 0095
info@milfordplanning.com.au
283 Flinders Street
Townsville City Q 4810
PO Box 5463
Townsville City Q 4810
ABN 31 162 988 132
milfordplanning.com.au

Table 1 – Response to Information Request	
Item	**Response**
Item 2 Hazardous Material Storage and Operations Management	This item requested further detail on how hazardous materials will be protected from flood waters, and how stormwater quality will be protected. Item 2 also seeks additional detail regarding how waste will be stored and removed from the site. In response to this item, an updated Risk and Hazard Management Plan has been prepared for the development (refer **Attachment 3**), inclusive of sections specifically dealing with 'flood hazard' and 'stormwater quality'. The additional sections confirm management measures including ensuring all hazardous material stored on site is above the 0.2 % AEP flood level, and management measures to ensure stormwater quality is protected. In terms of waste storage and management, as detailed in the development application package, waste will include neutralised water and nonproduct solids, and will be stored and removed off site by suitable waste disposal contractors. Given the status of the project, which is still in the planning approval stage, specific arrangements have not yet been made with waste disposal contractors and there is no additional detail relevant to waste management at this point in time. As such, it is recommended that Council include a standard condition of approval regarding refuse facility provision and management to ensure compliance with the relevant standards is achieved.

Proceeding

We trust the above and attached information is sufficient to allow Council to assess the development application. If Council is of the view that the response does not appropriately address the Information Request, we request the opportunity to meet to discuss further.

Correspondence regarding the intention to commence public notification will be issued to Council for its information shortly.

If you have any questions regarding this correspondence, please contact the undersigned on TEL: (07) 4724 0095.

Yours sincerely,

MILFORD PLANNING

Electronic

Matteo Sandona

SENIOR TOWN PLANNER

Encl: Attachment 1 – Council Information Request
Attachment 2 – Amended site layout plan
Attachment 3 – Amended Risk and Hazard Management Plan

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Attachment 1

RECEIVED
BY MILFORD PLANNING
27-11-24

PO BOX 1268, Townsville
Queensland 4810

13 48 10

enquiries@townsville.qld.gov.au
townsville.qld.gov.au

ABN: 44 741 992 072

Date >> 27 November 2024

Graphinex Anodes Pty Ltd
C/- Milford Planning
PO Box 5463
TOWNSVILLE CITY QLD 4810

Email >> info@milfordplanning.com.au

Dear Sir/Madam

Information Request
Planning Act 2016

As per our telephone conversation on 27 November 2024 please be advised that, upon review of the below mentioned development application, further information is required to undertake a comprehensive assessment. In accordance with section 12 of Development Assessment Rules under the *Planning Act 2016* the following information is requested.

Application Details

Application no:	MCU24/0109
Assessment no:	1109041
Proposal:	Special Industry - Battery Anode Manufacturing Demonstration Plant
Street address:	39-45 Crocodile Crescent MOUNT ST JOHN QLD 4818 0 Ingham Road MOUNT ST JOHN QLD 4818
Real property description:	Lot 4 RP 901581 Lot 5 SP 221657 Lot 102 RP 901581
Applicant's reference:	M2349

The information requested is set out below >>

Request Item 1 - Updated Plans

The applicant is requested to provide updated plans showing the entire development extent and existing site features.

Reason

To ensure Council can complete a comprehensive assessment of the proposed development.

Advice

The applicant is advised the provided plans (dated 27 October 2006) do not show the intent for Lot 5 SP 221657, nor do these plans include detail of established site features such as the access to Crocodile Cresent or extent of established vegetation.

Request Item 2 – Hazardous Material Storage and Operations Management

The applicant is requested to provide the following:

a) Updated plans illustrating appropriate storage for all hazardous materials likely to be onsite above the 0.2% AEP Flood level.
b) Demonstrate how the entry of contaminants into, and transport of contaminants in, stormwater is proposed to be managed.
c) Details on how waste generated is proposed to be managed, stored and disposed.

