



Mr Stephen Richardson  
Director

COWMAN STODDART PTY. LIMITED  
Suite 14, 31 Kinghorne Street  
Nowra NSW 2541

30 April 2021

Dear Mr Richardson

### **Shoalhaven Starches Expansion (MP06\_0228-Mod-22) Environmental Assessment Requirements (EARs)**

Please find attached a copy of the environmental assessment requirements (EARs) for the preparation of the Statement of Environmental Effects (SEE) for the Shoalhaven Starches Expansion Project Modification 22 at 160 Bolong Road, Bomaderry in the Shoalhaven local government area (LGA).

The EARs below have been prepared in consultation with Shoalhaven City Council (Council), Environment Protection Authority (EPA), Biodiversity and Conservation Division (BCD), Transport for NSW (TfNSW) and Fire and Rescue NSW (see **Attachment A**) and are based on the information provided to date.

Your modification application must be accompanied by an SEE which addresses the requirements of agencies (**Attachment A**) and includes the following:

- **Detailed Description of the Modification** – including:
  - detailed justification for the proposed modification
  - any staging of the modification
  - a description of how the modification integrates with existing, approved and proposed construction works and operations of the site
  - detailed plans of all proposed building works and
  - identification of conditions proposed to be modified.
- **Statutory and Strategic Context** – including:
  - demonstration the application constitutes a modification under section 4.55 of the EP&A Act
  - consideration of all relevant environmental planning instruments, including identification and justification of any inconsistencies with these instruments and
  - demonstration the modification is consistent with all relevant strategic planning documents and policies
- **Community and Stakeholder Engagement** – including:
  - a community and stakeholder participation strategy identifying key community members and other stakeholders
  - details and justification for the proposed consultation approach(s)
  - clear evidence of how each stakeholder identified in the community and stakeholder participation strategy has been consulted
  - issues raised by the community and surrounding landowners and occupiers;
  - clear details of how issues raised during consultation have been addressed and whether they have resulted in changes to the development, and
  - details of the proposed approach to future community and stakeholder engagement based on the results of consultation.
- **Air Quality and Odour** – including:
  - a detailed emissions inventory that characterises the emissions from existing and proposed operations, including approved but not yet constructed components of the development used to inform the quantitative assessment
  - a quantitative assessment of the potential air quality, dust and odour impacts of the development in accordance with relevant Environment Protection Authority guidelines, with an assessment that models various emission scenarios, including but not limited to:

- the cumulative impacts of the development and all current operations of the site;
  - the cumulative impacts of the development including all current operations and all approved but not yet constructed components of the site
- the details of buildings and air handling systems and strong justification for any material handling, processing or stockpiling external to buildings
- details of proposed mitigation, management and monitoring measures.
- **Noise and Vibration** – including:
  - a quantitative noise and vibration impact assessment undertaken by a suitably qualified acoustic consultant in accordance with the relevant Environment Protection Authority guidelines and Australian Standards which includes:
    - identification of impacts associated with site emission and traffic generation at noise affected sensitive receivers
    - details of noise monitoring survey, background noise levels and noise emission levels of proposed activities
    - consideration of annoying characteristics of noise and prevailing meteorological conditions in the study area
    - the cumulative impacts of the development and all current operations of the site;
    - the cumulative impacts of the development including all current operations and all approved but not yet constructed components 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 and vibration following application of mitigation these measures and details of any proposed compliance monitoring programs.
- **Soils and Water** – including:
  - an assessment of potential surface and groundwater impacts associated with the modification, including potential impacts on watercourses, riparian areas, groundwater, and groundwater-dependent communities nearby
  - a detailed site water balance including a description of the water demands and breakdown of water supplies, and any water licensing requirements
  - details of stormwater and wastewater management systems and how they integrate with existing operations including measures to treat, reuse or dispose of water
  - a description of the measures to minimise water use
  - a detailed flooding assessment
  - a description of the proposed erosion and sediment controls during construction
  - characterisation of the nature and extent of any contamination on the site and surrounding area
  - an acid sulfate soil assessment to assess the potential for acid sulfate soils to be present in areas of proposed works and the anticipated depth of disturbance of modification works.
- **Traffic and Transport** – including:
  - details of all traffic types and volumes likely to be generated during construction and operation, including a description of key access / haul routes
  - 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 at key intersections using SIDRA or similar traffic model and that considers the following scenarios:
    - the cumulative impacts of the development and all current operations of the site;
    - the cumulative impacts of the development including all current operations and all approved but not yet constructed components of the site
  - plans demonstrating how all vehicles likely to be generated during construction and operation and awaiting loading, unloading or servicing can be accommodated on the site to avoid queuing in the street network
  - details and plans of any proposed internal road networks, loading dock servicing and provisions, on-site parking provisions, and sufficient pedestrian and cyclist facilities, in accordance with the relevant Australian Standards
  - details of the largest vehicle anticipated to access and move within the site, including swept path analysis
  - swept path diagrams depicting vehicles entering, exiting and manoeuvring throughout the site

- details of road upgrades, infrastructure works or new roads or access points required for the modification if necessary.
- **Fire and Incident Management** – including:
  - technical information on the environmental protection equipment to be installed on the site such as air, water and noise controls, spill clean-up equipment and fire (including location of fire hydrants and water flow rates at the hydrant) management and containment measures
  - detailed information relating to the proposed structures addressing relevant levels of compliance with Volume One of the National Construction Code (NCC).
- **Hazards and Risk** – a Preliminary Hazard Analysis (PHA) must be prepared in accordance with *Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis* (DoP, 2011) and *Multi-Level Risk Assessment* (DoP, 2011). It must include a clear indication of class, quantity and location of all dangerous goods and hazardous materials associated with the development and compared against the relevant risk criteria as provided with *Hazardous Industry Planning Advisory Paper No. 4 – Risk Criteria for Land Use Safety Planning*.
- **Urban design and visual** including an assessment of the potential visual impacts of the modification on the amenity of the surrounding area.
- **Planning agreement/development contributions** – demonstration 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 modification.

The Department strongly recommends that you consult with relevant agencies and stakeholders including surrounding landowner/occupiers and previous submitters prior to submitting your modification application and SEE.

Please contact the Department at least two weeks before you propose to submit your application. This will enable the Department to confirm the:

- applicable fee (see Division 1AA, Part 15 of the Environmental Planning and Assessment Regulation 2000); and
- consultation and public exhibition arrangements, including copies and format requirements of the application and SEE.

If you have any questions, please contact Shaun Williams on (02) 8275 1345 / or [shaun.williams@planning.nsw.gov.au](mailto:shaun.williams@planning.nsw.gov.au)

Yours sincerely,



Joanna Bakopanos

**A/Director Industry Assessments**