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Erik Larson Jackson Environment and Planning Suite 102, Level 1, 25-29 Berry St North Sydney NSW 2060 erik@jacksonenvironment.com.au

Re: Sydney Recycling Park, Kemps Creek – Acoustic Advice DA22/0756 RWDI Project No 2303331

Dear Erik Jackson

Introduction

RWDI Australia (RWDI) has been commissioned by Jackson Environment and Planning to provide acoustic advice in support of Development Application No DA22/0756 for the proposed two temporary sheds and associated access, paving, and drainage works for the currently approved and operational Sydney Recycling Park, located at 16-23 Clifton Avenue, Kemps Creek, NSW.

This letter has been prepared in response to a comment related to noise issued by Penrith City Council (21 December 2022), which is as follows:

While it is noted that the proposal does not involve any change to the existing use of the site, the proposal provides for the potential concentration of operations on a part of the site. In the absence of a Noise Impact Assessment, it is unclear whether such provides for additional impacts on specific sensitive noise receivers and/or for compliance with the noise limits imposed by Environment Protection Licence No 12901.

Project Description

Sydney Recycling Park proposes to construct two temporary sheds: one 2,100 m² and one 2,520 m² floor area temporary shed structure. Both would be used to enclose recycling activities associated with the approved recycling and landfill facility uses. The proposed temporary sheds will be located next to the existing shed that was previously approved in 2017 under DA 17/396 by Penrith City Council. The sheds are proposed to be constructed of Colorbond Trimdek steel sheeting. There will be a number of roller doors surrounding the sheds to allow for truck entry and exit. RWDI understands that roller doors will remain closed unless providing access for vehicle entry/exit. It is proposed that the western and northern roller doors would be principally used for day to day access to the interior of the building for waste tipping, sorting, processing and



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recycling operations. The roller doors on the eastern side of the sheds, and the access provided around the building is for fire and emergency access only. These roller doors will remain closed, and operational vehicles will not use the access on this side of the sheds.

The current Environment Protection Licence (EPL) for the site (EPL 12901) allows the site to function as a recycling facility. The EPL provides for rigorous groundwater and discharge water monitoring and dust monitoring, and for cubic metre limits of various types of waste. Condition L4 of the EPA provides operational limits as follows:

L4 Noise Limits

L4.1 Noise from the premises must not exceed an $L_{A10,15min}$ noise emission criterion of 50 dBA or 55 dBA if the noise is tonal or impulsive in character

The new sheds will allow further enclosure of waste processing and recycling operations to reduce environmental impacts and protect the amenity of neighbouring properties. It is noted that the "temporary" nature of these sheds relates to the limited operational life of the facility and would be removed to allow for rehabilitation of the land.

Current external activities include:

- Tipping of mixed materials from trucks;
- Inspection of loads;
- Sorting of recyclable materials (recovery of metal, concrete, wood, etc.);
- Stockpiling and storage;
- Processing (such as coarse timber shredding, cardboard baling and mattress shedding);
- Loading of trucks with recovered materials for further processing offsite; and
- Soils and aggregates processing.

These activities are currently occurring in the northern section of the site, as annotated in **Figure 1**. These activities are currently occurring approximately 110 m to 180 m to the nearest sensitive receiver on Clifton Avenue. All the above external activities except for soil and aggregate processing would be relocated into the two proposed sheds.

The site currently operates between the hours of 7:00 am to 6:00 pm Monday to Friday, and 8:00 am to 1:00 pm Saturday. The operating hours will be retained as part of the development application.

RWDI understands that there have been no known noise complaints relating to the current operation of the facility.

The site currently implements an Environmental Management System which includes environmental noise management. These include:



- Eliminating, replacing or repairing the noisy machines or its operation by a quieter machine or operation with equal or better efficiency.
- Placing stockpile, materials, or structures to form an acoustic barrier where necessary
- Training staff to be noise aware
- Manage responses to noise and vibration complaints
- Conducting noise surveys when environmental noise complaints have been submitted.



Figure 1: Site Overview

Review of Potential Noise Impacts

It is proposed that the two new temporary sheds would be constructed in the eastern section of the site, immediately east of the existing shed. This location is approximately 90 m to 110 m to the nearest sensitive receivers on Clifton Avenue.

The reduced separation distance between noise sources and receivers would result in some increase in noise levels. However, based on the proposed construction of the shed, the shed enclosure would provide at least 10 dB reduction in noise levels (with roller doors shut). The net change at the receivers would be a reduction in noise levels experienced.

Table 1 summarises the calculated reduction in noise levels for the five receivers that would be directly impacted by the relocation of the noise generating activity. Calculations



are deemed conservative and do not consider any reduction in overall noise levels resulting from the shielding of activities that would remain external (i.e., soil and aggregate processing) provided by the proposed temporary sheds.

Receiver	Increase from reduced Distance	Decrease from enclosed shed	Net dB Change
395-409 Clifton Avenue (North)	0	-10	-10
395-409 Clifton Avenue (South)	5	-10	-5
410 Clifton Avenue	5	-10	-5
422-433 Clifton Avenue	7	-10	-3
434-441 Clifton Avenue	4	-10	-6

Table 1: Prediction Noise Level Change with Temporary Sheds

Conclusion

RWDI has prepared this letter to confirm that the proposed operation of two temporary sheds at Sydney Recycling Park would not increase noise impacts to the nearest sensitive receivers. The introduction of the temporary sheds would actually be beneficial and provide at least 3 dB reduction to the noise levels at the nearest receivers.

Regards

Peter Thang Project Engineer RWDI