

17 October 2025

Southern Cross Community Housing
69 Kinghorne St
Nowra NSW 2541

Attention: Sahand Farooji-Devloo

ACOUSTIC RFI – THE YARDS

Dear Sahand

Marshall Day Acoustics (MDA) have previously carried out an acoustic assessment of the proposed development at 25 Moss Vale Road Bomaderry of the site, detailed in our report RP 001 r01 20240382 dated 2 October 2024 (the acoustic report).

The purpose of this letter is to provide responses to requests for acoustic information regarding the proposed development. The requests for further information are detailed in the following documents:

- Letter from Department of Planning Housing and Infrastructure (DPHI) dated 13 May 2025 titled *Request for Further Information – Mixed-Use Development with in-Fill Affordable Housing at 25 Moss Vale Road Bomaderry (SSD-69257218)* (the DPHI letter)
- Letter from Shoalhaven City Council (SCC) dated 8 April 2025 titled *Shoalhaven City Council Response to Request for Comments* (the SCC 8 April letter)
- Letter from Shoalhaven City Council (SCC) dated 30 April 2025 titled *Shoalhaven City Council Response to Request for Comments* (the SCC 30 April letter)

1.0 DPHI letter dated 13 April

The DPHI letter does not raise any acoustic related requests for information and is therefore not considered further in this correspondence.

2.0 SCC letter dated 8 April

The SCC 8 April letter does not raise any acoustic related requests for information and is therefore not considered further in this correspondence.

3.0 SCC letter dated 30 April

Comments and RFIs regarding the acoustic assessment are provided in section titled 'Environmental Health Comments / Requirements'.

3.1 Consent Conditions

Item: The letter proposes acoustic consent conditions regarding *Noise – Commercial/Industrial, Development Noise – mechanical plant; and Noise – Commercial/Industrial Development*.

MDA comment: The acoustic conditions appear appropriate, and we would not seek further modifications.

3.2 Traffic noise impacts on the development and traffic noise impacts on existing residences due to increased traffic flow on Moss Vale Road due to the development

SCC comment:

The NSW State Environment Planning Policy (Transport and Infrastructure) (SEPP) provides noise criteria which applies to new residential developments adjacent to roads with an annual daily traffic (AADT) volume of more than 20,000 vehicles.

Environmental Services does not agree that no assessment of traffic noise impacts on the development is required unless it is exempt under the SEPP.

The NSW Road Noise Policy (RNP), prepared by Department of Environment, Climate Change and Water is a cabinet endorsed document administered by the Environment Protection Authority. It presents the NSW Government's approach to the assessment of road traffic noise. The document presents noise criteria for noise sensitive receivers near different road categories and requires a feasible and reasonable approach to noise mitigation on new projects.

The statement, "The additional traffic generated by the use is relatively low compared to existing traffic volumes and represents a noise level increase of less than 1.3 dB on Moss Vale Road" may be correct however, does not take into account the future developments on Moss Vale Road and increase in traffic movements and therefore the requirement to construct to a certain standard.

Consideration should be given to construction of the residential dwellings to mitigate noise from traffic – it is noted that further subdivisions on Moss Vale Rd will increase traffic flow as will the new road leading from Tapitallee to Moss Vale Rd as dwellings are built in the future. It should also be noted that during peak holiday periods, traffic flows would increase threefold as tourists come into the area primarily via the intersection of Moss Vale Rd and the Princes Highway.

MDA response:

There appears to be some confusion on the part of SCC regarding the assessment of traffic noise impacts relating to the development and the applicable assessment criteria. There are two traffic noise related assessments that have been carried out for the site described as item 1 and 2 below. Each require differing assessment procedures under differing acoustic planning documents.

- Item 1 Traffic noise impacts onto the new development (including new residences) from existing external roads (i.e. Moss Vale Road).
- Item 2 Traffic noise impacts on existing receivers (including existing residences outside of the development) due to increased traffic flows on existing public roads due to the subject development.

