

Opal Pty Ltd

Botany Paper Mill – EPL Compliance January - March 2026 Quarterly noise monitoring report



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Table of Contents

1.	Introduction	4
1.1	Background	4
1.2	Objective	4
1.3	Operational noise limits	4
2.	Existing environment	6
2.1	Receiver locations	6
2.2	Monitoring limitations	7
3.	Operational noise	8
3.1	Noise monitoring.....	8
3.2	Noise modelling	8
4.	Summary	17

Glossary

Acoustic and vibration related terms:

- **Acoustic Spectrum:** A representation of a sound sample (usually short term) of the amount of energy or sound level per frequency.
- **Ambient Noise:** Ambient noise encompasses all sound present in a given environment, being usually a composite of sounds from many sources near and far.
- **dB(A):** A unit of sound measurement which has frequency characteristics weighted so that it approximates the response of the human ear to sound waves
- **Heavy Vehicle:** A truck, transport or other vehicle with a gross vehicle weight above a specified level (for example: over 8 tonnes)
- **L_{A90}:** Is the noise level that is exceeded 90 per cent of the measurement time. This parameter is commonly referred to as the background noise level
- **L_{Aeq}:** Noise level that represents the energy average noise from the source during a specified time period, and is the equivalent continuous sound pressure level for a given period
- **L_{Aeq(15hr)}:** The Leq noise level for the period from 7 am to 10 pm.
- **L_{Aeq(9hr)}:** The Leq noise level for the period from 10 pm to 7 am.
- **NCA:** Noise Catchment Area. Grouping dwellings or receivers together in terms of similar noise environment.
- **Noise barrier:** Generally a wall or an earth mound that obstructs or restricts the passage of sounds waves from a noise source
- **Noise Logger:** A data logging (data and audio in some cases) which records noise. Usually used for unattended noise monitoring of background or ambient noise.
- **NML:** Noise Management Level as detailed in the NSW Interim Construction Noise Guideline. The NML is the noise goal for construction activities.
- **Octave Bands:** Sounds that contain energy over a wide range of frequencies are divided into sections called bands. A common standard division is in 10 octave bands identified by their center frequencies 31.5, 63, 250, 500, 1000, 2000, and 4000 Hz
- **RBL:** Rating Background Level is the overall single figure background level representing each assessment period over the whole monitoring period. The RBL is used for determining the appropriate construction noise criteria.
- **RNP:** Road Noise Policy (OEH, 2011)
- **Sound Level Meter:** An instrument consisting of a microphone, amplifier and data analysis package for quantifying and measuring noise.
- **Sound Power Level (L_w):** Sound power level or acoustic power level is a logarithmic measure of the sound power in comparison to a specified reference level.
- **Sound Pressure Level (SPL or L_p):** The level of noise, usually expressed in dB(A), as measured by a standard sound level meter.

1. Introduction

1.1 Background

OPAL operates a paper mill at its Botany site in Sydney, NSW. The paper mill is subject to operational noise conditions set out in the Ministers Conditions of Approval (MCoA) (including subsequent modifications) and the Environment Protection Licence (EPL) No. 1594.

As part of the EPL, a quarterly monitoring survey undertaken at receivers surrounding the site is to be prepared to demonstrate compliance with set noise limits. In addition to the monitoring survey results, Condition U1 of the EPL requires a summary of predicted noise levels from the validation noise model to be included in the quarterly monitoring report.

This report covers the January 2026 – March 2026 period. At the time of monitoring, the B9 paper machine was operating at normal production capacity. Validation modelling that covers normal production has been used to predict noise impacts from the Opal site and is confirmed in the Noise Model Validation Report (HW October 2022). There are no additional updates or changes to the site layout since the validation model was completed.

1.2 Objective

This report addresses operational licence conditions relating to measurements of the quarterly monitoring of the noise environment around the Opal site, i.e. Condition M6.1 and M6.2 of EPL 1594. These require:

- M6.1 The licensee must undertake noise monitoring at least once every three months to check compliance with the noise limits specified in Condition L4.1.
- M6.2 All monitoring required by this licence must be undertaken in accordance with Australian Standard 2659.1 – 1998: Guide to the use of sound measuring equipment – Portable sound level meters, or any revisions of that standard which may be made by Australian Standards Authority, and the compliance monitoring guidance provided in the NSW Industrial Noise Policy.

1.3 Operational noise limits

Operational noise limits for the new Opal Paper Mill are detailed in condition L4.1 of EPL 1594 and Condition 10 of the MCoA. These have been replicated in **Table 1**.

Since the inception of the monitoring program dating back to as early as 2012, the same receiver locations have been used. This last noise monitoring survey only had access to 5 locations with the residence located at R3 (Murrabin Avenue) no longer available for survey access.

Table 1 Operational noise limits

ID	Location	Day	Evening	Night	Night
		L _{Aeq,15min} , dB(A)	L _{Aeq,15min} , dB(A)	L _{Aeq,15min} , dB(A)	L _{Amax} , dB(A)
R1	Cnr McCauley Street & Australia Avenue	46	45	43	55
R2	Australia Avenue	45	45	43	55
R3*	Murrabin Avenue	46	45	43	55
R4*	Partanna Avenue	42	41	41	55
R5	Corner of Partanna and Moorina Avenues	42	42	39	55
R6	Moorina Avenue	43	43	39	55

*Receiver locations no longer accessible

Regular quarterly monitoring surveys have demonstrated that direct measurement of Opal's contribution to the noise environment is not possible because noise emissions from the site are generally lower than the ambient measured L_{Aeq} noise levels, which masks the actual noise from the Opal site.

Ambient noise levels measured at the receiver locations using the L_{Aeq} noise parameter are therefore not a true representation of noise from the Opal site but a combination of influences from all local noise sources.

The influence from Opal on the local noise environment may be better described using the L_{A90} statistical parameter. This additional parameter has been presented in the results summary to be considered in conjunction with the L_{Aeq} noise level when assessing compliance of the Opal site.

During the night periods fewer extraneous noise influences are present providing lower overall noise levels in the area. Under these conditions constant noise sources such as Opal operations are more likely to be apparent in the background noise levels noting that the emission levels from the site remain relatively constant throughout the day, evening, and night.

Maximum noise levels from the site are also captured under the EPL requiring a limit to L_{Amax} noise emissions of 55 dB(A) at all locations during the night period. An L_{Amax} parameter for the monitoring period simply records the loudest noise level measured during the night assessment period and does not distinguish the source of noise.

Maximum noise events are not generally observed from the Opal site unless equipment has broken down or maintenance activities are underway and neither of these scenarios reflect normal operation of the plant.

Maximum noise levels recorded during these surveys are, therefore, more representative of the broader noise environment which makes the distinction between external sources and Opal's emissions difficult. Furthermore, maximum noise levels measured during the monitoring surveys often, if not always, exceed the maximum noise limit from the site hindering the identification of Opal's contribution.

The addition of the L_{A1} noise level statistic is proposed in conjunction with the L_{Amax} parameter to compliment the maximum noise profile and provide a better representation of environmental noise influences.

An L_{A1} noise level above the night criteria would not necessarily indicate an exceedance of the Opal noise goals however, long term measurements of this parameter may be useful in identifying changes to the local noise profile, which can then be compared to any changes in functional operation within the Opal site.

2. Existing environment

The site is located on the boundary of an industrial area around Port Botany and is bordered to the north and east of the site by residential properties as illustrated in Figure 2-1. The local noise environment beyond the Opal boundary varies throughout the day depending on the contribution of sources including trucks on Botany Road, aircraft, port noise, local business activities on McCauley Road, and local traffic movements.

Noise emissions from the paper mill do not vary significantly as the operation of the plant has been demonstrated to be consistent and reliable.

The source of maximum noise level events in the area are typically from the local road network and aircraft fly-overs. The nature of the processes within the Opal site means that there are typically no maximum noise level events associated with production activities. The exception to this may occur when equipment is not functioning properly during a breakdown or during maintenance activities, both of which are not common scenarios.

The influence of weather conditions on noise levels are apparent as seasonal variations which form data trends in the long-term monitoring for the local area.

2.1 Receiver locations

The EPL specifies six locations for quarterly monitoring. These are illustrated in Figure 2-1 and described further in **Table 2**. The receiver locations traditionally monitored at R3 and R4 are not currently being monitored due to access restrictions.

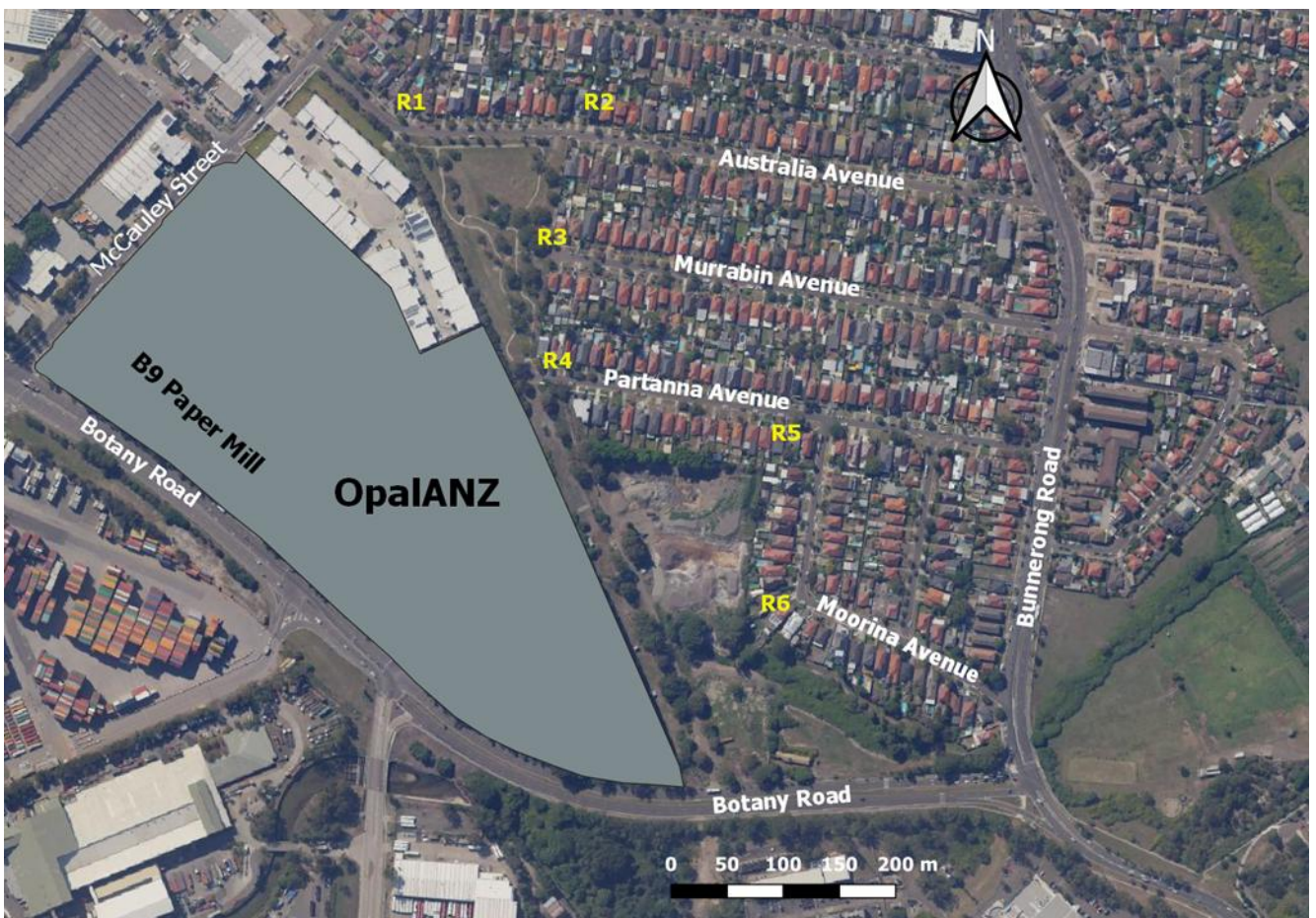


Figure 2-1 Site location and compliance monitoring locations

Table 2 Description of monitoring locations

Monitoring location	Description
R1	This location has a large degree of acoustic shielding from local noise sources due to the development of a warehousing facility on the corner of McCauley Avenue and Australia Avenue. The noise environment at this location is heavily influenced by traffic on McCauley Street, Perry Street and Beauchamp Road. Local industrial noise from Raymond Avenue is also audible during the day and night.
R2	This receiver is located opposite the bottom apex of the Purcell Park on Australia Avenue. At this location the residents have a clear line of sight to the paper mill. Noise walls have less effectiveness for the residences due to the large separation distances. Noise from port activities also has less shielding from the Opal site. Background noise levels are heavily dominated by road traffic noise from all sources.
R3*	This receiver is located adjacent to Purcell Park on Murrabin Avenue. At this location the residents have a partial line of sight to the paper mill although they are located closer to the boundary noise wall than receivers at R2. Noise from port activities are partially shielded by the Opal site. Background noise levels are heavily dominated by road traffic, aircraft and industrial noise from all surrounding sources.
R4*	The receivers at Partanna Avenue are physically closest to the Opal site but have the benefit of significant shielding of operational activities from the noise barrier located on the northern boundary. Road traffic noise contributes to background noise for this receiver. Some construction work was in progress at the park adjacent to the property during the monitoring period.
R5	Furthest location from the Opal site, a higher degree of influence from Botany Road, Bunnerong Road and the port. Noise from the Opal site is generally inaudible at this location although significant noise from the Opal site has been observed here during adverse meteorological conditions.
R6	In this location receivers are well shielded from operational noise from the Opal site due to the presence of the noise barrier and No. 8 paper machine building. Noise levels at this location are heavily influenced by local bird colonies, port noise, traffic on Botany road and traffic on Bunnerong Road. Construction of industrial units on the adjacent vacant land (Hanger block) is well underway at the time of writing this report.

*Receiver locations currently unavailable

2.2 Monitoring limitations

The local noise environment has been a feature of the area for many years and the total measured noise levels at monitoring locations are only partly due to Opal site operations. Direct monitoring of Opal noise emissions at the nominated receiver locations over time has demonstrated that specific contribution from Opal cannot be provided with any certainty due to the influence of other audible noise sources adjacent to the site.

Using intermediate monitoring locations to determine Opal’s contribution is not a practical option for determining compliance. This is primarily due to the influence of the existing local noise environment, the shielding from Opal’s boundary noise walls and the proximity of the receiver locations, some of which are already within 40 metres of the site boundary.

To provide more detail on the compliance monitoring, EPL 1594 has been updated to include Condition U1 with the requirement to incorporate modelling outcomes in the quarterly compliance reports. The predicted noise levels from validated noise modelling are used to compare the measured ambient noise levels.

Long term monitoring indicates that there is a strong correlation with the measured RBL and the predicted $L_{Aeq, 15 \text{ min}}$ noise levels for the EPL receiver locations. Information on the current noise model and predicted noise levels at the nearest receiver locations is presented in Section 3.2.

3. Operational noise

3.1 Noise monitoring

Noise monitoring for this monitoring report was completed between Thursday the 19th of February to Thursday the 26th of February, using automatic noise loggers deployed at four representative locations.

Monitoring was performed using Acoustic Research Laboratories Ngara Type 1 noise loggers, set to A-weighting, fast-response, and recording noise levels continuously over consecutive periods at each location. This survey period coincided with typical continuous operations of paper mill.

Weather data obtained from the Automatic Weather Station (AWS) maintained by the Bureau of Meteorology at Sydney Airport. Weather conditions for the monitoring period have been plotted showing trends in wind direction and speed which are presented in Figure 3-1.

3.2 Noise modelling

A noise model for the Opal site was developed in 2014 to predict noise emissions at receiver locations adjacent to the paper mill. This noise model has been updated in 2022 as the result of changes to the site layout and additional infrastructure projects over the intervening years.

The noise model was calibrated by internal site measurements and external noise monitoring correlation and is to be used as an aid to the quarterly monitoring surveys, specifically to verify the conclusions of the monitoring survey compared to the EPL criteria in Table 1.

Since the validation of the noise model there have been no changes to the site operations or noise sources included in the noise model. Ongoing development within the site will be captured in the noise model to reflect these changes in the noise emission profile of the Opal operations as necessary.