Reason

To demonstrate compliance with Performance Outcome PO15 of the Medium impact industry zone code, PO9 of the Flood hazard overlay code, PO3 of the Healthy waters code and PO33 of the Works Code of the Townsville City Plan.

Advice

The applicant is advised that information requested can be provided included within an Operations Plan.

End of Information Request >>

Under the provisions of the Development Assessment Rules under the *Planning Act 2016*, you have three options available in response to this Information Request. You may give the assessment manager (in this instance Council):

(a) all of the information requested; **or**
(b) part of the information requested; **or**
(c) a notice that none of the information will be provided.

For any response given in accordance with items (b) and (c) above, you may also advise Council that it must proceed with its assessment of the development application.

Please be aware that under the Development Assessment Rules under the *Planning Act 2016*, the applicant is to respond to any Information Request within **3 months** of the request. If you do not respond to the Information Request within this time period, or, within a further period agreed between the applicant and Council, it will be taken that you have decided not to provide a response. In the event of no response being received, Council will continue with the assessment of the application without the information requested.

Council prefers that all of the information requested be submitted as one package. If any additional matters arise as a result of the information submitted, or, as a result of public notification (where applicable), you will be advised accordingly.

Should any referral agency make an information request, you are reminded of your obligation to provide council with a copy of the information response provided to that referral agency.

You may wish to follow the progress of this application using PD Online on Council's website www.townsville.qld.gov.au

If you have any further queries in relation to the above, please do not hesitate to contact Taryn Pace on telephone 07 4727 9426, or email developmentassessment@townsville.qld.gov.au.

Yours faithfully

For Assessment Manager
Planning and Development

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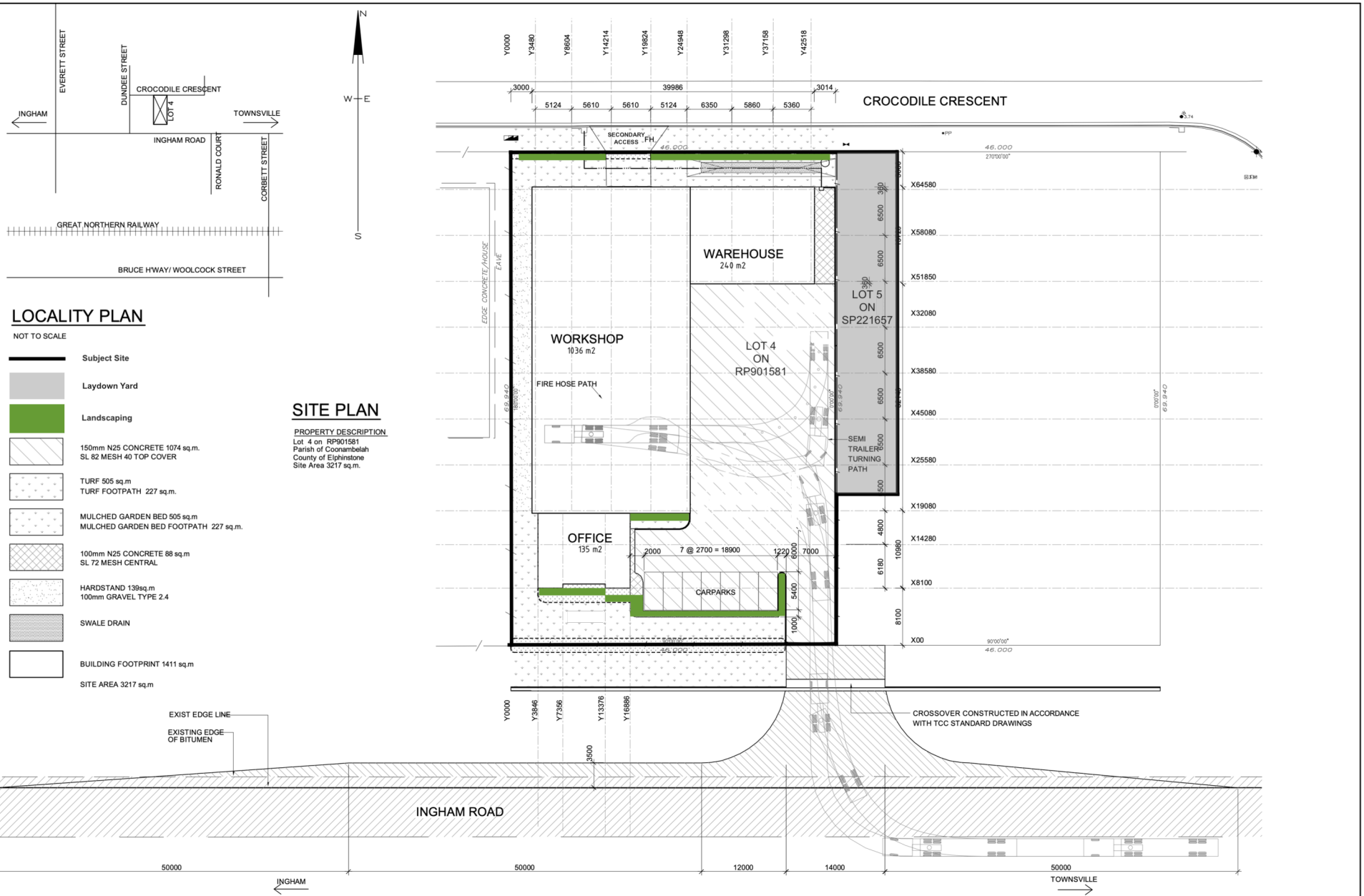
Attachment 2