These items are addressed below in the context of the correspondence from SCC

3.2.1 Regarding item 1: traffic noise impacts onto the new development from existing external roads.

Impacts on the development from existing roads is addressed in Section 5.3 of the acoustic report. The *NSW State Environment Planning Policy (Transport and Infrastructure) 2021 (SEPP)* provides noise criteria which applies to new residential developments adjacent roads with an annual average daily traffic (AADT) volume of more than 20,000 vehicles. This is set out in Chapter 2 Part 2.3 Division 17 Subdivision 2 Section 2.120 of the SEPP which states that:

This section applies to development for any of the following purposes that is on land in or adjacent to the road corridor for a freeway, a tollway or a transitway or any other road with an annual average daily traffic volume of more than 20,000 vehicles (based on the traffic volume data published on the website of TfNSW) and that the consent authority considers is likely to be adversely affected by road noise or vibration

The acoustic report notes that Moss Vale Road does not have an AADT of more than 20,000 vehicles, so the requirements of the SEPP do not apply. The acoustic report assessed on the basis of an estimated 5,500 AADT for Moss Vale Road. We are not privy to information on traffic projections for "future developments on Moss Vale Road and increase in traffic movements".

We note however that even if the 5,500 AADT was to increase by 100% (or even 200%) that the AADT would still be below the 20,000 AADT threshold requiring a SEPP assessment.

With regard to the increased traffic flow on Moss Vale Road and Princes Highway during peak holiday periods we note that the 20,000 vehicles adopted by the SEPP is applied based on the Annual Average Daily Traffic

volumes, not traffic volumes on particular days. Similar to the above, we are not privy to information of traffic flows during peak holiday period traffic flows being used for assessment of traffic noise at any other sites in the Shoalhaven. Nevertheless, even if current traffic flows of 5,500 AADT were tripled to 16,500 AADT the daily traffic flow would still be below the 20,000 AADT threshold.

The NSW Road Noise Policy (RNP) reference by SCC does not apply to the assessment of new residential and other sensitive developments affected by noise from existing roads (this is explicit in part 1.2 of the RNP), with reference given to the Infrastructure SEPP (2007). The relevant components of the Infrastructure SEPP (2007) were incorporated in the *State Environment Planning Policy (Transport and Infrastructure) 2021* in 2021, with the 2007 SEPP repealed.

Neither the Planning Secretary's Environmental Assessment Requirements (SEARs) dated 5 April 2024, nor the Shoalhaven DCP 2014 contain any additional acoustic requirements for assessment of traffic noise impacts onto the new development from existing external roads.

3.2.2 Regarding item 2: traffic noise impacts on existing receivers due to increased traffic flows on existing public roads due to the subject development

Impacts on existing receivers (including existing residences outside of the development) due to increased traffic flows on existing public roads due to the subject development are assessed in Section 5.2 and Section 7.3 of the acoustic report. The EPA NSW Road Noise Policy (RNP) is the applicable document for this assessment.

As noted in the acoustic report the projected increase in traffic noise from Moss Vale Road on existing receivers would be no more than 1.3 dB. The RNP notes that an increase of this level is a minor impact that is considered barely perceptible to the average person and as such no additional mitigation is required. This is because the number of vehicle movements expected to be generated by occupancy of the site is relatively small compared to the existing traffic on Moss Vale Road.

The 1.3 dB increase is based on 'existing' flow vs 'existing plus development' flow. Where future developments were to increase the traffic flows on Moss Vale Road the relative increase due to the subject development would be even smaller (i.e. less than 1.3 dB), as the existing traffic would be even more dominant.

Similarly, if the impact of traffic from the subject site were to be compared to peak holiday period traffic flows the relative increase due to the subject development would be further reduced, as noise from the existing traffic on Moss Vale Road would be even more dominant when compared to that generated by the development.

For example, if the existing traffic on Moss Vale Road were to be tripled from 646 to 1938 vehicles per hour, then the additional 219 vehicles generated by development would be further reduced in significance. In that instance, the increase in noise as a result of 219 additional vehicles per hour when compared to 1938 vehicle per hour would be less than 0.5 dB.

We trust the above satisfies your immediate requirements.

Yours faithfully

MARSHALL DAY ACOUSTICS (AUSTRALIA) PTY LTD



Matthew Ottley

Senior Associate