Table 3 Predicted noise levels at monitoring locations

ID	Location	EPL Noise Goals dB(A)		Predicted Noise Levels dB(A)	
		Night		Night	
		LAeq 15 Min	LAmix	LAeq 15 Min	LAmix
R1	Corner of McCauley Street and Australia Avenue	43	55	38	46 - 48
R2	Australia Avenue	43	55	39	47 - 49
R3	Murrabin Avenue	43	55	40	48 -50
R4	Partanna Avenue (Most affected façade)	41	55	40	48 -50
R5	Corner of Partanna Avenue and Moorina Avenue	39	55	37	42 -44
R6	Moorina Avenue	39	55	35	44 - 46

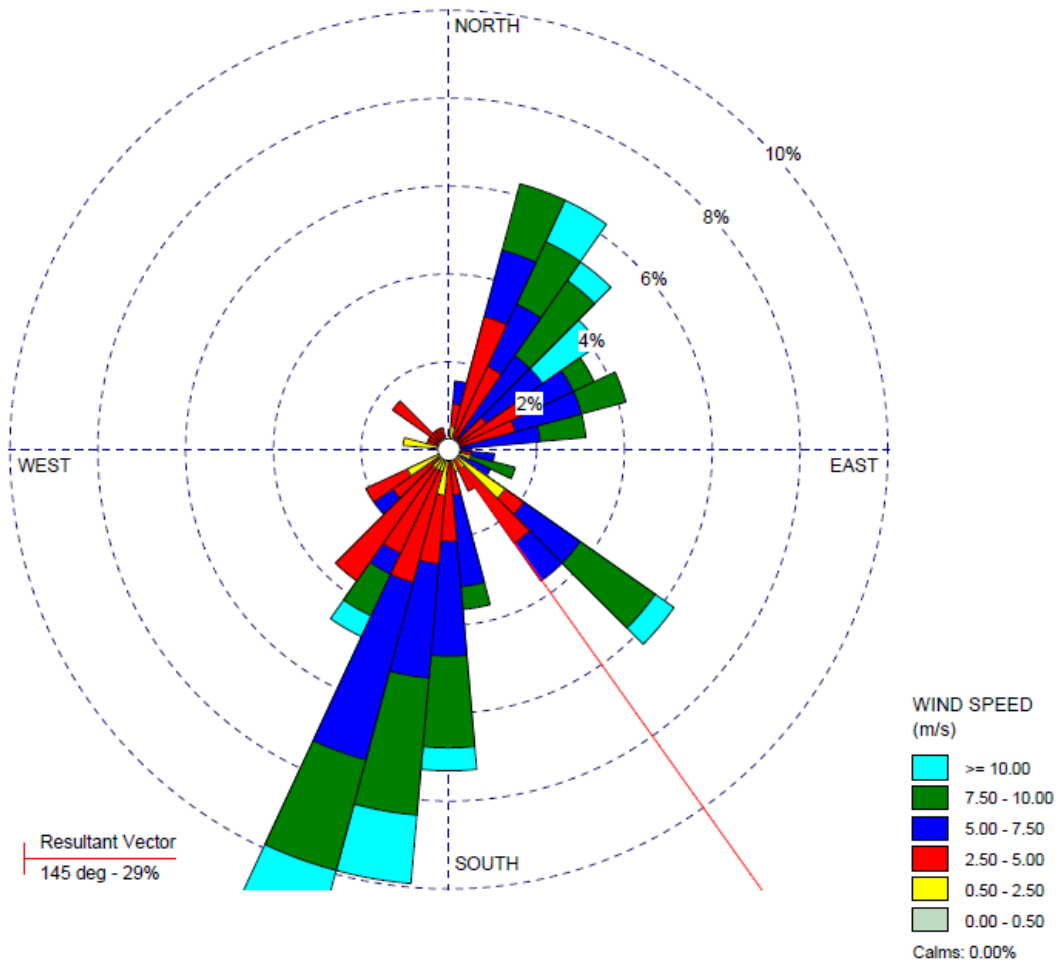


Figure 3-1 Wind speed and direction during monitoring period (19th February - Thursday 26th February)

The wind rose data indicate that wind speeds between approximately 2.5 m/s and 10 m/s were predominantly associated with winds from the southern to south-westerly sector, present for around 60% of the monitoring period. Moderate wind speeds between 5.0 and 7.5 m/s and 7.5 to 10.0 m/s were well represented, particularly from southerly directions. Lower wind speeds below 2.5 m/s occurred less frequently, and calm conditions were negligible during the monitoring period.

Resultant winds were generally from a southerly to south-westerly direction (resultant vector approximately 145 degrees), which would tend to enhance noise emissions towards receivers located north and north-east of the site. Under these wind conditions, noise from the site would be more apparent at downwind receivers, while noise propagation toward receivers to the south and west would be reduced.

A graph of the wind speed frequency during the monitoring period is presented in Figure 3-2.

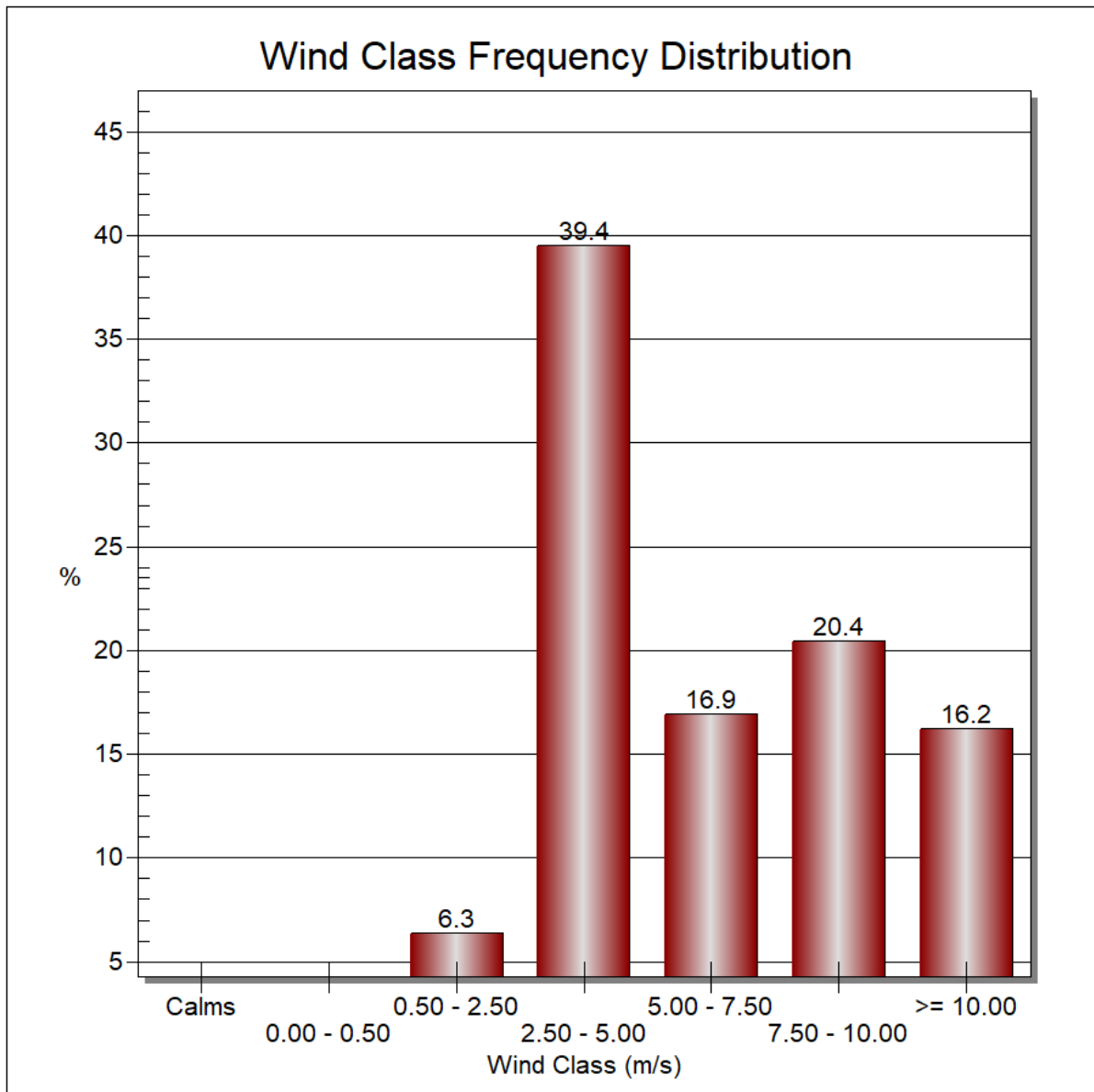


Figure 3-2 Wind speed frequency distribution over monitoring period –19th February - Thursday 26th February, source BoM 2026

The reported wind class frequency distribution is summarised from a 24-hour monitoring period, with the resultant values representative of the prevailing meteorological conditions influencing noise propagation at the site. The measured wind speeds include a range of conditions typical of coastal and industrial areas, including low, moderate, and higher wind speed events that may influence the measured noise environment during the survey period.

During the monitoring period, wind speeds were generally dominated by moderate wind conditions, with winds between 2.5 and 5.0 m/s occurring most frequently and accounting for approximately 39% of the total monitoring period. Wind speeds between 5.0 and 7.5 m/s and 7.5 and 10.0 m/s were also well represented, together accounting for approximately 37% of the recorded data.

Higher wind speeds greater than 10.0 m/s occurred for approximately 16% of the monitoring period, indicating that elevated wind conditions were present for a notable proportion of the survey. These conditions have the potential to influence both noise propagation from industrial sources and the generation of additional background noise from vegetation, buildings, and atmospheric effects.

Lower wind speeds between 0.5 and 2.5 m/s were recorded infrequently, accounting for approximately 6% of observations, while wind speeds below 0.5 m/s and calm conditions were negligible during the monitoring period. The limited occurrence of calm conditions indicates that the monitoring survey was undertaken predominately under conditions conducive to sound propagation.

The predominance of wind speeds above 2.5 m/s suggests that meteorological conditions during the monitoring period were generally appropriate for assessing operational noise emissions and their potential impacts at surrounding receivers. In particular, the relatively high frequency of wind speeds above 5.0 m/s indicates that wind-assisted noise propagation may have influenced measured noise levels during parts of the survey.

The results of the wind class frequency distribution for this monitoring period have been graphed and are shown and are used to support the interpretation of measured noise levels in relation to prevailing meteorological conditions.

Table 4 Summary of noise monitoring

Profile of Noise Environment - Noise Monitoring Location												
Time and date	R1		R2		R3		R4		R5		R6	
	L ₉₀ (10th Percentile)	L _{Aeq}	L ₉₀ (10th Percentile)	L _{Aeq}	L ₉₀ (10th Percentile)	L _{Aeq}	L ₉₀ (10th Percentile)	L _{Aeq}	L ₉₀ (10th Percentile)	L _{Aeq}	L ₉₀ (10th Perc41tile)	L _{Aeq}
Daytime: 7:00:00 AM to 6:00:00 PM												
Thursday 19 February 2026	44	50	48	52	-	-	-	-	40	75	41	52
Friday 20 February 2026	39	47	39	51	-	-	-	-	40	56	43	52
Saturday 21 February 2026	42	47	41	52	-	-	-	-	38	47	39	55
Sunday 22 February 2026	41	48	41	51	-	-	-	-	36	48	36	50
Monday 23 February 2026	39	45	37	51	-	-	-	-	42	71	40	51
Tuesday 24 February 2026	40	47	38	51	-	-	-	-	41	73	42	52
Wednesday 25 February 2026	44	50	46	53	-	-	-	-	44	71	42	51
Thursday 26 February 2026	44	49	49	54	-	-	-	-	50	71	42	52
Median	42	47	41	51	-	-	-	-	41	71	41	52
Evening: 6:00:00 PM to 10:00:00 PM												
Thursday 19 February 2026	42	45	48	54	-	-	-	-	36	50	43	53
Friday 20 February 2026	41	46	40	49	-	-	-	-	36	47	42	50
Saturday 21 February 2026	42	46	48	53	-	-	-	-	36	49	43	50
Sunday 22 February 2026	38	43	37	47	-	-	-	-	37	47	33	43
Monday 23 February 2026	39	44	36	51	-	-	-	-	34	48	37	48
Tuesday 24 February 2026	39	42	35	48	-	-	-	-	38	46	36	47
Wednesday 25 February 2026	43	47	47	51	-	-	-	-	36	48	40	47
Thursday 26 February 2026	43	45	48	51	-	-	-	-	52	63	39	46
Median	41	45	43	51	-	-	-	-	36	48	40	47

Night 10:00:00 PM to 7:00:00 AM	L ₉₀ (10th Percentile)	L _{Aeq}	L ₉₀ (10th Percentile)	L _{Aeq}	L ₉₀ (10th Percentile)	L _{Aeq}	L ₉₀ (10th Percentile)	L _{Aeq}	L ₉₀ (10th Percentile)	L _{Aeq}	L ₉₀ (10th Percentile)	L _{Aeq}
Thursday 19 February 2026	39	42	44	50					34	45	41	47
Friday 20 February 2026	37	39	37	43					34	39	37	44
Saturday 21 February 2026	40	41	47	51					33	39	41	47
Sunday 22 February 2026	39	41	40	49					34	42	36	46
Monday 23 February 2026	39	42	36	50					31	39	38	48
Tuesday 24 February 2026	41	44	44	49					33	41	38	51
Wednesday 25 February 2026	41	43	48	51					33	41	41	48
Thursday 26 February 2026	-	-	-	-					-	-	-	-
Median	39	42	44	50					34	41	38	63

Table 5 Summary of night maximum and LA1 noise levels

Time and date	Maximum Noise Environment - Noise Monitoring Location											
	R1		R2		R3		R4		R5		R6	
Date	L _{Amax}	L _{A1}	L _{Amax}	L _{A1}	L _{Amax}	L _{A1}	L _{Amax}	L _{A1}	L _{Amax}	L _{A1}	L _{Amax}	L _{A1}
Thursday 19 February 2026	71	59	77	56					106	94	77	66
Friday 20 February 2026	80	63	72	52					89	75	73	62
Saturday 21 February 2026	76	61	75	56					78	65	81	62
Sunday 22 February 2026	76	65	78	53					77	65	76	63
Monday 23 February 2026	79	65	79	56					89	86	75	63
Tuesday 24 February 2026	77	69	70	57					92	88	77	67
Wednesday 25 February 2026	78	73	75	54					92	87	86	70
Thursday 26 February 2026	-	-	-	-					90	87	-	-
Median	77	65	77	56					90	86	77	63

