



50 Junction Street, Nowra, NSW 2541

T: 02 4421 4583  
M: 0414 315 775

matthew@harwoodacoustics.com.au  
www.harwoodacoustics.com.au

ABN: 12 654 492 823

Shoalhaven Starches Pty Ltd  
C/- Cowman Stoddart Pty Ltd  
29-31 Kinghorn Street  
Nowra NSW 2541

Reference: 2103003e-l.docx

Attention: Mr Stephen Richardson  
Telephone: 02 4423 6198  
Email: stephen@cowmanstoddart.com.au

15 February, 2022

Dear Stephen,

**MODIFICATION 21 TO SHOALHAVEN STARCHES EXPANSION PROJECT 06\_0228.**

**ADDITIONAL INFORMATION REQUEST – ENVIRONMENTAL NOISE ASSESSMENT**

Shoalhaven Starches Pty Ltd has recently submitted a modification application to the NSW Department of Planning, Industry and Environment seeking approval for alterations to the approved northern packing plant and container storage area located opposite the existing facility on Bolong Road. The Modification application also seeks approval for the installation of a nitrogen generator; indirect cooking plant; associated pipe gantries; two new fermentation tanks and relocation of an approved car park near the former Dairy Farmers site. An Environmental Noise Assessment was prepared by Harwood Acoustics Pty. Ltd., reference 2103003E-R, Rev A dated June 2021 (the June ENA) and was submitted with the application for the Modification.

Subsequent to the submission of the application with the accompanying June NIA, in its letter reference DOC21/805693-2, dated 05/10/2021, the NSW EPA requested additional information and clarification of modifying factor corrections in the June ENA.

I am pleased to advise that I have reviewed the request and have prepared a revised Environmental Noise Assessment, reference 2103003E-R, Revision B, dated 14/02/2022 (the Rev B ENA), which addresses the items raised by the EPA, so far as is reasonably practicable.

In addition to the Rev B ENA, we offer the following clarification comments.

Each bullet point below is a summary of the EPA request (in italics) and below that (Response) is my response to indicate how each request has been addressed.



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### 1 (a) Modifying Factor Assessment

Section 4.2.3 presents the “Modifying Factor Assessment”. The assessment states ‘no modifying adjustments are applicable’ however it only appears to consider tonality and low frequency.

The EPA requests that the proponent provide information on whether intermittency has been considered (for example are any of the mechanical plant likely to cycle on and off).

The EPA also requests the proponent provide more information to support the claim that ‘the noise levels are not expected to contain tonal characteristic at any receptor location’.

Response:-

A more detailed assessment of the potential for the occurrence of annoying characteristics has been provided in Section 5 of the Rev B ENA.

Section 4 provides one-third octave band spectra from noise measurements taken at the existing facility of similar plant and equipment to that proposed under Modification 21.

There is potential for the motors associated with the baghouses to display tonal components when assessed up close, within the building. An assessment is then provided of the one-third octave band spectrum predicted at the closest receptors. The assessment concludes that noise from these items of plant will not be audible at the receptor location after reductions from transmission loss of the building elements and distance attenuation and are therefore acceptable.

Consideration is also given to intermittency in Section 5 and concludes that whilst a number of individual noise sources located within the penthouse may cycle on and off and could be considered intermittent within the building, up close, they would not be audible or subjectively noticeable as intermittent at the closest residential receptor locations.

### 1 (b) Recommended Noise Controls

Section 6 to the NIA includes recommended noise controls. The EPA recommends that Section 6 be expanded to include: “Any ventilation fans, blowers and pumps should be designed to not exhibit tonal or low frequency noise, with an appropriate one third octave assessment undertaken in accordance with the Noise Policy for Industry”.

Section 7.4 of the Rev B ENA has been updated to include this recommendation.

An assessment will be undertaken prior to the commencement of construction, at the Noise Design Verification Stage (in accordance with Condition 14M of the Approval) to ensure this has been satisfactorily addressed and achieved.

I trust this response along with the revised NIA addresses the queries raised by the EPA.

Please do not hesitate to contact the undersigned should you require any further information or clarification.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Matthew Harwood'.

**Matthew Harwood**, MAAS

Director

Harwood Acosutics Pty Ltd