13 February 2026

Attention: Sally Munk
Waste Management Facility, Botany (SSD-62855708)

Department of Planning, Housing and Infrastructure
4 Parramatta Square,
12 Darcy Street,
Parramatta NSW 2150

PO Box 1563
Warriewood
NSW 2102

ABN 45 162
835 083

Dear Sally,

Request for Additional Information – Noise Response

Background

Element Environment Pty Ltd (Element) is acting on behalf of Coombes Property Group (CPG) and Renier Group (formerly KLF Group), which propose to develop a construction and demolition (C&D) waste management facility (the 'project') at 2-4 Hale Street, Botany in the Bayside local government area (LGA) of New South Wales.

The facility will accept up to 300,000 tonnes per annum (tpa) of C&D waste and will operate as a waste transfer station receiving, sorting and storing C&D waste prior to bulk transportation to resource recovery facilities within the Renier Group, where more advanced sorting and recycling will be undertaken.

The project is considered a State significant development (SSD) under Clause 23(2) of Schedule 1 of the State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP).

An environmental impact statement (EIS) was prepared by EME Advisory (EME) on behalf of CPG and KLF (now Renier Group) in July 2024. The Department of Planning, Housing and Infrastructure (DPHI) subsequently published the EIS on the Major Projects portal in August 2024 and notified relevant government agencies, inviting them to review.

A response to submissions (RTS) report by Element was subsequently lodged with DPHI in April 2025. Further comments were received by government agencies, and the DPHI requested additional information in response to these comments. A request for information (RFI) response was submitted to the Major Projects portal on 1 October 2025.

An additional RFI regarding noise was received from the DPHI on 14 November 2025. The RFI requested that the following information be provided to inform the assessment of noise for the development:

- Demonstration that all reasonable and feasible noise mitigation measures have been adopted.
- Confirm that a review of sound power levels of operational plant and equipment has been carried out to confirm realistic predictions.
- If residual noise impacts remain, determine the significance of impacts in accordance with Table 4.1 of the NSW Environment Protection Authority's (NSW EPA) Noise Policy for Industry (NPfI) and commit to implementing appropriate receiver-based treatments in accordance with Table 4.2 of the NPfI.

The purpose of this letter is to capture CPG and Renier Group's response to the requested information for DPHI's consideration and subsequent determination of this application. Supporting information is provided as appendices to this letter and includes:

- Appendix A: Noise Impact Assessment (NIA).
- Appendix B: Acoustic Letter.

Additional engagement has been undertaken with government agencies, and the comments, outcomes and actions are summarised below.

Additional stakeholder engagement

Additional engagement with DPHI and the NSW EPA was undertaken to discuss the proposed response.

On 4 December 2025, representatives from E-Lab, CPG, and Element attended a meeting with DPHI and NSW EPA.

The main outcomes from the meeting included:

- E-Lab confirmed sound power levels (SWLs) have been verified by attended levels.
- Element confirmed development consent for the caretaker's residence at 3 Luland Street in 2006.
- E-Lab committed to developing appropriate noise levels to be set as limits.
- Element/E-Lab committed to retrieve the acoustic reports for the caretaker's residence to confirm existing acoustic treatment.
- Continue with formal response to the RFI.

Following the meeting, the DPHI sent an email on 4 December 2025, providing the following additional advice to consider in relation to the existing acoustic treatment at the caretaker residence at 3 Luland Street.

> *'The NPfI establishes that assessment locations for residential receivers, when determining intrusiveness and amenity noise levels, are generally selected to facilitate practical assessment. This approach assumes that windows are opened sufficiently to allow natural ventilation.*
>
> *Relevantly, we understand there is no requirement under AS2021:2015 Acoustic - Aircraft noise intrusion - Building siting and construction to mandate that residents keep windows closed at all times, particularly during periods of minimal or no aircraft noise such as airport curfew hours. This is important as the proposed waste management facility proposes 24/7 operation.*
>
> *Where a caretaker's flat or similar dwelling does not currently provide an adequate alternative ventilation method to enable windows to remain closed continuously, the appropriate treatment requirement under the NPfI is to install mechanical ventilation and/or comfort conditioning systems. These systems must ensure that windows can be closed without compromising internal air quality or amenity, thereby achieving compliance with the policy objectives for noise mitigation.*
>
> *However, if the investigation determines that an adequate ventilation method already exists, this finding would be taken into account in our consideration of treatment requirements.'*

Element replied to the DPHI, attaching the acoustic certificate for 3 Luland Street (Appendix D of the NIA), confirming that aircraft noise intrusion measures were applied (including mechanical ventilation) in accordance with the initial acoustic report.

