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EPA Follow-up Noise Advice – Botany Waste Transfer Facility – SSD 62855708

Dear Sally

I am writing in response to your request for the NSW Environment Protection Authority (EPA) to provide advice on the assessment for the proposed Botany Waste Transfer Station (Application SSD 62855708) at 2-4 Hale Street Botany NSW. The EPA provided interim advice on this matter on 17 October 2025 and advised that further technical noise advice would follow. Below is the further technical noise advice, and attached are EPA recommended conditions of consent to address noise impact.

In preparing this advice, the EPA has reviewed the following documents:

1. 2-4 Hale Street, Botany - Building Waste Transfer Facility - Noise and Vibration Impact Assessment - Project No. P00945, Revision 009 Issued 1 September 2025 prepared by E-LAB Consulting (hereafter the revised NIA).
2. Waste Management Facility Botany – SSD-62855708 – Response to RFI, prepared by Element Environmental, dated 30 September 2025.

Follow up-advice

EPA's review of the above documents has found that our previously raised concerns have been largely addressed. However, several matters warrant comment:

- **Noise assessment criteria applicable to RC1:** The revised NIA outlines the planning nuances surrounding the commercial / caretakers building at 3 Luland Street Botany. Given this, EPA believes that the Department of Planning, Housing and Infrastructure (DPHI) is best positioned to consider the planning circumstances of the sensitive use within an industrial zone, and seek to balance a reasonable level of amenity whilst not unreasonably compromising a planning decision on a permitted industrial land use in the zone. For that reason, EPA has not recommended noise limits for receiver RC1 in this advice, and suggest that DPHI may be better placed to make this determination. We are happy to be

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further consulted to assist DPHI in considering relevant parameters that would inform the derivation of suitable noise limits for this receiver.

- **Use of MEMs based noise instruments at LT2 and LT3 at heights of 2.5m AGL:** EPA considers that in this particular situation, the use of MEMS noise monitoring instruments is not material to the assessment and is therefore accepted.

The EPA's recommendation regarding the derivation of noise limits at RC1, being the commercial / caretaker building at 3 Luland Street Botany, is discussed above. For other sensitive receivers - RC2 (Residential dwellings situated along Erith and Bay Street Botany); RC3 (Botany Public School); and, RC6 Residential dwellings situated along Bay Street – further to the east) EPA has provided recommend conditions of approval including proposed noise limits. In compiling the recommended conditions EPA has considered the following matters:

- Where the predicted noise level is below the Project Noise Trigger Level (PNTL), but above the minimum criteria thresholds in the *Noise Policy for Industry* (NPfI) (EPA, 2017) the predicted levels have been adopted as limits.
- The predicted LAeq,15min,dB noise levels for the evening and nighttime period for RC2 are at the PNTL and marginally exceed (+2dB) the LAFmax sleep disturbance screening level of LAFmax 53dB. The LAeq,15min,dB level is approaching the PNTL (-2dB) for RC6. The prediction scenarios include operational management practices including roller doors being open for 4 minutes across a 15 minute period for the day and evening period and 1 minute across a 15 minute period for the night period. This is to allow for ingress and egress of heavy vehicles. The recommended conditions include the preparation of an operational noise management plan so that operational practices required to achieve the noise limits can be formulated and implemented, including cessation of noisy internal activities when the roller doors are open as required.

If you have any questions about this request, please contact Mark Jansons via email at environmentprotection.planning@epa.nsw.gov.au.

Yours sincerely



STEVEN TAN
Unit Head, Operations
NSW Environment Protection Authority

Attachment 1 - Recommended conditions of consent - Noise

Draft Noise Conditions – Building Waste Transfer Facility – Hale Street Botany

Noise Limit Conditions

L6.1 Noise generated at the premises must not exceed the noise limits at the times and locations in the table below. The locations referred to in the table below are indicated by Figure 1 in the document - Noise and Vibration Impact Assessment, 2-4 Hale Street Botany – Building Waste Transfer Facility prepared by E Lab Consulting dated 1/9/2025, Project No.P00945, Revision 009.