No.	Amendment	Date
E	FOR DEVELOPMENT APPROVAL	2.12.24
D	SWALE DRAIN ADDED	27.10.06
C	TITLE AMENDED	12.10.06
B	FOR DEVELOPMENT APPROVAL	04.07.06
A	FOR CLIENT APPROVAL	30.10.05

NOTES:

GENERAL NOTES:

1. Dimensions are in millimetres unless otherwise noted. (U.O.N.)
2. Figured dimensions take precedence over scale dimensions.
3. Verify all dimensions and levels prior to the start of work.
4. All work is to be in accordance with the 1991 Building Act Amendment Act, The Local Authority By-Laws, The current Australian Standards and The Manufacturers' Specification.
5. Confirm the location of underground services prior to the start of work

building designers association of queensland inc.
MEMBER

BILL BARBER
DESIGN & DRAFTING
W.L.Barber Lic. No. 65800 expires Jun 2005
Lic. under QBSA Act 1991
Building Design - Medium Rise
262 HUGH STREET,
GULLIVER, TOWNSVILLE. 4812
Phone(07) 4728 8679 Fax (07) 4728 6974

DESIGNED	CHECKED
W.L.B.	
DRAWN	APPROVED
DB	
HT. DATUM	DATE
	14.04.05
AZIMUTH	DISK FILE

JUSTIN PASCOE

WORKSHOP, WAREHOUSE AND OFFICE
35-45 CROCODILE CRESCENT
BOHLE

SCALE:- 1:250 @ A1

PA4011C/01D

MILFORD PLANNING

Attachment 3

Risk/Hazard Management Measures

Esmeralda Graphite

Item	Hazards	Prevention Statements	Emergency Procedures
Sulphuric acid (H_2SO_4)	• Skin/eye corrosion/irritation, may cause severe skin burns and eye damage • Respiratory irritation if inhaled, may cause cancer by inhalation • May be corrosive to metals • Can fume when in high concentrations. • Elevated temperature accelerating burns.	• Sulphuric acid is stored and locked in self-bunded IBCs as containment precaution in event of leak. The bunding can catch 100% of the volume of the IBC. • Areas where sulphuric acid are used will include containment bunding. • Wetted parts are chemically resistant to minimize corrosion and contamination. • Vessels and pipes are sealed. • Entering reagents storage area requires PPE: monogoggles, PVC or nitrile gloves. • Use protective gloves, clothing, eye protection in case manual handling is required. Wash face, hands and any exposed skin thoroughly after handling. • Isolation procedures including method of verifying isolation will be documented and communicated (embedded in training) to facilitate safe access to parts of the plan requiring adjustment or maintenance.	• In case of an any incident, call a poison center or doctor/physician. • In case of contact with skin take off contaminated clothing. Wash skin immediately with shower for at least 15 minutes. Wash contaminated clothing before reuse. • Contact with eye, rinse immediately with eye-washing station for at least 15 minutes, also under eyelid. Remove contact lenses if present. Continue rinsing. Seek immediate medical assistance. • Ingestion by swallowing, rinse mouth. DO NOT induce vomiting. Never give anything by mouth to unconscious person. • In case of inhalation, move to fresh air and keep at rest in position comfortable for breathing. Seek immediate medical assistance. If breathing is difficult, give oxygen. Do not use mouth-to-mouth if victim ingested or inhaled substance. Use a pocket mask equipped with a one-way valve or other proper respiratory medical apparatus. • In case of spillage, neutralize and absorb to prevent material damage. Full PPE is required when dealing with sulphuric acid clean-ups. • Emergency STOP buttons outside the reagent storage area will be installed to ensure safe and swift shutdown of the equipment.
