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RTB/EH/sjb
Ref: 241115_Letter1_Rev1
29 May 2025

Attention: Ben Paterson
Development Assessment
Liverpool City Council

Dear Ben,

Re: Request for Additional Information 20th May 2025

This letter is a response to Liverpool City Council's Request for Additional Information (Ref: DA-263/2018/C) for the modification application regarding the resource recovery facility located at 55 Martin Road Badgerys Creek. The relevant comment regarding the noise impact assessment is repeated below:

4. Acoustic Report – Addendum

'Noise Impact Assessment for AMJ Demolition and Excavation 55 Martin Road, Badgerys Creek (Report no. 191238-NIA-Rev3) prepared by Benbow Environmental dated September 2019' approved under DA-263/2018 does not specifically include recommendations relating to the design, construction and operation of the existing office building.

Council previously requested for the applicant to provide written advice from a suitably qualified acoustic consultant confirming whether the abovementioned document is still relevant to the modification Application. Otherwise, Council explained that revised acoustic advice may need to be incorporated into the modified consent to ensure that conditions imposed by the Approval remain relevant to the amended proposal.

According to Clarion Consulting Pty Ltd, Benbow Environmental suggested that building treatment requirements could be satisfied by including a Condition on any future consent as follows: "Prior to the issue of the Construction Certificate an 'aircraft noise report' is to be prepared by a suitably qualified acoustic consultant in accordance with the Australian Standard AS 2021:2015 Acoustics - Aircraft Noise Intrusion - Building Siting and Construction".

The enquiry Council raised in relation to the office building did not relate specifically to aircraft noise impacts. As outlined in Council's earlier correspondence, the Western Sydney International (Nancy-Bird Walton) Airport Aircraft Overflight Noise Tool suggests that this location falls outside of the selected ANEC noise contours for Western Sydney International Airport. This information is inconsistent with the State Environmental Planning Policy (Precincts—Western Parkland City) 2021 Noise Exposure Contour Map (Sheet NEC_001) which indicates that the land falls in an area with the ANEC exceeding 35. AS 2021—2015 explains that there are circumstances where a building of a particular type will contain spaces used for activities which would generally be found in a different type of building such as an office in an industrial building. In these cases, Table 2.1 should be used to determine site acceptability, but internal design noise levels within the specific spaces should be determined by Table 3.3.

In addition to the above requirements, Council requires written confirmation from the acoustic consultant as to whether potential acoustic impacts associated with the operation of the office building/lab were considered as part of the original acoustic assessment and if the proposed modifications to the office building require further consideration as part of this Application to comply with the nominated assessment criteria.

In addition, further email correspondence with Council was undertaken on 27/05/2025 with environmental assessment officer Neil Ramsay, which informs this response.

Benbow Environmental Comment:

Aircraft Noise Intrusion – AS2021:2015 Compliance

The proposed two-storey office building will be assessed for aircraft noise intrusion in accordance with Australian Standard AS 2021:2015 Acoustics – Aircraft noise intrusion – Building siting and construction. As part of the typical process for this type of development, an aircraft noise intrusion assessment would be prepared by a suitably qualified acoustic consultant prior to the issue of a Construction Certificate. This assessment would confirm that the building design and construction methodology meet the required internal noise level targets.

We propose that Council include a condition of consent requiring this aircraft noise assessment at the Construction Certificate stage. Such an approach ensures that the assessment aligns with the final building design, material selections, and construction details—consistent with best practice and achieving the highest standard of compliance.

Upon completion of works and prior to the issue of an Occupation Certificate, written certification would also be provided by an acoustic consultant to confirm that the constructed development achieves compliance with AS2021:2015 and the specific recommendations of the acoustic report.

Benbow Environmental Comment:

Acoustic Impacts of the Office and Laboratory – Clarification

Regarding Council's query about potential acoustic impacts associated with the operation of the office building and laboratory, we confirm the following:

None of the previous noise assessments undertaken by Benbow Environmental for the site considered noise emissions from the office and laboratory, which were part of the original application though of a different design.

Noise emissions associated with the office and laboratory are limited to staff car parking movements, laboratory exhaust fans, and office air conditioning units. These noise sources are insignificant compared to the operational noise sources assessed for the broader resource recovery facility. They are conservatively estimated to be at least 10 dB(A) below the modelled noise sources in the operational scenario. Consequently, the noise emissions from the office and laboratory do not warrant further acoustic assessment in the context of the broader noise environment of the site.

Yours faithfully,
for Benbow Environmental



Emma Hansma
Senior Engineer



R T Benbow
Principal Consultant