

Submission regarding MP06_0228-Mod-26

Shoalhaven Starches Expansion Project - Modification 26

To the Department of Planning, Housing and Infrastructure,

Many thanks for the opportunity to make this submission regarding Modification 26 of the Shoalhaven Starches Expansion Project.

This submission is not an objection to manufacturing, regional employment or Manildra's contribution to the Shoalhaven economy. Manufacturing has been part of Bomaderry's history for decades and remains an important contributor to regional employment and economic resilience.

I recognise that the proposal is likely to deliver economic benefits through investment, employment and improved freight efficiency. My submission does not seek to diminish those benefits. Rather, it asks whether those benefits have been weighed transparently against cumulative environmental, infrastructure and community impacts and raises broader questions about planning governance, cumulative impacts and long-term strategic planning.

Large industrial facilities do not operate successfully through planning approvals alone. Their long-term success also depends upon maintaining community confidence, transparency and social licence to operate.

After more than 35 successive modifications to the original State Significant Development approval over almost two decades, I believe the Department has reached a point where it should step back from assessing another individual modification and instead consider whether the cumulative expansion of this industrial complex continues to serve the long-term public interest.

I make this submission as someone with a longstanding interest in how planning decisions shape resilient regional communities.

Following the Black Summer bushfires, I worked across the Shoalhaven as the Program Manager for Investing in Rural Community Futures (IRCF)-a place-based community development initiative led by the Foundation for Rural & Regional Renewal (FRRR), supported by the Snow Foundation, Bendigo Bank's Community Enterprise Foundation, and the Australian Government Black Summer Bushfire Recovery funding. IRCF was a five-year, multi-million-dollar investment in helping regional communities develop locally-led visions for their future.

Through that work I facilitated community roadmapping processes with a wide range of locally governed organisations, including in Nowra and Bomaderry. Those conversations gave me a deep appreciation for Bomaderry as a community with comparatively limited formal civic infrastructure, yet an extraordinary number of committed local people working towards a safer, healthier, more creative, inclusive and environmentally sustainable future.

Unexpectedly, and as a result of this work, in December 2025 I was invited by members of the Shoalhaven community to stand as their Community Independent candidate for Gilmore at the 2025 Federal Election, and later also contested the 2025 Kiama by-election. Those campaigns brought me back into regular conversations with residents, businesses and community organisations throughout Bomaderry.

One issue arose repeatedly: the relationship between Manildra's continued expansion and the future of the community- especially as it related to the shared South Coast public rail corridor. Community concerns regarding longstanding concerns regarding passenger rail reliability, frequency and journey times prompted me to take a much closer interest in the evolution of the Shoalhaven Starches site and its relationship with the surrounding community.

My perspective is also informed by previous work with Bundanon Trust, including involvement in strategic planning for the redevelopment there, together with service on the Shoalhaven Tourism Board and the Shoalhaven Economic Development Committee, where balancing economic development, environmental stewardship and community benefit is a recurring consideration.

Finally, my connection to this place is personal. My children attended Bomaderry Preschool, my family has spent many years boating and fishing on the Shoalhaven River, and I have a longstanding interest in the environmental health of the river and the industries it supports, including the fragile and vital oyster industry.

It is from that perspective-not in opposition to industry, but in support of transparent, strategic and evidence-based planning-that I make this submission.

Why I believe broader assessment is now required

State Significant Development exists because projects are considered to be of strategic importance to New South Wales. With that status surely comes a heightened responsibility for transparency, strategic planning and community confidence.

I accept that modification applications are an entirely appropriate mechanism for allowing major projects to evolve over time.

However, after more than 35 successive modifications, I believe the cumulative changes for this site have reached a point where it becomes increasingly difficult for the community;

regulators and potentially even decision-makers to fully appreciate the overall scale, trajectory and long-term implications of development on this site.

The issue is no longer whether another grain silo, conveyor or unloading facility is appropriate.

The issue is whether our planning system continues to provide sufficient transparency for the community and decision-makers to understand the mega industrial complex that is ultimately being created.

Accordingly, I respectfully ask the Department to consider the following questions before determining this application.

1. Has the cumulative effect of more than 35 modifications been adequately assessed?

Modification 26 forms part of a long sequence of approvals involving expansion of:

- grain handling;
- flour milling;
- ethanol production;
- wastewater treatment;
- rail infrastructure;
- logistics;
- energy infrastructure;
- hazardous chemical storage;
- freight handling; and
- associated industrial facilities.

The proposal currently before the Department includes:

- six wheat silos (approximately 33.68 metres high);
- train unloading facilities;
- truck unloading facilities;
- grain conveyor systems;
- maintenance workshop;
- weighbridge;
- electricity substation;
- container handling infrastructure;
- wastewater works;
- nitric acid storage;
- rail maintenance facilities.

While each modification may be capable of justification individually, the cumulative effect appears to have transformed the operational scale and complexity of the site well beyond what

most members of the public would associate with a development classified simply as 'Food, beverages and tobacco manufacturing'.

I respectfully request that the Department prepare-or require-the preparation of a whole-of-site cumulative assessment describing the development as it exists today rather than continuing to assess successive incremental modifications largely in isolation.