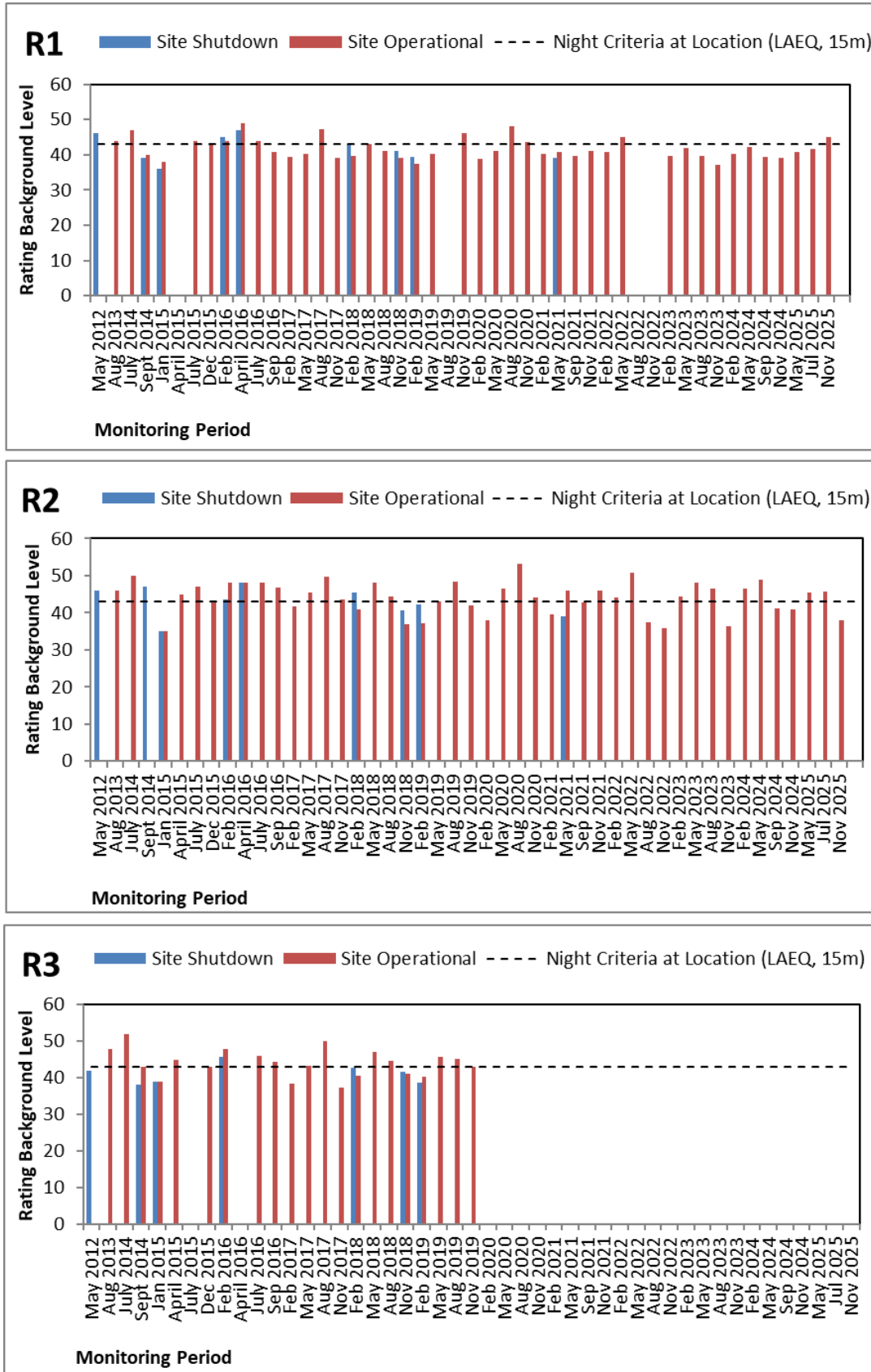


Figure 3-3: Comparison of background noise levels at R1 – R3

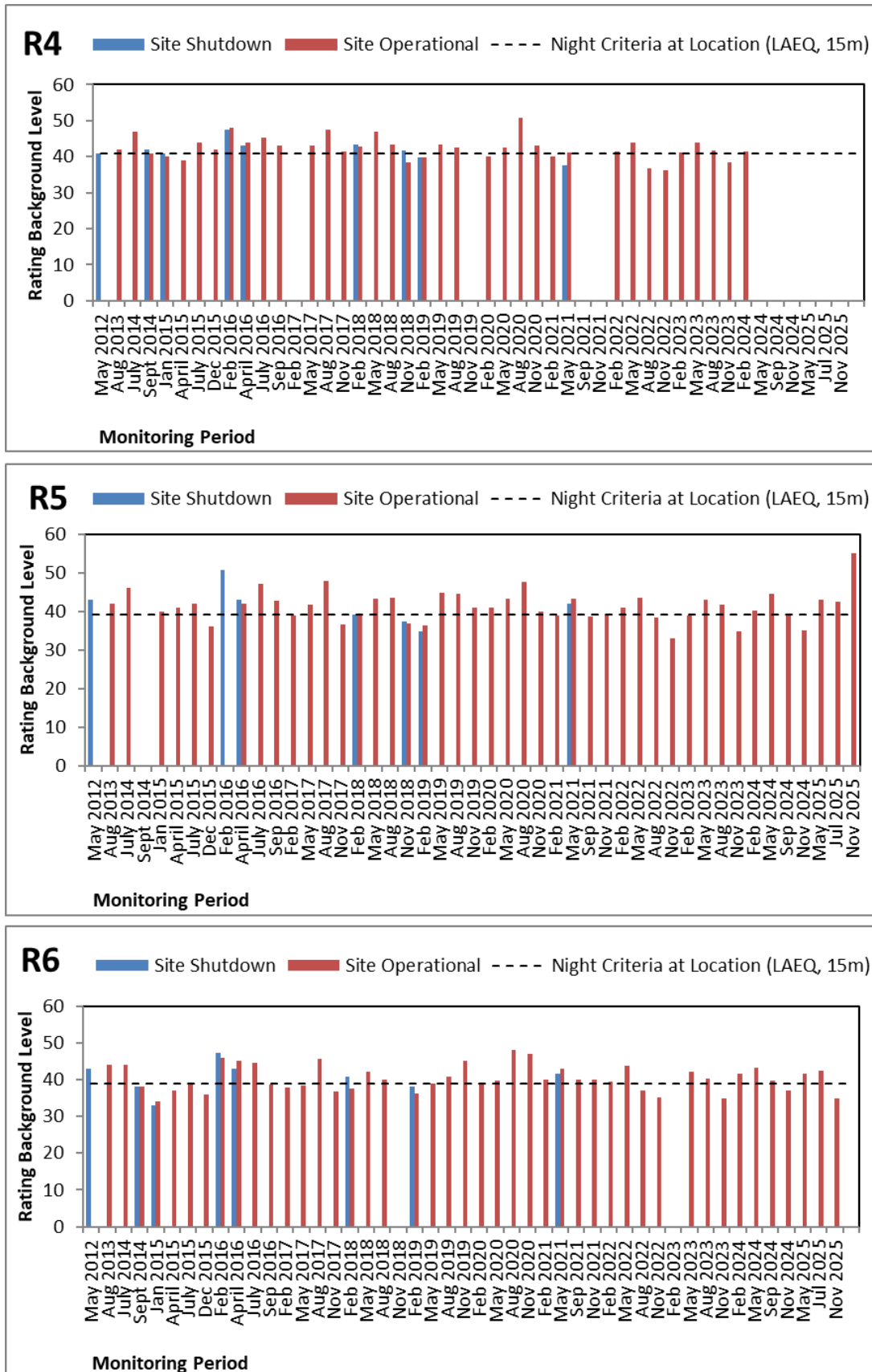


Figure 3-4: Comparison of background noise levels at R4 – R6

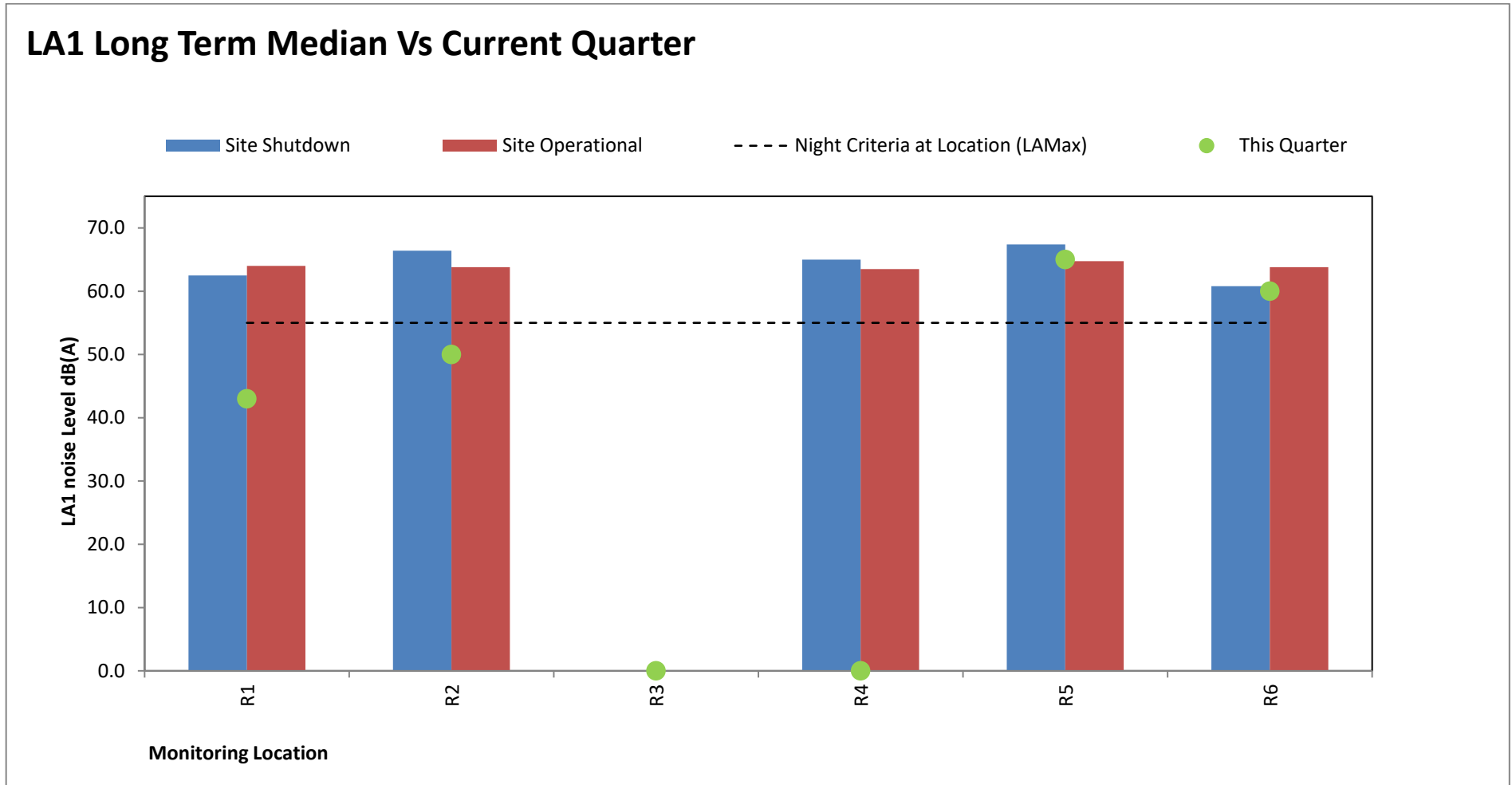


Figure 3-5: Long term LA1 noise levels at R1 – R6

4. Summary

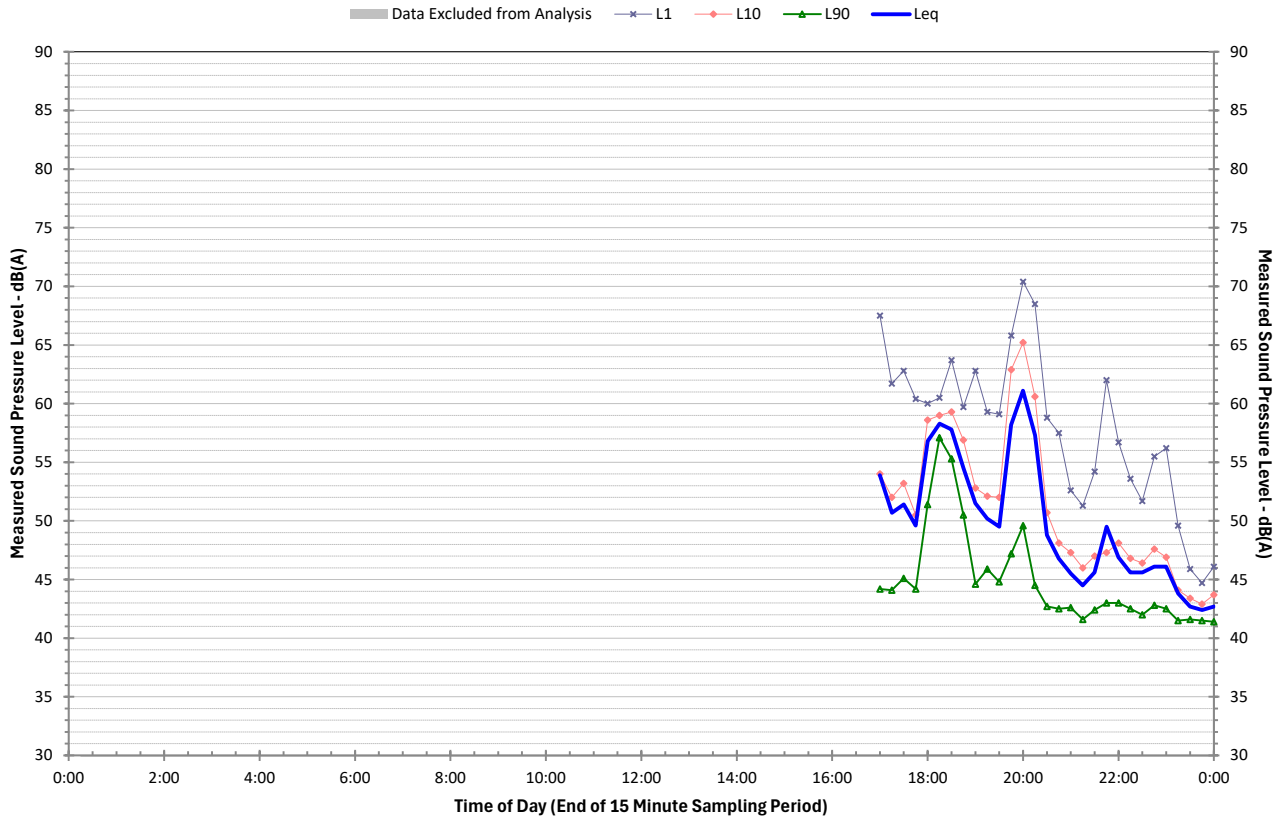
The noise survey data for the period Thursday the 19th of February to Thursday the 26th of February indicates that the L_{Aeq} long term measured noise levels in the vicinity of the paper mill exceeded the EPL criteria for day, evening, and night-time. The maximum (L_{A1}) recorded noise levels at each monitoring location averaged between about 60-65 dB(A), which also exceeded the EPL criteria of 55 dB(A) L_{Amax} at all receiver locations.

In summary the following conclusions have been drawn from the latest quarterly monitoring data:

- Several years of monitoring data consistently indicate that the ambient noise environment in the local area is a product of the combined influence of all noise sources within the Port Botany area including the Opal site when operational.
- The meteorological condition during the survey produced a wind vector from the west, which is likely to increase noise influences from all sources including Botany Road as well as other nearby industrial sources, to residences located to the east of the site.
- The most recent noise monitoring results indicate that the measured L_{Aeq} noise levels are generally like the median noise levels of the long-term series of data for corresponding seasonal measurement periods.
- The median L_{A90} night period noise levels were higher than the EPL criteria for all locations except R1.
- The L_{Amax} noise levels for the July monitoring period are consistent with L_{Amax} noise levels from previous surveys. The L_{A1} noise levels are also consistent with other monitoring periods.
- The L_{Aeq} and L_{Amax} noise levels recorded during the survey period are higher than the EPL criteria at the monitoring locations but are not related to the operation of the Opal site.

