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ATTN: MATT INCH

BULLI ACCE – RESPONSE TO EPA QUERIES REGARDING ACOUSTIC REPORT

1 INTRODUCTION

Acoustic Logic has been engaged to conduct an assessment of the potential

This letter presents a response to the queries raised by the EPA regarding our acoustic report prepared for this development.

Weather affected data during the background noise monitoring period.

EPA have commented that a significant amount of our background noise logging data is weather affected.

ALC response - To account for some periods of rain/wind, an 8 day monitoring period (as opposed to the typical 7) was adopted. In addition, the periods of time which are theoretically weather impacted are no higher on average than other times, indicating that the weather did not significantly impact the measurements. The EPA also appears to agree that the noise levels look appropriate.

Background Noise Level Used During the 6am-7am Morning Shoulder Period.

The EPA have queried our 6am-7am background noise level of 37dB(A)_{L90}. They have stated that the appropriate level should be the numerical average of the night time level (33dB(A)), and the daytime level (40dB(A)). If this is adopted, the 6am-7am background noise level is in fact 37dB(A) (as per our report), not 35dB(A), as noted by the EPA.

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Assessment of Car Park Noise.

The EPA have queried the impact of car park noise in the night time period, stating that additional acoustic treatment should potentially be adopted. They have raised concern about the sound power level per car (we had used 84dB(A)) and that there may be exceedances at nearby residences.

ALC response:

- Our prediction of night time car park noise was based on the maximum peak one hour period of use of the site. This is an abundantly conservative approach, as the peak period of use of the car park will be during the daytime, rather than the night time.
- Despite that fact that a conservatively high level of activity was assumed for the night time period, the car park noise was still calculated to be compliant with noise emission requirements.
- Further, it would be expected that night time use of the car park would be significantly less than the daytime peak period. If it likely that night time use would be approximately one quarter of the day time use (an 80/20 split is typical in my experience), the car park noise would be a further 6dB(A) quieter than the noise levels predicted by us in our report.
- With respect to the assumed sound power level of 84dB(A) used in noise emission calculations:
- This level is reasonable for a car driving a 0-10km/h, and is based on measurements conducted by us. I have routinely seen other consultants use levels of between 79-82dB(A), making our analysis conservative.
- For sound power levels to exceed 84dB(A), in my experience the vehicle must be moving faster than 10km/h, and is therefore not relevant in the assessment of car park noise.

Plant and Equipment Noise Levels.

The EPA have recommended that a plant noise limit of 35dB(A)_{Leq} and 45dB(A)_{Lmax} be set for any time of day.

ALC Response:

- The EPA proposed noise limits are completely inconsistent with the EPA Industrial Noise Policy and there is no basis to their recommendation.
- In essence, in setting a limit of 35dB(A), the EPA have proposed the strictest possible criteria that may be imposed under the Industrial Noise Policy (suitable for rural areas at night time), and applied them for **daytime** use in a **suburban** area.

- Also, setting a 45dB(A) L_{max} noise criteria during the daytime and evening is not consistent with either the INP or the explanatory notes, as L_{max} criteria (short duration peak events) are only assessed in the 10pm-7am period.
- Noise levels should be set based on background noise measurements and the Intrusiveness and Amenity Criteria in the INP, as was recommended tables 2 and 3 of our report. There is no reason for the EPA to be ignoring the INP. The EPA proposed criteria are effectively made up without reference to the INP or other justification.
- Compliance with the EPA proposed criteria will potentially add very significant and unnecessary cost to the developer, particularly for equipment that might run during the daytime or evening, but not at night.
- Potentially, the EPA had intended that this limit apply during the 10pm-7am period only, however it does not state this in their report.
- An appropriate condition that should be adopted is that plant and equipment noise must comply with the Industrial Noise Policy at all times.

Please contact us should you have any further queries.

Yours faithfully,



Acoustic Logic Consultancy Pty Ltd
Thomas Taylor