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15 March, 2022

Our ref: 21/16

Your ref: MP06_0228_Mod 21

Shaun Williams
Industry Assessments
Department of Planning, Industry and Environment
Locked Bag 5022
PARAMATA NSW 2124

Dear Shaun

**RE: SHOALHAVEN STARCHES EXPANSION PROJECT - MODIFICATION 21
FURTHER COMMENTS FROM EPA AND SHOALHAVEN COUNCIL**

1.0 Introduction

I refer to the Department's letter dated 4th March 2022 requesting further information in relation to the above Modification Application. Attached to the Department's letter are further submissions from the EPA and Shoalhaven Council in relation to this Modification Application. This submission has been prepared to respond to the matters raised in these two submissions.

In addition, attached to this submission are revised plans for the Modification Proposal following further detailed design work that has been undertaken for this project.

2.0 Further Government Agency Comments

2.1 EPA Submission

The further EPA submission takes the view that the revised Noise Impact Assessment (revised NIA) does not adequately address the previous EPA's comments.

However, the EPA also notes that Shoalhaven Starches has committed to developing a comprehensive noise model for the entire Shoalhaven Starches site including existing and proposed noise sources. The EPA submission emphasises that the model will be required to incorporate an assessment of "annoying characteristics".

The EPA submission states that whilst they consider the revised NIA is inadequate, they note that the existing Project Approval includes conditions related to design verification. Specifically,

Conditions 14F, 14G, 14H, 14I and 14M which relate to Mod 9 (which related to the initial modification relating to the Packing Plant).

The EPA submission acknowledges Shoalhaven Starches commitment to developing a comprehensive noise model and recommends that the Department retain these noise-related conditions that relate to the packing plant and apply them to Mod 21. The EPA notes that Section 7.4 of the revised NIA indicates that during the design verification stage, prior to construction, the potential for annoying characteristics will be further assessed. The EPA strongly advises that this assessment be undertaken.

Comment

Shoalhaven Starches do not raise any objections or comments in relation to the comments raised by the EPA.

No further comments are required to respond to the submission prepared by the EPA.

2.2 Shoalhaven City Council (SCC)

The submission from SCC raised two issues:

1. Stormwater Quality

The Integrated Water Cycle Management Strategy (IWCMS) has been reviewed. The subject site is located outside of the Sydney Drinking Water Catchment and therefore acceptable solution A10.1 is not relevant. The site will be assessed against the acceptable solution A10.2 for development outside Sydney's drinking water supply catchments, pollutant load reduction must be a minimum reduction of the post development average annual load of pollutants in accordance with Table 3. Therefore, a revised IWCMS will need to be provided.

2. Stormwater OSD

Further information is requested for the design of the OSD (e.g., typical section, depth of ponding). The IWCMS notes that the device is not located in landscaped areas and is in an 'out of bounds' area. Details will need to be provided to confirm how that area is to be managed and the Site Safety Protocols.

Comment

Attached to this submission are:

- A submission prepared by Allen Price & Scarratts (APS) responding to Council's comments in relation to the IWCMS.
- The APS submission also addresses issues raised in relation to the OSD in terms of what is meant by an "Out of Bounds" area and how this area will be maintained.
- A modified IWCMS Stormwater Concept Plan including details relating to a typical section and depth of ponding.

If necessary, to avoid further delays in resolving issues pertaining to stormwater management issues we suggest that such concerns could be addressed as a pre-construction condition of consent similarly to the existing condition 22 and as suggested below:

Stormwater

22. *The Applicant shall prepare a revised Stormwater Management Plan for the development to the satisfaction of the Secretary. This plan must:*

- a) be prepared in consultation with Council and be submitted to the Secretary for approval prior to the commencement of construction;*
- b) be prepared in accordance with the latest version of Managing Urban Stormwater: Council Handbook (DECC);*
- c) outline measures to manage stormwater to prevent the pollution of waters; and*
- d) include detailed plans of the stormwater system.*

3.0 Modified Plans

In addition to the above, please note that this submission foreshadows that Shoalhaven Starches will be submitting revised plans in relation to this Modification Application. The modified plans will reflect further detailed design work that has been undertaken in relation to this project following the submission of this application to the Department. The plans will include more detailed design work to more closely reflect the future construction of the proposed works. These drawings will be supplied to ensure that there is less likelihood for difficulties to arise with any future Construction Certificate application. The modifications will not however materially change the nature of the Modification Proposal or its overall impacts above that outlined in the original Modification Application documentation.

I trust that the above information is of assistance to the Department's consideration of this Modification Application. If you require any further clarification or information in relation to this matter, please do not hesitate to contact me.

Yours faithfully



Stephen Richardson
COWMAN STODDART PTY LTD

Enc.