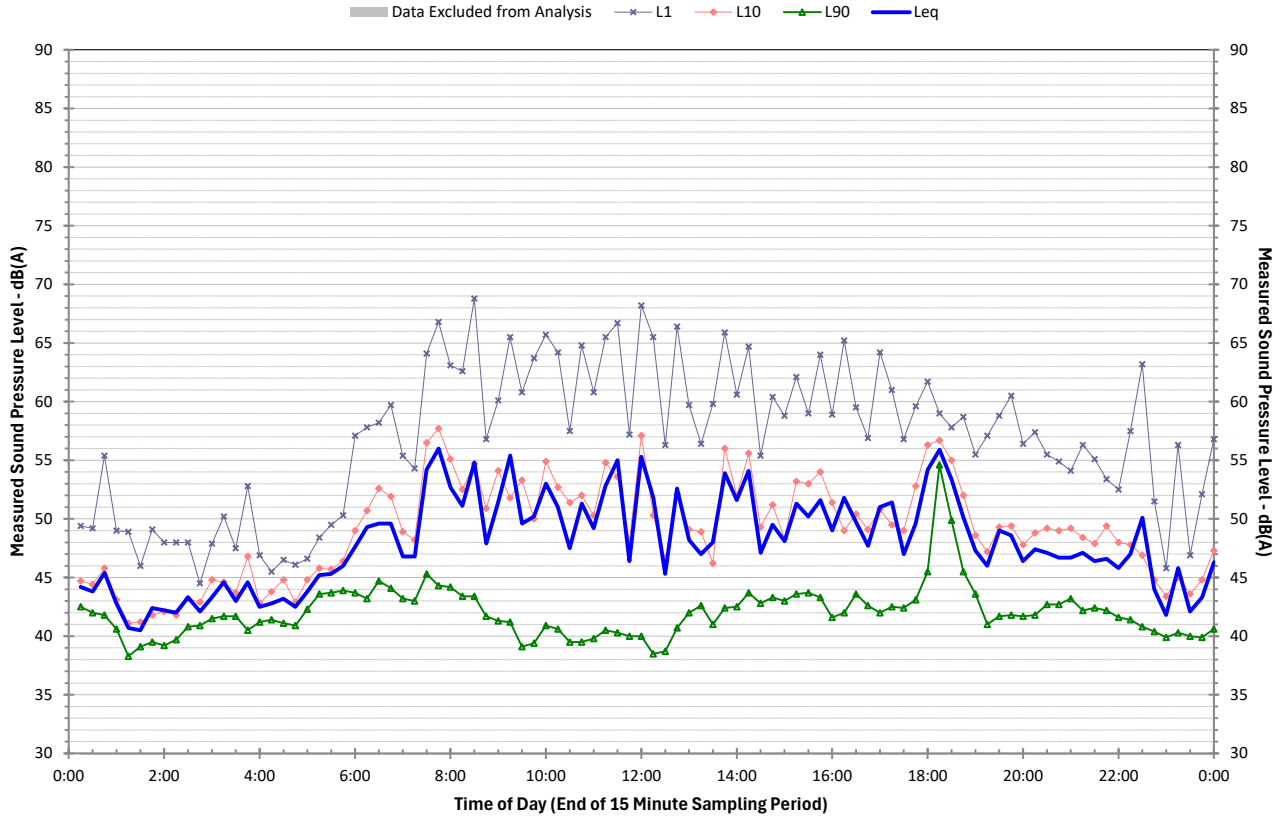
Appendix A. Noise Monitoring Data

Noise Monitoring Location 1 Thursday 19 February 2026

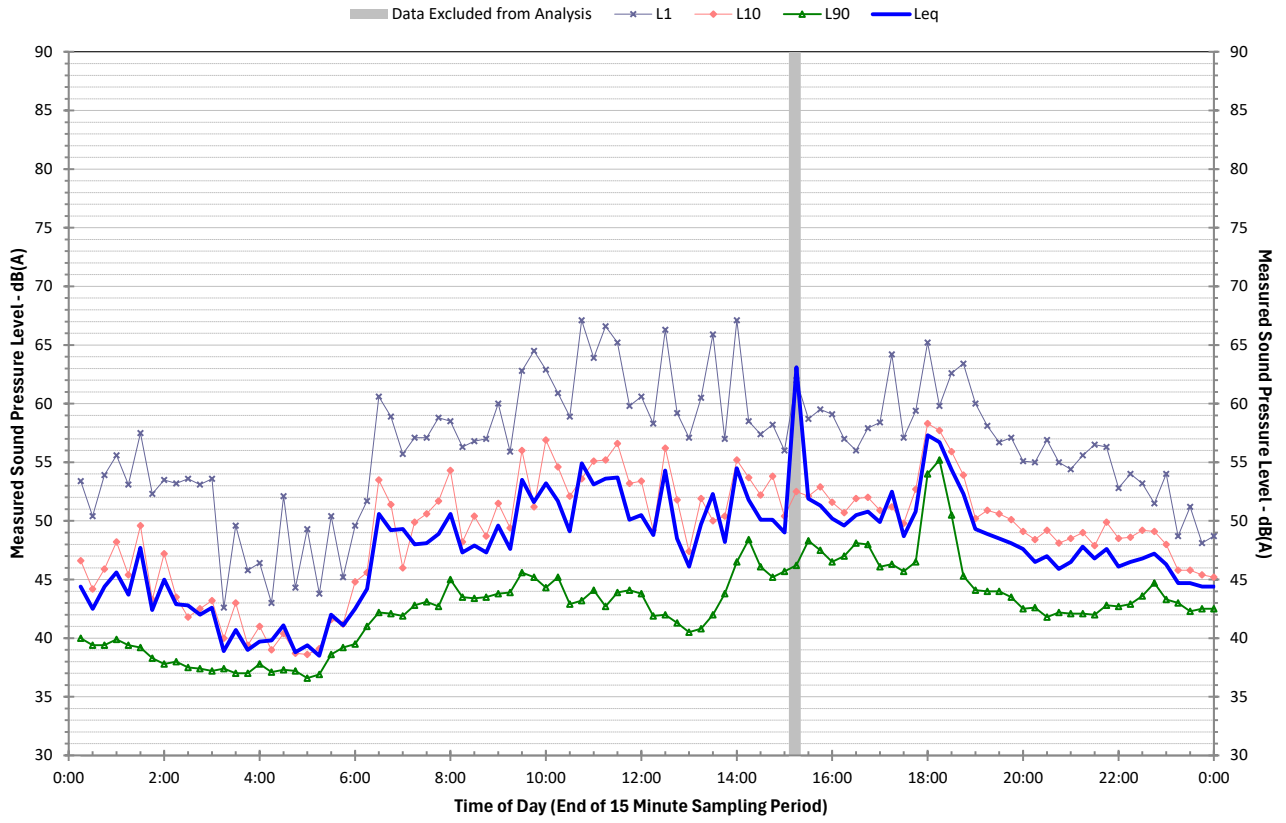


Noise Monitoring Location 1

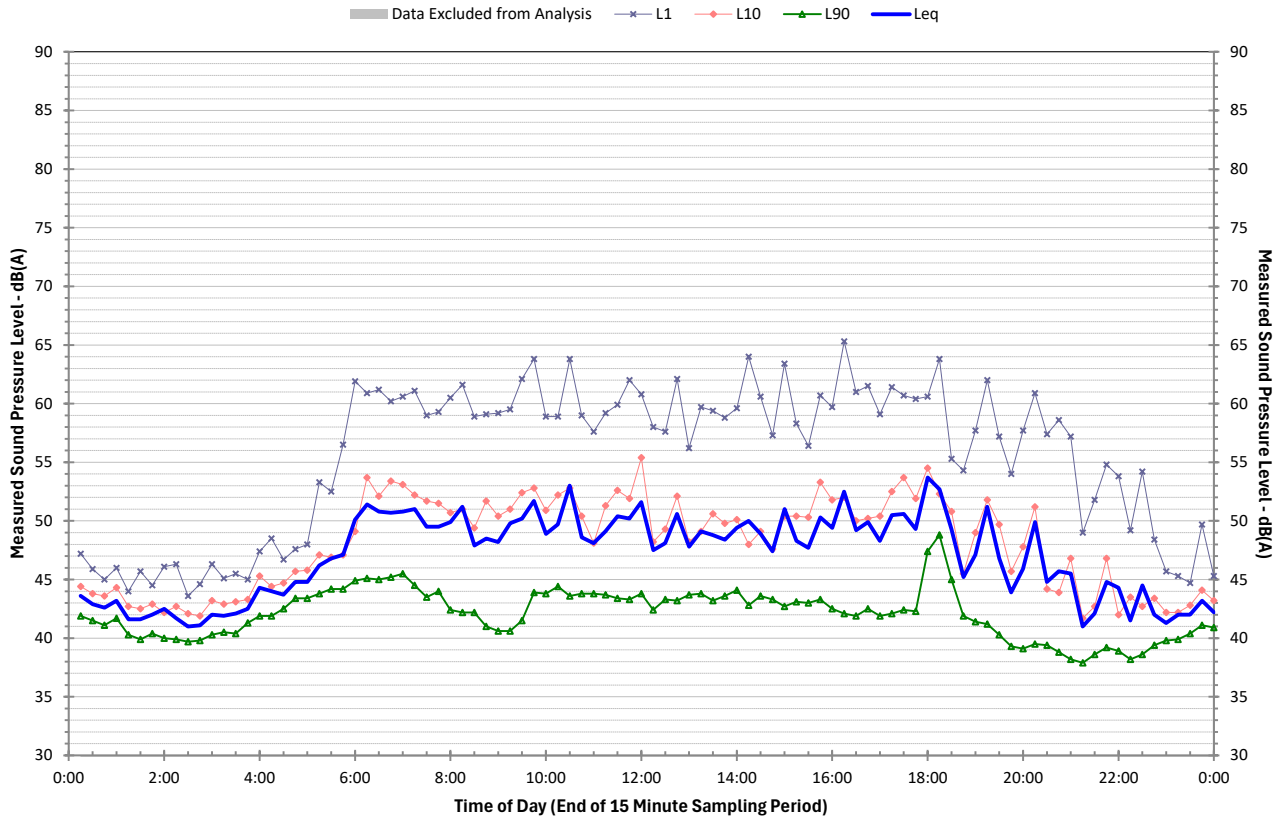
Friday 20 February 2026



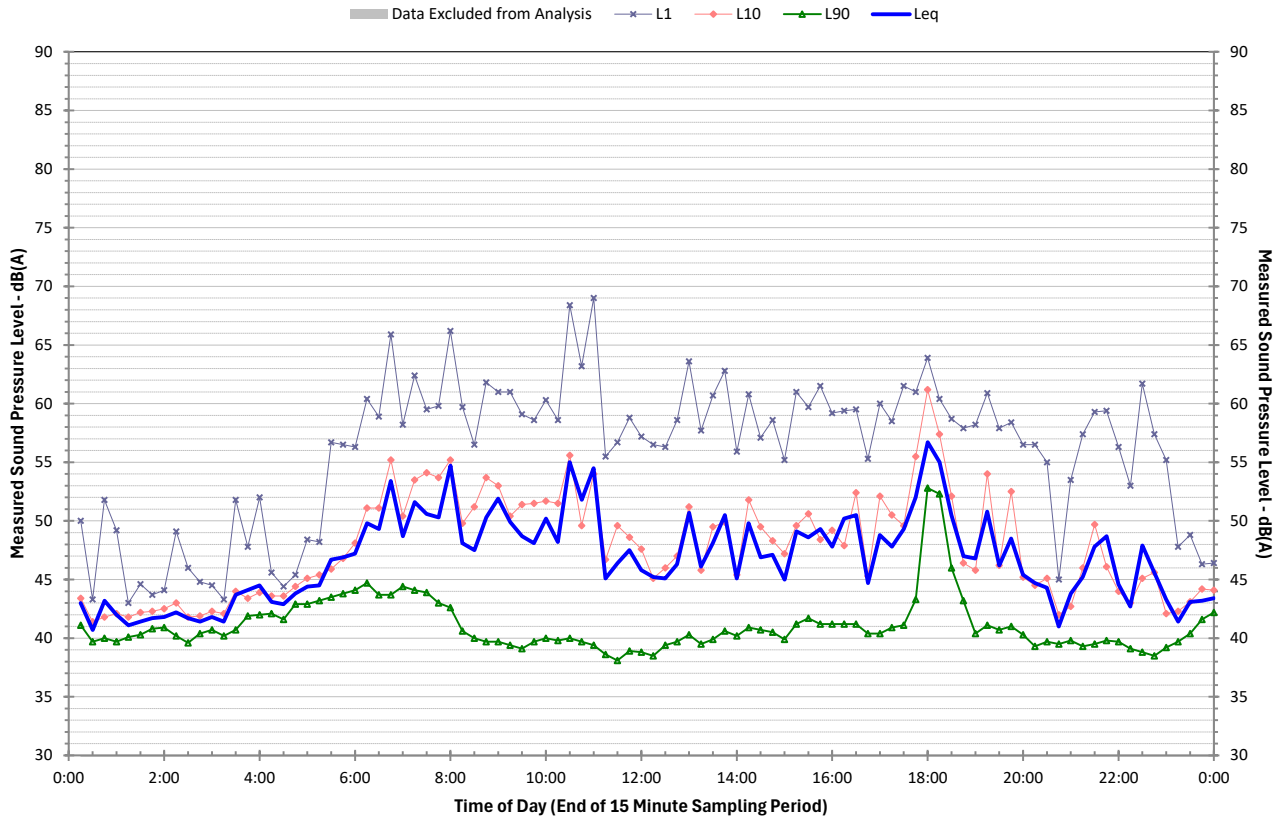
Noise Monitoring Location 1 Saturday 21 February 2026



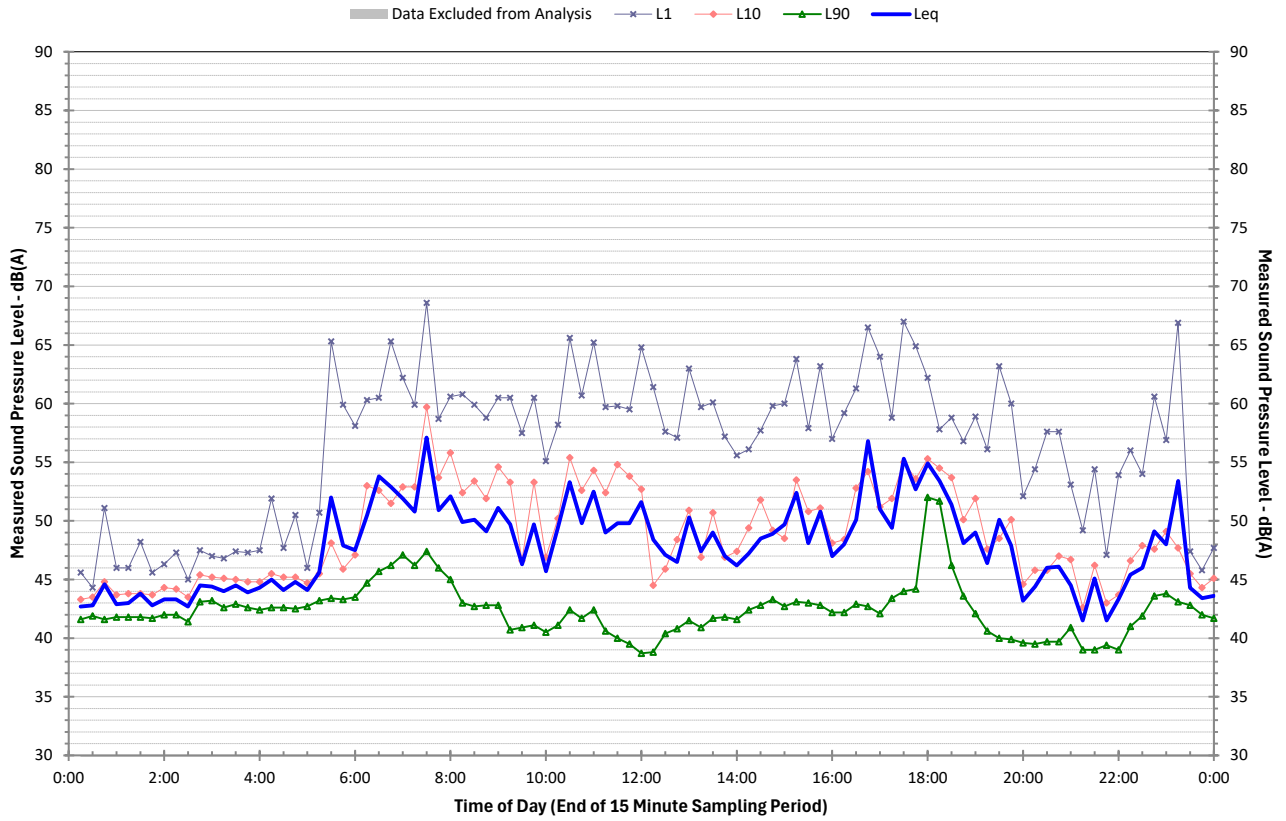
Noise Monitoring Location 1 Sunday 22 February 2026



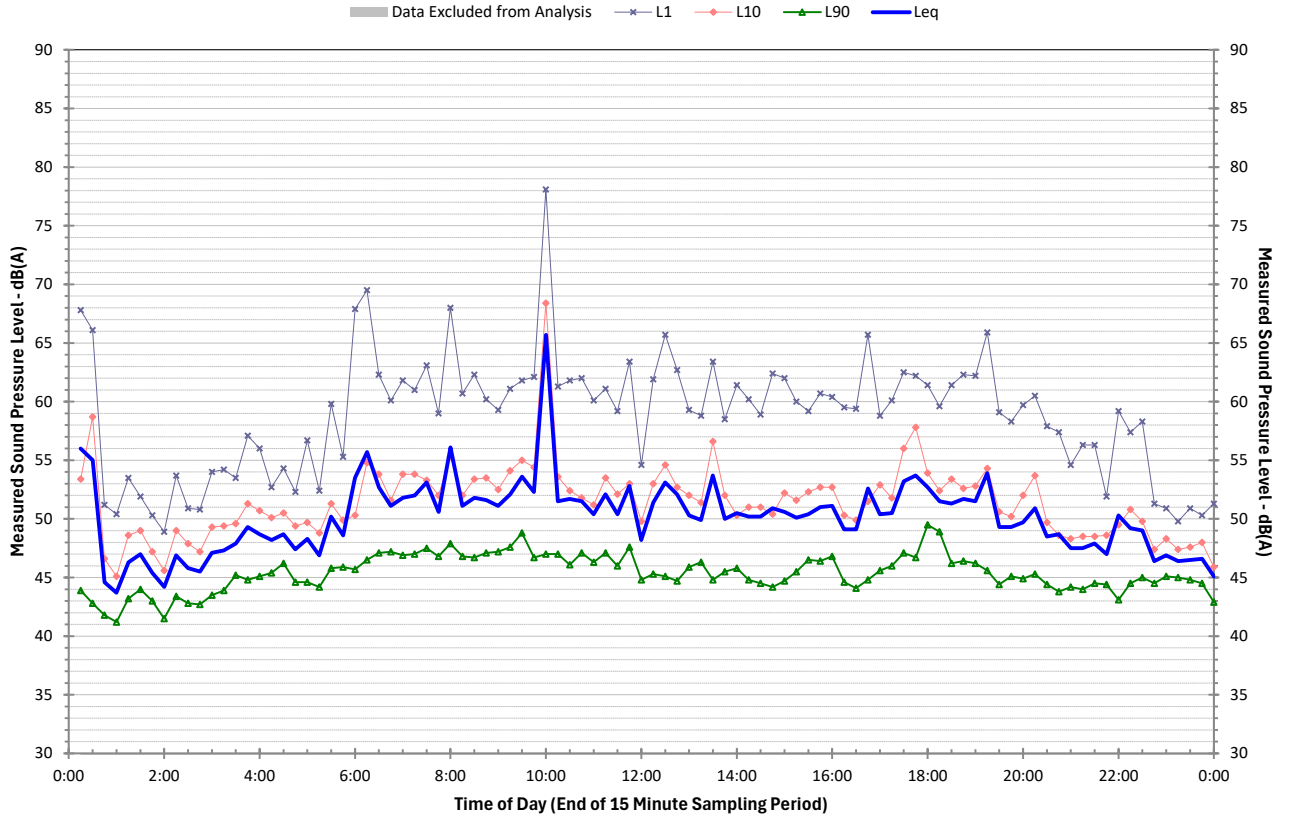
Noise Monitoring Location 1 Monday 23 February 2026



