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NSW Department of Education and Training
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Attn: Hussein Najdi

Marsden Park Public School - Response to Submissions

This letter has been drafted in response to submissions to the NSW Department of Industry relating to the Marsden Park Public School Development (SSD 9809). A submission from the NSW EPA regarding the project (document reference: DOC19/1013715, dated 20/11/19) details several queries & recommendations relating to noise/acoustics. These matters are reproduced within this letter and our response to each issue has been detailed.

An acoustic report to support the proposed school was prepared by this office *New Marsden Park Public School – Noise & Vibration Impact Assessment* (document reference 20190017.2/1807A/R1/AW, dated 18/07/2019), hereafter referred to as the *NVIA*.

1.0 Construction Phase**EPA Submission***1.2. Noise & Vibration**Recommendation*

The proponent be required to adopt the noise mitigation described in Appendix H (Noise Vibration Impact Assessment (NVIA)) Recommendations in section 9.8.

ALC Response

Noted.

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EPA Submission

1.2.1 General construction hours and intra-day respite

Recommendation

The proponent be required to ensure that construction activities associated with the project must only be undertaken during the following construction hours:

- a) 7:00 am to 6:00 pm Mondays to Fridays, inclusive;*
- b) 8:00 am to 1:00 pm Saturdays, and*
- c) no work on Sundays or gazetted public holidays.*

The EPA recommends that the proponent should consider whether intra-day 'respite periods' should be scheduled.

ALC Response

As detailed in Section 9.1 of the NVIA, the proposed construction hours for the project are consistent with those recommended by the NSW EPA. A discussion regarding the implementation of 'feasible and reasonable' mitigation measures is also presented in Section 9.6.

A finalised construction methodology would be developed by the main contractor and reviewed for noise impacts as part of the noise management plan recommended in Section 9.8 of the NVIA. If intra-day respite periods are required to mitigate noise then they may be implemented by the contractor.

EPA Submission

1.2.2 Idling and queuing construction vehicles

Recommendation

The proponent be required to:

- 1) ensure construction vehicles (including concrete agitator trucks) involved in demolition, site preparation, bulk earthworks, construction and construction-related activities do not arrive at the project site or in surrounding residential precincts outside approved construction hours.*
- 2) where feasible, ensure construction vehicles turn off their engines during idling to reduce noise impacts.*
- 3) comply with quiet work methods/technologies including those described in NVIA (Appendix H) section 9.8.*

ALC Response

Noted, and is commonly conditioned as part of the development consent for state significant developments.

2.0 Operational Phase

EPA Submission

2.1 Noise and vibration impacts

Recommendation

The proponent be required to adopt the noise mitigation described in the NVIA (Appendix H) Summary of Recommendations in section 10.

ALC Response

Noted

EPA Submission

2.1.1 Out of hours' community use of school facilities

Recommendations

1. The proponent be required to ensure that the school hall is not made available for community use:

- a) during week day mornings,*
- b) later than 10:00 pm on week nights,*
- c) other than between the hours of 8:00 am and 6:00 pm on Saturdays, and*
- d) during Sundays and public holidays.*

2. The proponent be required to ensure doors and other large ventilation opening should be closed after 6:00 pm where activity involves amplified loud music or speech. Furthermore, the EPA anticipates that external activities are likely to be considered at some time in the future and recommends that the following conditions are included.

3. The EPA recommends that the proponent be required to:

- a) Undertake comprehensive noise compliance monitoring of representative uses of the school hall, outdoor sports courts and associated facilities (e.g. parking) outside school hours to demonstrate that the level, nature, quality and character of noise emitted by those uses and the time at which and frequency of those uses would not interfere unreasonably with or be likely to interfere unreasonably with the comfort or repose of persons not on the development site, especially the occupants of nearby residences.*
- b) Submit a detailed noise compliance monitoring report with noise measurements reported against relevant noise criteria and the outcomes of appropriate community consultation together with detailed recommendations concerning any additional feasible and reasonable noise mitigation and management measures, including more stringent or more relaxed restrictions on the times at which and the frequency of each type of use of the school hall, outdoor sports courts and associated facilities (e.g. parking) outside school hours.*

