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TM296-04F01 Wyong RDC Woolworths RTS Comments (r1).docx

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Woolworths Wyong RDC - Response to submissions - Noise and vibration

1 Introduction

Renzo Tonin & Associates (RTA) was engaged by Fabcot Pty Ltd (Fabcot) on behalf of Woolworths Group Limited (Woolworths) to prepare a noise and vibration impact assessment (NVIA) to accompany the Environmental Impact Statement (EIS) for State Significant Development (SSD) application 33701741. Fabcot is proposing alterations and additions to the existing Woolworths Wyong Regional Distribution Centre (Wyong RDC) at Lot 413 DP 1058215, commonly known as 11 Warren Road, Warnervale (the Proposal).

The NSW Department of Planning and Environment (DPE) provided submissions on the SSDA NVIA report (reference: *TM296-01F03 Noise impact assessment (r6), dated 27 April 2022*) (SSDA NVIA) following the exhibition period.

This technical memorandum has been prepared to summarise the response to the submissions.

2 Responses to submissions

2.1 Summary of responses

Table 2-1 provides RT&A's responses to the submissions on the SSDA NVIA. The responses refer to the relevant sections in the SSDA NVIA.

Table 2-1: Responses to submissions

Item	Comments on NVIA	RTA responses
Department of Planning and Environment (DPE)		
10	<p>The Department notes the submitted Noise Impact Assessment (Appendix S) has adopted a project amenity category of 'suburban residential' for all identified Noise Catchment Areas (NCAs). This decision has primarily been based on:</p> <ul style="list-style-type: none"> • advice provided by the Environment Protection Authority (EPA) in June 2021 • elevated existing background noise levels • attended monitoring observations • Case Study E4 of the Noise Policy for Industry (EPA, 2017). <p>However, given the reliance of the Noise Impact Assessment upon the use of NCAs to categorise receivers, the Department considers that insufficient information has been provided to demonstrate that this analysis is applicable to <u>all</u> residential receivers within the identified NCAs, particularly given that background noise levels were found to vary significantly between monitoring locations L2 and L3.</p> <p>Based on recent discussions with the EPA (April 2022), the Department maintains that where a change in receiver category would affect a group or catchment of residential receivers, the justification provided must clearly demonstrate that the matters influencing the change would <u>apply across the whole catchment</u>. If there is reasonable doubt or ambiguity in the amenity category based on a single factor or a combination of factors, the more conservative category should generally be selected. In addition, elevated noise levels from non-anthropogenic sources (e.g. flora and fauna) are unlikely to be considered sufficient grounds to alter the amenity category.</p>	<p>RTA has reviewed the process undertaken for deriving the residential receiver noise category, and maintains that this process has been undertaken in accordance with the NPfI, including the clarifications sought from the EPA where elements of this process are unclear. This approach is supported by Case Study E4 of the Noise Policy for Industry (EPA, 2017) which details an example situation represented in the current Proposal. These steps have been applied using reasonable and practical approaches, and noise monitoring data from representative locations as per Fact Sheet A1.2 and B1.1 of the NPfI.</p> <p>It was because of variations in ambient and background noise levels and the relative distance to the key environmental noise source of the M1 Motorway at the receivers west of the M1 Motorway, that the receivers are separated into two different logical Noise Catchment Area (NCA) groupings in the NVIA.</p> <p>The monitoring for each NCA was based upon the potentially most affected residence which could be accessed within each of these areas. These locations were selected considering the potential noise emissions from the development. The appropriateness of these locations can be seen by the noise contours presented in NVIA Appendix D and predictions in Section 6. Illustrated by the noise contours is a reduced level of acoustic shielding due to the unoccupied industrial lot directly west of the existing Wyong RDC, which results in the noise monitoring locations being more affected than other residences within their respective NCAs. As such, the noise monitoring is consistent with NPfI Fact Sheet B1.1 as the background noise levels were measured at the potentially most affected residences.</p> <p>NVIA Section 4.1.3.1 clearly demonstrates the justification for the various matters influencing the selection of receiver category based upon the application of NPfI Section 2.4. Notably, NVIA Table 2.3 outlines the expectations for applying the residential receiver categories. As explained in NVIA Section 4.1.3.1, NPfI Table 2.3 allows for a justified use of the 'urban residential' category. However, consistent with the comment from DPE and already noted in NVIA Section 4.1.3.1, a conservative category (suburban residential) was selected because there was reasonable doubt of its suitability. Similarly, there was reasonable doubt in the suitability of the 'rural residential' category for the reasons already presented in the NVIA. The 'suburban residential' was adopted as it was found to be the most fitting category which offered the least amount of doubt in its suitability.</p>

