28th January 2010

Shoalhaven Starches Pty Ltd
c/o
Mr Stephen Richardson
Cowman Stoddart Pty Ltd
PO Box 738
Nowra NSW 2541

Shoalhaven Starches – Pelletiser Modification Traffic Review

Dear Stephen,

Further to our recent discussions, Stapleton Transportation & Planning Pty Ltd (STAP) has examined in this brief report potential access and traffic impacts arising from proposed Modifications to the current Project Approval (MP 06_0228) at the Shoalhaven Starches site, Bomaderry.

The current Project Approval includes the pelletising of Dried Distillers Grain (DDG) produced at the Site, with Appendix 3 of the Ministers Approval requiring that the pelletising of DDG product be included as part of the mandatory odour controls to be undertaken as part of the first stage of the Project.

Shoalhaven Starches have approached the Department of Planning seeking to have this requirement modified so that whilst they would commit to undertake the Pelletiser construction, it would not be required in the mandatory odour controls. The Department of Planning has subsequently issued their requirements for the preparation of an Environmental Assessment for the Modification application (MP 06_0228 MOD 1). While the primary issue of investigation will relate to odour control, the requirements also include the following: -

- ***Traffic*** *– including an assessment of any changes to traffic volumes as a result of the proposed modification and where required, measures to minimise impacts.*

STAP has therefore examined the potential access and traffic impacts associated with the modification proposal. As part of our assessment, we have: -

- Reviewed our past work on the Site, and specifically our report of 2008 Shoalhaven Starches Ethanol Upgrade & Packaging Plant Proposal TIA May 2008 (EU TIA 2008).

- Examined the existing DDG traffic generation, including peak period and daily trips and vehicle types.

- Determined the future DDG pelletised product traffic generation, including peak period and daily trips and vehicle types.

- Assessed the potential impacts arising from the different processing/distribution process on the local traffic network.

Data provided in this report in regard to current traffic generation characteristics is primarily sourced from the EU TIA 2008, based in turn on classifier counter, intersection and manual surveys conducted by STAP and Shoalhaven City Council (on behalf of STAP). There is no information to suggest that the general traffic generation characteristics of the specific DDG components, or of the larger Site, have altered since the EU TIA 2008 was completed.

Additional information in regard to the future pelletised product traffic generation has been provided by Mr Greg Murphy of Shoalhaven Starches based on vehicle capacities and types, and further to testing by Shoalhaven Starches of the general bulk and handling requirements of pelletised DDG as opposed to the current non-pelletised DDG product.

1 DDG Traffic Generation Characteristics

At present, DDG is transported from the Site in non-pelletised form by heavy vehicles for reuse as high protein stock feed. With reference to our EU TIA 2008, the DDG generates: -

- An average of 20 heavy vehicle trips (i.e. 10 vehicles arriving and departing) each week day.

- An average of less than 4 heavy vehicle trips (i.e. less than 2 vehicles arriving and departing) in the commuter peak hour

- Approximately 65% of vehicles are articulated vehicles (semi-trailers or truck and trailer), and approximately 35% of vehicles are B-Doubles

The DDG heavy vehicle generation represents approximately 17% of the total Site heavy vehicle trip generation. All DDG heavy vehicles exclusively access the Site via Access Point 3 (Western).

2 Approved DDG Increase

The current Upgrade Approval (06_0228) provides for minor heavy vehicle increases associated with increased Ethanol production at the Site, to a total of an additional average of 38 heavy vehicle trips daily (being 19 vehicles arriving and departing). 8 of these trips (4 vehicles) are DDG trips, bringing the total approved DDG vehicle generation to approximately 28 heavy vehicle trips per day.

As per EU TIA 2008, the current approval also provides for the relocation of the packaging plant, such that the increase in DDG vehicle trip generation at Access Point 3 would be totally offset (and more) by the removal of packaging plant trips from Access Point 3.

Notwithstanding, minor increases in overall Site heavy vehicle generation (Ethanol trucks to Access Point 1) and staff trips were tested in detail by STAP in the EU TIA 2008, and found to have no significant impact on the local traffic network pursuant to the upgrade of the access intersections. Shoalhaven Starches is currently in final discussions with Shoalhaven Council and the RTA in regard to these upgrades so as to provide full compliance with Approval conditions.

3 The Pelletiser Modification Proposal

The proposed Modification seeks to remove the implementation of the Pelletiser from the mandatory odour controls as detailed in Appendix 3 of the Approval. As Shoalhaven Starches is nonetheless still committed to the Pelletiser, the effect of the Modification would therefore be to delay implementation of the Pelletiser to the later stages of the current approved upgrade.

It is the opinion of STAP that from an access and traffic perspective, the timing of the implementation of the Pelletiser would have no impact on the heavy vehicle generation of the Site, nor alter the existing approved DDG generation.

Essentially, the Pelletiser will refine the DDG on-site into pellet form, whereas it is currently transported in non-pellet form. In order to test the bulk and handling characteristics of the pelletised DDG, Shoalhaven Starches has conducted preliminary testing of the pelletising process and has determined that the heavy vehicle capacity required to transport the pelletised material is no different to the capacity required to transport the non-pelletised DDG product.

As such the DDG (and total Site) generation will remain unchanged from the approved heavy vehicle trip generation levels regardless of the timing of the implementation of the Pelletiser.

4 Conclusions

Further to our review of the access and traffic generation characteristics of the current transportation of Dried Distillers Grain and the future transportation of Dried Distillers Grain Pellets, STAP has determined that the proposed Modification would have no impact on access or traffic generation.

The transportation of the DDG product generates the same number and type of heavy vehicles to the local traffic network whether in pellet or non-pellet form. As such, the proposed delay in construction of the Pelletiser as proposed in the Modification would not alter the vehicle generation of the Site, or by association result in any adverse impacts on the local traffic network.

STAP would therefore support the Modification on access and traffic grounds.

If STAP can assist Shoalhaven Starches or the Department of Planning further in regard to the Modification, please do not hesitate to contact Anton Reisch via our Sydney office.

Yours sincerely,

Anton Reisch
Stapleton Transportations & Planning Pty Ltd