

After reading the documents, comments are as follows;

With regard to the proposed levels:

#### 2.2.1 PROPOSAL

Current consent conditions do not regulate bass frequency noise, only higher frequency or 'A-weighted' emissions. Parkland's A-weighting consent conditions, on the other hand, are prohibitively low in winter and therefore very difficult to comply with. Further, the A-weighted noise conditions are inconsistent with best practice. To be over-regulated at less intrusive, high frequency noise, but not at all regulated at the intrusive low end is the situation this modification seeks to amend.

The key noise management controls proposed in this modification at the sensitive receiver are:

- a. Between 11:00am and midnight, music noise levels must not exceed LAeq 65 dB(A) or 75 dB(C) Leq in the 63 Hz 1/1 octave frequency band;
- b. Between midnight and 2:00am, music noise levels must not exceed LAeq 55 dB(A) or 70 dB(C) Leq in the 63 Hz 1/1 octave frequency band;
- c. A 5 dB tolerance above the criteria listed above be provided during extreme meteorological conditions, but must be accompanied by reasonable and feasible measures to manage dB(C) in the 63 Hz 1/1 octave frequency band; and
- d. On New Year's Eve, the event noise being permitted to operate between 11:00am and 2:00am.

By setting the above specific noise criteria covering both A-weighting and bass frequencies, events held at Parklands will have a clear and practical range within which to operate in line with similar events in the



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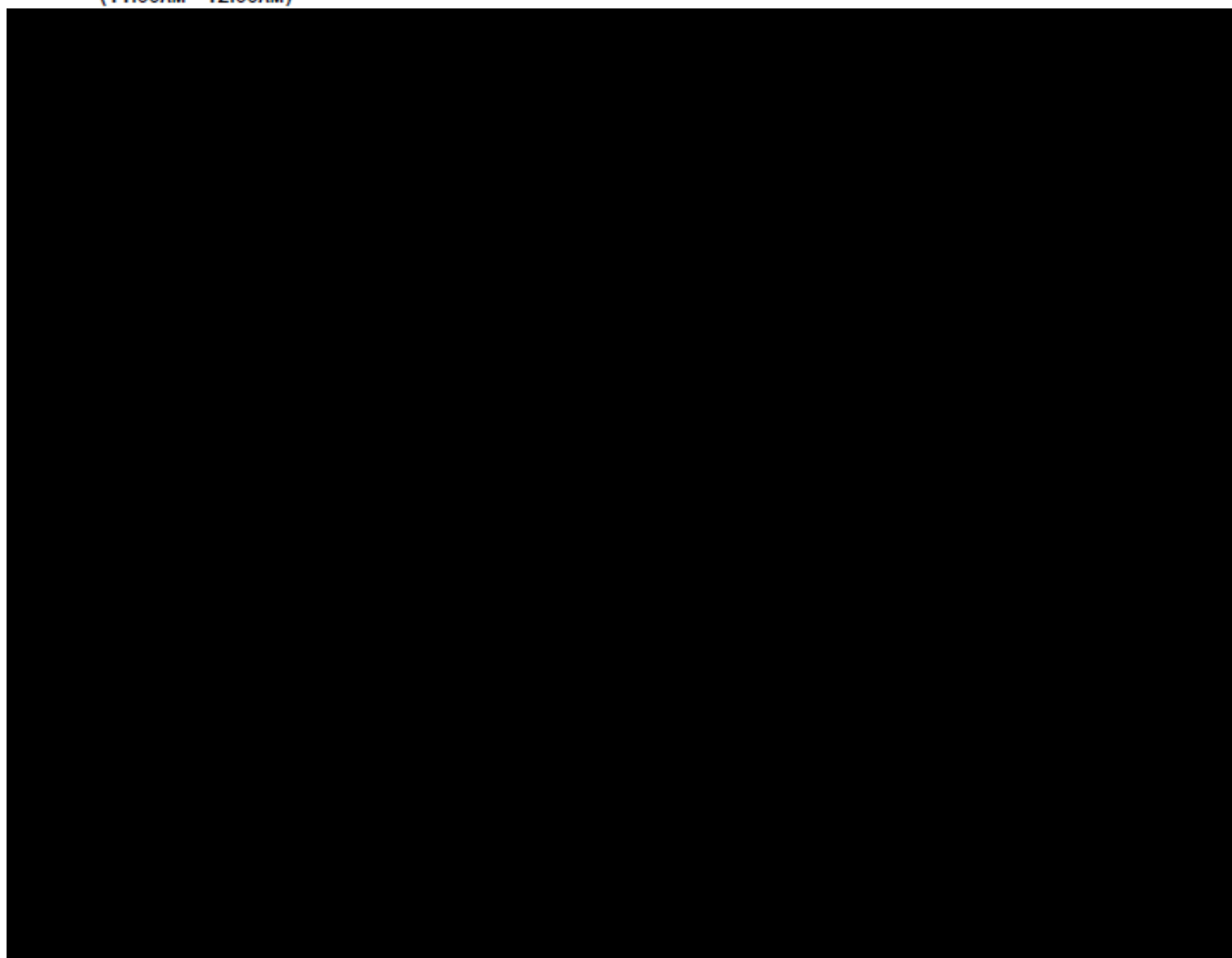
Items a) and b) will not reduce low frequency noise levels compared to measured levels from SITG 2013 and 2014. It is a token gesture designed to appear as if noise will be reduced, whereas in reality the criteria has been retrofitted to the measured data.

Item c) is basically a licensed for Parklands to nominate a higher noise limit under an 'adverse weather clause' if they don't comply at the time e.g. they measure the noise to be 3dB over the (already high) proposed noise limit, then they just say 'it's adverse weather conditions so it still complies'.

Item d) will just allow the noise to go for an extra 2 hours.

With regard to the proposed limit of 65dB(A), this is ridiculous. They are essentially proposing the noise to be subjectively twice as loud as it was for SITG 2013 and 2014.

TABLE 2.2 PREDICTED LAeq RECEPTOR MUSIC NOISE LEVELS – ALL STAGES, BARS, CAFÉS & DANCE FLOORS  
(11:00AM – 12:00AM)



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In terms of comparison between the currently allowed limit [REDACTED] and the proposed limit of 65dB(A), the proposed limit would be a staggering [REDACTED] above the current limit. In subjective terms the noise at 65dB(A) would be subjectively more than four times louder than at [REDACTED]. If the 70dB(A) adverse weather limit was applied this would be even worse.

Regards,

[REDACTED]  
[REDACTED]

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