The DPHI followed up further with an email on 5 December 2025 requesting additional information required to complete the assessment of the noise impacts, as reproduced below.

'By having regard to 'What the NSW EPA Considers when Developing Noise Conditions for Activities Assessed using the Noise Policy for Industry' and NPfI's definition on noise limits, the Department intends to set noise limits at the best-achievable noise levels as predicted. If there is a risk that the worst-case LAeq,15min and LAFmax predictions in the September 2025 report may be exceeded, please provide the following information for consideration by the Department and the EPA. It remains the Applicant's responsibility to demonstrate that noise levels can be achieved under the meteorological conditions applicable to the site.

Parameter	September 2025 report	Revised report
Operating conditions modelled, including sensitivity analysis of variation in noise emissions during receipt, stockpiling, sorting and dispatch		
Source and pathway controls proposed		
Mitigated LAeq,15min predicted noise level at RC1 and RC2 (dB(A))		
Mitigated LAFmax predicted noise level at RC1 and RC2 (dB(A))		
Number of maximum noise events and likely time of occurrence during the night-time period		
Source and pathway controls deemed not reasonable or feasible, and why not		

In addition, please provide at least two 15-minute samples of the recorded WAV audio files and corresponding 100ms data to demonstrate that industrial noise is the dominant source at monitoring location LT1 across all periods of the day. The samples must include periods where LA10(15min) is less than LAeq(15min), including quieter night-time periods as indicated in the logging charts in Appendix B, and must cover the airport curfew hours between midnight and 6am. This information is required to confirm the statements made in the September 2025 report and the position E-Lab presented yesterday regarding the consideration of existing industrial noise at RC2.'

Response to RFI – 14 November 2025

E-Lab have provided an updated NIA attached to this letter as Appendix A. The following table details the recommendations from DPHI and where they are addressed in the NIA.

DPHI recommendation	Response
The Noise and Vibration Impact Assessment (NVIA) prepared by E-Lab Consulting dated 1 September 2025 has adopted a night-time Project Noise Trigger Level (PNTL) of $L_{Aeq,15min}$ 56 dB(A) for the residential receiver at RC1 (3 Luland Street, Botany). The Department considers this is inconsistent with the Noise Policy for Industry (EPA, 2017), which states the PNTL is the lower value of the project intrusiveness noise level and project amenity noise level for residential receivers. In the case of RC1, the project intrusiveness noise level is $L_{Aeq,15min}$ 47 dB(A) and is lower than the adopted amenity level of LAeq,15min 56 dB(A).	As detailed in Section 1.4 of the NIA, it was concluded in a meeting with the DPHI and NSW EPA that the noise-sensitive receiver at RC1 is only approved as a caretaker's quarters. Based on the definitions provided by the NPfI, the intrusiveness noise level is not applicable to this receiver (also see Section 6.1.1 of the NIA).
Predicted night-time noise levels are LAeq,15min 53 dB, which results in an exceedance of up to 6 dB at RC1 for PNTL of 47 dB(A), which can be categorised as 'moderate', in accordance with Table 4.1 of the NPfI, subject to confirming that	As the intrusiveness noise level is no longer applicable to RC1, no exceedances are predicted.

