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16 December 2016

Department of Planning and Environment  
Level 22, 320 Pitt Street  
Sydney NSW 2000

**Attention: Chris Ritchie / Thomas Piovesan**

Dear Chris and Thomas

**Oakdale South Industrial Estate - s96(2) Modification Application (SSD 6917 MOD 1)  
Submission on behalf of Jacfin Pty Ltd**

We act for Jacfin Pty Ltd (**Jacfin**), the owner of Lot A in DP 392343 (**Lot A**).

Lot A immediately adjoins the proposed Oakdale South Industrial Estate (**OSE**) to the east. We note that an area of approximately 35 hectares along the southern and eastern boundaries of Lot A has recently been rezoned to RU4 Primary Production Small Lots, to enable future residential development on that part of the land (**Jacfin Residential Land**).

This submission is made on behalf of Jacfin in relation to the Oakdale South s96(2) Modification Application (SSD 6917 MOD 1), which was exhibited between 24 November and 9 December 2016. We note your confirmation by email on 9 December 2016 that the Department of Planning and Environment (**Department**) has granted an extension of time for Jacfin to make a submission on the Modification Application until 16 December 2016.

Jacfin makes the following comments in relation to the Modification Application.

## **1 Noise Impacts**

Jacfin has commissioned an expert analysis of the Noise Impact Assessment undertaken by SLR in relation to the Modification Application (**Noise Report**). The **attached** letter from Wilkinson Murray identifies significant failings in the assessment presented in the Noise Report and raises significant concerns in relation to the noise impacts of the proposed modified development.

### **1.1 Noise criteria**

The Noise Impact Assessment undertaken by SLR for the original Concept and Stage 1 SSD Application for the OSE demonstrated that the approved masterplan for the OSE can achieve a noise criteria of 37 dBA on the Jacfin Residential Land, which is consistent with the EPA's Industrial Noise Policy.

This outcome was based on a specific configuration of buildings in Precincts 4 and 5 of the OSE. In particular, the approved configuration of buildings did not include any loading docks along the eastern face of the OSE buildings adjoining the Jacfin Residential Land. This had the result that the OSE buildings shielded the Jacfin Residential Land from noise generated by loading docks on the OSE site.

**Our Ref** QNMS:NJSS:120562169

njss A0138200903v3 120562169 16.12.2016

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Goodman now proposes a single building in Precinct 4 with an extensive hardstand area and numerous loading docks immediately adjoining Lot A. Amendments are also proposed to the orientation of the buildings in Precinct 5, with loading docks now proposed to be located to the north of these buildings. The hardstand areas and loading docks shown in the modified masterplan are completely exposed to the Jacfin Residential Land. The only attenuation measure proposed is an extended 5 metre noise wall.

The Noise Report indicates that the development as proposed to be modified by Goodman will produce noise levels up to 40 dBA on the Jacfin Residential Land under adverse weather conditions. This is inconsistent with the Project Specific Noise Criteria considered by the Department to be appropriate for the Jacfin Residential Land in its assessment of the original OSE application, which was 38 dBA.

As noted by Wilkinson Murray in the attached letter, the conditions of approval for the OSE in fact apply a 40 dBA noise limit for all 'L3' receivers, including the Jacfin Residential Land. It is evident from the Department's assessment report for the OSE that the 40 dBA limit was applied to accommodate a 2 dBA exceedance under adverse weather conditions at two of the L3 receivers, being Kemps Creek and Capitol Hill. However, noise levels up to 40 dBA were never contemplated on the Jacfin Residential Land by any of the application materials or noise assessments submitted by Goodman in connection with the original OSE application.

The Modification Application, if approved, would therefore result in greater noise impacts on the Jacfin Residential Land than the development as currently approved and would not comply with the Project Specific Noise Criteria previously assessed by the Department as being appropriate for the Jacfin Residential Land.

Goodman should not be permitted to take advantage of the 2 dBA allowance that was made by the Department for the Kemps Creek and Capitol Hill areas, but was never intended to apply the Jacfin Residential Area, to increase the noise impacts of the OSE on the Jacfin Residential Area from those originally proposed and assessed.

Jacfin submits that any modification to the OSE should be required to comply with the appropriate Project Specific Noise Criteria of 38 dBA at the Jacfin Residential Land. In order to achieve this, Condition B18 and Appendix 4 of the OSE approval should be modified as set out in Annexure A to this submission.

