



DOC21/449131-9

Department of Planning, Industry and Environment  
Locked Bag 5022  
PARRAMATTA NSW 2124

Attention: Jeffrey Peng – Senior Environmental Assessment Officer, Energy Resource Assessment

Dear Jeffrey

**Luddenham Resource Recovery Facility (SSD-10446)  
Request for Additional Information**

Thank you for the request for advice on the Response to Submissions for the proposed Luddenham Resource Recovery Facility at 275 Adams Road, Luddenham (**the Premises**).

The NSW Environment Protection Authority (**EPA**) has reviewed the following documents:

- *'Luddenham Advanced Resource Recovery Centre Submissions Report'*, EMM, May 2021 (**the Submissions Report**)
- *'Appendix K – Addendum Noise and Vibration Impact Assessment'*, EMM, May 2021 (**the Addendum NVIA**)
- *'Appendix F – Addendum Air Quality Impact Assessment'*, EMM, March 2021 (**the Addendum AQIA**)

The proposal has been amended following public submissions, specifically in regard to traffic movements. The amended proposal has a reduction in the number of truck movements, which is achieved with the use of larger trucks to bring waste onto the Premises.

The EPA requires additional information about the proposal from the proponent and further clarification from Department of Planning, Industry and Environment (**DPIE**) in order to recommend conditions of consent or consider issuing an environmental protection licence for the proposed activities at the Premises. Please see **Attachment A** for details on what the EPA requires.

Yours sincerely

18 June 2021

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## Attachment A – Further clarification and information the EPA is requesting

### Clarification from DPIE

The Addendum NVIA has identified significant exceedances of the Project Noise Trigger Levels (as defined by the Noise Policy for Industry (NPfI)) at several receivers and **to the extent that the EPA is unable to recommended noise conditions.**

It is understood that several of these residences may experience noise impacts from the associated quarry development connected to the subject development. These noise impacts from the associated quarry development triggered the Voluntary Land Acquisition and Mitigation Policy (VLAMP) and resulted in condition 12A of modified consent DA 315-7-2003 assigning mitigation upon request rights for receivers R3 and R6.

### **The Luddenham Resource Recovery Facility will have significant noise impacts (within the meaning of the NPfI) both immediately following its start date and after the quarry is decommissioned.**

Before the EPA can recommend any noise conditions in a licence, the EPA requires clarification from Planning on how immediate and ongoing noise impacts from the resource recovery centre will be assessed and managed through the planning approval process. For example, this may include negotiated agreements on noise mitigation / compensation commensurate as recommended by the EPA (DOC21/272588).

Notwithstanding the above, the following technical matters should also be addressed.

### **Matters to be resolved by the Proponent**

The following matters need to be resolved prior to EPA being in a position to provide final advice:

1. For purposes of deriving the project amenity noise levels the Addendum NVIA correctly assigns a “rural residential” category. However, the Addendum NVIA notes in Section 3.1.2 that:

*“To ensure that industrial noise levels (existing plus new) remain within the recommended amenity noise levels for an area, the project amenity noise level for a new industrial development is the recommended amenity noise level (outlined in Table 2.2 of the NPfI) minus 5dB. It is noted that this approach is based on a receiver being impacted by multiple industrial sites (or noise sources) which currently is not the case for the subject site, hence the baseline amenity levels were adopted for cumulative noise from the ARRC and quarry”.*

Due to several factors, not least the recent rezoning of land in this area to agribusiness, the **EPA strongly disagrees with the Proponents approach for deriving the amenity noise levels and views it as directly contradictory to the provision in the NPfI.** Project amenity noise levels should be adjusted to reflect the NPfI prior to further determination of the application. In some cases the Addendum NVIA is proposing amenity noise levels 5dB higher than provided for in the NPfI.

2. The Addendum NVIA reports that that truck movements on site have reduced compared to the assumptions presented in the ‘Luddenham Advanced Resource Recovery Centre – Environmental Impact Statement’, EMM, July 2020, with smaller 4.4 tonne trucks being replaced with larger 30 tonne vehicles. However, the same sound power level has been

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used for both assessments. Given the truck movements throughout the site take 13.5 minutes, the sound power level used within the noise model may have a large impact on the overall 15 minute noise level at the receivers. The EPA requires that an assessment be undertaken with more appropriate sound power levels for the 30t trucks, taking into account acceleration, deceleration and air brakes.

Based on a number of published references and noise levels for large road trucks reported in other environmental assessment documents, the EPA believes a sound power level of LW 103dB(A) is on the low side of expected / reported levels. For example:

- Lw 108dB(A) – Volvo prime mover and semi-trailer (source: Tarrawonga Coal mine – Life of Mine Modification – Noise Assessment – October 2019 (Wilkinson Murray Pty Ltd, Report No. 09341-D)
  - LAmax pass-by levels for slow moving road lorries calculated to Lw 104 – 111 dB(A) (source: DEFRA, 2005)
  - LWR eq,ave 107-115dB(A) for accelerating trucks (source: “Sound power levels of trucks at low speeds, Granneman, JH et. al. Inter.noise 2009).
3. A detailed assessment of maximum noise levels and sleep disturbance is to be undertaken in accordance with the NPfl.