Noise Monitoring Location 1 Tuesday 24 February 2026

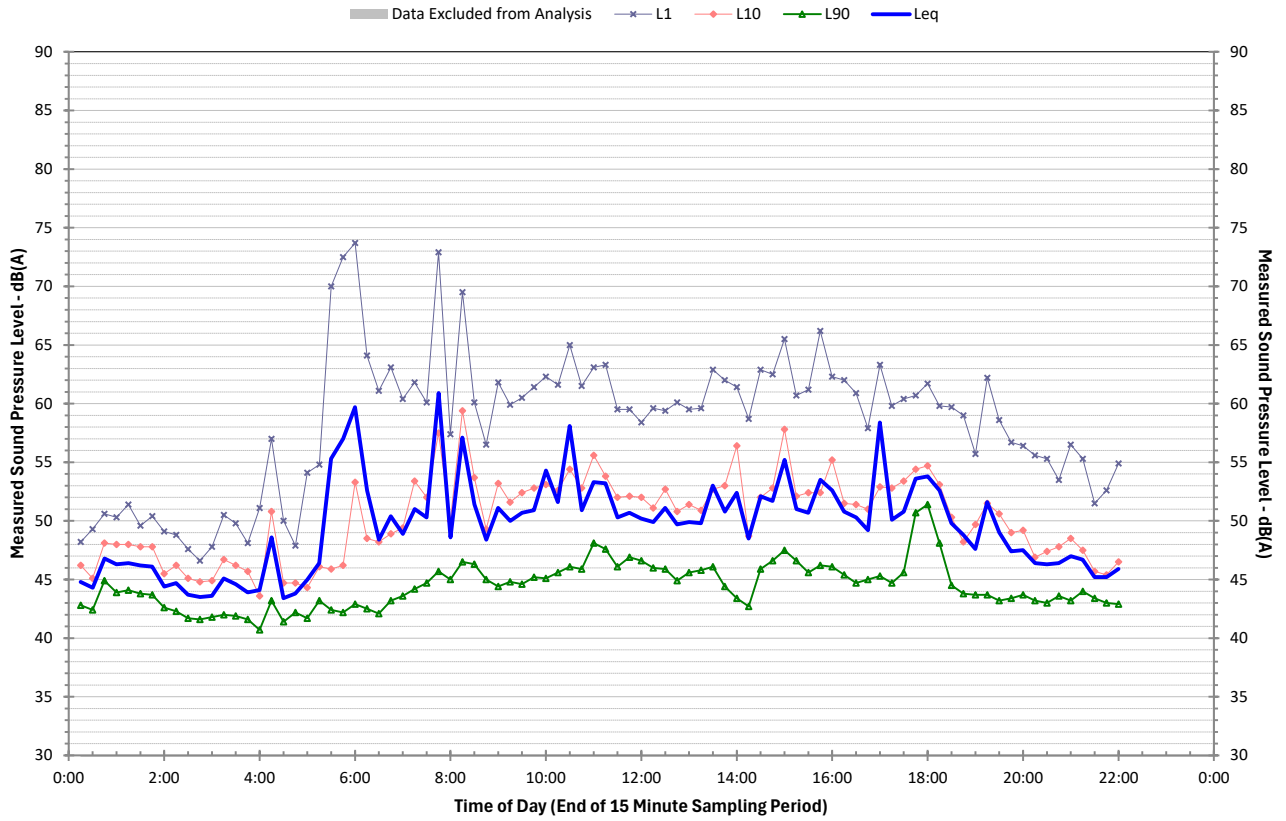


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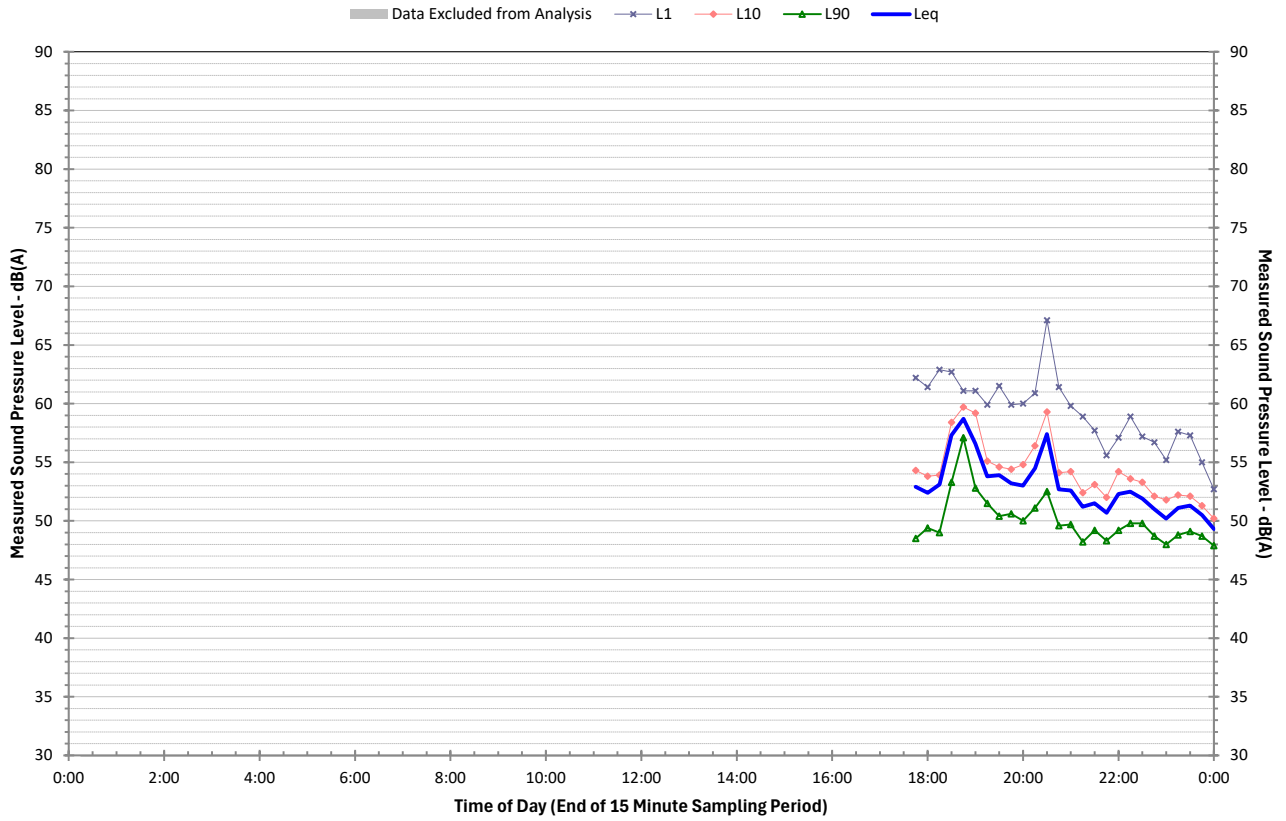


Noise Monitoring Location 1

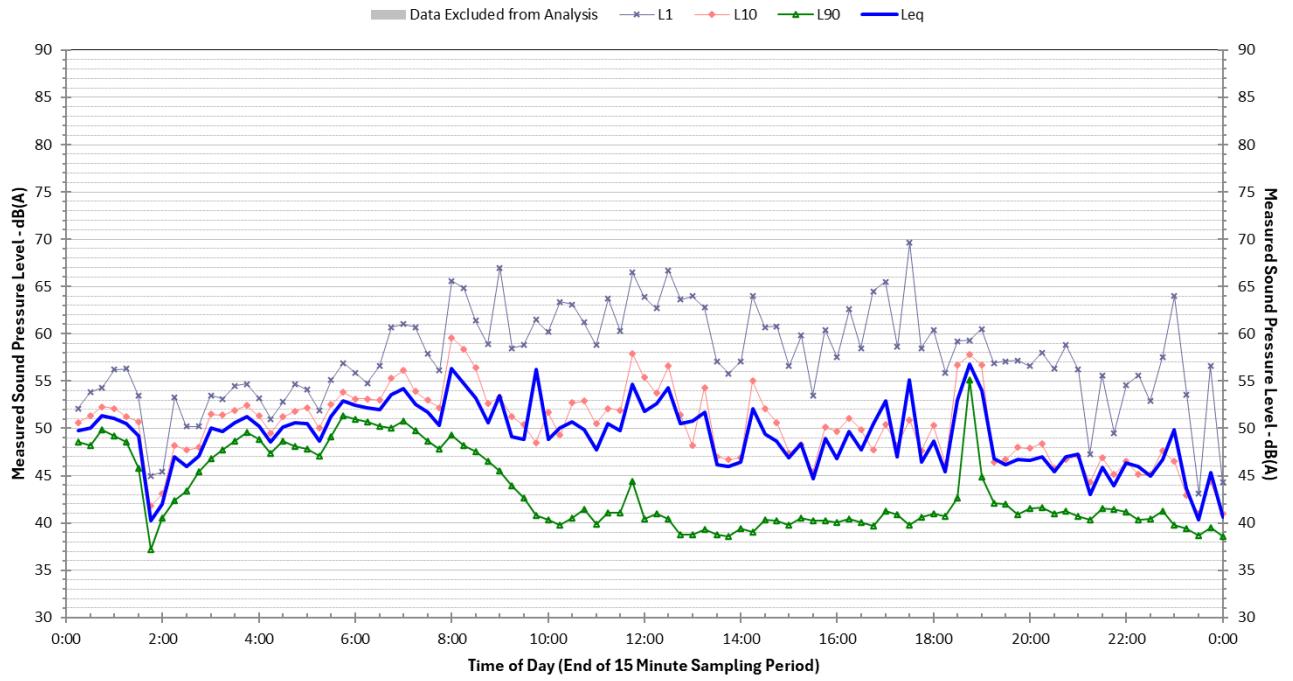
Thursday 26 February 2026



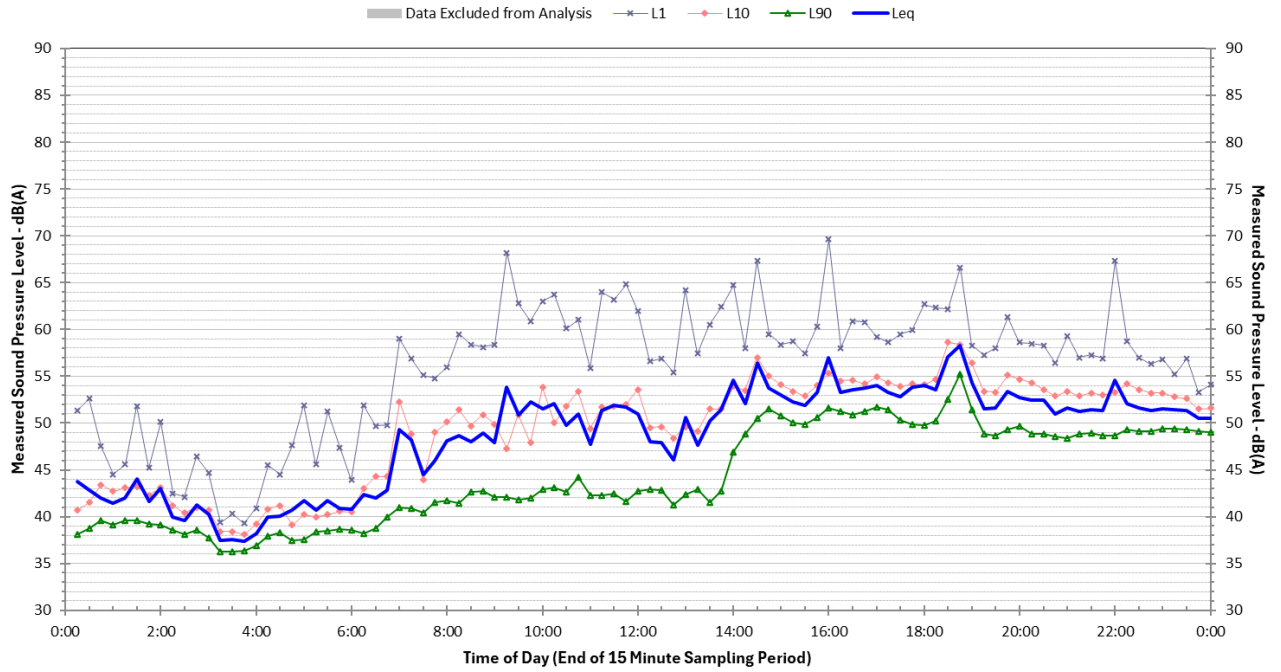
Noise Monitoring Location 2 Thursday 19 February 2026



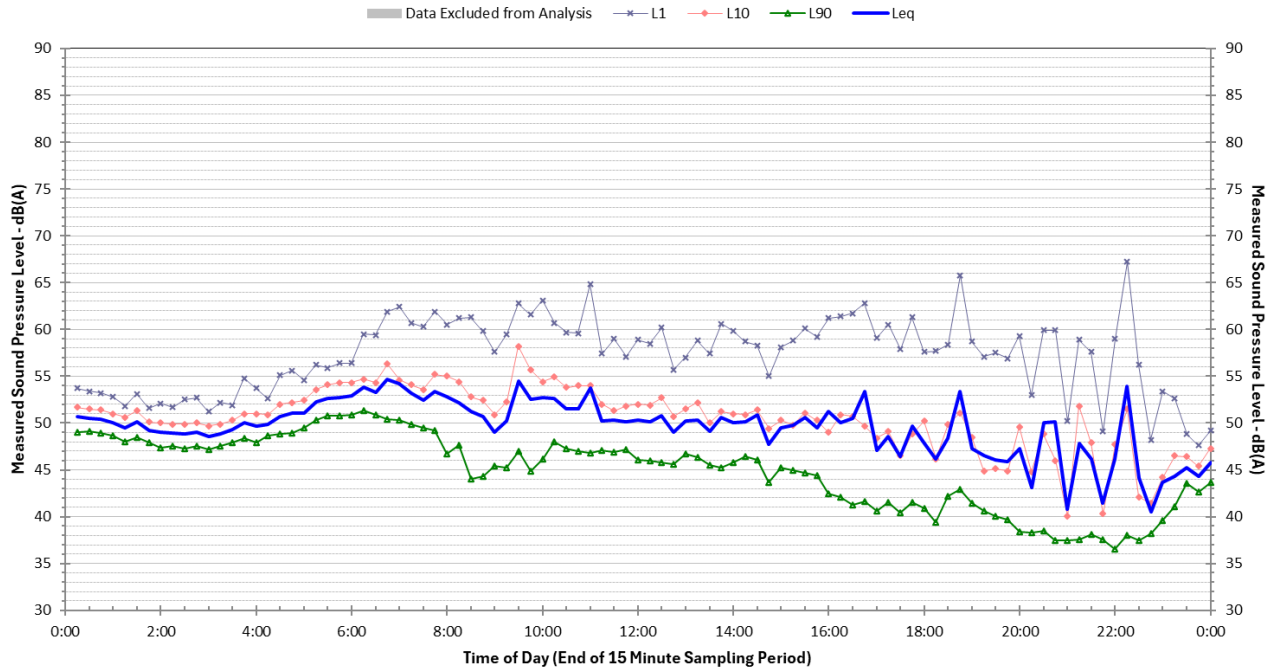
Noise Monitoring Location 2 Friday 20 February 2026



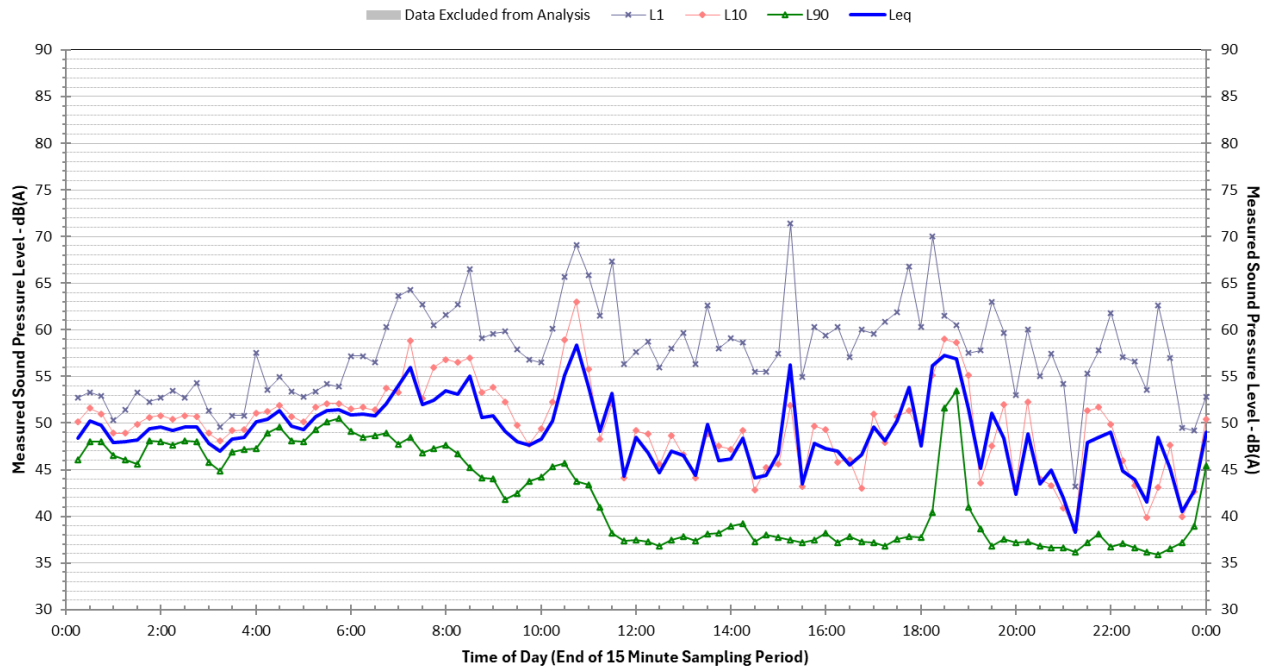
Noise Monitoring Location 2 Saturday 21 February 2026