## 1.2 Proposed attenuation measures

The Noise Report indicates that the proposed noise wall along the eastern boundary of the OSE site will need to be extended to address the additional noise that will be generated by the reconfiguration of the buildings in Precincts 4 and 5 and maintain a reasonable level of amenity on the Jacfin Residential Land. The Noise Report specifies that a 5 metre high noise wall will be required, but does not state the length of the noise wall that will be required if the OSE is modified as proposed.

The extended noise wall is depicted in Figures 5 and 6 of the Noise Report and, as noted by Wilkinson Murray, appears to be in excess of 300 metres in length. Jacfin submits that Goodman should be required to confirm the length of the proposed noise wall. The dimensions of the noise wall should be expressly recorded in the conditions of consent for the Modification Application.

Further, Jacfin submits that the approach being taken by Goodman, whereby it is seeking to obtain consent for the key noise attenuation measure that will deal with noise emissions from Precincts 4 and 5, in circumstances where it is simultaneously seeking to remove Precincts 4 and 5 from the Stage 1 consent and defer these to later development applications, is fundamentally problematic.

In the absence of adequate details regarding the proposed future uses of the buildings in Precincts 4 and 5 and the specific noise sources that will be generated by those developments, it is not possible

to assess whether the proposed 5 metre high by 300+ metre long noise wall will be sufficient. It is immediately apparent that it is impracticable to identify, assess and condition the dimensions of a noise wall in a consent where the details regarding the sources of noise generation that the wall is intended to mitigate are not known and are not yet even subject to development applications.

Goodman has indicated to Jacfin that inputs for the future development in Precincts 4 and 5 have been included in the modelling undertaken by SLR. However, Goodman has not informed Jacfin what those inputs are, other than that they included gas powered forklifts at unspecified locations. Further, the noise modelling data underlying the conclusions in the Noise Report has not been provided. It is therefore not possible for Jacfin or the Department to verify whether the assumptions adopted by SLR are reasonable.

Jacfin urges the Department to urgently seek that the SLR noise modelling data be provided by Goodman and submits that the data should be made publicly available, as well as specifically being provided to Jacfin as a clearly interested party. Jacfin also submits that the Department should require Goodman to provide revised plans showing the specific height and length of the proposed noise wall, and that the dimensions of the noise wall should be recorded in the conditions of consent for the Modification Application.

### 1.3 Cumulative impacts

The Noise Report does not include any cumulative assessment of the noise that will be generated by the modified OSE and future industrial operations on Lot A. This is contrary to the express requirements of the Secretary's Environmental Assessment Requirements for the OSE, which continue to apply to the OSE and any proposed modification to the OSE.

Jacfin met with Goodman on 8 December 2016 to discuss the Modification Application. At that meeting, Jacfin raised with Goodman the lack of any evidence of a cumulative noise impact assessment in the materials submitted with the Modification Application and sought confirmation whether a cumulative assessment has been undertaken. Goodman subsequently responded that a cumulative assessment is not applicable to the Modification Application, because a cumulative assessment has already been undertaken at the EIS stage of the project and project specific noise limits have been specified for the OSE.

As noted above, the appropriate Project Specific Noise Criteria for the OSE on the Jacfin Residential Land, as previously determined by the Department, is 38 dBA. Since Goodman is now proposing modifications to the OSE that will result in noise levels up to 40 dBA on the Jacfin Residential Land, the assumptions on which the previous cumulative noise assessment were based are no longer correct and that assessment cannot be relied upon to predict the cumulative noise impacts of the modified OSE and future Jacfin industrial operations. A further cumulative noise assessment is therefore required in order to understand the impacts of the proposed modification.

The supplementary noise assessment submitted by Goodman with its Response to Submissions Report for the original OSE application noted that the applicable Amenity Noise Level for cumulative impacts is 40 dBA. The supplementary noise assessment also indicated that cumulative noise levels from both the OSE and Jacfin industrial sites combined may be up to 3 dBA higher than the noise from either of those sites considered in isolation.

This raises significant concerns in terms of the impacts of the Modification Application on the Jacfin Residential Land, since the OSE development as proposed to be modified would alone generate noise levels up to 40 dBA on the Jacfin Residential Land **before** the noise from any other industrial noise sources is factored in. As noted by Wilkinson Murray, it is therefore likely that cumulative noise levels will exceed the acceptable Amenity Noise Level of 40 dBA on the Jacfin Residential Land.

