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Department of Planning
Received
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Scanning Room

Attention: Mr Ben Eveleigh

Dear Mr Gibson

I refer to discussions between the Department of Planning and the Environment Protection Authority (EPA) on 21 November 2012 regarding the EPA's submission dated 13 November 2012 on the proposed redevelopment of Dubbo Base Hospital – Stages 1 and 2.

Following discussions the EPA has reviewed the *'Dubbo Base Hospital Redevelopment – Stage 1 and 2 State Significant Development DA – Acoustic Assessment'* (AA) prepared by Norman Disney and Young dated 17 July 2012 (Revision 2.0) and still considers that the AA and the EIS are not adequate; the details of which can be found in Attachment A.

It should be noted that adoption of the recommendations regarding the need for additional information are integral to the EPA's ongoing support for the proposal. The EPA recommends that the proponent be required to provide the additional information specified above relating to noise; and that the EPA is provided with a further opportunity to review this new information before the project proceeds to the determination stage.

The EPA would also appreciate receiving a copy of the submissions received by the DoP (or a report summarising these submissions) in response to the exhibition of the Environmental Assessment. This is to assist the EPA to review the draft Director-General's Report and to recommend additional conditions of approval, if required.

Should you have any further enquiries regarding this matter please contact Samantha Wynn at the Dubbo Office of the EPA by telephoning (02) 6883 5330.

Yours sincerely

BRADLEY TANSWELL
Acting Head Pesticides, Operations and Planning
Environment Protection Authority

Encl: Attachment A – Assessment of the Proposal and Request for Additional Information

ATTACHMENT A

Assessment of the Proposal and Request for Additional Information

NOISE

The EPA has reviewed the '*Dubbo Base Hospital Redevelopment – Stage 1 & 2 State Significant Development DA - Acoustic Assessment*' (AA) prepared by Norman Disney & Young dated 17 July 2012 (Revision 2.0).

In summary, the EPA considers that the AA and REF are not adequate for the reasons outlined below:

- Noise monitoring was carried out at only one location, shown in Figure 3-1 of the AA and on the hospital site. The resulting unattended noise monitoring results presented in Table 4-1 and Appendix A of the AA may be influenced by existing noise from the hospital operations. No operator-attended noise monitoring results are provided to gauge the existing level of noise from the subject site, any other existing industrial noise, and any other extraneous noise. The NSW Industrial Noise Policy Application Note titled 'Noise impact assessment for the modification of existing industrial premises' clearly states that noise from the existing premises should be excluded when quantifying background and existing industrial noise levels.
- Ordinarily, background noise levels would be measured in the vicinity of the surrounding sensitive receivers (eg. residences along Leonard Street and Morgan Street, etc.) rather than within the subject site. The EPA considers that the results from the noise logger location may not be adequately representative of these two (possibly different) noise environments.
- The EPA considers that additional monitoring should be carried out and presented to accurately quantify the existing noise environment at the sensitive receivers, excluding existing noise from the subject development, to determine appropriate project specific noise levels for the assessment.

The EPA would like to provide the following additional minor comments outlined below:

- The EPA would typically not consider noise and vibration impacts from demolition, construction and operation to sensitive receivers such as these that are associated with a development. In this case, the EPA assumes that the proponent has considered these potential impacts and has taken adequate and appropriate measures to address them.
- The NSW Road Noise Policy should be included in Section 2.3 of the AA as a reference.
- Section 5.5.1 of the AA states that the development areas do not require a rail noise and vibration assessment due to significant offset distances. The Mental Health Unit site marked in Figure 3-1 is not discussed in this context, and appears close enough to the rail line to require assessment. This should be addressed in the AA.
- The noise management levels (NMLs) for residences in Table 7-2 of the AA should be revised, if necessary, to account for the results of any additional noise monitoring.
- The NML for offices in Table 7-3 of the AA should be 70 dBA.
- Table 9-1 of the AA lists the use of a 815 [vibratory?] compactor during construction works, however no sound power levels are shown for this item in Table 9-2, and no safe working distances with respect to vibration are shown in Section 10.2 of the AA.

- The AA predicts significant exceedances of the NMLs for some activities, with some receivers being highly noise affected during the earthworks stage. Noise control measures for highly affected receivers in Section 9.4 of the AA should include the provision of respite periods if appropriate, as well as individual consultation with affected parties.
- The measured noise level chart in Appendix A is difficult to read and should ideally be presented in a day to a page format to facilitate easier review.

The EPA recommends that the DoP request the proponent to address the inadequacies outlined above in relation to potential noise impacts on the surrounding environment.