Caustic soda (NaOH)	• Skin/eye corrosion/irritation, may cause severe skin burns and eye damage • Respiratory irritation if inhaled, may cause cancer by inhalation • May be corrosive to metals	• Caustic soda is stored and locked in self-bunded IBCs as containment precaution in event of leak. The bunding can catch 100% of the volume of the IBC. • Areas where caustic soda are used will include containment bunding. • Do not breath mist, ensure good ventilation in reagent storage room. • Store sodium hydroxide solution locked up in tightly closed corrosion resistant container.	• In case of an any incident, call a poison center or doctor/physician. • In case of contact with skin take off contaminated clothing. Wash skin immediately with shower for at least 15 minutes. Wash contaminated clothing before reuse. • Contact with eye, rinse immediately with eye-washing station for at least 15 minutes, also under eyelid. Remove contact lenses if present. Continue rinsing. Seek immediate medical assistance. • Ingestion by swallowing, rinse mouth. DO NOT induce vomiting. Never give anything by mouth to unconscious person.

Item	Hazards	Prevention Statements	Emergency Procedures
		• Anhydrous sodium hydroxide may be used and mixed onsite. Store dry, using protective equipment. • Use protective gloves, clothing, eye protection in case manual handling is required. Wash face, hands and any exposed skin thoroughly after handling.	• In case of inhalation, move to fresh air and keep at rest in position comfortable for breathing. Seek immediate medical assistance. If breathing is difficult, give oxygen. Do not use mouth-to-mouth if victim ingested or inhaled substance. Use a pocket mask equipped with a one-way valve or other proper respiratory medical apparatus. • In case of spillage, neutralize and absorb to prevent material damage. Full PPE is required when dealing with caustic soda clean-ups. • Emergency STOP buttons outside the reagent storage area will be installed to ensure safe and swift shutdown of the equipment.
Pitch (Petroleum pitch)	• Skin/eye corrosion/irritation, may cause severe skin irritation, burning, itching and changes to pigmentation. Can cause severe irritation and damage to eyes. • Respiratory irritation possible if vapors or dust inhaled. • May cause cancer • May cause genetic defects • Suspected of damaging fertility and fetuses.	• Stored in a cool, well-ventilated reagent storage. • Store dry. • Do not breath dust, fumes, gas, mist, vapors, ensure good ventilation in reagent storage room. • Use protective gloves, clothing, eye protection in case manual handling is required. Wash face, hands and any exposed skin thoroughly after handling. • Do not take contaminated clothing out of the workplace.	• In case of contact with skin take off contaminated clothing. Wash skin twice with mild detergent. waterless hand cleaner, or soap and water. Exposed area should be examined by medical personnel if irritation or pain persists. Do not use solvents on skin as that may promote absorption. Seek immediate medical assistance. • Contact with eye, rinse immediately with eye-washing station for at least 15 minutes, occasionally lift eyelid. Seek immediate medical assistance. • In case of an any incident, call a poison center or doctor/physician. • In case of inhalation, move to fresh air and keep at rest in position comfortable for breathing. Seek immediate medical assistance. If breathing is shallow, give oxygen. If breathing has stopped give artificial respiration. Keep affected person warm and at rest. • Thermal exposure, contact with molten pitch causes serious burns. For contact with molten pitch, do not remove contaminated clothing. Flush skin immediately with large amounts of cold water. If possible, submerge area in cold water. Pack affected area with ice and get medical assistance immediately. • Containment procedures: ○ Solid pitch spill; shovel spilled material into disposal containers.