If the OSE is permitted to generate noise levels up to 40 dBA on the Jacfin Residential Land, this will leave no room for any other sites to generate reasonable noise whilst complying with the applicable Amenity Noise Level. For this reason, it is essential that the cumulative impacts of the modified OSE and the future Jacfin industrial operations be assessed and Goodman be required to demonstrate that the modified OSE development will not result in unacceptable cumulative noise impacts.

## **2 Landscape and Civil Plans**

The Landscape Plans exhibited with the Modification Application (Appendix T to the EIS) state that the noise wall along the eastern boundary of the OSE site is to be established 'by others' (per Drawing No. LR-006 Issue F).

Jacfin has raised this with Goodman and has been provided with updated Landscape Plans which do not refer to the noise wall being established by others. Goodman has confirmed that the noise wall forms part of the proposed scope of work to be undertaken by Goodman. We understand that the updated Landscape Plans will be provided to the Department by Goodman to replace those originally lodged.

Jacfin submits that the updated plans should be referenced in any approval of the Modification Application by the Department.

We also note that the Landscape Plans and the civil drawings included in the Civil Works Package submitted with the Modification Application do not include the extended noise wall along the eastern boundary of the OSE site. Updated drawings should be provided by Goodman showing the extended noise wall and should be incorporated into any approval of the Modification Application.

## **3 Local Road Connection**

The EIS notes that the Modification Application seeks to maintain the opportunity for a future connection between Estate Road 03 and Lot A. The plans of Estate Road 03 contained in Appendix B of the Response to Submissions Report for the original OSE application, and approved in condition B7(c) of the OSE approval, show Estate Road 03 continuing to the boundary of Lot A.

The revised masterplan on page 12 of the EIS for the Modification Application shows Estate Road 03 terminating at a cul-de-sac a number of metres short of the Lot A boundary. There does not appear to be any proposal to continue the road or the road reserve to the boundary of Lot A. If approved, this would have the result that a small area of privately owned land will remain between Estate Road 03 and Lot A, preventing any future connection without the acquisition of land.

Jacfin submits that this is unacceptable and that the conditions of consent for the Modification Application should require the road reserve of Estate Road 03 to be continued and dedicated to the boundary of Lot A.

The Modification Application also proposes a minor realignment of Estate Road 03. The centre line of the realigned Estate Road 03 is approximately 847.5 metres from the northern boundary of the OSE site and does not align with the centre line of Local Road 1 on Lot A, which is approximately 830 metres from the northern boundary of Lot A. The location of Local Road 1 was approved under Concept Plan Approval MP 10\_0129. It is essential that the location of Estate Road 03 align with the approved location of Local Road 1 to preserve the opportunity for a future connection between the OSE and Lot A. Jacfin submits that the Department should require Goodman to provide revised plans with the centre line of Estate Road 03 relocated 17.5 metres further north, so that it aligns with Local Road 1.

#### 4 Zoning of Jacfin Residential Land

It is also noted that the EIS for the Modification Application does not acknowledge that the rezoning of the Jacfin Residential Land has now taken place.

The rezoning of the Jacfin Residential Land from 'IN1 General Industrial' to 'RU4 Primary Production Small Lots' was effected on 24 June 2016. The EIS was finalised on 4 November 2016, many months after the rezoning occurred. It is concerning that the current zoning of the Jacfin Residential Land has not been recognised in the assessments carried out in relation to the Modification Application.

In addition, the EIS erroneously states that the Jacfin Residential Land was proposed to be rezoned to 'E2 Environmental Living'. There has never been any proposal to rezone the Jacfin Residential Land to 'E2 Environmental Living'.

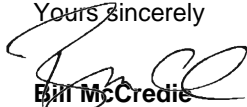
#### 5 Submission

While Jacfin supports the OSE development, Jacfin submits that the noise assessment undertaken in relation to the Modification Application is inadequate.

