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**Major Planning Portal & Electronic Mail**  
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### **EPA Advice on Submissions Report – Noise Impacts**

Dear Mr Koppers,

Thank you for the request for advice from Public Authority Consultation (PAE-11708957), requesting the review by the NSW Environment Protection Authority (**EPA**) of the Submissions Report for the proposed Central Sydney Industrial Estate incorporating the Sustainable Road Resource Centre (SSD-10459) (**the Proposal**) at part Lot 100 DP 1168951 known as 9 Devon Street, Rosehill, NSW, 2142 (**the Premises**).

The EPA understands VE Property Pty Ltd (**the Applicant**) is proposing to create a thirty-five (35) hectare industrial estate at the Premises by subdividing the Premises into fourteen (14) lots and conducting infrastructure works. The EPA understands the Proposal also involves the construction and operation of the Sustainable Road Resource Centre (**the Road Resource Centre**) on the proposed lot six (6) of the industrial estate including an asphalt plant, a bitumen projects plant, and two waste facilities being a reclaimed asphalt pavement facility and Reconomy facility.

The EPA has conducted a review of the information provided including the “*Response to Submissions: Central Sydney Industrial Estate incorporating the Sustainable Road Resource Centre*” prepared by Element Environment Pty Ltd on behalf of the Applicant and Downer EDI Works Pty Ltd and dated 30 November 2020.

Based on the information provided, the Proposal, specifically the proposed Road Resource Centre, will require an Environment Protection Licence (**Licence**) in accordance with *the Protection of the Environment Operations Act 1997*.

While the EPA has determined, following its review of the information provided, that it will be able to issue a Licence for the Road Resource Centre, subject to a number of conditions, the Applicant has not provided sufficient information regarding the potential noise impacts of the Proposal.

As such, the EPA is unable to provide recommended conditions of approval for noise at this stage. The EPA requires further information be supplied by the Applicant in relation to noise impacts before any possible conditions of approval for noise can be provided for the Proposal to the Department of Planning, Industry and Environment (**DPIE**). The EPA’s comments concerning noise are provided in Attachment A.

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The EPA notes, with the exception of noise conditions, its conditions of approval for the Proposal will be provided to DPIE within a separate document.

The Applicant should be aware that despite conditions of approval being provided by the EPA with the exception of noise, the provision of sufficient information with respect to the potential noise impacts of the Proposal is essential in order for an adequate assessment of the noise impacts (and therefore overall environmental impact) to be conducted and for conditions of approval for noise to be provided. The EPA notes that it anticipates any potential Licence relating to the Proposal, will require the inclusion of noise conditions.

If you have any questions about this request, please contact Alex Sands on (02) 9995-5981 or via email at [alexandra.sands@epa.nsw.gov.au](mailto:alexandra.sands@epa.nsw.gov.au).

Yours sincerely

A handwritten signature in black ink, appearing to read 'CF', with a large, stylized loop at the end.

**CELESTE FORESTAL**  
**Unit Head Regulatory Operations – Metro North**  
**Environment Protection Authority**

## **Attachment A**

The EPA has reviewed the following submissions report:

- *“Response to Submissions: Central Sydney Industrial Estate incorporating the Sustainable Road Resource Centre”* prepared by Element Environment Pty Ltd on behalf of the Applicant and Downer EDI Works Pty Ltd and dated 30 November 2020.

The EPA has determined that the information included within the provided submissions report is insufficient for the EPA to adequately assess the potential noise impacts from the Proposal. The EPA requires additional information from the Applicant to enable the adequate assessment of noise impacts.

The EPA has a number of comments regarding the noise related information/clarification provided by the Applicant within the submissions report in response to the EPA’s original comments regarding noise which were provided following the EPA’s review of the Environmental Impact Statement (**EIS**) for the Proposal.

1. The proposed noise limits for the Road Resource Centre should be based on the noise levels achievable through the application of best practice. The Applicant must confirm that the predicted noise levels provided in the Noise Impact Statement (**NIA**) as an attachment to the EIS represent best achievable levels. The EPA notes that lower levels are likely achievable as the NIA did not consider all feasible and reasonable noise mitigation measures as exceedances of criteria originally proposed in the NIA were not expected.
2. The EPA required the Applicant to consider potentially annoying characteristics of noise in accordance with Fact Sheet C of the Noise Policy for Industry (**NPfI**). The Applicant advised in their response that; modifying factors in accordance with Fact Sheet C of the NPI were analysed and are not applicable and key tonal sources from the project are associated with reverse alarms. The Applicant stated that section 8.1 of the noise assessment report recommends that both a Construction Environmental Management Plan and Operational Environmental Management Plan are completed for the project to investigate alternatives to tonal reverse alarms and broadband reversing beepers would be applied to all mobile plant on site.

The response provided by the Applicant is not acceptable and does not adequately address what was required by the EPA. The Applicant is required to conduct a quantitative assessment for tonality and low frequency noise based on expected noise spectra at receiver locations in accordance with the NPfI. In terms of an acceptable approach to consider low frequency noise, the Applicant is directed to Acoustics Australia (2020), Volume 48: 149-180 – Forum Article – ‘*An example approach to consider low frequency noise in the context of the NSW Noise Policy for Industry*’.

Note: The EPA required the Applicant to fully outline the noise modelling approach used in the NIA and justify its accuracy, particularly regarding the meteorological parameters considered in the assessment. The EPA reviewed the response to this matter and accepts the use of the stated modelling approach in the circumstances outlined. However, the Applicant should be aware that they bear the responsibility of the accuracy of the model and any noise limit conditions derived from the NIA must be met.