



DOC19/1078371

11 December 2019

Mr Navdeep Singh Shergill
Social and Infrastructure Assessments
Department of Planning, Industry and Environment
GPO Box 39,
Sydney NSW 2001

Dear Mr Singh Shergill

**Lindfield Learning Village (SSD 8114)
EPA Comment on Response to Submissions (Phases 2 and 3)**

I am writing to you in reply to the invitation to the Environment Protection Authority (EPA) to provide comment on the Response to Submissions (RtS) for Phases 2 and 3 of the Lindfield Learning Village project.

The EPA has reviewed relevant RtS documents provided by the Department of Planning, Industry and Environment (DPIE) and makes the following comments regarding **noise and vibration**.

- The *Phase 2a Acoustic Review of Additional Numbers*, prepared by White Noise Acoustics, (dated 20.11.19) does not reference or acknowledge the *Lindfield Learning Village – Response to EPA Queries* document, prepared by Acoustic Logic (dated 13.08.18). The Response document contains additional noise monitoring as well as an assessment of additional noise sources not included in the original *Noise Impact Assessment (NIA)*, prepared by Acoustic Logic (dated 08.06.17). As a result, the White Noise Acoustics document does not include the most up to date noise logging results. Subsequently the noise goals set throughout the report are higher than they would be if the most recent noise logging was utilised. **The EPA advises that all assessments of noise impacts, including derivation of project specific noise levels, should be undertaken with reference to the most recent noise logging data in *Lindfield Learning Village – Response to EPA Queries* document, prepared by Acoustic Logic (dated 13.08.18).**
- The *Noise Impact Assessment (NIA)* prepared by Acoustic Logic (dated 08.06.17), regarding this portion of the development does not contain any predicted noise or vibration levels from the construction stage. Although the numerical values themselves are not the best indicator of construction impact on the receivers, they do inform the noise mitigation and management practices required on site. **The EPA requires a quantitative assessment to be undertaken in accordance with Section 4.5 of the *Interim Construction Noise Guideline (DECC, 2009) ICNG*.**
- Further to the above, it is noted that an assessment of mechanical plant noise has not been included in the NIA, as the report states that the early design stage of the project does not allow for it. The EPA notes that it is important to select and, if appropriate, design mechanical plant to achieve noise levels of no greater than the background (RBL) noise level + 5 dB and should form part of the development consent as Condition B40.

Phone 131 555
Phone 02 9995 5555
(from outside NSW)

Fax 02 9995 6900
TTY 133 677, then
ask for 131 155

PO Box 668
PARRAMATTA
NSW 2124

Level 13
10 Valentine Avenue
PARRAMATTA NSW
2150 AUSTRALIA

info@epa.nsw.gov.au
www.epa.nsw.gov.au
ABN 43 692 285 758

- The EPA notes that there are noise sources associated with the development that do not comply with the nominated criteria. Noise impacts from the loop road for drop off and pick up is predicted to exceed the NSW Road Noise Policy (DECCW, 2011) and Industrial Noise Policy (EPA, 2000) (as referenced in the NIA) requirements for a development of this type. However, there is no discussion of reasonable and feasible mitigation measures. Rather, the report seeks to minimise the acoustic impact of development by referring to other common noise levels of similar magnitude, such as “normal human conversation”. **The EPA advises that where exceedances of the Industrial Noise Policy and NSW Road Noise Policy are expected, consideration of all reasonable and feasible mitigation must be included in the assessment.** Significant exceedances may require the upgrading of the nearby dwellings and this should also be considered.

Should you require clarification of any of the above please contact Anna Timbrell on 9274 6345 or email anna.timbrell@epa.nsw.gov.au.

Yours sincerely



SARAH THOMSON
Unit Head, Metropolitan Infrastructure
Environment Protection Authority