DPHI recommendation	Response
the predicted noise levels represent the mitigated and best-achievable outcome.	
The Department requests that the following information be provided to inform the assessment of noise for the development: ▪ demonstration that all reasonable and feasible noise mitigation measures have been adopted ▪ confirm that a review of sound power levels of operational plant and equipment has been carried out to confirm realistic predictions ▪ if residual noise impacts remain, determine the significance of impacts in accordance with ▪ Table 4.1 of the NPfI and commit to implementing appropriate receiver-based treatments in accordance with Table 4.2 of the NPfI.	All reasonable and feasible mitigation measures have been adopted where necessary in the form of operational management controls to ensure project trigger noise levels have been achieved. A review of sound power levels and operational plant has been carried out through the use of the attended noise measurements of the actual (if not conservatively louder) equipment to be used at the proposed development. As the project trigger noise levels have been satisfied, receiver-based treatments are not deemed necessary. Notwithstanding, as outlined in Section 1.4 of the NIA, receiver-based treatments should already be in place at RC1, being the nearest sensitive noise receiver (aside from other adjacent industrial use developments). The acoustic reports and certificates for 3 Luland Street are provided in Appendix D of the NIA.

Response to DPHI email – 5 December 2025

E-Lab have provided a letter (Appendix B) to address the email outlined above from the DPHI on 5 December 2025. The letter response by E-Lab is summarised below.

The use of desktop-predicted noise levels as the project's operational noise limits is not supported by any EPA statutory or mandatory requirements, either for setting noise limits or assessing compliance PNTLs should rather be set in accordance with the NSW EPA mandatory criteria, as reported in the NVIA, and presented in the table below.

Receiver type	Time of day	Project intrusiveness noise level – $L_{Aeq,15min}$ dB(A)	Project amenity noise level – $L_{Aeq,15min}$ dB(A)	Sleep disturbance noise level – dB(A)	Project noise trigger level – $L_{Aeq,15min}$ dB(A)
RC1 – Caretakers Quarters (Urban)	Day	N/A	65	-	65
	Evening	N/A	64	-	64
	Night	N/A	61	57 dB(A) L_{max}	61dB(A)L_{eq} and 57dB(A)L_{max}
RC2 – Residential (Urban)	Day	53	58	-	53
	Evening	52	48	-	48
	Night	43	43	46dB(A)L_{eq} and 53dB(A)L_{max}	43dB(A)L_{eq} and 53dB(A)L_{max}
RC6 – Residential (Urban)	Day	57	58	-	57
	Evening	57	48	-	48
	Night	46	43	43dB(A)L_{eq} and 56dB(A)L_{max}	43dB(A)L_{eq} and 56dB(A)L_{max}
RC3 – School Premises	When in use	-	43	-	43
RC4 – Commercial Premises	When in use	-	63	-	63

Receiver type	Time of day	Project intrusiveness noise level – $L_{Aeq,15min}$ dB(A)	Project amenity noise level – $L_{Aeq,15min}$ dB(A)	Sleep disturbance noise level – dB(A)	Project noise trigger level – $L_{Aeq,15min}$ dB(A)
RC5 – Industrial Premises	When in use	-	68	-	68

The DPHI has requested two 15-minute samples of WAV audio files obtained at monitoring location LT1. With the most recent assessment clarifying that noise-sensitive receiver RC1 is not for residential use but assessed as a caretaker's quarters (as per the definitions provided in the NSW EPA NPfI), all required compliance obligations have been met under the current NSW EPA guidelines.

The request for WAV files is not considered necessary given:

- all measurements have been conducted in accordance with the requirements of the NPfI;
- all amenity criteria have been determined in accordance with the NPfI;
- all measurement data have been presented in accordance with the NPfI requirements; and
- submitting WAV files is not a requirement of the NPfI.

Closing

We trust that the above offers a complete response to the RFI and that the updated NIA and acoustic letter clarifies any previous queries.

We have made every effort to consult and collaborate with the DPHI and NSW EPA to address all concerns while keeping the DPHI informed of our approach and progress.

We hope our efforts to close out the noise matters can give confidence in the project's suitability for approval and assist the DPHI in finalising consent conditions.

Please do not hesitate to contact us if anything further is required.

Kind Regards

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Senior Environmental Consultant

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APPENDIX A – NOISE AND VIBRATION IMPACT ASSESSMENT

APPENDIX B – ACOUSTIC LETTER