

20200376.3/0608A/R2/AW

6/08/2021

Fabcot Pty Ltd  
1 Woolworths Way  
BELLA VISTA NSW 2153  
AUSTRALIA

Attn: Michael Rumble

**Woolworths Customer Fulfillment Centre (CFC), 74 Edinburgh Road, Marrickville - Response to Submissions**

This letter has been prepared to address submissions in relation the proposed Woolworths Customer Fulfillment Centre at 74 Edinburgh Road, Marrickville. Submissions relating to noise have been received from NSW Planning, Inner West Council and the community.

Acoustic Logic Consultancy prepared a report in support of the proposed development (ref: 20200376.1/1510A/R2/WY, dated 15/10/2020), the *submitted acoustic report*, upon which the submissions relating to noise have been made. An updated report has been prepared to address a number of comments (ref: 20200376.1/0906A/R5/WY, dated 9/06/2021), the *updated acoustic report*.

Submissions relating to noise can generally be summarised as:

- Concerns around operational noise from the site, and in particular truck movements (both on site and on surrounding roadways).
- Establishment of appropriate noise criteria to surrounding land uses.
- The potential for sleep disturbance from operations.
- General clarification on the report and addressing technical matters in the assessment.

The submissions and corresponding responses are summarised in the below table.

## **Department of Planning Queries**

<b>Submission</b>	<b>Response</b>
<p>Noise criteria for non-residential receiver types are presented in Table 6-3 of the acoustic report. Noise criteria apply during business hours (i.e. when in use) for commercial and industrial premises. The acoustic report does not provide information on the time of use of nearby non-residential receivers.</p> <p>Please provide clarity around whether operational noise should be assessed at non-residential receivers across all time periods (day, evening and night).</p>	<p>The NSW EPA Noise Policy for Industry (NPI) requires that noise emission goals at non-residential receivers be met when those premises are in use. When not in use, specific noise emission requirements would not apply at these locations (noting that residential noise limits apply at all times).</p> <p>Notwithstanding, Table 7-5 of the updated acoustic report indicates that relevant noise emission levels are able to be achieved at surrounding commercial/industrial properties during all times of use.</p>
<p>Based on the architectural plans, the development comprises 32 loading bays, including 10 large articulated vehicle loading bays and 22 small rigid truck loading bays. However, this level of detail is not reflected in the acoustic report as all truck types were assumed to be acoustically similar under Section 7.3 of the report.</p>	<p>Refer to Sections 7.2 and 7.3 of the updated acoustic report. Further detail has been provided on operational noise sources and associated noise levels.</p>
<p>In addition, assumptions made for carpark noise in Section 7.2 of the acoustic report appear to have only considered passenger vehicles, despite there being two separate parking areas for both passenger vehicles and small rigid trucks.</p>	<p>The northern carpark (adjacent to Edinburgh Road) is intended for use by passenger vehicles only. Parking facilities for home delivery vans are located at the rear of the development above the loading docks. Notwithstanding delivery vehicles returning to park present a lower potential level of noise impact (as compared to loading/unloading activities), this has been included as part of the modelled operational noise levels from site. Refer to Sections 7.2 &amp; 7.3 of the updated acoustic report for detailed modelling and operational assumptions.</p>
<p>Section 7.3 of the acoustic report is unclear about the hours of operation and the assumptions made around typical truck movements, which creates uncertainty in the noise management and mitigation measures needed to address night-time noise impacts.</p>	<p>Refer to Sections 7.2 and 7.3 of the updated acoustic report. Further detail has been provided on proposed/assumed operational scenarios. This includes night time use of the facilities, particularly between 5am – 7am.</p>

