



DOC21/896988

14 October 2021

Ms Teresa Gizzi
Team Leader, Regional Assessments
Department of Planning, Industry and Environment

(via email: Teresa.Gizzi@planning.nsw.gov.au)

Dear Ms Gizzi

**New Public School at Mulgoa Rise, Glenmore Park (SSD 11070211)
EPA Advice on Environmental Impact Statement (EIS)**

I am writing to you in reply to your request to the NSW Environment Protection Authority (EPA) to provide comment on the noise and vibration impact assessment for the Environmental Impact Statement (EIS) for the above project.

I note the proposed development has been on exhibition which has closed and that the EPA provided a response dated 27 September 2021 advising that the premises did not require an Environment Protection Licence and that the EPA has no comment on the proposal and suggested Council should be consulted. (DOC21/765516-2).

The EPA has reviewed the document *New Primary School in Mulgoa Rise Review of Environmental Factors – Noise & Vibration Assessment Report*, Rev 2.0, dated 12 August 2021, prepared by Pulse White Noise Acoustics (the NVA), and provides the following comments and recommendations.

Site Details

The site of the proposed new primary school at 1-23 Forestwood Drive is located on current vacant greenspace, inside a fairly recent residential estate called Mulgoa Rise. Existing residences are located along the western, southern and north-eastern boundary with an intervening local road. A proposed mixed-use development is approved but not yet constructed to the north of the site, and community sporting fields and associated carparking are located to the east of the site. There are no major through roads or industrial areas in the vicinity, however there is an early learning centre just to the north-east of the site, within the existing mixed-use complex at 71 Deerubbin Drive (which appears to contain low-rise residential, child care, a café and a gym).

Background Noise Levels

The EPA considers the background noise monitoring is adequate for these reasons:

- Background noise levels were measured at one of the nearest sensitive receivers (30 Forestwood Drive, in the front yard of the residence, facing the development site). The daytime rating background level (RBL) is calculated as 34 dBA, the evening is 34 dBA, the night is 32 dBA and the morning shoulder from 6.30 am to 7:00 am is 39 dBA.

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- For the proposed, but not yet constructed, mixed-use development to the north of the site, monitoring results conducted for the mixed-use development proposal were used, resulting in a daytime RBL of 43 dBA, the evening is 38 dBA, the night is 33 dBA and the morning shoulder (6.30 am to 7:00 am) is 37 dBA.
- The outdoor play area of the early learning centre has the potential to influence background noise levels in the area to the north-east of the site. No similar source is located to the south of the site to influence the measured background noise levels at 30 Forestwood Drive.
- The Project Amenity Noise Level for the area, zoned as R1 and classified as 'urban' in accordance with the *Noise Policy for Industry* (EPA, 2017), is stated in the NVA as 55 dBA.
- The Project Intrusive Noise Levels are the controlling criteria as they are lower than the Amenity levels.

However, the EPA recommends the following alternate background noise levels at the receivers to the west of the site (on Darug Avenue):

- for receivers located along Darug Avenue (to the west of the site), it is more appropriate to use the RBLs measured at 30 Forestwood Drive; and
- for the receivers at 71 Deerubbin Drive, the RBLs from the mixed-use development proposal are appropriate.

Items that need addressing in the NVA

The NVA should assess the potential impact of construction work on the Early Learning Centre and suggest feasible and reasonable mitigation measures to manage any noise impact. This receiver has not been identified in the NVA as a sensitive receiver. Daytime construction work has the potential to impact on this receiver.

Community consultation and engagement should be included in the Construction Noise and Vibration Management Procedures.

Recommended limits on noise impacts

The EPA recommends that any development consent should include conditions requiring the applicant to select, install, and operate mechanical plant and equipment that does not result in a noise impact greater than 5 dB above background level when operated – either individually or cumulatively.

This recommendation should be considered in the context of comments provided above regarding the appropriate assignment of the background noise levels at receivers to the west of the site.)

Recommended limits on out of hours operations

The EPA recommends the development consent include a requirement to restrict usage of the School Hall to appropriate activities, and appropriate times, so that noise does not unacceptably impact on surrounding residents.

The NVA states in Section 1.1 "*It is intended that the Communal Hall in Building C, and library in Building A; operate between 6:30 pm and 10:00 pm as part of the out of hours operation. On rare occasions, these out of hours activities could extend till 12:00 am.*" The NVA does not predict noise levels for School Hall Out Of School Hours (SHOOSH) operations, it only states operational procedures if activities occur out of school hours (such as closing all external doors and windows). The EPA considers, in relation to the School Hall, that noise from normal activities would not be acoustically significant.

Recommended limits on construction hours

The EPA recommends that construction work be limited to the standard construction hours noted in the *Interim Construction Noise Guideline* (DECC, 2009) and that conditions for providing respite from construction noise be included in any consent for the proposal.

Should you require clarification of any of the above please contact Anna Timbrell on 9274 6345 or email anna.timbrell@epa.nsw.gov.au

Yours sincerely

MITCHELL BENNETT
Unit Head – Statutory Planning