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Attn: Alison Holland & Salma Malik

Eileen O'Connor School - Response to DPHI Comments

This letter has been prepared in response to the Request for Additional Information from NSW Department of Planning, Housing and Infrastructure ("DPHI"), dated 23rd May 2025. The matters relating to noise and vibration impacts have been reproduced and our responses are demonstrated below.

DPHI RFI:

19. *The operational noise limits, as presented in the NVIA, appear to consider the proposal in isolation rather than in the context of the existing background noise. Operational noise limits must be presented in the context of the existing background noise and if necessary, mitigated to meet project trigger levels (background + 5dB(A)). The Department requires the tables showing predicted noise at receivers to be updated to:*

- a. *make it clear that the predicted noise levels presented refer only to the predicted noise generated by the development*
- b. *provide an additional column to demonstrate what the result noise environment will be at each receiver. For example, it may demonstrate that a logarithmic model confirms additional noise attributed to the development would not result in an exceedance of the trigger level at each receiver (i.e. the Rating Background Level would remain unchanged or would only be increased marginally, hence the trigger level not exceeded. This would provide additional evidence and justification to the report's commentary which states "noise emissions not exceeding the trigger levels indicate that adverse impact will not be produced."*

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AL Response:

AL has undertaken background noise monitoring at various locations within the existing school premises to obtain the existing environmental noise levels for the surrounding receivers as shown in Figure 1. The closest monitored location (M3) has been utilised as the representative background noise levels of the immediate surrounding receivers of the proposed ECOCS. The operational limits have been formulated by applying 5dB(A) above the measured existing background noise level as presented in Table 7 of the report. It is important to note that based on the LEC, typical school activities are not considered to be offensive, however BG + 5dB(A) is typically adopted as the emissions guideline to assess the noise generating activities within the school.

With respect to the above, a general assessment has been provided within Section 8.3 of the report which summarises the proposed activity areas and its potential noise impacts to the immediate receivers. For external activity areas, the assessment has mainly conducted for the outdoor dance stage area and PE court as these are the most noise intensive uses proposed within the new areas of the school. Within the discussion of each section, AL has provided a predicted noise levels when the areas are being used and provided recommendations to mitigate any potential noise impacts, based on the existing noise levels at the site.

For internal noise impacts, the assessment been conducted based on the assumptions shown in Table 8. The resultant noise levels have been compared against the BG+5dB(A) guideline as shown in updated Table 9 of the report. Given the predicted noise levels from these activities are well below the formulated criteria, it can be determined that the proposal does not provide additional noise impact to the surrounding receivers and existing ambient environment.

DPHI RFI:

20 The NVIA indicates that receivers are highly noise affected and briefly touches upon quiet work methodologies. No management or mitigation measures such as respite periods are discussed.

21 The NVIA indicates that there would be periods of noise generated resulting in receivers being 'highly noise affected'

- a) The ICNG states: The highly noise affected level represents the point above which there may be strong community reaction to noise. Where noise is above this level, the relevant authority (consent, determining or regulatory) may require respite periods by restricting the hours that the very noisy activities can occur, taking into account: 1. times identified by the community when they are less sensitive to noise (such as before and after school for works near schools, or mid-morning or mid-afternoon for works near residences)*
- b) It is not clear how construction noise is assessed to a level that indicates the time periods of noise that would exceed limits. Particularly relevant for the continued operation of the neighbouring and adjoining sensitive receivers.*

AL Response:

The aim of the ICNG guideline is to provide a guidance on managing construction works to minimise noise (and vibration) impacts with an emphasis on communication and cooperation with all involved, or affected by construction noise. The steps within the ICNG for managing noise impacts from construction noise are:

- Identifying the affected sensitive land uses;
- Identifying the hours of construction works;
- Identifying the noise impacts at sensitive land uses; and
- Selecting and applying the best work practices to minimise the noise impacts.

Depending on the extent of works and impacts, managing noise impacts may vary on the scale of construction project. The Table 1 within the ICNG presents the recommended hours of work for normal construction, which has been reproduced below:

Monday to Friday -	7am to 6pm
Saturday -	8am to 1pm
Sundays and Public Holidays-	No works allowed.

Based on previous experience with school projects, it is unlikely that construction works will be conducted outside of these hours unless it is emergency work, infrastructure upgrades related, delivery of oversized plant or structures or any specific reasons that has been approved to be conducted outside of the typical hours.

With respect to the above, the assessment for construction noise and vibration presented within the report are preliminary with assumptions on the equipment, operational hours and location of equipment. It should be noted that the construction methodology, process and programme is not definitive at this stage of the project as there has been no engagement of a head contractor yet. Although the report highlights the potential impacts to 'highly noise affected level' at the surrounding land uses, it is not a definitive result. Respite periods are typically determined once the contractor has consulted with the governing body and the affected receivers to determine suitability of undertaking certain noisy works or the use of equipment. It is typical for a head contractor to establish a management plan which will include a sub noise and vibration management plan which is a detailed lists of resultant results based on the finalised construction methodology. This has also been a standard approach taken by DPHI.

The predicted noise levels in Table 14 have been provided with respect to the standard hours of work by ICNG. A range of noise levels experienced at the receivers have been presented to show the varying levels when the works are being undertaken depending on the distance from the source to the receiver. It should be noted that as the locations of the equipment are not determined yet, therefore the assessment considers the source to be close to the site boundary and the façade of the receiver as the predicted noise level. Once the construction methodology has been provided, a more accurate prediction of the noise emissions can be determined. The construction noise and vibration management plan will able to provide a detailed mitigation measures to minimise its impacts to the receivers in which respite periods can be provided as part of a mitigation measure.

We trust this information is satisfactory. Please contact us should you have any further queries.

Yours faithfully,



Acoustic Logic Pty Ltd
Samantha Wong