

Your reference 10/12381-2
Our reference: DOC10/43090
Contact: Lisa Farrell – 9995 6807

Ms Dinuka McKenzie
Senior planner – Water & Energy
Infrastructure Projects
Department of Planning
GPO BOX 39
SYDNEY NSW 2001

Dear Ms McKenzie

RE: North Sydney Zone Substation Redevelopment (MP10_0092) Environmental Assessment - Exhibition.

I refer to your letter dated 20 September 2010 inviting The Department of Environment, Climate Change and Water (DECCW) to make a submission on the environmental assessment (EA) for the above mentioned Project and any additional information DECCW considers appropriate to address shortcomings in the EA.

DECCW has undertaken a detailed review of the EA and considers that it adequately addresses the Director General's Requirements. The key environmental impacts associated with the proposal relate to noise and vibration during construction.

While DECCW supports approval of the project it is strongly recommended that the conditions in (Attachment A) are included in any consent.

If you wish to discuss any of the issues raised in this letter, please contact Lisa Farrell on 9995 6807.

Yours sincerely

Giselle Howard 25/10/10

Giselle Howard
Director Metropolitan
Environment Protection and Regulation

Attachment A: DECCW comments on the EA for the North Sydney Zone Substation Redevelopment – (MP10_0092)



Attachment A: DECCW comments on the EA for the North Sydney Zone Substation Redevelopment (MP 10_0092)

Noise and vibration Impacts

1. Background noise levels

The construction noise objective for the project is to manage noise from construction activities (as measured by a LAeq (15 minute) descriptor) so it does not exceed the background LA90 noise level by more than 10 dB (A) for works during standard construction hours; and by more than 5 dB (A) for works outside standard construction hours.

Background noise levels are those identified in the EA or otherwise identified in the Construction Noise and Vibration Management Plan.

Any activities that have the potential for noise emissions that exceed the objective must be identified and managed through the implementation of feasible and reasonable noise mitigation and management measures, to be outlined in a Construction Noise and Vibration Management Plan, with the aim of achieving the construction noise objective.

If the noise from a construction activity is substantially tonal or impulsive in nature (as described in Chapter 4 of the NSW Industrial Noise Policy), 5dB (A) must be added to the measured Construction noise level when comparing the measured noise with the construction noise objective.

2. Construction noise management plan

The proponent must prepare and implement a detailed Construction Noise and Vibration Management Plan (CNVMP) that includes, but is not necessarily limited to:

- identification of the specific activities that will be carried out and associated noise sources at the premises;
- identification of all potentially affected sensitive receiver premises;
- quantification of the rating background noise level (RBL) for sensitive receivers, as part of the CNVMP, or as undertaken in the EA;
- identification of the construction noise, ground-borne noise and vibration objectives;
- assessment of potential noise, ground-borne noise and vibration levels from the proposed construction methods expected at sensitive receiver premises against the construction noise objectives;
- where the objectives are predicted to be exceeded, an analysis of feasible and reasonable noise mitigation measures that can be implemented to reduce construction noise impacts;
- description of management methods and procedures, and specific noise mitigation treatments that will be implemented to control noise and vibration during construction,
- where the objectives cannot be met, additional measures including, but not necessarily limited to the following should be considered for implementation where practicable:
 - reduced hours of construction
 - the provision of respite for 1 or 2 nights per week from noisy / vibration intensive activities,
 - an acoustic enclosure over the excavation site,
 - alternative excavation methods
 - other negotiated outcomes of respite or compensation with the affected community;
- where it is determined that the works cannot be undertaken in a manner that satisfies the construction noise and vibration objectives, a report justifying that the construction noise and vibration measures (including management measures) consistent with current best

practice should be submitted to the Director General for approval prior to commencement of works,

- procedures for notifying residents of construction activities that are likely to effect their noise and vibration amenity,
- publication of a 24 hour contact number for community complaints;
- measures to monitor noise performance and respond to complaints.

Note: community notification alone (such as letter box drops) is an inadequate response to high noise impacts. Management measures should include the provision of respite and alternative accommodation to affected receivers.

3. Construction hours

All construction work at the premises, other than noise intensive activities such as rock breaking, may be conducted between 8am and 6pm Monday to Friday and between 8am and 5pm Saturdays and at no time on Sundays and public holidays. Noise intensive activities such as rock breaking must be conducted between 9am and 12pm Monday to Saturday and between 2pm and 5pm Monday to Friday and at no time on Sundays and public holidays.

Works outside these hours are not permitted except as explicitly specified below, with strong justification and include:

- the delivery of materials which is required outside these hours as requested by Police or other authorities for safety reasons;
- emergency work to avoid the loss of lives, damage to property and/or to prevent environmental harm;
- other works expressly approved by the Director General.

In considering applications for Out of Hours works the Director General should give consideration to the following:

- the likely effectiveness of any acoustic enclosure or alternative excavation methods in reducing noise levels to impacted sensitive receivers
- the need for respite periods for night works extending past 5 consecutive nights
- the need to limit all rock breaking and noise sensitive activities to before 10pm unless there is clear evidence of community support for an alternative approach as a result of negotiations between the proponent and representatives of potentially affected noise receivers.

4. Vibration

Vibration caused by construction and received at any sensitive receiver outside the proposal must be assessed against the guidelines contained in the DECC publication "Environmental Noise Management - Assessing Vibration: a technical guideline".

Regenerated noise from construction works must not exceed the following criteria as measured at the nearest sensitive receptor:

- 40 dB(A) between the hours of 6:00 pm and 10:00 pm; and
- 35 dB (A) between the hours of 10:00 pm and 7:00 am.