- c) *Ensure that noise compliance monitoring referred to in paragraph (a) above, would include quantitative noise impact assessment to address noise emissions arising from amongst other things –*
- i. audience/spectator noise,*
 - ii. referee whistle noise,*
 - iii. training sessions as well as sporting events,*
 - iv. any amplified sound during sporting events and any associated training sessions,*
 - v. any amplified sound during music performances and other non-sporting events and any associated rehearsals, and*
 - vi. post-event audience/spectator noise, including vehicle door slamming and departure noise.*
- d) *Ensure that the outdoor sports courts are not made available for community use:*
- i. during week day mornings,*
 - ii. later than 6:00 pm on week nights,*
 - iii. other than between the hours of 8:00 am and 6:00 pm on Saturdays, and*
 - iv. During Sundays and public holidays.*

ALC Response

With regard to out of hours community use of school facilities:

- The EPA recommendations restricting operating hours for community use of sporting facilities and the hall, and the proponent should consider whether these are acceptable.
- Item 2, Section 6.1.1 of the NVIA presents an assessment of noise emissions the community hall from the currently proposed use. Table 7 of the report demonstrates that even assuming a conservatively high internal noise level (80 dB(A) $L_{eq(15min)}$, representative of a music performance), compliance with noise objectives can be achieved to all surrounding residents even with doors partially open (25% of total door area). As such, it should be considered appropriate that provided use of the hall during the evening period is able to achieve the required noise levels at surrounding residents then the façade may remain open for ventilation.
- The EPA recommends that compliance monitoring and assessment of out of hours events be undertaken.

EPA Submission

2.1.2 Mechanical plant and equipment

Recommendations

The proponent be required to undertake the following:

1. *design mechanical plant noise to achieve no greater than background + 5dB and include the specific design requirements set out in section 6.2 of NVIA*
2. *provide a comprehensive quantitative assessment of operational noise impacts of mechanical plant and equipment (especially ventilation/ air conditioning plant and equipment) on surrounding noise sensitive receivers, especially surrounding residences;*
3. *ensure mechanical plant and equipment installed on the development site does not generate, (either individually or cumulatively):*
 - a. *noise emissions that exceed the Project Noise Trigger Level (day, evening and night assessment periods) measured at the boundary of the most affected or reasonably most affected residence, and*
 - b. *noise emissions that exhibit tonal or other annoying characteristics.*

ALC Response

As noted in Section 6.2 of the NVIA, detailed mechanical layouts and equipment selections for the project have not been prepared at this stage of the project, as is typical. Noise emission criteria which any plant and equipment installed on site would need to meet to surrounding land uses are summarised in Section 5.2.3 of the NVIA. The acoustic review and assessment of noise emissions from mechanical plant is typically formulated as a consent condition prior to the issue of the relevant construction certificate.

Further, we note that for areas undergoing changing land use, the NSW EPA Noise Policy for Industry (NPI) recommends the adoption of amenity noise levels only (refer Section 5.2 of the NVIA). Given that the application of the NPI within the report has not been queried (and that point 3 of the recommendations refers to project noise trigger levels from the NPI), it should be clarified whether or not the BG+5dB recommendation is correct in this situation.

EPA Submission

2.1.3 Public address and school bell system

Recommendations

The proponent be required to design, install and operate the school public address/bell system to achieve a noise level of no greater than background + 10 dB. Furthermore, speakers should be selected and located in accordance with section 6.2 of NVIA (Appendix H).

ALC Response

The public address system has the capacity to be designed to achieve a noise level of no more than background + 10dB at neighbouring residences. We note that no time descriptor is currently proposed, and that it would be most appropriate to apply the $L_{eq(15min)}$. This is consistent with the NSW EPA Noise Policy for Industry for the assessment of noise emissions.

EPA Submission

2.1.4 Waste collection services

Section 4.9.2 states that "...a curfew will be applied so that waste/service vehicles occurred outside school activities (at night or early mornings) to minimise interactions with parked cars."

Recommendation

The proponent be required ensure waste collection services are not undertaken outside the hours of 7.30 am to 6.00 pm Monday to Friday to minimise noise impacts on surrounding receivers in the more sensitive morning, evening and night time periods.

ALC Response

We note that the NVIA report does not contain a Section 4.9.2, and so it is unclear from which report or project the quoted text of the submission has been produced.

Nevertheless, Section 6.5 of the NVIA details proposed waste collection times which mirror the EPA recommended hours.

EPA Submission

2.1.5 Grounds maintenance using powered equipment

Recommendation

The proponent be required ensure grounds maintenance involving the use of powered equipment is not undertaken outside the hours of 7.30 am to 6.00 pm Monday to Friday.

ALC Response

Noted. This is unlikely to have a significant impact on the proponent.

Please contact us should you have any further queries.

Yours faithfully,



Acoustic Logic Consultancy Pty Ltd
Alex Washer