2. Does the community have sufficient visibility of the site's long-term vision?

One of my principal concerns is the absence of a contemporary master plan. The community is repeatedly asked to comment on complex reports relating to individual components with 14 days notice.

What we are never shown or able to understand is:

- the ultimate built form;
- future production capacity;
- long-term logistics footprint;
- cumulative freight movements;
- ultimate building heights;
- long-term environmental footprint;
- or whether further expansion beyond Mod 26 is anticipated?

After more than 35 modifications, I believe the Department should require a contemporary Master Plan showing:

- all approved development;
- infrastructure already constructed;
- works currently underway;
- approved but not yet constructed works;
- cumulative environmental footprint;
- and the site's long-term development vision.

Without this, meaningful community participation becomes increasingly difficult.

3. Does continued industrial intensification remain strategically appropriate?

The planning and community question is not whether manufacturing belongs in Bomaderry. It clearly does. The question is whether continuing industrial intensification at this scale remains consistent with the evolving strategic direction of the area.

Since the original approval:

- residential development has expanded;
- higher-density housing has increased and is located closer to the site;
- the Shoalhaven River has become an increasingly important recreational and environmental asset;
- The State government has identified Bomaderry as a key South Coast location for transport-oriented development and greater investment in public amenities.

Historical precedent **should not** automatically create for Manildra an entitlement to indefinite industrial expansion.

The Department should demonstrate how continued and seemingly indefinite intensification aligns with contemporary strategic planning objectives for Bomaderry and the region.

4. Have cumulative impacts on shared public infrastructure been adequately assessed?

One issue that appears to receive little attention in the reports is the cumulative impact on the shared and exceptionally poorly served South Coast rail corridor.

Mod 26 seeks to improve the site's capacity to receive grain by rail through expanded unloading infrastructure and increased storage.

However, I have been unable to identify any meaningful assessment of:

- cumulative freight train demand;
- impacts on passenger rail reliability;
- future opportunities for increased passenger frequency;
- cumulative capacity of the **shared** corridor;
- Transport for NSW's long-term assessment of rail capacity.

Given the increasing reliance on rail freight associated with successive modifications, the Department should demonstrate that future industrial growth will not materially constrain the reliability, frequency, resilience or future expansion of passenger rail services on the shared South Coast corridor.

The Department should demonstrate that continuing industrial expansion by Manildra will not compromise the South Coast line's long-term capacity for public transport..

5. Has the Department distinguished between expansion and remediation?

Mod 26 includes significant works adjacent to the Shoalhaven River including:

- riverbank works;
- extension of rock revetment;
- wastewater upgrades;
- stormwater infrastructure;
- environmental protection measures.

Following the 2024 grain silo collapse into the Shoalhaven River, the NSW EPA separately required foreshore protection, rehabilitation works and an independent Environmental Hazard Analysis as part of an Enforceable Undertaking.

It is therefore unclear whether aspects of the proposed riverfront works represent:

- infrastructure necessary for future expansion;
- upgrades because existing infrastructure has reached capacity;
- remediation of historical environmental issues;
- or works already required under existing environmental obligations.

I believe the Department should clearly distinguish between these categories when assessing the application and make it clear to the community what the difference between remediation works and future expansion.

6. Does recent operational history justify greater independent scrutiny?

Recent regulatory action has justifiably affected community confidence in Manildra's maintenance and environmental controls and credentials.

The October 2024 collapse of two approximately 30-metre grain silos released approximately 2,000 tonnes of wheat into the Shoalhaven River prompting investigations by both the NSW EPA and SafeWork NSW.

Subsequent regulatory action included:

- an Enforceable Undertaking requiring environmental projects and river rehabilitation;
- an independent Environmental Hazard Analysis;
- establishment of a Community Consultative Committee;
- and numerous SafeWork notices relating to identified deficiencies in structural asset inspection and maintenance systems.

These matters of course do not determine the merits of Mod 26. However, they surely justify a higher standard of independent verification regarding engineering governance, environmental management and operational risk before further expansion proceeds.

7. Are cumulative environmental risks acceptable in the long-term public interest?

The accompanying reports identify numerous environmental risks requiring active management.

These include:

- works immediately adjacent to the Shoalhaven River;
- extension of riverbank protection works;
- operation adjacent to mapped Class 1 Key Fish Habitat;
- sediment and erosion;
- disturbance of aquatic habitat;
- fuel and chemical spills;
- wastewater management;
- nitric acid storage;
- dust explosion hazards;
- hydrogen sulphide and biogas hazards;
- emergency response planning.

The reports propose extensive mitigation measures. However, those measures should be considered in the context of:

- continuing industrial expansion;
- cumulative environmental risk;
- recent regulatory action;
- and the long-term environmental significance of the Shoalhaven River.

Additional matters warranting consideration

In addition to the matters raised above, I encourage the Department to consider several broader cumulative issues that are difficult to appreciate through assessment of Modification 26 in isolation.

Planning character and visual impact

The proposal includes structures of approximately 33.68 metres in height within an area where the applicable development standard is 11 metres.