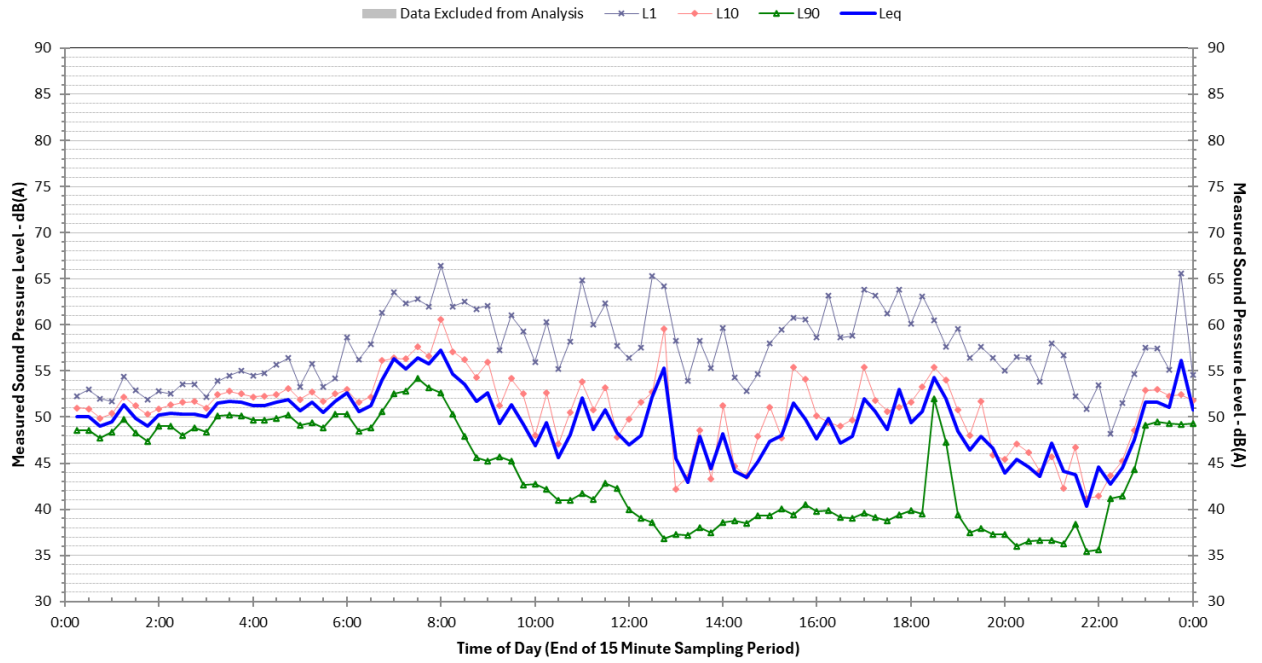
Noise Monitoring Location 2 Sunday 22 February 2026



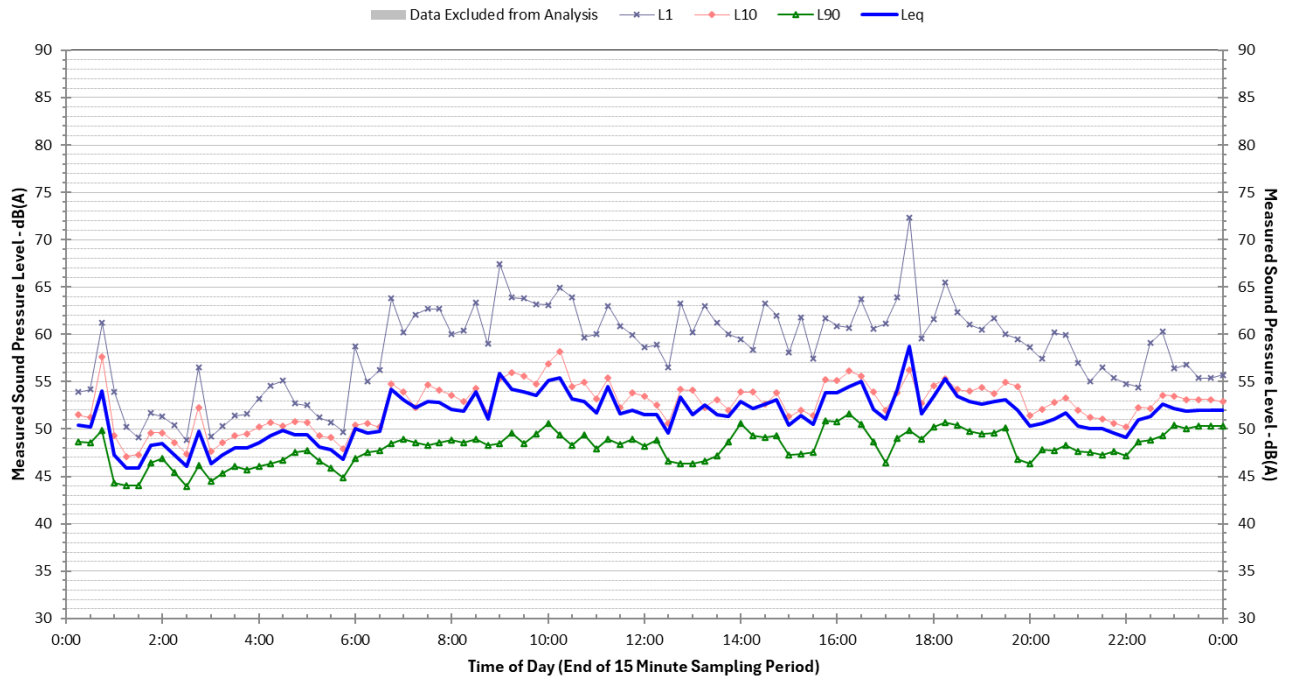
Noise Monitoring Location 2 Monday 23 February 2026



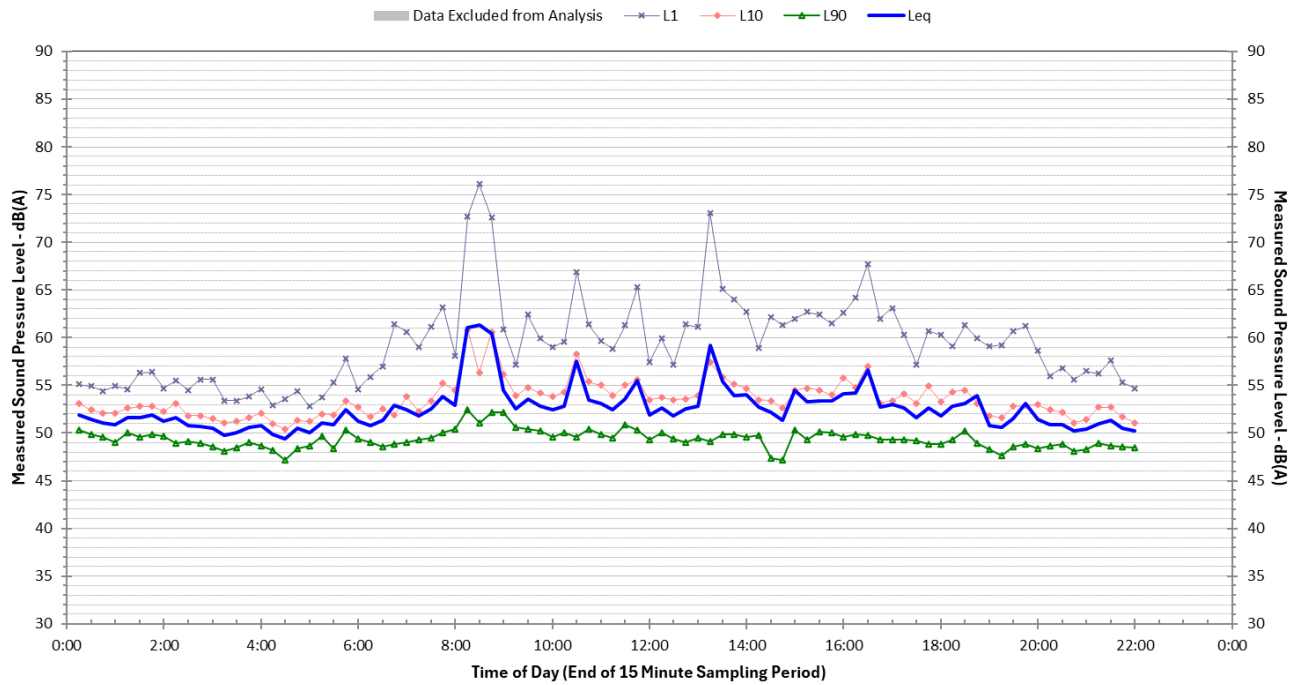
Noise Monitoring Location 2 Tuesday 24 February 2026



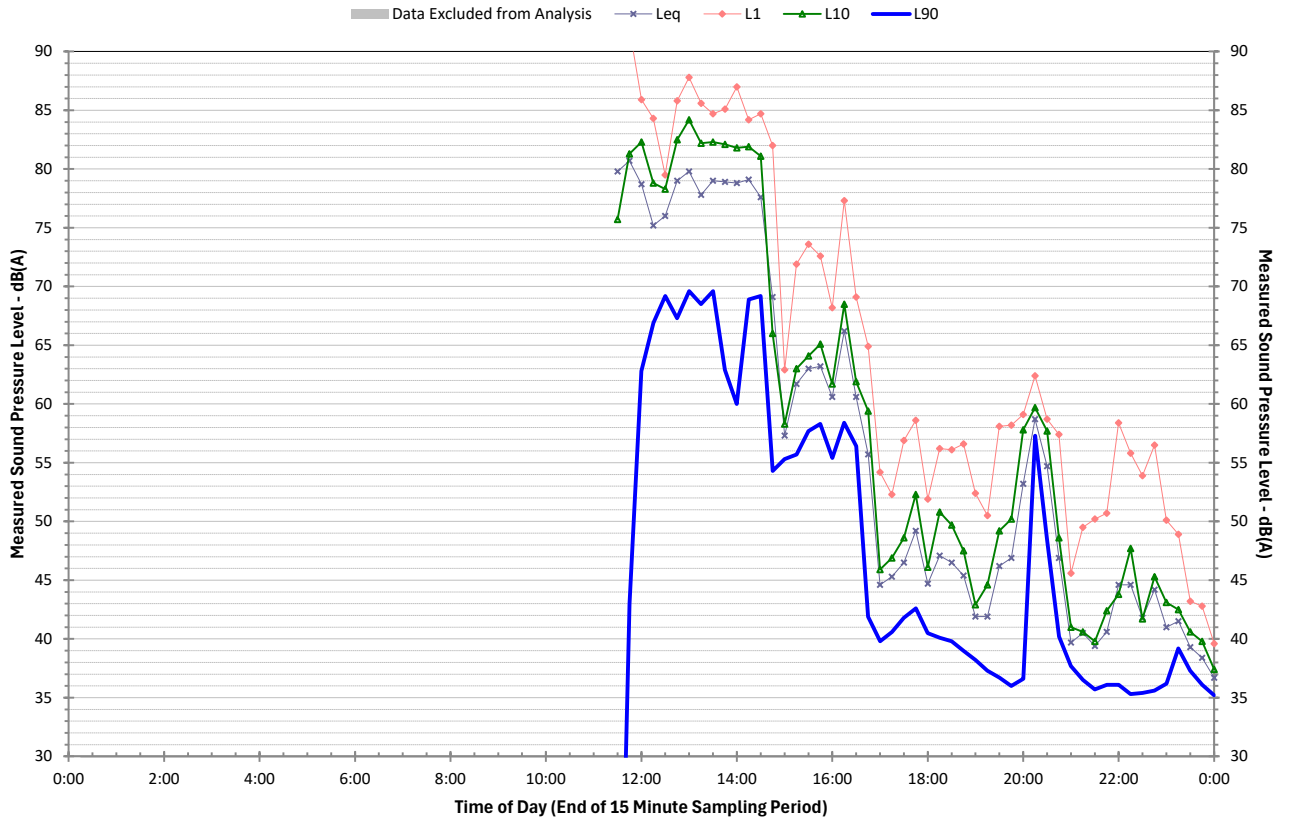
Noise Monitoring Location 2 Wednesday 25 February 2026



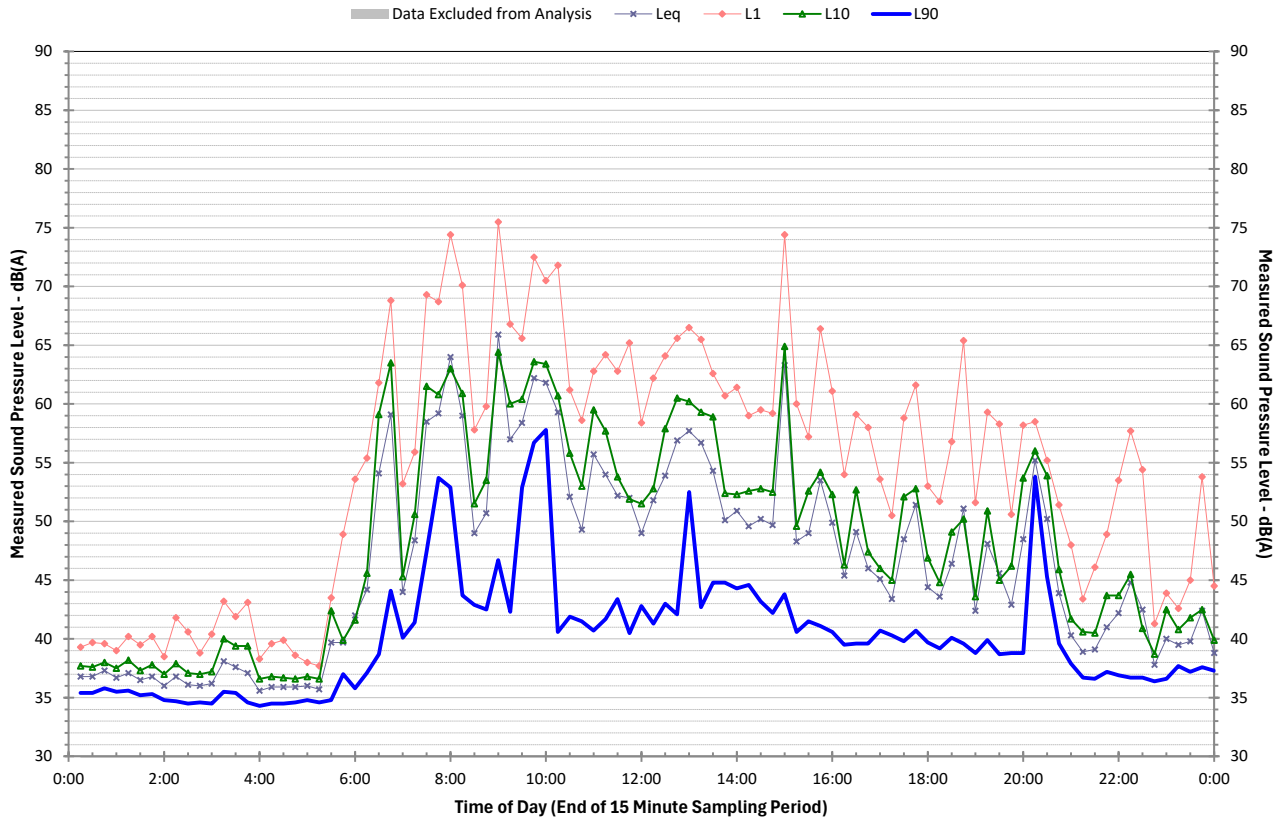
Noise Monitoring Location 2 Thursday 26 February 2026



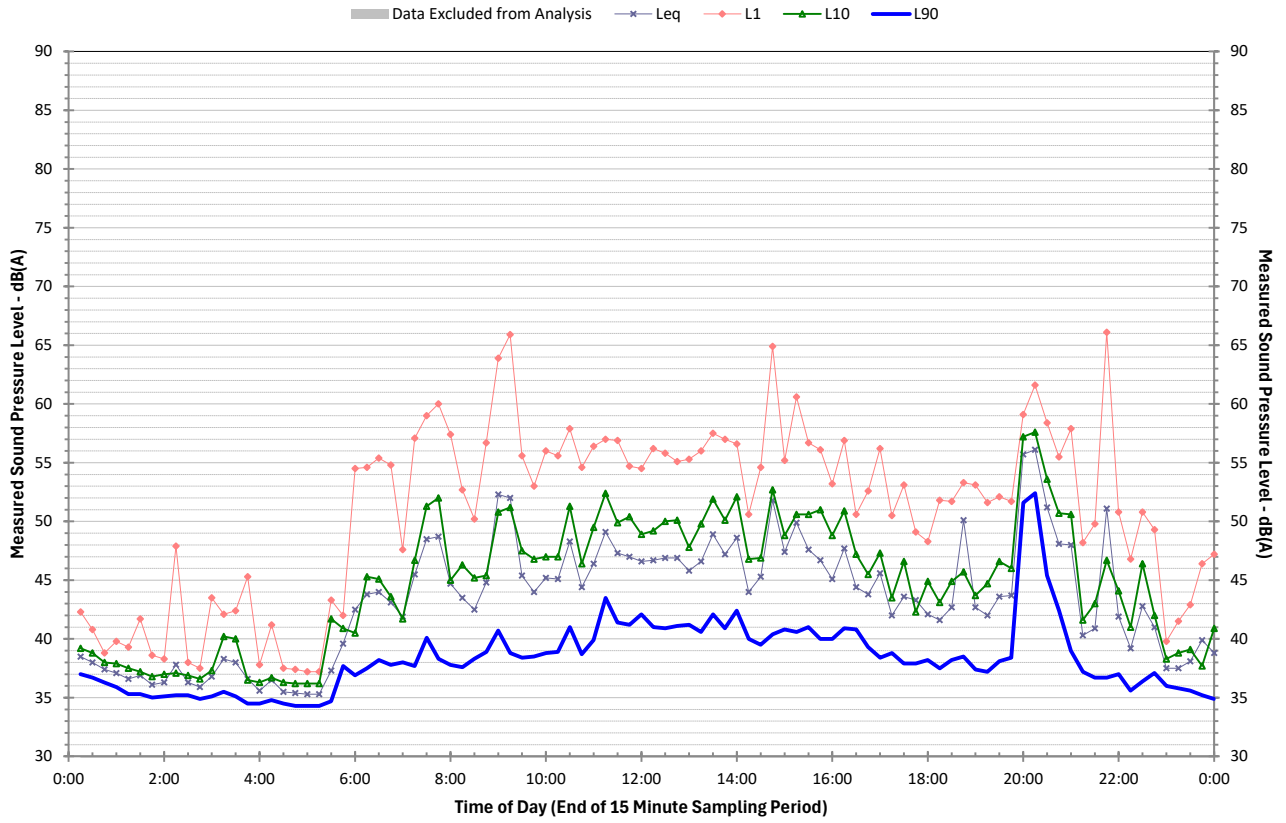
Noise Monitoring Location 5 Thursday 19 February 2026