Submission	Response
<p>Section 7.3 of the acoustic report (Loading Dock and Waste Collection) assumed a single sound power level value of 100 dB(A) to represent noise emissions from a variety of scenarios corresponding to heavy vehicle movements, loading activities and waste collection. The oversimplification of modelling parameters is unlikely to result in accurate operational noise predictions.</p>	<p>Refer to Sections 7.2 and 7.3 of the updated acoustic report. Further detail has been provided on operational noise sources and associated noise levels.</p>
<p>There is insufficient information in the acoustic report to verify if heavy vehicle movements have been modelled appropriately. For example, the duration of noise exposure at a receiver location is sensitive to vehicle passage speed. However, there is no mention of heavy vehicle speed in the acoustic report, nor a delineation between large articulated vehicles and small rigid trucks.</p>	<p>Refer to Sections 7.2 and 7.3 of the updated acoustic report. Further detail has been provided on operational noise sources and associated noise levels.</p>
<p>Please clarify the reference source for this assumed sound power level and provide supporting evidence if derived from measurements.</p>	<p>Section 7.3.1 of the updated acoustic report details noise levels used in the assessment. Modelled noise levels have been based on the US FHWA TNM 2.5 technical model, measurements of current Woolworths delivery trucks, and noise data previously obtained from similar developments.</p>
<p>The acoustic report must objectively account for acceleration, reversing, materials delivery, handling and processing as separate noise sources in the operational noise model.</p>	<p>Refer to Sections 7.2 and 7.3 of the updated acoustic report. Further detail has been provided on operational noise sources and associated noise levels.</p>
<p>The acoustic report must also specify the assumed passage speeds for all heavy vehicle manoeuvres.</p>	<p>Refer Sections 7.3.1 and 7.4 of the updated acoustic report. On site heavy vehicle movements have been modelled as travelling at 10km/h, and off site vehicle noise (for the assessment of the potential for traffic noise increase) in line with the methodology provided in the US FHWA TNM Technical Model 2.5.</p>
<p>There appears to be no evidence of an objective assessment that demonstrates the modifying factors outlined in Factsheet C of the Noise Policy for Industry (EPA, 2017) have been considered in the acoustic report.</p>	<p>Refer Section 7.5.1 of the updated acoustic report. Based on the predicted noise levels at receivers, modifying factors outlined in Factsheet C of the NPI are not applicable in this instance.</p>

Submission	Response
<p>The acoustic report needs to include tests for low frequency content, tonality and impulsivity for all assessment time periods as well as the intermittency test for activities undertaken during the night-time period and apply any relevant modifying factors to assess operational noise impacts in accordance with the Noise Policy for Industry.</p>	<p>The nominated tests are considered as part of Factsheet C in the NPI. As described above and within the updated acoustic report, modifying factors are not required to be applied to the predicted noise levels. Note also that the NPI does not provide a correction for impulsive noise (as opposed to the superseded Industrial Noise Policy).</p>

### **Inner West Council Submission**

Submission	Response
<p>The proposal seeks consent for 24-hour operation 7 days a week and is located within close proximity of sensitive residential receivers. The potential acoustic impacts from the proposed operations needs to be closely assessed and controlled as part of the current application to ensure minimal impacts for the locality and community.</p>	<p>The updated acoustic report presents an assessment of noise emissions from the proposed operation of the facility in line with the requirements of the NSW EPA Noise Policy for Industry. The report includes an assessment of noise impacts from 24-hour use, inclusive of the night time period. Noise levels are expected to meet all relevant requirements. Refer to Sections 7 of the updated acoustic report for the assessment of potential noise impact from the proposed development.</p>
<p>In particular concerns regarding truck movements to and from the site during the night should be reviewed and measures to mitigate noise emissions from trucks must be incorporated into any consent.</p>	<p>Truck movements to and from the site have been considered as part of the noise impact assessment. Recommendations have been made in relation to truck access to the site during the night time period (10pm – 7am). Refer to Section 7.6 of the updated acoustic report.</p>
<p>Acoustic measures should incorporate both management plans and physical treatments and any physical measures should be properly architecturally integrated into the fabric of the building.</p>	<p>The updated acoustic report presents both management and physical controls as part of the assessment. Refer to Section 7.6 of the updated acoustic report.</p>