Item	Hazards	Prevention Statements	Emergency Procedures
			○ Liquid pitch spill; absorb material using inert solids (earth, sand, etc.). Allow for cooling and shovel cooled pitch in disposal container. • Clean-up procedures & equipment: ○ Protective PPE required. ○ Remove all ignition sources. ○ Ventilate area of spill
Sodium Silicate (Na_2SiO_3)	• Skin/eye corrosion/irritation, may cause severe skin irritation, burning. Skin inflammation is characterised by itching, scaling, reddening or blistering. Can cause severe irritation and damage to eyes. Eye may become red, watery and itchy. • Respiratory irritation possible if vapors or mist inhaled. This may be characterised by coughing, choking, shortness of breath. • Liquid or spray mist may produce tissue damage on mucous membranes of eyes, mouth and respiratory tract.	• Do not breath dust, fumes, gas, mist, vapors, ensure good ventilation in reagent storage room. • In case of insufficient ventilation, wear suitable respiratory equipment. If you feel unwell, seek medical attention and show the label when possible. • Avoid contact with skin and eyes. • Keep away from incompatibles such as oxidizing agents, acids. • PPE includes face shield, full suit, vapor respirator. Be sure to use an approved/certified respirator or equivalent. Gloves and boots.	• Contact with eye, rinse immediately with eye-washing station for at least 15 minutes, occasionally lift eyelid. Seek immediate medical assistance. Do not use an eye ointment. • In case of contact with skin take off contaminated clothing. Wash skin immediately with deluge shower. Gently and thoroughly wash the contaminated skin with running water and non-abrasive soap. Be particularly careful to clean folds, cervices, creases and groin. Wash contaminated clothing before reuse. • If inhaled, remove victim to area with fresh air and keep at rest in comfortable position for breathing. • Ingestion by swallowing, rinse mouth. DO NOT induce vomiting. Never give anything by mouth to unconscious person. If the victim is not breathing, perform mouth-to-mouth resuscitation. Seek immediate medical assistance. • In event of small spill, dilute with water and mop up or absorb with inert dry material, dispose of in appropriate waste container. • In event of large spill, stop leak if possible. Absorb with dry earth, sand or other non-combustible material. Do not use water. Do not touch spilled material. Use water spray curtain to divert vapor drift. Prevent entry into sewers, basements or confined areas; dike if needed. Call for assistance on disposal. Neutralize the residue with a dilute solution of