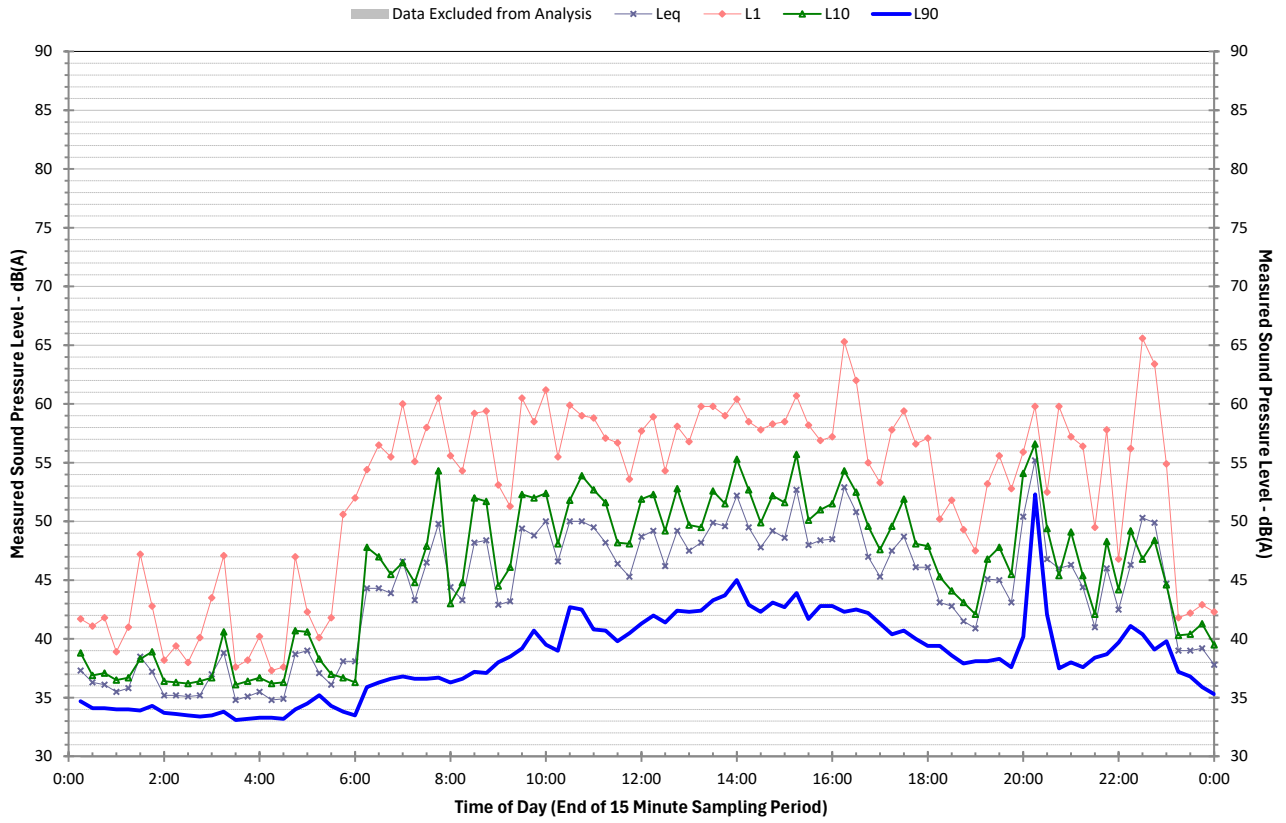
Noise Monitoring Location 5 Friday 20 February 2026



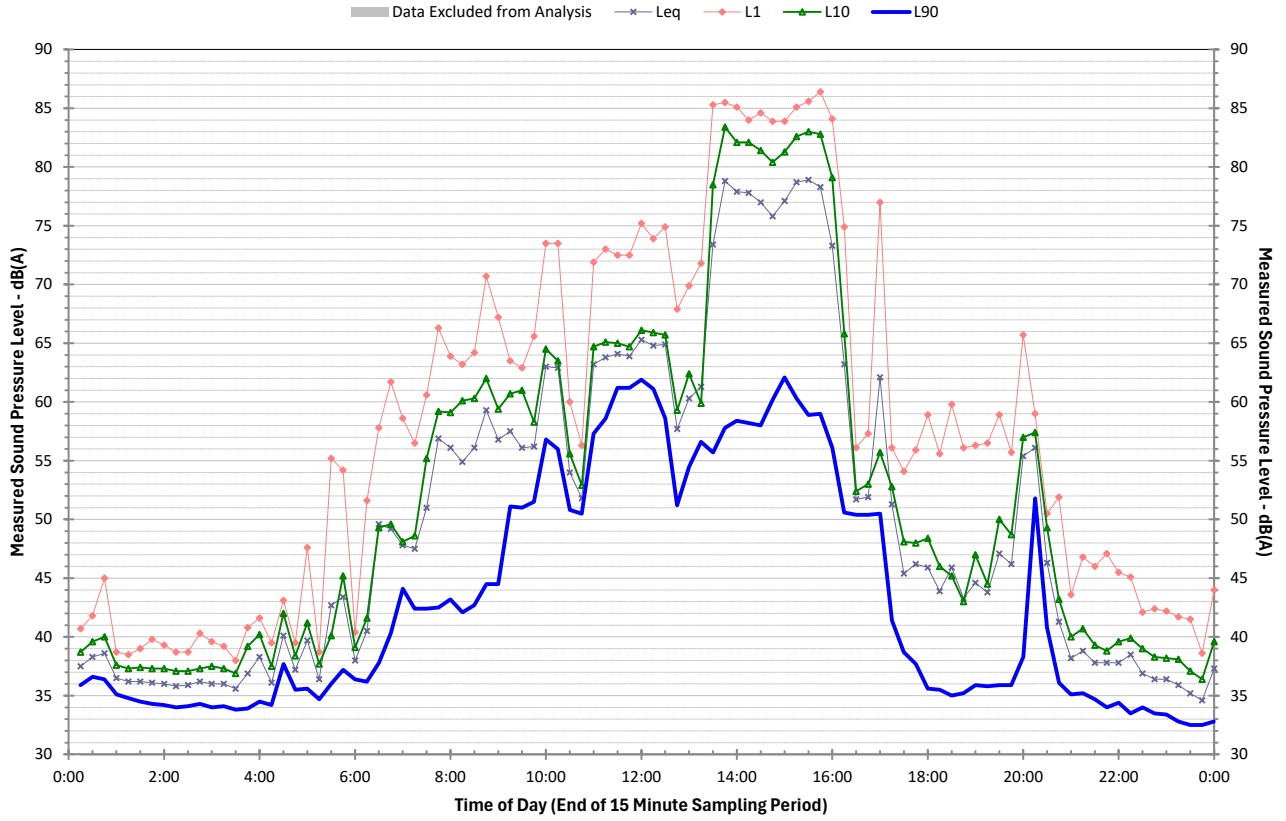
Noise Monitoring Location 5 Saturday 21 February 2026