Item	Comments on NVIA	RTA responses																																																																			
		<p>Notwithstanding the explanation above, even if the 'rural residential' category was adopted, this will not change the outcomes of the assessment. The following table shows the worst case predicted levels in the various NCAs against both the NPfI Project Noise Trigger Levels (PNTL) and the PNTL if the 'rural residential' category is used.</p>																																																																			
		<table border="1"> <thead> <tr> <th data-bbox="798 459 901 582">Receiver</th> <th data-bbox="901 459 1061 582">Predicted noise level, $L_{eq\ 15min}$, dB(A)</th> <th data-bbox="1061 459 1220 582">PNTL (NVIA)², $L_{eq\ 15min}$ dB(A)</th> <th data-bbox="1220 459 1377 582">PNTL ('Rural residential' category only)¹, $L_{eq\ 15min}$ dB(A)</th> </tr> </thead> <tbody> <tr> <td colspan="4" data-bbox="798 582 1377 627">Day</td> </tr> <tr> <td>R2</td> <td>35</td> <td>53</td> <td>48</td> </tr> <tr> <td>R4</td> <td>37</td> <td>56</td> <td></td> </tr> <tr> <td>R13</td> <td>33</td> <td>48</td> <td></td> </tr> <tr> <td>R23</td> <td>37</td> <td>53</td> <td></td> </tr> <tr> <td colspan="4" data-bbox="798 784 1377 828">Evening</td> </tr> <tr> <td>R2</td> <td>35</td> <td>43</td> <td>43</td> </tr> <tr> <td>R4</td> <td>37</td> <td>55</td> <td></td> </tr> <tr> <td>R13</td> <td>33</td> <td>43</td> <td></td> </tr> <tr> <td>R23</td> <td>37</td> <td>43</td> <td></td> </tr> <tr> <td colspan="4" data-bbox="798 985 1377 1030">Night</td> </tr> <tr> <td>R2</td> <td>35</td> <td>38</td> <td>38</td> </tr> <tr> <td>R4</td> <td>37</td> <td>44</td> <td></td> </tr> <tr> <td>R13</td> <td>33</td> <td>38</td> <td></td> </tr> <tr> <td>R23</td> <td>37</td> <td>38</td> <td></td> </tr> </tbody> </table>				Receiver	Predicted noise level, $L_{eq\ 15min}$, dB(A)	PNTL (NVIA) ² , $L_{eq\ 15min}$ dB(A)	PNTL ('Rural residential' category only) ¹ , $L_{eq\ 15min}$ dB(A)	Day				R2	35	53	48	R4	37	56		R13	33	48		R23	37	53		Evening				R2	35	43	43	R4	37	55		R13	33	43		R23	37	43		Night				R2	35	38	38	R4	37	44		R13	33	38		R23	37	38	
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		<ol style="list-style-type: none"> Residences as 'rural residential' category only, ignoring existing high traffic noise levels. As presented in the NVIA, derived as per the NPfI. 																																																																			
		<p>Overall, the 'suburban residential' category is most applicable based on the guidance in the NPfI. However, as shown in the table above, even if the NPfI process was ignored and the 'rural residential' category was used, this deviation from the policy would not change the assessment outcomes.</p>																																																																			

Document control

Date	Revision history	Non-issued revision	Issued revision	Prepared	Instructed	Authorised
22.07.2022	Initial issue	0	1	A. Leslie / A. Morris	A. Leslie	P. Karantonis

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