Item	Hazards	Prevention Statements	Emergency Procedures
			acetic acid. Finish cleaning by spreading water on the contaminated surface and allow to evacuate through the sanitary system.
Electricity	• Electrocution • Burns	• Ensure electrical supply is earthed and designed to provide energy in the electrochemical process only in a safe manner (designed to comply with AS3000 wiring regulations). • Overload circuits exist to prevent an unsafe condition from occurring. • Maintenance procedures to safely isolate key equipment.	• Ensure plant is shut down from electrical source. Remove them from the hazard area. • If anyone is affected by an electroshock, perform first aid: ○ Monitor pulse and breathing. Perform CPR if required. ○ Treat the burns (cover with gauze). ○ If person is nauseous, elevate legs if able to without pain.
Noise	• Prolonged exposure to loud noise can lead to permanent hearing loss or tinnitus (ringing in the ears). • Constant noise can cause psychological stress and fatigue, reducing overall productivity. • High noise levels can interfere with communication, leading to misunderstandings and accidents. • Long-term exposure to noise can contribute to cardiovascular problems such as hypertension.	• Ensure all plant equipment is rated in accordance with occupational health and safety exposure limits. • Select machinery and tools that produce less noise where possible. • Implement noise barriers, silencers, and vibration dampers to reduce noise at the source. • Limit the time workers spend in noisy areas and rotate tasks to minimize exposure. • Provide earplugs or earmuffs to workers in high-noise environments. • Ensure machinery and equipment are well-maintained to prevent increased noise levels due to wear and tear.	• If someone shows signs of hearing damage, seek medical attention. • Move the affected person to a quieter area and provide hearing protection if necessary. • Regularly train workers on noise hazards, prevention strategies, and emergency procedures.
Dust	• Inhalation of dust can cause respiratory problems such as asthma, bronchitis, and chronic obstructive pulmonary disease. • Prolonged exposure to certain types of dust, like silica or	• Implement dust collection and extraction systems where manual handling occurs to capture dust at the source. • Ensure adequate ventilation to reduce dust concentration in the air.	• When someone is exposed to a high concentration of dust, move them to a well-ventilated area and seek medical attention if necessary. • Provide first aid for any skin or eye irritation caused by dust exposure.

Item	Hazards	Prevention Statements	Emergency Procedures
	asbestos, can lead to serious lung diseases such as silicosis, asbestosis, and lung cancer. • Dust can cause skin rashes and eye irritation. • Certain types of dust, like graphite dust mixtures in air, can be explosive when ignited.	• Use wet milling or wet suppression methods to minimize dust generation if possible. • Provide appropriate PPE such as masks, respirators, and protective clothing to workers. • Maintain a regular cleaning schedule to remove dust from surfaces and equipment.	
Hot work / hot surfaces	• Direct contact with hot surfaces can cause severe burns to the skin. • Sparks and molten material from hot surfaces can ignite flammable materials nearby. • Heat stress. Working in extreme heat for prolonged periods of time can cause the body to overheat, causing heat related illness such as heat stroke and heat exhaustion.	• Holistic handling procedures will be developed. • Regularly train workers on hot work safety practices and emergency procedures • Wear appropriate personal protective equipment (PPE) such as gloves, face shields, and flame-resistant clothing • Ensure proper ventilation to disperse fumes and gases. • Keep fire extinguishers, fire blankets, and other firefighting equipment readily available.	• Call emergency medical services immediately if someone is injured. • While waiting for help, raise the burned area above the heart and ensure no clothing is stuck to the injury • Have fire extinguishing equipment on hand and monitor the area for at least 30 minutes after completing hot work to ensure there is no risk of fire. • Plan and practice evacuation procedures regularly to ensure everyone knows how to respond in an emergency

Item	Hazards	Prevention Statements	Emergency Procedures
Flood hazard	• Reagent contamination of flood waters • Electrical equipment inundation	• Chemicals with potential to contaminate flood waters are to be stored above the 0.2% AEP flood level. • Equipment and valves with potential of spillage or leakage will have capture trays installed below equipment and within bunded areas. • All IBC storage to be elevated and include self-bunded catchment. • All reagent dry packaging to be stored elevated (shelving or similar). • Electrical equipment will be housed in enclosed buildings with susceptible components raised.	• Sandbagging/redirection of water to avoid inundation of susceptible areas in accordance with local directives.
Stormwater quality	• Stormwater becomes contaminated.	• All equipment and bunds to be within enclosed buildings. • Stormwater is directed away from building using appropriate falls. • Areas of potential contamination will include bunding and recovery mechanisms to minimize any risk of discharge to environment. • Housekeeping – cleaning of minor spills as occur and regular wash down of bund areas.	• Sandbagging/redirection of water to avoid inundation of susceptible areas in accordance with local directives.