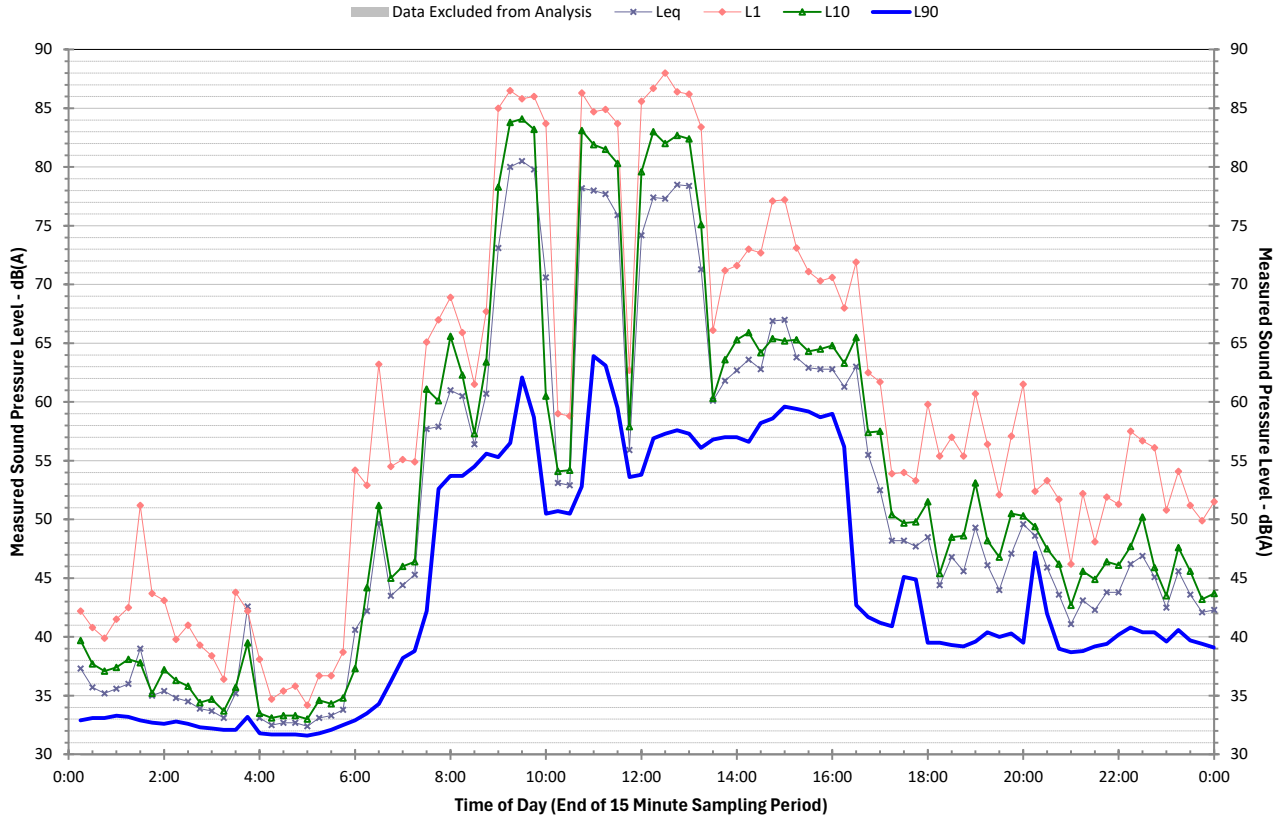
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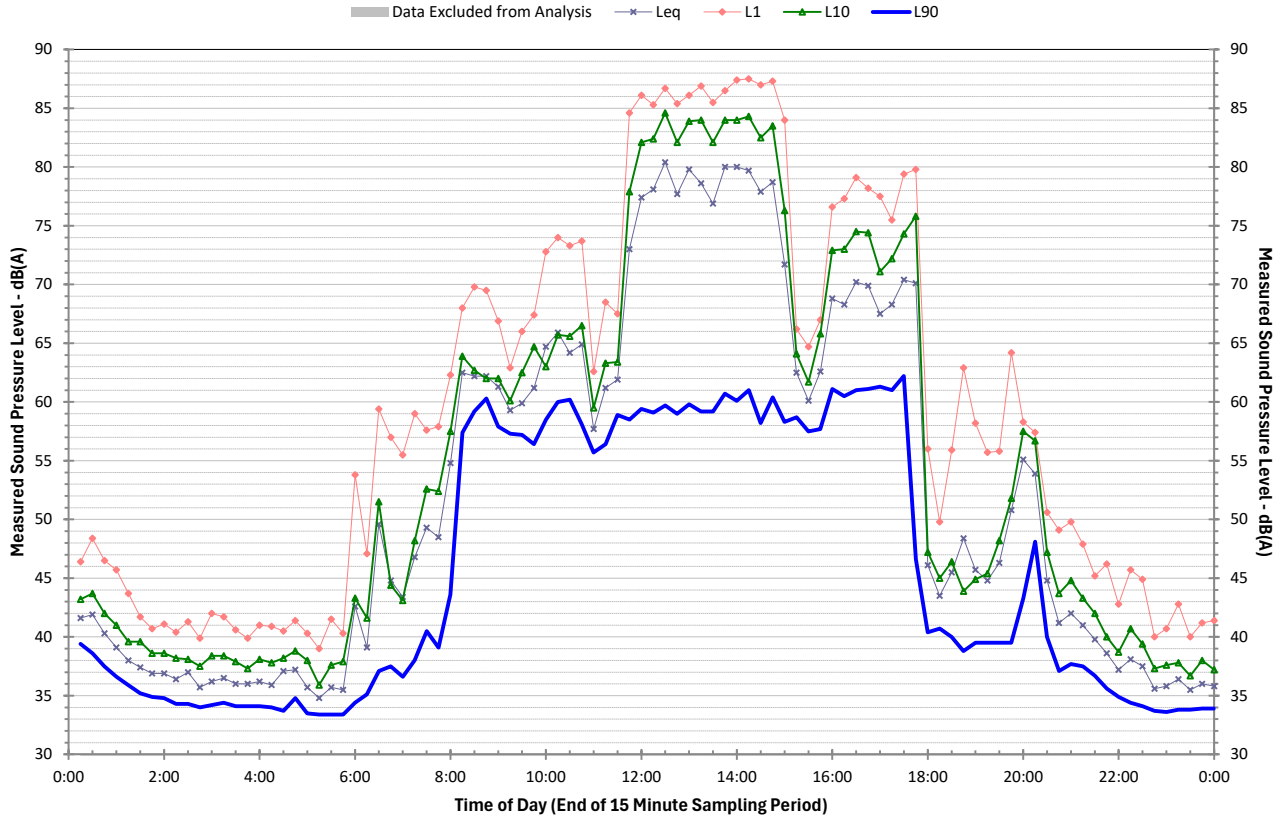
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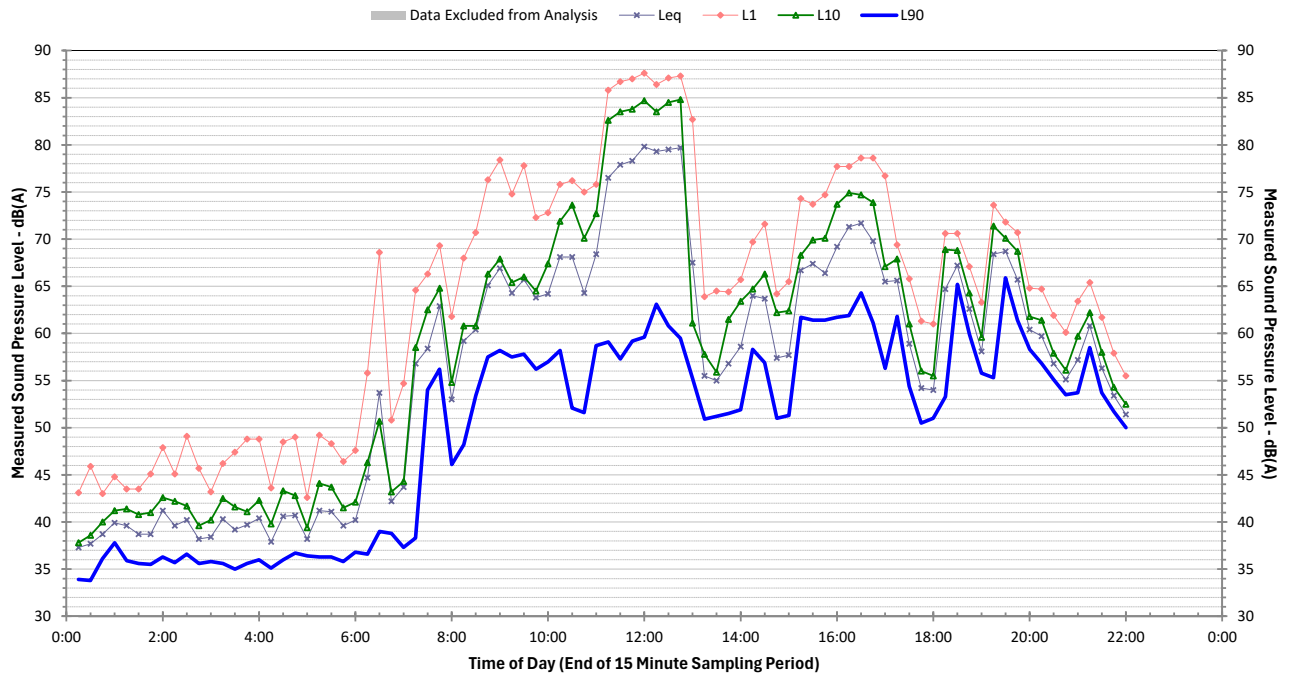
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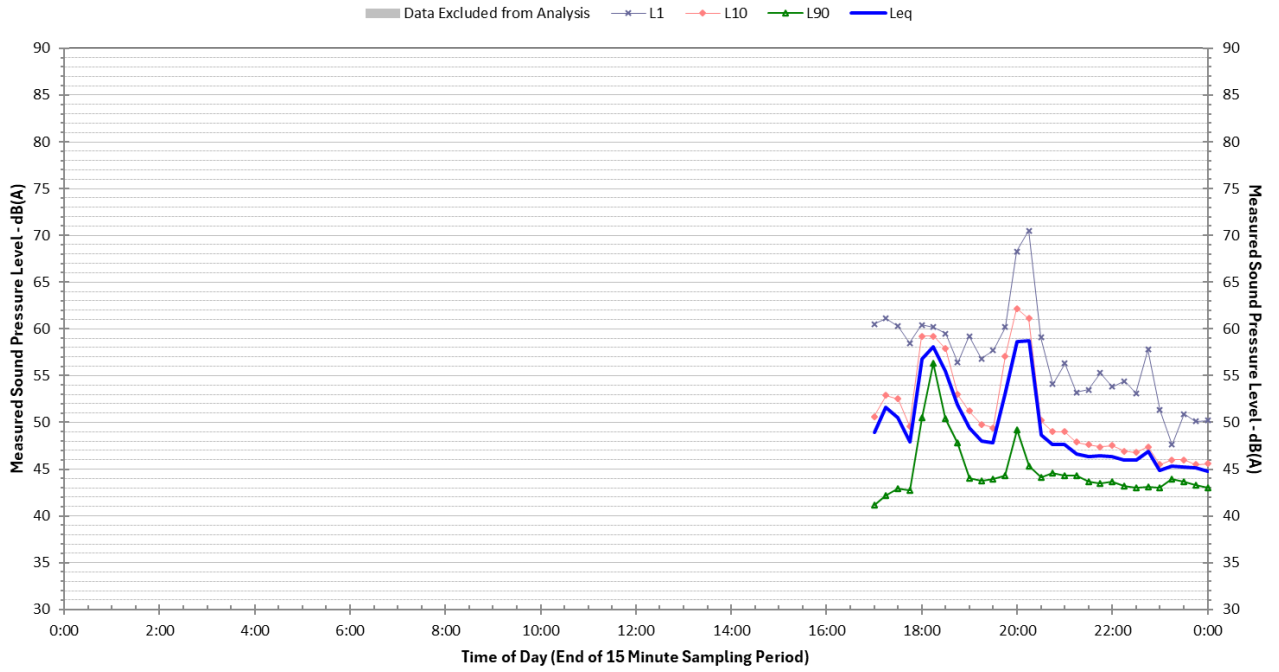
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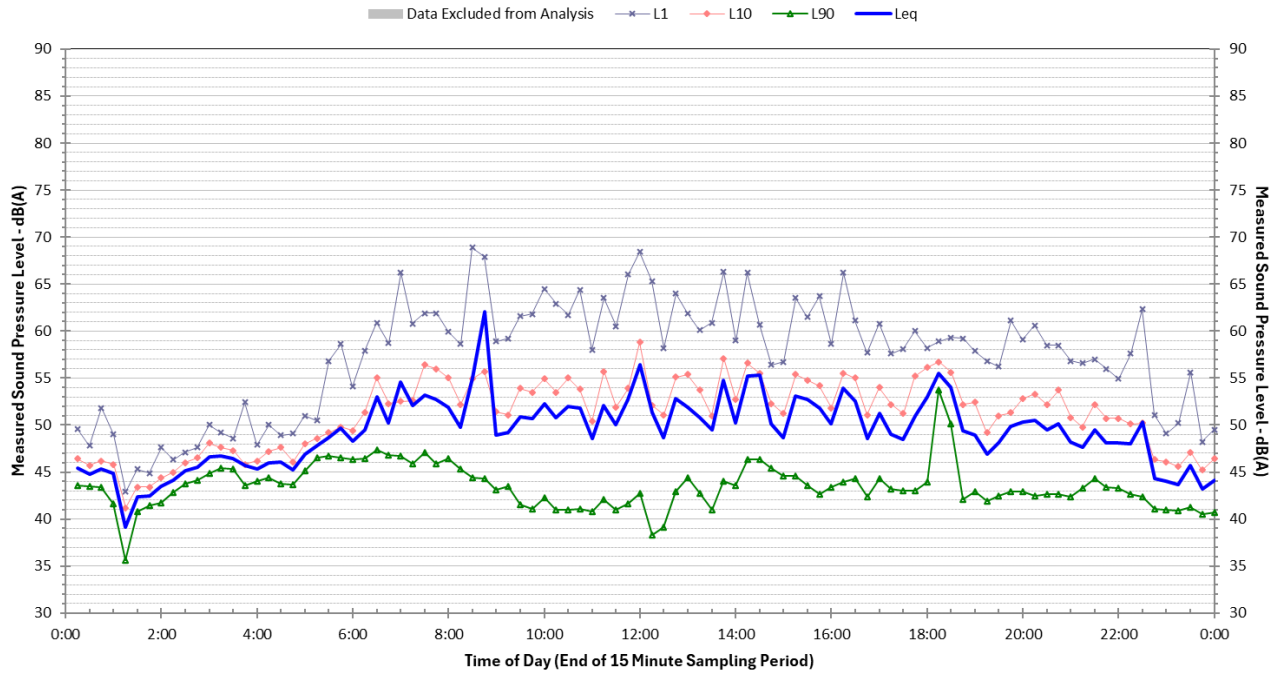
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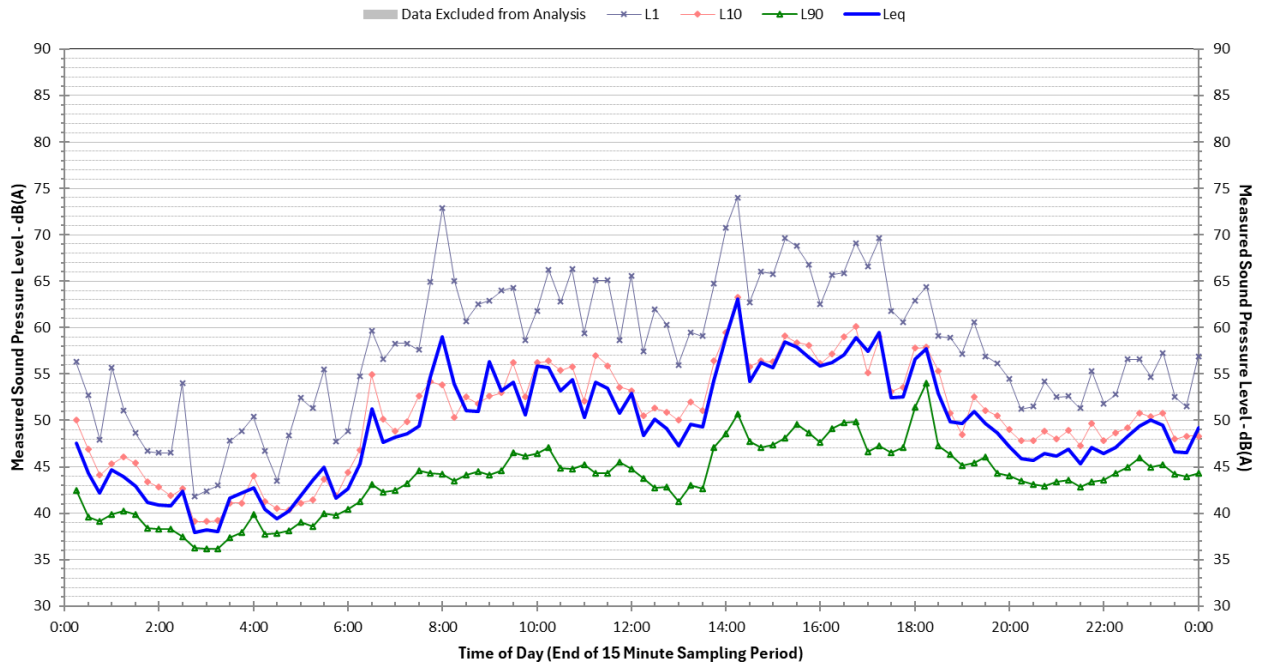
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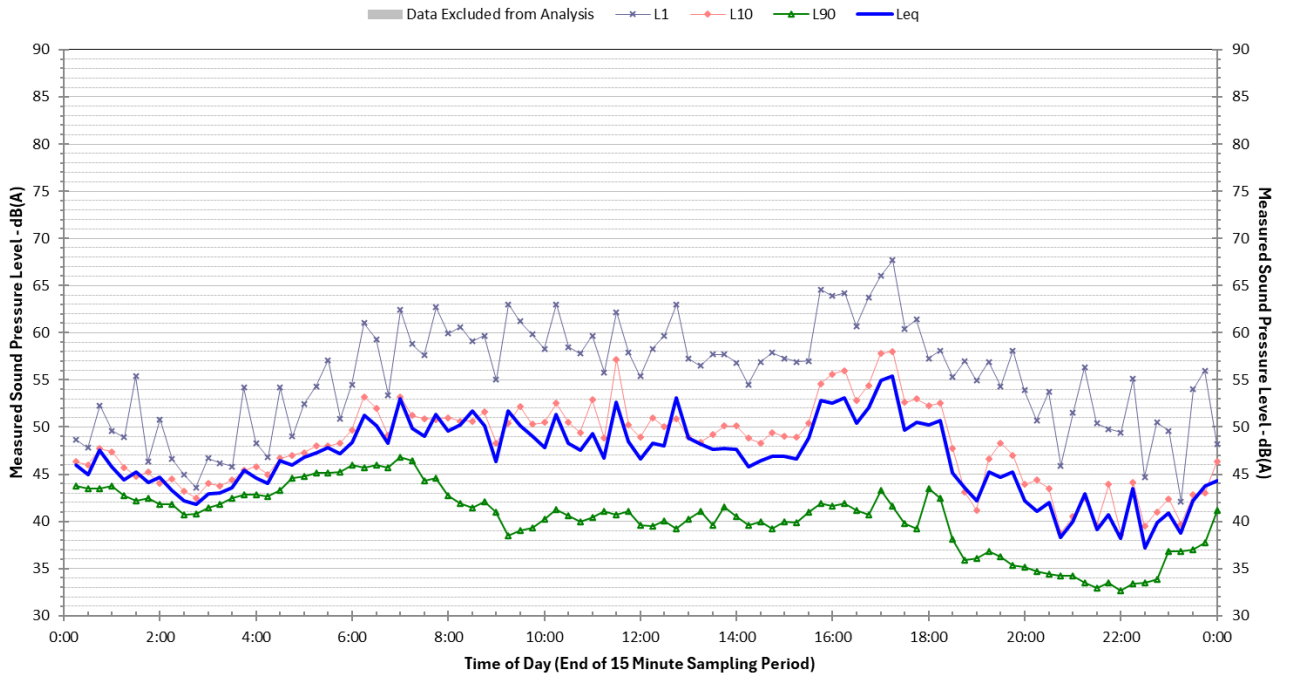
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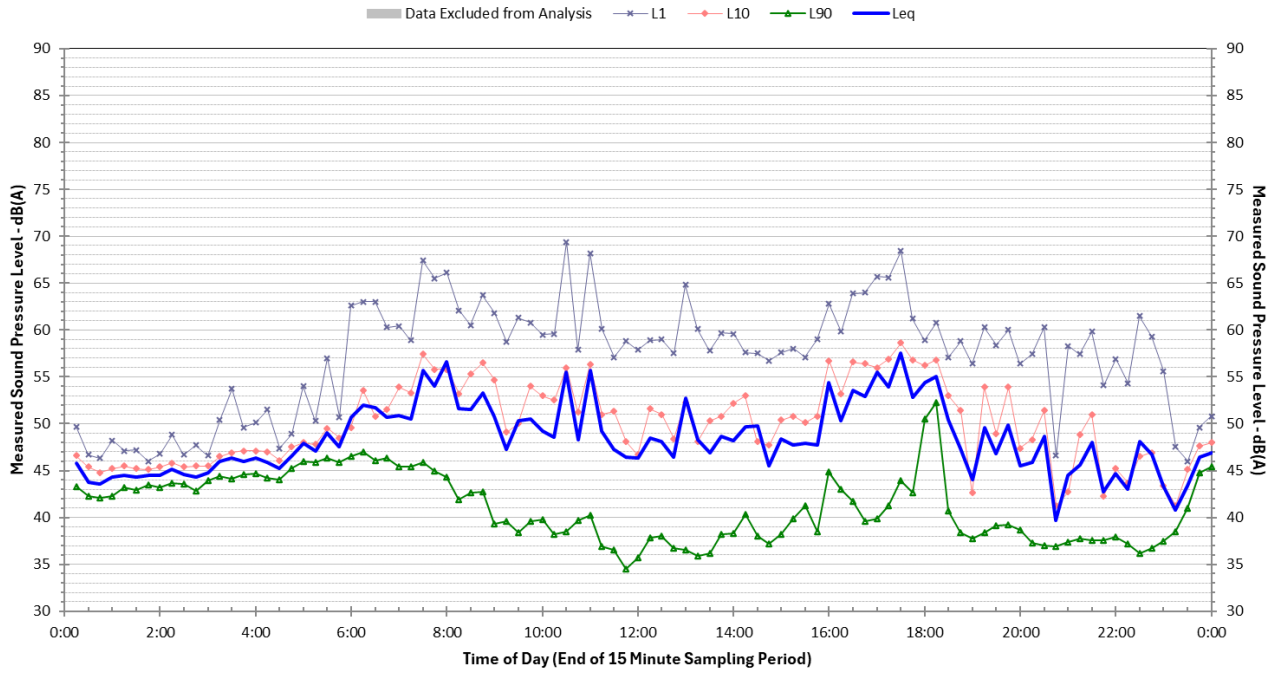
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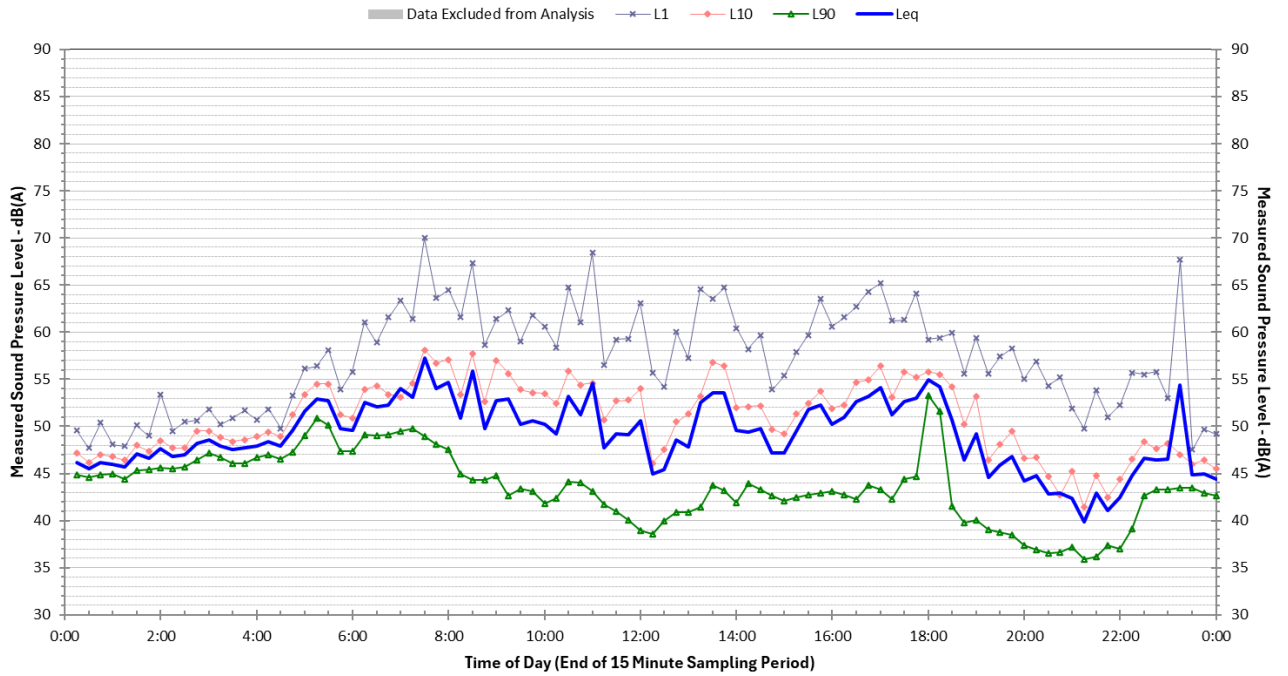
Noise Monitoring Location 6 Sunday 22 February 2026



Noise Monitoring Location 6 Monday 23 February 2026



Noise Monitoring Location 6 Tuesday 24 February 2026



Noise Monitoring Location 6 Wednesday 25 February 2026