## Community Submissions

Comment	Response
<b>Noise Impacts</b>	
<p>Concerned that noise from Edinburgh Road is already at an untenable level due to construction currently occurring within the immediate vicinity.</p>	<p>Whilst construction related traffic may present additional noise impacts whilst in progress these impacts are temporary, occurring for the duration of the projects in question. An assessment of the potential for increased road traffic noise from the operation of the Woolworths facility has been undertaken, and detailed in Section 7.4 of the updated acoustic report. Recommendations have been made in relation to truck movements during the night time period.</p>
<p>Concerned regarding noise impacts associated with construction and 24/7 operation. Acknowledge the residential areas are located on the edge of an industrial area however consider it unreasonable to expect residents to have to deal with noise on a 24/7 basis.</p>	<p>Noise impacts associated with operational noise from the facility have been predicted within the updated acoustic report, and compared to the requirements of the NSW EPA Noise Policy for Industry. Operational noise from the site is predicted to be below the relevant noise emission requirements during all time periods, inclusive of night time.</p>
<p>Concerned there is no wall or screening of the car park onto Edinburgh Road.</p>	<p>The updated acoustic report has recommended screening to carpark areas located along Edinburgh Road. Refer Section 7.6.</p>
<p>Concerned the 24-hour operation of the premises will give rise to vehicles going in and out of the car park at night, the slamming of car doors, shining lights directly into residential properties, noise from conversations and car radios.</p>	<p>Noise from the use of the carpark has been assessed and found to meet the requirements of the NPI. The assessment has considered both vehicles entering the development, manoeuvring to parking spaces and instantaneous peak noise events, such as vehicle doors closing or engines starting.</p>
<p>Main concern is the 24-hour operation of the warehouse and the subsequent disturbance to sleep.</p>	<p>The NPI provides an assessment criteria for sleep disturbance, which is based on peak (<math>L_{max}</math>) noise levels relative to the prevailing background noise level during the night time period. Peak noise levels from vehicle movements on site (both passenger and trucks) have been predicted, and are below the relevant emergence levels detailed in the policy.</p>

<b>Comment</b>	<b>Response</b>
<p>Concerned regarding statements within Appendix Z including: Section 7.2 states the "carpark is unlikely to be used during the night-time period." Concerned the proposal does not offer suggestions to mitigate possible carpark noise emissions and is merely speculating that it is "unlikely".</p>	<p>An updated assessment of the carpark is presented in the report, which includes use during the night time period. Refer Sections 7.2 &amp; 7.3.3 of the updated acoustic report.</p>
<p>Notes that the sleep disturbance criteria are only met by 2dB and the night criteria by 1dB. Consider the margin through which the noise analysis meets guidelines is exceptionally narrow.</p>	<p>The updated acoustic report includes screening to the carpark along Edinburgh Road (presenting the location which produces the highest peak noise level to residential receivers), which has reduced the predicted peak noise level from the site. Refer Sections 7.3.3 and 7.6 of the updated acoustic report.</p>
<p>Concerned with the number of truck movements to the proposed development, especially at night, again noting the narrow sleep disturbance criteria. Request that truck movements be reduced or constrained at night or that there is a restriction between hours</p>	<p>Truck movements to and from the site have been considered as part of the noise impact assessment. Recommendations have been made in relation to truck access to the site during the night time period (10pm – 7am). Refer to Section 7.6 of the updated acoustic report.</p>
<p>Request the proponent consider further screening at the front of the development to screen carpark noise and/or consider negotiating with sensitive residential receivers, the installation of glazed windows and doors or insulation from sound events, given the significance of the project and the severe effect it will have on residential properties directly opposite the development site.</p>	<p>The updated acoustic report includes screening to the carpark along Edinburgh Road (presenting the location which produces the highest peak noise level to residential receivers), which has reduced the predicted peak noise level from the site. Refer Sections 7.3.3 and 7.6 of the updated acoustic report.</p>

Please contact us should you have any further queries.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Alex Washer', with a stylized, cursive script.

Acoustic Logic Consultancy Pty Ltd  
Alex Washer