



NSW Government

DEPARTMENT OF NATURAL RESOURCES

27th March 2007

Our ref: ERM 2007/04604

Your ref: MP 07_0021

Department of Planning
Major Project Assessments
Manufacturing and Rural Industries.
GPO Box 39
SYDNEY NSW 2001

Attention: Jacqueline Ingham

Dear Jacqueline,

Subject: REQUEST FOR PROVISION OF DETAILS OF KEY ISSUES AND ASSESSMENT REQUIREMENTS - Shoalhaven Starches Proposed Flour Mill, Bolong Road, Bomaderry Major Project Application MP 07_0021

I refer to your request of 14th March 2007 following the Planning Focus Meeting (PFM) for the above proposal, seeking this Departments key issues and assessment requirements for inclusion in the Environmental Assessment Requirements in relation to Part 3A of the Environmental Planning and Assessment Act 1979.

At the PFM, you advised that the Department of Planning (DoP) had already issued draft Environmental Assessment Requirements (EAR) to the proponent. The proponent also identified and presented a number of issues at the PFM which are outlined in the Preliminary Assessment Report prepared by Cowman Stoddart Pty Ltd.

The Department of Natural Resources (DNR) concurs that all the issues identified by the Proponent and DoP should be appropriately assessed in the EAR. DNR considers that the following additional issues should also be considered and assessed in the Environmental Assessment Report.

Shoalhaven River Bank Stability

The bank of the Shoalhaven River adjacent to the Shoalhaven Starches factory site has a known history of recession. In addition, the development of the Shoalhaven Starches site has occurred over many years without the provision of an appropriate foreshore setback and riparian buffer. The river bank is reasonably high and dominated by exotic vegetation and weeds, predominantly coral trees and lantana. Recent bank collapse has occurred immediately downstream of the proposed flour mill site and is currently being addressed by Manildra. Such events present risks to existing substantial infrastructure on the site and generally require substantial bank restoration and protection works to restore bank stability.

Given the above, DNR recommends that an assessment of the bank stability in the vicinity of the proposed new Flour Mill be undertaken and options for any necessary remediation/bank enhancements should be determined.

Whilst understanding that the site is physically constrained, any bank stabilisation options should endeavour to be sympathetic to the geomorphic and ecological functions of the riverbank in addition to providing any necessary bank stability function. Options should also allow for the removal of exotic vegetation and weeds

and incorporate the re-establishment of appropriate native vegetation. In addition to ecological and stability functions, native vegetation may assist the screening of both the existing and proposed infrastructure.

Undertaking bank stabilisation/enhancement works requires good access and so if necessary, appropriate works should be undertaken prior to the construction of any additional infrastructure before access is further impeded and to ensure that the riverbank/shoreline will be stable in the longer term, thereby enhancing protection for both existing and new infrastructure.

Acid Sulphate Soils

The Department's Acid Sulfate Soils Risk maps indicate that the site has a low probability of acid sulphate soil (ASS) risk with localised occurrences of ASS likely at depths generally below 3 metres of the ground surface. In considering this proposal, activities such as excavations for piling etc in areas of ASS risk should be identified and if necessary an ASS management plan prepared. The Department recommends that the level of assessment is consistent with the NSW Government guidelines regarding assessing and managing acid sulfate soils from the *Acid Sulfate Soil Manual* by ASSMAC.

Should you have any queries regarding the above or require any further clarification, please contact David Zerafa, Senior Natural Resources Officer on 44294441.

Please forward future correspondence to Ketj Nikolovski, Environmental Review Coordinator, Department of Natural Resources, PO Box 867, Wollongong NSW 2520.

Yours sincerely

David Zerafa
Senior Natural Resources Officer
For
Marwan El-Chamy
Licensing Manager (Southern)
Department of Natural Resources