Location	Noise Limits in dB(A)			
	Day	Evening	Night	Night
	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{AFmax}
Any residence in Receiver Catchment RC2. Monitoring Location: 26 Erith Street Botany.	48	48	43	55
Any residence in receiver catchment RC6. Monitoring Location: 45 Bay Street Botany	46	46	41	52
RC3 – Botany Public School. Monitoring Location: The reasonably most affected point 3-5 metres from the most exposed facade of a normally occupied teaching room.	43	43	39	-

L6.2 For the purposes of condition L6.1:

- a) Day means the period from 7am to 6pm Monday to Saturday and the period from 8am to 6pm Sunday and public holidays.
- b) Evening means the period from 6pm to 10pm.
- c) Night means the period from 10pm to 7am Monday to Saturday and the period from 10pm to 8am Sunday and public holidays.

L6.3 Noise-enhancing meteorological conditions

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- a) The noise limits set out in condition L6.1 apply under the following meteorological conditions:

Assessment Period	Meteorological Conditions
Day	Stability Categories A, B, C and D with wind speeds up to and including 3m/s at 10m above ground level.
Evening	Stability Categories A, B, C and D with wind speeds up to and including 3m/s at 10m above ground level.
Night	Stability Categories A, B, C and D with wind speeds up to and including 3m/s at 10m above ground level; or Stability category E and F with wind speeds up to and including 2m/s at 10m above ground level.

- b) For those meteorological conditions not referred to in condition L6.3(a), the noise limits that apply are the noise limits in condition L6.1 plus 5dB.

L6.4 For the purposes of condition L6.3:

- a) The meteorological conditions are to be determined from meteorological data obtained from the meteorological weather station identified as - **Bureau of Meteorology AWS at Sydney Airport Station numbers: 066037**
- b) Stability category shall be determined using the following method from Fact Sheet D of the *Noise Policy for Industry* (NSW EPA, 2017):
- i. Use of sigma-theta data (section D1.4).

L6.5 To assess compliance:

- a) with the $L_{Aeq(15\text{ minutes})}$ or the L_{Amax} noise limits in condition L6.1 and L6.3, the noise measurement equipment must be located:
- (i) approximately on the property boundary, where any residence is situated 30 metres or less from the property boundary closest to premises; or where applicable,
 - (ii) in an area within 30 metres of a residence façade, but not closer than 3 metres where any residence on the property is situated more than 30 metres from the property boundary closest to the premises; or, where applicable,
 - (iii) in an area within 50 metres of the boundary of a National Park or Nature Reserve,
 - (iv) at any other location identified in condition L6.1
- b) with the $L_{Aeq(15\text{ minutes})}$ or the L_{Amax} noise limits in condition L6.1 and L6.3, the noise measurement equipment must be located:
- (i) at the reasonably most affected point at a location where there is no residence at the location; or,
 - (ii) at the reasonably most affected point within an area at a location prescribed by condition L6.5 (a).

L6.6 A non-compliance of conditions L6.1 and L6.3 will still occur where noise generated from the premises is measured in excess of the noise limit at a point other than the reasonably most affected point at the locations referred to in condition L6.5 (a) or L6.5 (b).

NOTE to L6.5 and L6.6: The reasonably most affected point is a point at a location or within an area at a location experiencing or expected to experience the highest sound pressure level from the premises.

L6.7 For the purpose of determining the noise generated from the premises, the modifying factor corrections in Table C1 in Fact Sheet C of the *Noise Policy for Industry* (NSW EPA, 2017) shall be applied, if appropriate, to the noise measurements by the noise monitoring equipment.

L6.8 Noise measurements must not be undertaken where rain or wind speed at microphone level will affect the acquisition of valid measurements.

Hours of Construction

L6.9 All construction work at the premises must be conducted between 7am and 6pm Monday to Friday and between 8am and 1pm Saturdays and at no time on Sundays and public holidays unless approved by the Secretary - Department of Planning, Housing and Infrastructure and / or via an EPL.

Monitoring Conditions

d) M8 Requirement to Monitor Noise

e) **M8.1** Attended noise monitoring must be undertaken in accordance with Condition L6.5 and must:

- a) occur at each location specified in Condition L6.1;
- b) occur within three (3) months of commencement of operations and annually thereafter;
- c) occur during each day, evening and night period as defined in the *Noise Policy for Industry* for a minimum of:
 - 1.5 hours during the day;
 - 30 minutes during the evening; and
 - 1 hour during the night.

d) occur for three consecutive operating days.

