

I strongly object to the proposed modification at White Bay 6 Marine Park for the following reasons:

Noise

- The noise impact assessment is totally inadequate. It relies on past assessments and only uses modelled impacts at one residential receiver (Grafton Street). The proposed modification re-orientes the building to face east, towards the residences at Datchett Street. This location was nominated as being sensitive in the approval given previously, and the noise limits are stricter than those at Grafton Street. Therefore, to simply conclude that as the noise levels can be met at one location (based on an approval given over 5 years ago) they can be met at all locations is erroneous and lazy.
- The Industrial Noise Policy used in the EA has since been revised (2017) and noise assessment should be re-done and all residential locations nominated as having noise levels in the approval should be re-assessed. Particular taking into account:
 - o The height of the apartments next to Datchett Street (16 Hosking Street)
 - o Wind conditions and the open space (water) between the site and the apartments at Hosking Street
 - o The re-orientation of the proposed workshops, which would be facing the residences at Balmain East
- The assumption that the previous approval given (that covered 2 hours of night time period) can be extended to cover the entire night-time period is laughable and totally inadequate.
- The operational noise compliance only just meets the requirements at Grafton Street. No noise compliance has been provided for the other 3 locations in the approval (Condition F1), in particular, the Datchett Street location which has stricter levels (41dB and opposed to 48dB). The compliance levels provided for one location can not be relied on for the assessment of noise for the proposed modification as each location has different noise limits imposed and will experience noise differently due to meteorological conditions and the change in building orientation of the modification.
- Further, the review of maximum noise levels in Table 2 in Appendix J shows data for night time noise criteria, but only for the LA1, 1min noise levels. The condition requires a 9 hour criteria, why is this not reported? Data for only partial condition criteria can not be extrapolated to show compliance with all noise criteria, and can not be relied on for assessment of the proposed modification.

Hours of Operation

- The hours of operation should not be extended as the noise will also then be extended, and the noise assessment provides no evidence that noise will be acceptable within existing hours of operation.
- The noise experienced is already disturbing my sleep during the early weekend hours and allowing earlier operation would only increase this impact.
- Allowing operation 24 hours for activity 2 (mooring, pump out etc) is not appropriate for a residential area, and as above, the noise for this night-time period has not been assessed, nor is there any evidence that is currently being met for the existing approval.

In summary, the EA regarding noise and hours of operation is inadequate and incomplete. It would be impossible for the Department to undertake a proper assessment of the impacts due to the proposed modification based on the information provided, and therefore the proposal should be rejected until a full and proper assessment, including compliance with existing noise conditions is undertaken.