Jacfin respectfully submits that:

- (a) the Modification Application should not be approved unless and until an adequate noise assessment has been provided, which includes a cumulative noise impact assessment and demonstrates that the OSE, as proposed to be modified, can comply with the applicable Project Specific Noise Criteria of 38 dBA and (cumulative) Amenity Noise Level of 40 dBA at the Jacfin Residential Land;
- (b) the conditions of consent for the OSE should be modified as set out in Annexure A to this submission to ensure that the appropriate Project Specific Noise Criteria of 38 dBA is applied to the Jacfin Residential Land;
- (c) the Department should require Goodman to provide the noise modelling data underlying SLR's noise assessment and confirm the precise dimensions of the proposed noise wall;
- (d) the dimensions of the noise wall should be expressly recorded in the conditions of consent for the Modification Application;
- (e) the Landscape Plans and Civil Works Package should be updated to include the extended noise wall;
- (f) the conditions of consent for the Modification Application should require the continuation and dedication of the road reserve for Local Road 03 to the boundary of Lot A and the Department should require Goodman to provide updated plans with the centre line of Estate Road 03 relocated 17.5 metres to the north to align with the approved location of Local Road 1 on Lot A; and
- (g) the Department should require Goodman to update the references to the Jacfin Residential Land in the application materials submitted to acknowledge the rezoning of the Jacfin Residential Land to RU4.

Yours sincerely

  
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## Annexure A

- B18. The Applicant shall ensure that the Development does not exceed the noise limits provided in **Table 3** below and the receiver locations (L1, L2, L3 and L4 shown in **Appendix 4**):

**Table 3:** Project Specific Noise Limits dB(A)

Location	Day	Evening	Night	
	L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)	L <sub>A1</sub> (1 minute)
L1 North of Warragamba Pipeline	37	37	37	47
L2 Horsley Park	39	39	39	49
L3 Kemps Creek and Capitol Hill	40	40	40	48
L4 Mt Vernon and Jacfin	38	38	38	48

**Note:** Noise generated by the Development is to be measured in accordance with the relevant procedures and exemptions (including meteorological conditions) of the NSW Industrial Noise Policy.



#### APPENDIX 4 – NOISE RECEIVER LOCATIONS

Receiver area	Sensitive Receivers within Area
L1 North of Warragamba Pipeline	Includes all rural-residential dwellings in Kemps Creek and the Emmaus Village residential complex.
L2 Horsley Park	Includes all residential and rural-residential dwellings in Horsley Park and Mt Vernon.
L3 Kemps Creek and Capitol Hill	Includes all residential dwellings in Erskine Park to the north.
L4 Mt Vernon and Jacfin	Includes all future residential dwellings in the Jacfin RU4 residential area.



15 December 2016

WM Project Number: 16422  
Our Ref: NB 151216BC ltr Ver 3

Naomi Bergman  
Allens Linklaters  
Deutsche Bank Place  
Corner of Hunter & Phillip Streets  
Sydney NSW 2000 Australia

Dear Sir

**Re: Proposed modification to Oakdale South Estate  
Noise Assessment**

As requested we have reviewed the following noise report prepared by SLR consulting with respect to the application by Goodman to modify the Oakdale South Concept and Stage 1 Approval:

*Oakdale South Estate S.96 Modification Operational Noise Impact Assessment Report Number  
630.11166-R3 22 September 2016 (**Noise Report**)*

The Noise Report is inadequate in the assessment of noise emissions from the site because of the proposed modification. It is noted that discussions with Goodman have resulted in the provision of additional information and this is also noted in the following comments.

**Proposed Modification**

The modification proposes changes to buildings in Precincts 3, 4 and 5. Noise modelling was previously undertaken by SLR for the original Oakdale South application based on a configuration of the proposed buildings. The orientation and configuration of the buildings in Precincts 4 and 5 resulted in the buildings providing noise shielding to future residences from any truck and loading dock noise.

The current S96 modification presents building changes that will result in loading docks, particularly in building 4A, that will face future residences in the Jacfin Residential Land (Lot A DP 392643).

