

Mr Michael de Zilva  
Property Development Manager  
Gazcorp Pty Ltd  
60 Park Street  
SYDNEY NSW 2000

06/07/2021

Dear Mr de Zilva

**Gazcorp Industrial Estate Modification 1 (SSD-5248-Mod-1)**  
**Request for additional information**

I refer to Assessment for the Gazcorp Industrial Estate Modification 1 (SSD-5248-Mod-1) (the modification). The Department has reviewed the Environmental Assessment for the modification and request you to respond to issues detailed in the **Attachment 1** of this letter.

Please provide the information or notify us that the information will not be provided, by Tuesday 10 August 2021. If you cannot meet this deadline, please provide and commit to an alternative timeframe for providing this information.

If you have any questions, please contact Bruce Zhang, on 9274 6137 or at [bruce.zhang@planning.nsw.gov.au](mailto:bruce.zhang@planning.nsw.gov.au).

Yours sincerely,



William Hodgkinson  
Team Leader  
Industry Assessments

*Attached: the Department's Comments*

## Attachment 1 the Department's Comments on the Environmental Assessment for the Modification

### Noise and Vibration Impact Assessment (NVIA)

1. Background noise levels are used to establish intrusiveness noise criteria for evaluating impacts associated with the potential increases in noise in an existing environment. Measured noise levels reported in the NVIA appears to be significantly influenced by extraneous noise. An abnormal diurnal variation in noise levels were reported in the NVIA for which evening and night rating background levels (RBLs) were found to be higher than day.  
In contrast, background noise monitoring undertaken in August 2019 at 106 Burley Road in Horsley Park (SSD-10330) appears to follow a typical trend of diurnal variation in noise for which rated background levels (RBLs) of 38, 36 and 36 dB(A) were found for day, evening and night periods respectively.  
As such, this raises the question around whether the measured noise levels reported in the NVIA are representative of typical conditions in the area.
2. Section 5.4 of the NVIA does not provide recorded background noise levels during daytime of 13, 15, 16, 17, 19, 20, 21, 22, 23, and 28 August 2020, evening of 14, 19, and 28 August, and night-time of 28 August. The NVIA justified the deficiency by stating that the data were missing due to weather conditions or they did not record data through the entire period due to the monitor being installed during or after the period. It is unclear what weather conditions impacted the monitoring, for example, high wind speed or rainfall events.
3. The NSW Noise Policy for Industry 2017 (NPfI) requires that noise impact assessments must consider meteorological conditions. Further, the Department notes Class F temperature inversion was identified in the SSD-10330 NVIA.  
The NVIA must be revised to include the site and surrounds meteorological conditions and clarify impacts of prevailing wind and temperature inversion on noise emissions considering *ISO 9613-2:1996 Acoustics — Attenuation of sound during propagation outdoors*.
4. The NVIA defines the nearby residences as suburban. It should be rural residential despite the NVIA argues the area is dominated by traffic noise from M7 Motorway, but the background noise monitoring shows it is not. Please revised the NVIA to define the surrounding area as rural residential.
5. Section 7.1.1 of the NVIA report states 'the vehicle movement numbers are based on the traffic impact report prepared by GHD ref: 21/22381'. This is inconsistent with the modification report which includes a Traffic Impact Assessment (TIA) prepared by Ason Group. Please update the NVIA to be consistent with the Ason Group TIA.
6. The SSD TIA refers to B-Doubles as the largest design vehicle type. The NVIA report is inconsistent with the SSD TIA as it states the largest vehicle would be semi-trailers.
7. The NVIA must be updated to show the speed of semi-trailers when they travel along internal roads.
8. The NVIA must be revised to incorporate each distinct outdoor operation corresponding to forklift operations as well as heavy vehicles idling, passing by, accelerating, and reversing (including the contribution of energy-average noise emission associated with non-tonal reversing alarms). This would involve changes to modelled sound power levels for onsite vehicle movements and source path footprint. In addition, the representative duration of noise emission for each distinct operation also need to be amended accordingly. It should be noted that it is unlikely semi-trailers and B-doubles would be able to consistently manoeuvre at certain speed within the site. The operational noise modelling must consider 'worst-case' emission scenarios.  
The Department requires all operational modelling assumptions be clearly identified and justified in the amended NVIA, including an updated source emission inventory that delineate steady and non-steady noise generating activities and a visual illustration that maps the location of modelled sources. The NVIA shall adhere to the reporting requirements for steady and non-steady sounds specified in the Australian Standard AS 1055:2018 Acoustics – Description and Measurement of Environmental Noise.
9. The NVIA only consider noise emissions from forklifts' reversing alarm and doesn't consider noise associated with forklifts movements in loading dock areas as well as loading and unloading activities. The NVIA must be updated to include these noise emissions.
10. It is unclear which type of sound power level in Table 8 of the NVIA represents (i.e. L<sub>90</sub>, L<sub>10</sub>, L<sub>Amax</sub> or L<sub>eq</sub>). Please clarify.
11. Please clarify which noise generating sources detailed in Table 8 of the NVIA are steady and which are non-steady.

12. Please clarify whether vehicle speeds described in Table 8 are average speed or maximum speed.
13. Please clarify what types of truck activities will occur during night-time, such as reversing, sounding horns, stopping, and releasing air brakes. Further, please clarify how these activities contribute to  $L_{Aeq}$  and  $L_{Amax}$  assessments?