NOTE: The EPA has published an [Approved Methods for the Measurement and Analysis of Environmental Noise](#) that set out minimum requirements and good practice methods. Formal licence conditions referencing these Approved Methods are yet to be added to PALMS. However, you may wish to consider adding the following condition to the licence: *Subject to any express provision to the contrary in this licence, measurement and analysis of noise required by this licence must be done in accordance with the Approved Methods for the Measurement and Analysis of Environmental Noise in NSW.*

Reporting Conditions

R4 Noise Monitoring Report

A noise compliance assessment report must be submitted to the EPA within 30 days of the completion of the monitoring. The assessment must be prepared by a competent person and include:

- a) an assessment of compliance with noise limits presented in Condition L6.1 and L6.3; and
- b) an outline of any management actions taken within the monitoring period to address any exceedences of the limits contained in Condition L6.1 and L6.3.

Additions to Definition of Terms

- Noise Policy for Industry - the document entitled "*Noise Policy for Industry*" published by the NSW Environment Protection Authority in October 2017.
- Noise – 'sound pressure levels' for the purposes of conditions L6.1 to L6.8.

- $L_{Aeq(15\text{ minute})}$ - the value of the A-weighted sound pressure level of a continuous steady sound that, over a 15 minute time interval, has the same mean square sound pressure level as a sound under consideration with a level that varies with time (Australian Standard AS 1055:2018 *Acoustics: description and measurement of environmental noise*).
- L_{AFmax} – the maximum sound pressure level of an event measured with a sound level meter satisfying Australian Standard AS IEC 61672.1-2013 *Electroacoustics - Sound level meters - Part 1: Specifications* set to 'A' frequency weighting and fast time weighting.

Recommended inclusions in the Planning Approval

Noise Management and Traffic Management

Operational Noise Management Plan

The proponent must prepare and implement a Noise Management Plan that covers all premises based activities and on-premises transport operations. The plan must include but need not be limited to:

- all measures necessary to satisfy the limits in Table **L6.1** at all times,
- a system that allows for periodic assessment of Best Management Practice (BMP) and Best Available Technology Economically Achievable (BATEA) that has the potential to minimise noise levels from the facility,
- Effective implementation of identified BMP and BATEA measures, where considered feasible and reasonable,
- Measures to monitor noise performance and respond to complaints,
- Measures for community consultation including site contact details,
- Implementation of operational measures to ensure that roller doors are closed other than to allow for ingress and egress of vehicles and to ensure that internal activities are modified to minimise break out noise when the roller doors are open.
- Noise monitoring and reporting procedures.

Construction Noise Management Plan

The proponent must prepare and implement a detailed Construction Noise Management Plan (CNMP), prior to commencement of construction activities, that includes but is not necessarily limited to;

- identification of each work area, site compound and access route (both private and public)
- identification of the specific activities that will be carried out and associated noise sources at the premises and access routes,
- identification of all potentially affected sensitive receivers,
- the construction noise and vibration objectives identified in the Environmental Assessment,
- assessment of potential noise and vibration from the proposed construction methods (including noise from construction traffic) against the objectives identified in the Environmental Assessment,
- where the objectives are predicted to be exceeded an analysis of feasible and reasonable noise mitigation measures that can be implemented to reduce construction noise impacts,
- description of management methods and procedures and specific noise mitigation treatments that will be implemented to control noise and vibration during construction, including the early erection of any operational noise control barriers,
- procedures for notifying residents of construction activities that are likely to affect their noise and vibration amenity,
- measures to monitor noise performance and respond to complaints.

Traffic Noise Management Plan

That a Traffic Noise Management Strategy (TNMS) be developed by the proponent, prior to commencement of construction and operation activities, to ensure that feasible and reasonable noise

management strategies for vehicle movements associated with the facility are identified and applied, that include but are not necessarily limited to the following;

- driver training to ensure that noisy practices such as the use of compression engine brakes are not unnecessarily used near sensitive receivers,
- best noise practice in the selection and maintenance of vehicle fleets,
- movement scheduling where practicable to reduce impacts during sensitive times of the day,
- communication and management strategies for non licensee/proponent owned and operated vehicles to ensure the provision of the TNMS are implemented,
- a system of audited management practices that identifies non conformances, initiates and monitors corrective and preventative action (including disciplinary action for breaches of noise minimisation procedures) and assesses the implementation and improvement of the TNMS,
- specific procedures for drivers to minimise impacts at identified sensitive receivers,
- measures to ensure that heavy vehicle movements will only be to and from the site via Foreshore Road Botany, and
- clauses in conditions of employment, or in contracts, of drivers that require adherence to the noise minimisation procedures and facilitate effective implementation of the disciplinary actions for breaches of the procedures.

Activities to occur within the building

All waste receipt, dispatch, sorting, storing and processing activities, including container storage must occur within the building