**Noise Limits on the Jacfin Residential Land**

We note that the approved conditions of consent for the Oakdale South Estate set a noise limit at the Jacfin Residential Land (Location L3) of  $L_{Aeq}(15 \text{ minute})$  40 dBA for the day, evening and night as follows:



## NOISE LIMITS

B18. The Applicant shall ensure the Development does not exceed the noise limits provided in **Table 3** below and the receiver locations (L1, L2 and L3 shown in **Appendix 4**):

**Table 3: Project Specific Noise Limits dB(A)**

Location	Day	Evening	Night	
	L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)	L <sub>A1</sub> (1 minute)
L1 North of Warragamba Pipeline	37	37	37	47
L2 Horsley Park	39	39	39	49
L3 Kems Creek, Mt Vernon, Jacfin and Capitol Hill	40	40	40	48

**Note:** Noise generated by the Development is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy.

The above L3 noise criteria, which includes the Jacfin Residential Land, are higher than the established intrusive noise criteria of 37 dBA that was included in the original Masterplan acoustic report prepared by SLR consulting and is consistent with the EPA's Industrial Noise Policy, and the Project Specific Noise Level (PSNL) of 38 dBA determined by the Department of Planning in their assessment.

A review of the Department of Planning's State Significant Assessment Report for Oakdale South Industrial Estate reveals that the 40 dBA criterion was applied to the L3 receiver area. The reasoning being that SLR noise modelling under adverse weather conditions indicated that a 2 dBA exceedance of the PSNL would occur at Kems Creek and Capitol Hill rural residential areas. The assessment concluded:

*Based on the results of the Applicant's noise assessments, the Department has concluded the development contemplated under the Concept Proposal will comply with the PSNLs during normal weather conditions at all receivers. However, where Class F temperature inversions occur, a minor exceedance of 2 dB(A) is predicted at two properties outside of the site. One is adjacent to the southern boundary and the other at the nearest residential dwelling 500 m to the south west (see Figure 19).*

*The Department has concluded this exceedance is acceptable on the basis that exceedances less than 2 dB(A) are generally not audible, and the noise modelling is based on an absolute worst-case operating scenario, which is unlikely to occur and considers the mitigation provided by the proposed noise walls along the southern and eastern boundaries would further mitigate any potential impacts. The Department also notes the proposal fully complies with the sleep disturbance criterion outlined in the INP in all weather conditions*

In the case of the Oakdale South Estate as originally approved the application of the above noise criteria for the L3 area presented no real issue for the Jacfin Residential Land, given that the original SLR noise predictions indicated that compliance with the PSNL of 38 dBA would be achieved at the Jacfin Residential Land (and Mt Vernon Residential Land) under neutral and adverse weather conditions. In the originally proposed configuration the bulk of the buildings in Precincts 4 and 5 would shield the Jacfin Residential Land from any excessive Oakdale South site noise.

However, with the revised reorientation of buildings as proposed by the S96 application, the grouping of Kems Creek, Mt Vernon, Jacfin and Capitol Hill into one receiver group with an allowable noise limit up to 40 dBA potentially exposes future residences located in the Jacfin Residential Land to higher noise levels than were presented in the original Oakdale South application to the Department.

Therefore, it is now considered reasonable to revisit the grouping of L3 receivers and conclude that the Project Specific Noise Level of 38 dBA, as originally determined by the Department, should be applied

to the Jacfin Residential Land (and Mt Vernon Land) and separated from the other two receiver areas where exceedances were predicted in the original noise assessment for Oakdale South.

Applying this reasoning, a fourth receiver area (say L4) representing the Jacfin Residential Land and Mt Vernon Land should be added and the PSNL of 38 dBA should be applied to this area. The approved criteria of 40 dBA for the L3 area, consisting of the Kemps Creek and Capitol Hill areas, could be retained for these receiver areas.

That is, it is considered reasonable that the Project Specific Noise Level of 38 dBA should be applied to the Oakdale South development in relation to the Jacfin Residential Land (and Mt Vernon) so that the outcomes of the original Oakdale South noise assessment are maintained.

### **Noise Modelling**

The Noise Report considers normal and adverse weather conditions. At the Jacfin Residential Land resultant industrial noise levels under adverse weather conditions are predicted to be 40 dBA (Table 4) with an extended 5 metre barrier installed on the boundary of the site.

Whilst data has been supplied for truck and car noise levels there is no indication in the Noise Report that loading dock noise has been modelled. This is particularly important as the new building configuration appears to have loading docks facing the Jacfin Residential Land. Previously the site configuration had buildings located between the docks and Jacfin Residential Land which shielded future residents from industrial noise.

Subsequent advice by Goodman indicates that noise from gas powered forklifts has been modelled however no indication of the locations and number of these noise sources has been provided or if forklift reversing alarms have been included in noise modelling. Without this information and whether the noise modelling scenario is representative of the likely future uses of Precincts of 4 and 5, it is not possible to assess whether the noise modelling has been properly undertaken, with all appropriate assumptions applied.

