



DOC18/648422-01
Sender's ref: SSI7400

Lisa Mitchell
Team Leader – Transport Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

By email: luke.kennington@planning.nsw.gov.au

11 September 2018

Dear Ms Mitchell,

**REQUEST FOR EPA COMMENT – SYDNEY METRO (CHATSWOOD TO SYDENHAM) (SSI 7400)
MODIFICATION 5 – BLUES POINT ACOUSTIC SHED**

I refer to the request from the Department of Planning and Environment (DPE) to the NSW Environment Protection Authority (EPA) dated 3 September 2018 to undertake a review of the proposed modification to the Sydney Metro City and Southwest (Chatswood to Sydenham) rail project SSI 7400 Modification 5.

Environment Protection Licence No. 20971, issued to John Holland Pty Ltd (“the licensee”), applies to the Blues Point worksite the subject of this application. If a modified SSI approval is granted, the licensee will need to consider whether a variation to the licence is needed before executing works approved by the modification.

The EPA has reviewed the modification report. The incorporation of an acoustic shed over the site will have consequential benefits in terms of dust, water, soil and sediment control issues. However, while somewhat counter intuitive, the incorporation of the acoustic shed will introduce noise impacts into the Blues Point area, as works that would have been undertaken during standard hours will now potentially occur outside of standard hours. Comments in this regard are included in Attachment 1.

The EPA considers that the project approval conditions are appropriate for the proposed modification, but recommends that the matters outlined in Attachment 1 are considered as part of the determination so that potential impacts are fully identified and considered.

Please contact Gordon Downey on 02 9995 5783 or gordon.downey@epa.nsw.gov.au for any questions or comments in relation to this matter

Yours sincerely

JACINTA HANEMANN
Manager Regional Operations - Metropolitan Infrastructure
Environment Protection Authority

Phone 131 555	Fax +61 2 9995 6900	PO Box 668	Level 13
Phone +61 2 9995 5000 (from outside NSW)	TTY 133 677	Parramatta	10 Valentine Avenue
	ABN 43 692 285 758	NSW 2124 Australia	Parramatta NSW
			2150 Australia

info@epa.nsw.gov.au
www.epa.nsw.gov.au

Attachment 1

The following aspects of the modification have the potential to increase noise impacts in the areas surrounding the Blues Point worksite and are recommended for consideration in determining the application:

- The construction of the acoustic shed will have associated construction noise impacts. Construction of the shed should be limited to standard construction hours outlined in CSSI CoA E36.
- CSSI CoA E48 permits 24/7 operation for “*excavation within an acoustic enclosure*”. Construction of the acoustic shed will therefore permit 24/7 excavation at the Blues Point worksite. While the application highlights the benefits (noise attenuation) provided by the acoustic shed, it does not fully consider the fundamental impacts associated with out of standard hours excavation. The Modification Report, August 2018 (“the modification report”), section 8.3 states: “*Bulk shaft excavation within the acoustic shed has the potential to exceed the NML by approximately 10dBA*”. It is clear that out of standard hours excavation will have noise impacts. Therefore the need and justification for 24/7 excavation should be considered before determination of the application.
- The Noise Management Levels (NMLs) presented in the modification report adopt night time values based on external equivalent noise levels derived from CSSI CoA E42. It is the EPA’s position that condition E42 does not replace the NMLs derived from the *Interim Construction Noise Guideline (ICNG - EPA,2009)* for the purposes of determining potential impacts from a proposal. The purpose of condition E42 is to mandate a level above which mitigation measures in the *Sydney Metro City and South West Noise and Vibration Strategy* are to apply. The EPA’s position is that the ICNG should be used to determine potential impacts from the proposal.
- The modification report identifies the potential for significant noise impacts associated with out of standard hours TBM retrieval operations. However the modification report does not clearly and succinctly provide a comparison of project timeframes with and without the modification; and more importantly, with and without out of standard hours works. The benefits of reduced project time frames and associated impacts on the community, need to be carefully weighed against the shorter term impacts that will arise from approval of the modification.