

Nadja Zimmermann

From: [REDACTED]
Subject: FW: RCA's review of MAC's response

----- Forwarded message -----

From: Alex Rees <[REDACTED]>
Date: Tue, Mar 14, 2023 at 5:13 PM
Subject: RCA's review of MAC's response
To: Belubula Headwaters Protection Group [REDACTED]

Table 1 of RCA's report 16545-401/2 outlines a number of items that RCA recommend be investigated further prior to project approval being considered. Table 1 is reproduced here:

Item recommended for further review	Brief description of item for review
RBLs, Table 10 of MAC report	RCA believe the NPI procedure for setting RBLs (particularly the rules for excluding data) have not been followed for the Kings Plains location. This could have bearing on the adopted criteria and then the degree of impacts discussed. See section 4.2 of this report for more information.
Meteorological analysis, section 5.2 of MAC report	There is some doubt over the temperature inversion analysis since the NPI states that the location of a 10 m high weather station needs to be on "level terrain" in order to execute the chosen method for analysing temperature inversions. RCA recommend this is a vitally important detail to the assessment and that the analysis should be double checked against another nearby weather station. See section 4.1 of this report for more information.
Road noise assessment, section 5.4 of MAC report	The Road Noise Assessment has not assessed maximum noise level events associated with braking and engine noise at the proposed intersection at the site access, which could potentially cause significant sleep disturbance impacts for the nearest resident. See section 4.4 of this report for more information.
Construction vibration human comfort impacts, section 2.5 of MAC report	RCA believe a typographical error was made in referencing safe working distances supplied by the TfNSW Construction Noise and Vibration Strategy. This should be corrected for accuracy. See section 6 of this report for more information.
Proposed DPIE noise conditions	The client has forwarded RCA the DPIE proposed noise conditions. RCA have concerns that the proposed conditions in B7 Table 1 will not protect the amenity of the nearby receivers. See section 8 of this report for more details.

In MAC's latest response, they say "Most points raised are minor and do not alter the outcomes of the ANVIA assessment. These could be confirmed by RCA's own analysis for the points raised or by seeking clarifications with the author to address questions from their review". MAC then present technical clarifications and affirm their position on all items listed above except one. The single item not discussed in MAC's latest response is the adequacy of the proposed noise consent conditions. While there has potentially been some disagreement between the two noise experts on most of the items above, we might construe MAC's silence on RCA's criticism of the proposed consent conditions to mean that the two experts agree on this one point.

MAC also makes the point that RCA's internal reviewer should be more experienced. RCA agrees that a more experienced internal reviewer would be ideal, but contend that the experience level of the internal reviewer is far less

important when preparing an independent review (as RCA have done) than what it is when preparing the assessment report itself (as MAC have done). When preparing the assessment report, there are many technical areas that present opportunity for error. Most of these technical intricacies are not visible to the independent reviewer, and there is much less opportunity to make an error. The role of the independent reviewer is more to compare the approach taken against the relevant guidelines. A junior internal reviewer has not diminished my ability to do this.



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