In the case of sleep disturbance, we are advised by Goodman that a noise levels of 115 dBA has been modelled. However, it is unclear if the modelling has been conducted under adverse weather conditions. Preliminary calculations by ourselves indicate that noise levels could be significantly higher under adverse weather conditions and thereby exceed sleep disturbance screening noise criteria.

### **Noise Attenuation**

Goodman is proposing to install a 5 metre noise barrier on the eastern and southern boundaries of the site. As a higher noise criteria of 40 dBA has been applied to the Oakdale South Site at the Jacfin Residential Land in the Noise Report for the modification application, a higher noise barrier is likely to be required to meet the correct noise criterion of 38 dBA.

However, whilst the proposed barrier is clearly detailed in the Noise Report, there is no clear definition of the length of the barrier in the modification application. Also, it is not clear what has been modelled around the modified building configuration and the input and assumptions that have been made in the noise modelling. Therefore, there is no confidence that the proposed barrier is adequate to address potential noise impacts at future residences on the Jacfin Residential Land.

### **Cumulative Noise Predictions**

No cumulative predictions of noise from the Oakdale South and the Jacfin Industrial Site have been presented in the Noise Report. A cumulative assessment should be conducted to establish that noise from both sites will not exceed the Amenity Noise Level (ANL) of 40 dBA. As the Noise Report predicts

the Oakdale South Site will generate noise levels of 40 dBA (Table 4 of the SLR report) then it is likely that cumulative noise levels from both sites will exceed 40 dBA at the Jacfin Residential Land.

Subsequent advice from Goodman is that cumulative noise was assessed in the initial application for Oakdale South and now that consent conditions have been applied to their site they consider no new cumulative noise assessment is required for the S96 application.

However, in their initial application Goodman proposed that cumulative noise from both the Oakdale South and Jacfin industrial lands should meet the Amenity Noise Level (ANL) of 40 dBA at the Jacfin Residential Land. Under the current S96 application it is now proposed that the revised configuration of Oakdale South by itself should be permitted to generate 40 dBA at the Jacfin Residential Land. It is therefore likely that cumulative noise levels will exceed 40 dBA at the Jacfin Residential Land.

Therefore, the issue of cumulative noise is of relevance and should be addressed in the S96 application consistent with the ANL proposed by SLR for Goodman in the initial application.

## **Conclusion**

The Noise Report predicts that noise levels at the Jacfin Residential Land will be in the order of 40 dBA which is the appropriate noise criterion for the cumulative industrial noise from all industrial receivers. However, this noise level is predicted to occur due to the operations of the Oakdale South site in isolation and noise levels are likely to be higher when Jacfin industrial operations are included in any assessment.

We have determined the following:

- The noise criteria applied to the Oakdale South Site with respect to Jacfin and Mt Vernon receivers is now too high, the result being that cumulative noise levels at the future residences could be above the Amenity Noise Level (ANL) of 40 dBA.
- Cumulative noise at receivers has not been assessed in the application even though this was conducted in relation to the original Oakdale South application and was required by the Department of Planning.
- There is no indication of the locations of the noise sources from loading docks that have been assessed or if reversing alarms have been included in the modelling. As a result, there is no confidence that the proposed noise barrier will be adequate when it comes time to develop Precincts 4 and 5 and further details of the development become known.
- Maximum noise levels from trucks could be significantly higher under adverse weather conditions thereby resulting in an exceedance of noise criteria at the Jacfin Residential Land.

Therefore, given the above findings it is likely that noise from the Oakdale South site, based on proposed operations and barriers will result in noise levels, when combined with the Jacfin industrial site operations, that will exceed the Amenity Noise Level (ANL).

A revised assessment based on achieving a PSNL of 38 dBA at the Jacfin Residential Land should be conducted. It is expected that a higher noise barrier will be required. In addition, the conditions of consent for location L3 should be revised so that there is a separate area classification for the Jacfin Residential Land and Mt Vernon residential land (L4) where the PSNL of 38 dBA is applicable. Once the above issues have been addressed confirmation that maximum noise levels comply with sleep disturbance criteria should also be demonstrated.

The above measures will ensure that the acoustic amenity of residences south of the Oakdale South and the Jacfin Residential Land is protected.

