

05/09/2025

AP Ref: 131401

Ref: MP06_0228 Mod 30

The Team Leader
Attn: Thomas Bertwistle
Industry Assessments
Department of Planning, Housing and Infrastructure
Via email: Thomas.Bertwistle@planning.nsw.gov.au

SUBJECT: RESPONSE TO ISSUES

SHOALHAVEN STARCHES EXPANSION – MODIFICATION APPLICATION MP06_0228 MOD 30

Dear Thomas,

This letter has been prepared by Allen Price on behalf of Shoalhaven Starches and Supagas in response to the submission received from the Environment Protection Authority (EPA) and the Department of Planning, Housing and Infrastructure (DPHI) correspondence dated 8 August 2025 in relation to the Modification Application for Shoalhaven Starches Expansion MP06_0228 Mod 30.

We appreciate DPHI providing this feedback and the opportunity to respond in detail to the issues raised. As such, this Response to Issues submission comprises a response to the comments raised by the EPA and DPHI as outlined in Table 1 of this correspondence.

Table 1: Response to comments

Submission Comment	Applicant Response
Noise (DPHI)	
The provided noise assessment has considered the expanded Supagas facility against the noise limits set Environment Protection License (EPL) no. 21178. While it is acknowledged this EPL applies to the operation of the Supagas facility, the subject development consent, as amended, also sets noise limits for the entire Shoalhaven Starches facility under Schedule 3, condition 12 which the modification must have regard to. As such, please update the noise assessment to undertake a cumulative assessment of the proposed facility in the context of existing and approved operations, demonstrating that the modified development can continue to meet the consent's noise limits.	GHD has updated its Noise Impact Assessment (29 August 2025) to include additional detail of model scenarios to specify what noise levels from the site (Section 5.4.1). This includes cumulative noise from the existing site and proposed modification. The updated Noise Impact Assessment is provided at Attachment A of this correspondence.
Noise Impacts (EPA)	
The NIA should be updated to address Section 6.1 of the NPfI and address issues relating to mitigation and management of noise impacts from existing industrial activities on the site, including an assessment of reasonable and feasible mitigation measures for the proposal.	Section 7.2 of the Noise Impact Assessment has been updated to address Section 6.1 of the Noise Policy for Industry. This includes consideration of the broader 24 hours / 7 day industrial operation, and whether any

	additional impacts from the proposed modification are reasonable and feasible.
Mitigation of construction noise impacts (EPA)	
The EPA recommends the NIA be updated to include an assessment of feasible and reasonable mitigation measures for proposed construction works.	The updated Noise Impact Assessment includes an assessment of reasonable and feasible mitigation measures to be implemented during construction activities in Sections 7.1.1 and 7.1.2.
Details of noise sources and impacts (EPA)	
The NIA should be updated to clarify the matters below. - The NIA does not include an assessment of off-site road traffic noise impacts in accordance with the Road Noise Policy (DECCW 2011). - Section 5.2 Noise Sources appears to contain inconsistent information that should be confirmed, including: - Truck loading/unloading and truck movements (including reversing alarms) are said to occur but are not included in Tables 5.1 and 5.2. - Table 5.1 states the cooling tower fan sound power level is 101 dBA, but Table 5.2 includes a sound power level of 99 dBA. - Site layout plans included with the proposed Mod show other potential noise sources that are not included in Table 5.1, for example a dryer, blower, catox unit and vaporisers. - Table 5.2 shows the number of items of plant as being 2 cooling tower fans and 2 cooling tower water pumps, plus 4 side walls and 4 louvres. It's not clear if the overall sound power level is the noise level of one item or multiple items, i.e. the noise level for one cooling tower fan or for two cooling tower fans. - Section 5.4.2.1 states that third octave results have been analysed for tonal and low frequency characteristics. It doesn't appear that third octave results are included in the NIA. - It is not clear how the background noise levels to derive the NMLs for construction were calculated without	Section 6 of the updated Noise Impact Assessment has been added to assess noise from traffic generated during construction and operation of the proposed modification. Section 5.2 has been updated to consider truck loading and unloading, truck movements, sound power levels for cooling tower components and clarification for other potential noise sources from the noise model. Predicted one-third octave band levels and analysis for tonal and low frequency noise characteristics have been included in Attachment A. Clarification on how the background noise levels to derive the noise management level has

the influence from the existing site (Shoalhaven Starches and Supagas). The meteorological station details in Appendix A should be checked or justified, as it states that the BoM met station at Wagga Wagga was used for the met data.	been provided in the updated Noise Impact Assessment. Meteorological station details have been revised in the updated Noise Impact Assessment.
Wastewater Management (EPA)	
The Modification Report should confirm the expected volume of wastewater to be generated by the additional CO2 plant and capacity of the existing WWTP to accommodate the additional volume. This should include details of the capacity of the existing WWTP and current and approved wastewater volumes from development on the site.	In the accompanying correspondence, Shoalhaven Starches Attachment B has confirmed that expected increase in wastewater volume generated by the additional CO2 plant is 27 KL per day which is within the existing 9,000 – 12,800 KL per day design capacity of the Shoalhaven Starches existing wastewater treatment plant.
Air Quality (EPA)	
The AQIA should address the likely emissions and potential impacts from venting of ammonia associated with the proposal. An estimate of CO2 to be vented should also be provided.	Section 4.2 of the Air Quality Assessment by GHD has been updated to consider potential emissions of CO2 and ammonia and is supplied at Attachment C.

We trust that the information provided in this response addresses the matters raised and allows the planning assessment to proceed to a favourable determination. Should you require any further clarification, please do not hesitate to contact our office on 44216544 or consultants@allenprice.com.au

Yours sincerely,



Sebastian Tauni
Director – Town Planning
Allen Price Pty Ltd

Enclosures:

Attachment A – Updated Noise Impact Assessment by GHD dated 29 August 2025
Attachment B – Correspondence by Shoalhaven Starches dated 2 September 2025
Attachment C – Updated Air Quality Assessment by GHD dated 28 August 2025