

26 February 2018

WM Project Number: 17084

Our Ref: AL26022018L01JW

Bill McCredie
Jacfin Pty Ltd
c/o Allens Linklaters
Level 28, Deutsche Bank Place
126 Phillip Street
SYDNEY NSW 2000

Dear Mr McCredie

**Re: Energy from Waste Facility - State Significant Development SSD 6236
Noise Peer Review on behalf of Jacfin
Review of Response to Submissions Report / Amended Stage 1 Application**

INTRODUCTION

Wilkinson Murray has been engaged by Jacfin Pty Ltd, to conduct a peer review of the noise assessment forming part of the response to submissions relating to a State significant development application (SSD 6236) for an Energy from Waste (EfW) facility at Honeycomb Drive, Eastern Creek.

A noise assessment was conducted by Pacific Environment for the proposed Energy to Waste Facility as part of the Amended Environmental Impact Statement for the original EfW proposal. Wilkinson Murray previously reviewed that noise assessment and concluded it was deficient in four critical areas, namely:

- Noise Monitoring;
- Noise Sources, Noise Source Locations and Sound Power Levels;
- Low Frequency Noise; and
- Cumulative/ Precinct Plan Noise Goal / Amenity Criteria.

An updated noise assessment by Pacific Environment (Job ID. 21292E) was undertaken to address submissions on the Amended EIS including the above deficiencies and was based on a preferred project option with an operational throughput of 552,000 tonnes per annum, which coincides with Stage 1 from the original project.

The updated noise report includes additional background noise data, updated modelling, assessment of low frequency noise impacts and cumulative noise impacts. The additional noise modelling also included assessment at the Jacfin Site.

Below are comments following the review of the updated report:

Noise Monitoring

In its previous review Wilkinson Murray stated the following regarding the noise monitoring:

"Wilkinson Murray Pty Ltd considers the (long-term) noise monitoring is not sufficient for the proposed development. The rigor applied to establishing the existing ambient background noise levels should be commensurate with the potential for a development to cause noise impacts at sensitive receivers. Considering the scale of the proposed development, which has been declared as State Significant, the proximity of the residential receivers to the proposed EFW facility and the fact that the noise monitoring data from 2014 included only two monitoring locations one of which has been identified as being affected by extraneous noise, additional noise monitoring should be conducted. The ideal time for any additional noise monitoring would be in winter to ensure that seasonal variations in the background noise levels are identified as required by the INP."

The NSW Industrial Noise Policy recommends that at least one week of continuous background noise monitoring be conducted at representative receivers to establish the ambient background noise levels. No additional long-term noise measurements have been conducted for the updated noise assessment to support the previous measurements.

The updated noise assessment only provided additional short-term operator attended noise measurements. The data provided was gathered for the purpose of compliance monitoring for the neighbouring Genesis site and is not considered sufficient to establish the ambient background noise levels. For example, the data does not include any night time monitoring (between 10pm and 7am) which is where the original data was impacted by insect noise, this could have resulted in higher ambient background noise levels.

In my opinion this new data has not adequately responded to Wilkinson Murrays previous concerns, as the potential noise impacts may be underestimated due to a higher ambient background noise level resulting in a higher intrusive noise criteria (Background noise + 5dBA).

Noise Sources, Noise Source Locations and Sound Power Levels

The updated noise assessment provided additional noise modelling, noise source information, noise source locations and sound power levels. The information provided appears to address Wilkinson Murray's previous comments.

Low Frequency Noise

The updated noise assessment provides a satisfactory low frequency assessment. While the low frequency noise criterion of dBC-dBA<15dB is met, it should be noted that the criterion is only just achieved by 0.1dBA.

The marginal level of compliance shows potential risk for low frequency noise to exceed the criteria.

As such to ensure compliance with relevant noise criteria, if the project were to be approved, it is recommended that a detailed low frequency noise assessment be conducted by the proponent, for approval by the Department of Planning and Environment. The compliance noise assessment should be undertaken prior to plant construction commencing and should detail the specific low frequency mitigation that is required to be installed to meet the noise criteria.

Cumulative Noise/ Precinct Plan Noise Goal / Amenity Criteria

The cumulative noise impact of the development was revised in the updated assessment based on the assumption of operational throughput of 552,000 tonnes per annum. The predicted cumulative noise from the facility at the closest residential receivers is predicted to be 39dBA, which complies with the amenity criteria and Eastern Creek Precinct Plan.

It should be noted, the calculated cumulative level complies exactly with the Eastern Creek Precinct Plan criterion and therefore future expansion of the site would likely result in an exceedance of the cumulative noise criteria under the Eastern Creek Precinct Plan. The Response to Submissions Report foreshadows an expansion. It is not clear to Wilkinson Murray how this could be achieved without breaching the relevant noise criteria for the area.

We trust you find this information to be of assistance. Should you wish to discuss any of the foregoing in further detail, or require any additional details, please do not hesitate to contact us.

Yours faithfully

WILKINSON MURRAY



John Wassermann

Director