Yours faithfully

**WILKINSON MURRAY**

A handwritten signature in cursive script, appearing to read "Brian Clarke".

**Brian Clarke** - Senior Associate

**Extract from Planning Assessment Report- Noise Modelling Exceedances**

Oakdale South Industrial Estate  
SSD 6917

Environmental Assessment Report

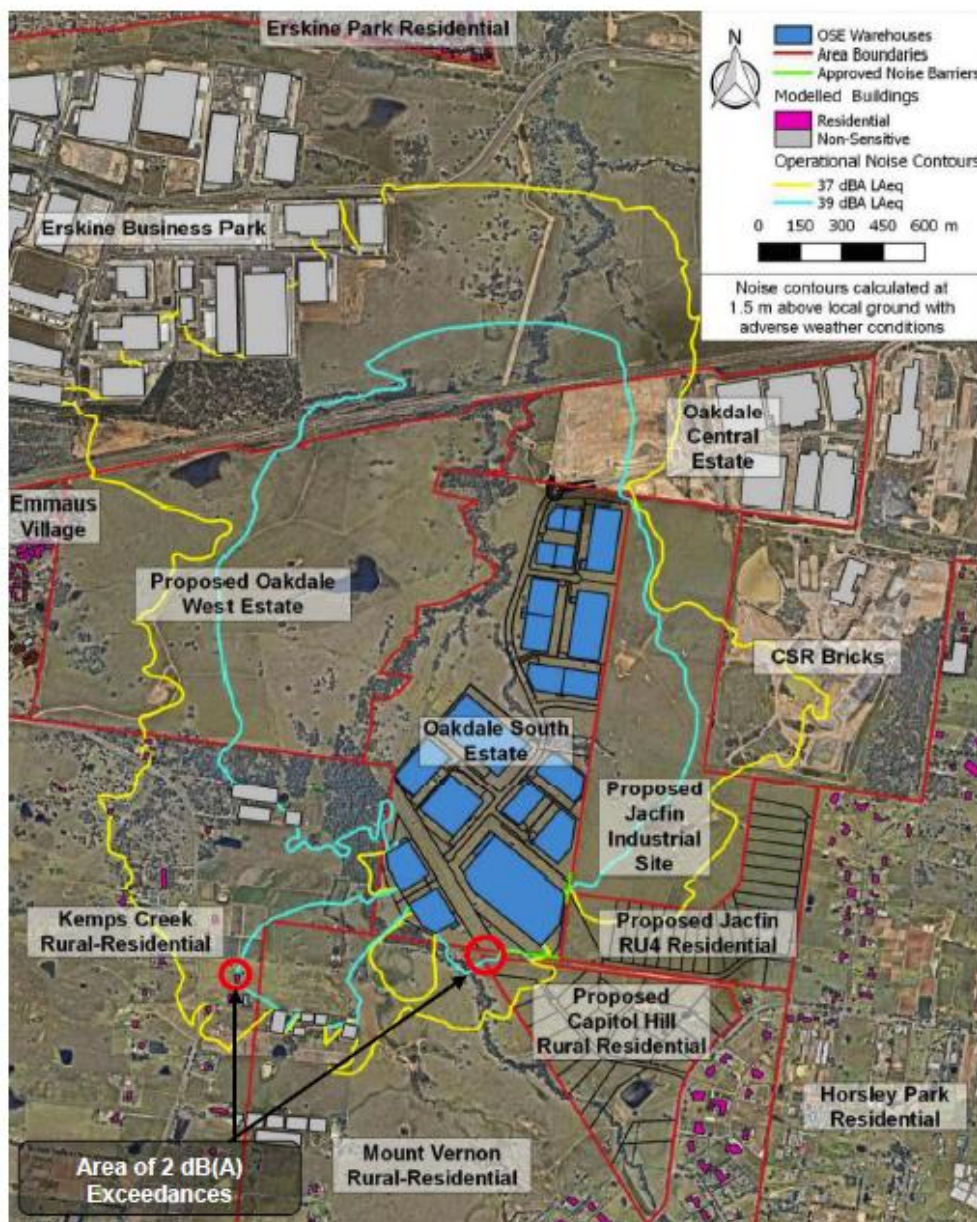


Figure 19: Area of Noise Exceedance During Adverse Weather Conditions