

1st February 2021

Ref: 5068R20220201as157-161WalworthRd

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RESPONSE TO INTERNAL COUNCIL MEMO (REF: 369.1/2020)

157-161 WALWORTH ROAD, HORSLEY PARK NSW

Koikas Acoustics Pty Ltd was requested to review and provide comment on the contents of an internal Council referral memorandum regarding the acoustic report prepared for the proposed child care centre development at 157-161 Walworth Road, Horsley Park NSW (ref: 396.1/2020, dated 9 November 2021).

Having reviewed the Council memorandum and comments provided therein, Koikas Acoustics concludes that there are essentially five (5) issues raised, being:

1. The Council not accepting of noise criteria being derived following the procedures specified within the Association of Australasian Acoustical Consultants (AAAC) Guideline for Child Care Centre Acoustic Assessment (V3.0, September 2020).
2. The noise management proposal presented by the applicant, which seeks to require a set group of children to engage solely in passive play whilst outdoors, is not supported.
3. Provide the total sound power levels for all children and their age groups.
4. No mention of the mechanical plant and equipment that is likely to be required.
5. There is no clear statement that the proposal will not cause unacceptable noise impacts to surrounding development and that the noise will comply with the adopted noise criteria.

Koikas Acoustics provides the following responses to each of the points raised in the memorandum and as summarised above:

Response to Item 1

In the absence of a set noise limit prescribed in the Fairfield Citywide DCP (Chapter 13 – Child Care Centres) that would apply to noise generation from child care centres, it is considered appropriate to derive noise emission criteria from the AAAC child care centre guidelines. The AAAC child care centre guidelines were developed specifically in response to noise generation and emission from child care centre development and for use in the assessment of its effect on nearby development/land uses, whereas the NSW EPA Noise Policy for Industry (NPfI) was designed for the assessment of large-scale industrial premises.

The AAAC child care centre guidelines generally support the use of a background + 5 dB noise limit for outdoor play areas that are in use with no time restrictions. A further 5 dB allowance above the background noise level (background + 5 + 5 dB) is allowed where the outdoor play area is limited to not more than 2 hours (morning) and 2 hours (afternoon) use. The extra 5 dB allowance for the time limited use of the outdoor play area is designed on the basis of having a similar daily noise exposure between limited and unlimited access to the outdoor play area. A ratio calculation of noise exposure over 4 hours versus a full 11-hour day (7 am to 6 pm) equates to -4.3 dB. This would appear to generally support the increase in allowable noise level under the AAAC child care centre guidelines.

It is also important to note that the concepts of ‘offensive noise’ and ‘intrusive noise’ are not interchangeable, thus it would not be accurate to assert that noise exceeding the background level by more than 5 dB would be automatically considered offensive.

Koikas Acoustics notes that the use of the AAAC child care centre guidelines in the assessment of noise emission from child care centres is commonplace among Council’s throughout Sydney and has been repeatedly adopted by the NSW Land and Environment Court (NSWLEC).

Response to Item 2

We note that the Council memorandum states that, because the AAAC child care centre guidelines do not present a clear definition of ‘active’ and ‘passive’ play, the consideration of passive play in the assessment of noise emissions should not be supported. It is further stated that it would not be possible for the Council to enforce active/passive play areas.



In responding to this item, Koikas Acoustics directs the Council to Section 6.8 'Noise Management Plan' of the AAAC child care centre guidelines and bullet point five (5) which reads:

The type of outdoor activities may be programmed to only allow quiet or "passive" activities such as painting, garden exploration, reading, block play or drawing in certain areas of the centre's outdoor play area.

This would appear to present a reasonable definition of activities suited to and representative of passive play.

Regarding the issue of enforcement of the active/passive play areas, we do not see how enforcing active/passive play area use would be any different to enforcing any other operational management responses such as:

1. The number of children outside at any time
2. The duration of outdoor play
3. Centre operating hours
4. Total number of children at the centre

Response to Item 3

Koikas Acoustics have presented the effective sound power levels for groups of 10 children involved in both active/free play and passive/educational play and separated into age groups being 0-2 years, 2-3 years, and 3-5/6 years. The report also states that the sound levels used in the assessment have been calculated from the base sound power levels.

It is unclear what relevance having a total sound power level for all children, per age group has, especially considering that one of the critical noise management recommendations of the acoustic report is to limit the number of children in outdoor play areas at any one time.

In any case, someone with a basic understanding of acoustics will be able to calculate the total overall sound power level by knowing the number of children and group (10) sound power levels.

Response to item 4

It is the position of Koikas Acoustics that assumptions provided within an acoustic report, especially regarding engineering disciplines to which Koikas Acoustics consultants are not experts (mechanical engineering), are not useful and can often be misleading or incorrect. It would serve no purpose to 'assume' plant and equipment that may be required for the development.

Response to Item 5

Minor amendments that can easily be incorporated into an updated report.

Kind regards,

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Senior Acoustical Consultant

Koikas Acoustics Pty