

12 February 2018

TJ524-01F03 (r0) Response to comments

UrbanGrowth NSW

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Bank Street Commercial Wharf - Response to comments

Renzo Tonin & Associates are advised that submissions were received on Acoustic Assessment report TJ524-01F02 (r5) dated 24 November 2017. The submission comments were provided to us by UrbanGrowth NSW Development Corporation, and responses are provided below.

Submissions received on Acoustic Assessment dated 24 November 2017 ref. TJ524-01F02 (r5)		
Item	Submission Comment	Response
1	Renzo Tonin & Associates acoustic report is based on "NSW Industrial Noise Policy" (INP) The NSW Industrial Noise Policy (2000). This is superseded and is replaced by the Noise Policy for Industry (2017). The INP does not specifically address sleep disturbance from high noise level events. Noise Policy for Industry (2017) incorporates sleep disturbance assessment levels based on World Health Organization guidance. The World Health Organisation report (2009) advises with levels above 55 dB(A), adverse health effects occur frequently, and a sizeable proportion of the population is highly annoyed and sleep disturbed. Cardiovascular disease risk rises, and public health is also threatened.	The amended SEARs (MOD3) for this project were issued in April 2017. At that time the relevant EPA noise guideline was the NSW Industrial Noise Policy (INP) 2000. SEARS normally apply for a period of two years from the date of issue. EPA released the Noise Policy for Industry (NPI) in October 2017 which supersedes the INP. Our understanding is that the NPI does not apply to this project because of the date of the SEARs, and the fact that the noise assessment had substantially commenced before the issue of the release of the new policy. There has been no formal request from any agency to update the acoustic assessment in accordance with the NPI. The current acoustic assessment report assesses sleep disturbance in accordance with EPA policy statements that were current at the time of preparation. The NPI does have a section on sleep disturbance which we have reviewed. We confirm that the NPI sleep noise trigger levels are no more stringent than what is already presented in the acoustic assessment, therefore the NPI requirements would still be met.
2	Refrigeration units operating 24/7, measured at 6m, have a sound pressure of 63 dB(A).	The nearest receivers are far more than 6m away. Noise reduces over distance such that refrigeration unit noise would be compliant at night. Furthermore, refrigeration units are relatively small and stationary, and can therefore be readily mitigated by screens and enclosures if required.

Submissions received on Acoustic Assessment dated 24 November 2017 ref. TJ524-01F02 (r5)		
Item	Submission Comment	Response
3	Noise report does not consider the intrusion of reversing forklifts and truck safety sirens required for deliveries plus the noise of manoeuvring of heavy vehicles for deliveries of consumables and rubbish removal.	Forklifts are considered in the acoustic assessment (see Section 5 for source noise levels). Deliveries and reversing beepers are not usually an issue where deliveries and rubbish removal are limited to daytime hours only.
4	6.1.3 Sleep disturbance assessment - As the roof over the area is still open to the air at either end and not fully enclosed, a sound attenuation of 10 dB(A) would not be achieved, so the noise observed at residential locations would be higher than proposed.	The nearest receivers are apartments which are elevated and look down on the site, therefore a roof structure has more benefit than usual. Partial side walls or acoustic lining could be incorporated into the final design of the waste storage area if required, to ensure that the 10dB reduction is achieved.
5	Page 41, APPENDIX A, Glossary of terminology suggests 100dB is the equivalent sound of a "rock band". The Bella Vista reverse thrusters (Table 5.2) operate at 104 dB(A) and the engines at 97 dB(A). The potential to have the noise level of a 'rock band' operating 7 days between 7am and 1am is totally unacceptable in a residential area.	The glossary contains broad and generalized references to different noise sources and their sound pressure level in the typical environment that they occur. The noise levels in Table 5.2 are different. They are time-unweighted sound power levels. Sound power and sound pressure cannot be directly compared. This query shows a misunderstanding between different noise metrics and makes no consideration for the character noise, the time the source is on, the way sound propagates in the environment, or the distance from the source to the receiver. To suggest that vessel noise will have the same impact as a rock band is inaccurate and misleading.

Document control

Date	Revision history	Non-issued revision	Issued revision	Prepared	Instructed	Authorised
12.02.2018	Issued to client		0	MG	-	MG

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In preparing this report, we have relied upon, and presumed accurate, any information (or confirmation of the absence thereof) provided by the Client and/or from other sources. Except as otherwise stated in the report, we have not attempted to verify the accuracy or completeness of any such information. If the information is subsequently determined to be false, inaccurate or incomplete then it is possible that our observations and conclusions as expressed in this report may change.

We have derived data in this report from information sourced from the Client (if any) and/or available in the public domain at the time or times outlined in this report. The passage of time, manifestation of latent conditions or impacts of future events may require further examination and re-evaluation of the data, findings, observations and conclusions expressed in this report.

We have prepared this report in accordance with the usual care and thoroughness of the consulting profession, for the sole purpose described above and by reference to applicable standards, guidelines, procedures and practices at the date of issue of this report. For the reasons outlined above, however, no other warranty or guarantee, whether expressed or implied, is made as to the data, observations and findings expressed in this report, to the extent permitted by law.

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