While height variations may be justified for individual industrial structures, the Department should consider the cumulative effect of repeated variations over successive modifications, including:

1. the changing visual character and skyline of the industrial precinct;
2. the cumulative bulk and scale of development;
3. long-distance visual impacts;
4. the progressive industrialisation of the Shoalhaven River corridor; and
5. whether the cumulative departure from planning controls remains strategically justified.

Amenity

The Department should also consider cumulative operational impacts associated with an increasingly intensive twenty-four-hour industrial operation, including:

1. light spill;
2. night-time visual impacts;
3. cumulative dust and particulate emissions associated with expanded grain handling and storage;
4. noise associated with rail, truck movements and loading activities; and
5. the broader amenity impacts on nearby residential communities, recreational users of the Shoalhaven River and surrounding businesses.

While individual proposals may satisfy technical standards, the cumulative effect of successive expansions deserves explicit consideration.

Climate resilience and flooding

The proposal repeatedly identifies increased storage capacity as improving resilience to supply disruptions caused by floods and other natural disasters.

However, the Department should also consider the converse question:

Does continued expansion of industrial infrastructure, hazardous materials and wastewater systems adjacent to the Shoalhaven River improve or increase long-term exposure to flood risk?

Given increasing flood frequency and intensity associated with climate change, I believe the proposal should be assessed within a broader climate resilience framework, including the long-term suitability of concentrating increasingly complex industrial infrastructure within a river floodplain.

Water resources

Given the continued expansion of grain processing, wastewater treatment and ethanol production, I encourage the Department to consider:

1. cumulative water demand;
2. long-term regional water security;
3. wastewater capacity;
4. and whether projected future operations remain consistent with regional water planning objectives.

Emergency management

The accompanying Hazard Analysis demonstrates the increasing complexity of operations involving ethanol, nitric acid, biogas, hydrogen sulphide, grain dust and other industrial hazards.

While engineering controls are described in detail, I encourage the Department to consider whether cumulative emergency planning has evolved alongside the increasing scale and complexity of the site, including:

1. emergency service capacity;
2. evacuation planning;
3. neighbouring land uses;
4. community notification arrangements; and
5. emergency response under concurrent natural disaster scenarios such as major flooding or fires.

Long-term strategic opportunity cost

Finally, I encourage the Department to consider not only the direct impacts of this proposal but also the long-term strategic opportunity cost associated with continuing to intensify one of the Shoalhaven's largest industrial sites immediately adjacent to an increasingly valued river corridor.

This is really not an argument against industry. Rather, it is a question of whether the Department has sufficiently considered the long-term balance between:

1. employment concentrated with one dominant industrial employer;
2. housing growth;
3. recreation;
4. tourism;
5. environmental restoration;
6. river access;
7. public transport investment; and

8. broader community aspirations for a safe, healthy and sustainable Bomaderry for future generations

Request

Rather than simply determining Modification 26 as another incremental modification, I respectfully request that the Department consider whether the cumulative evolution of this State Significant Development has now reached a point where broader strategic assessment is warranted.

In particular, I request that the Department consider requiring:

1. preparation of a contemporary Whole-of-Site Master Plan illustrating all existing, approved and proposed infrastructure, together with the long-term development vision for the site;
2. a comprehensive Cumulative Impact Assessment considering the collective effect of all approved modifications rather than assessing Modification 26 in isolation;
3. a broader Strategic Review of the site's long-term role within the evolving Bomaderry urban area and Shoalhaven River corridor;
4. an independent review of cumulative environmental, engineering and operational risks in light of recent regulatory actions and the increasing complexity of the site;
5. a cumulative assessment of impacts on the shared South Coast rail corridor, including implications for passenger service frequency, reliability, travel times and future public transport capacity;
6. clear distinction between infrastructure required to facilitate future expansion and works that represent remediation, upgrading or compliance with existing environmental obligations;
7. ongoing independent environmental monitoring and public reporting to strengthen community confidence;
8. strengthened community consultation through the Community Consultative Committee together with greater transparency regarding the site's future development trajectory.

Closing

This submission is not made in opposition to industry. It is made in support of community desperate for better planning governance.

After almost two decades and more than 35 successive modifications, I believe the question is no longer whether another silo, another conveyor or another unloading facility can be justified.

The question is whether the planning system has now reached the point where incremental assessment no longer provides either the community or decision-makers with a transparent understanding of the ultimate scale, cumulative impacts and long-term trajectory of this State Significant Development.

State Significant Development exists because projects are considered to be of strategic importance to New South Wales. With that status comes an expectation of best practice in transparency, cumulative impact assessment and long-term planning.

The Shoalhaven Starches site is now one of the largest and most strategically significant industrial complexes in NSW. Decisions regarding its future should therefore be made with a level of transparency and strategic oversight commensurate with that significance.

For these reasons, I respectfully ask the Department to consider whether it is time to move beyond another incremental modification and instead undertake a broader strategic assessment of the site's future evolution, ensuring the community has a genuine opportunity to understand, engage with and help shape the long-term future of this nationally significant industrial facility and its relationship with the Bomaderry community and the vulnerable Shoalhaven River ecosystem.