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Electronic Mail
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EPA Advice on Environmental Impact Statement – Noise Impacts

Dear Mr Koppers,

Thank you for the request for advice from Public Authority Consultation (PAE-9405812), requesting the review by the NSW Environment Protection Authority (**EPA**) of the Environmental Impact Statement (**EIS**) for the proposed Central Sydney Industrial Estate incorporating the Sustainable Road Resource Centre (SSD-10459) (**the Proposal**) at part Lot 100 DP 1168951 known as 9 Devon Street, Rosehill, NSW, 2142 (**the Premises**).

The EPA understands VE Property Pty Ltd (**the Applicant**) is proposing to create a thirty-five hectare industrial estate at the Premises by subdividing the site into eight lots and conducting infrastructure works. The EPA understands the Proposal also involves the construction and operation of Downer's Sustainable Resource Centre on Lot 6 of the industrial estate including an asphalt plant, a bitumen projects plant, and two waste facilities being a reclaimed asphalt pavement facility and a reconomy facility.

The EPA has conducted a preliminary review of the information provided relating to potential noise impacts and has determined that it is insufficient for the EPA to adequately complete its assessment of the Proposal's potential noise impacts. Therefore, the EPA is unable to provide recommended conditions of approval at this stage. The EPA's comments are provided in Attachment A below.

Please note that the EPA is still in the process of reviewing the EIS and associated documents and further comments will be provided upon the completion of the EPA's review.

If you have any questions about this request, please contact Alex Sands on (02) 9995-5981 or via email at alexandra.sands@epa.nsw.gov.au.

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Yours sincerely

A handwritten signature in black ink, appearing to read 'CF', with a large loop and a trailing flourish.

CELESTE FORESTAL
Unit Head Regulatory Operations – Metro North
Environment Protection Authority

ATTACHMENT A

The EPA has reviewed the following noise impact assessment (**NIA**) submitted with the EIS:

- Appendix C – Noise and Vibration Impact Assessment Report – Central Sydney Industrial Estate Rosehill, NSW prepared by Muller Acoustical Consulting dated 17 September 2020 (Report No. MAC201090-01RP1V2)

The EPA has determined that the information within the NIA is insufficient for the EPA to assess the potential noise impacts from the Proposal. The EPA requires additional information from the Applicant in order to adequately assess potential noise impacts.

The EPA does not support the following assertion in the NIA: *“Furthermore, in satisfying the relevant criteria, it is anticipated that there would be no cumulative industrial noise impacts at the nearby residential receivers”*.

The EPA requires the Applicant to address the following:

- The NIA at S.3.1.1 identifies “typical” construction hours of 6am to 6pm Monday to Friday and 7am to 1pm Saturday, and also notes that *“construction outside these hours will be required on both weekdays and weekends including Sundays”*. The Interim Construction Noise Guidelines (**ICNG**) (DECC, 2009) outlines standard construction hours (i.e. Monday to Friday – 7am to 6pm and Saturdays 8am to 1pm) and a need to justify construction outside these hours. The Proponent must outline the nature and extent of out of standard hours construction and the justification for it in accordance with the ICNG.
- Both operational and construction noise criteria are in part informed by prevailing background noise levels. The NIA has adopted Rating Background Noise Levels (RBLs) from a previous assessment (i.e. SSD-9302 – Viva Energy Clyde Western Area Remediation). The Proponent must ensure that adopted background noise data are reviewed and a statement provided that the data conforms to the requirements of the Noise Policy for Industry (**NPfI**) (EPA, 2017).
- Project Amenity Noise Levels: The NIA notes on page 29 that exceptions to the standard approach to deriving “project amenity noise levels” (i.e. NPfI, Section 2.4) exist. One of the exceptions relates to proposed developments in major industrial clusters. This current proposal will potentially result in the development of eight new industrial noise sources in an area with existing industrial noise sources. Therefore, the approach to developing operational “project amenity noise levels” (PANL) for Lot 6 (and remaining lots) needs to consider the NPfI Section 2.4.2. This approach effectively shares the “project amenity noise level” across the eight lots. For example, based on the night-time derived PANL of LAeq,15minutes 43dB, the level for Lot 6 isolation would be LAeq,15minutes 34dB. This approach is designed to manage cumulative noise impacts which is a SEARs requirement. The assessment must be amended to consider the adjusted PANL applicable in this situation.
- It is noted that the formula in Section 2.4.2 contains a typographical error and should be read as follows:

$$\text{Individual project amenity noise level} = 10\text{Log} (10^{((\text{ANL} - 5 \text{ dB})/10)/N}).$$
 Note: the 3dB conversion factor between LAeq,period and LAeq,15min applies to this process.
- The NIA at Table 12, Note 2, identifies application of the “industrial interface’ provisions in the NPfI. While this does not appear to be adopted in the assessment, the EPA advises that it would not support the application of the industrial interface provisions in this case and the Proponent should ensure this is reviewed.
- The NPfI requires that prevailing meteorological conditions be considered in noise assessments which include the occurrence of light winds and temperature inversion conditions. The NIA presents an analysis of the occurrence of light winds in Section 6.2.1. The assessment has not undertaken an analysis, or considered the occurrence and effect of temperature inversion conditions. The assessment must be amended to consider the

occurrence of temperature inversion conditions in accordance with Fact Sheet D of the NPfI. If temperature inversions are considered to be a feature of the area they must be taken into consideration in the noise modelling scenarios adopted.

- The NIA has reported use of the ISO9613 noise modelling algorithms implemented through the iNoise modelling package. The NIA, Table 18, presents the meteorological parameters considered in the assessment. Modelling these parameters would require the augmentation of the ISO9613 model. The assessment needs to fully outline the noise modelling approach used and justify its accuracy.
- The NIA, Table 20, identifies the expected noise attenuation from noise mitigation measures considered for the asphalt plant. The expected noise reductions are significant and in one case up to 26dB. The NIA must outline whether the stated noise attenuation levels are achievable and the notional design parameters needed to achieve them.
- The NIA has not considered potentially annoying characteristics of noise in accordance with Fact Sheet C of the NPfI. A detailed assessment in accordance with the provisions of the NPfI is required.