

19 February 2024

Chris Ritchie

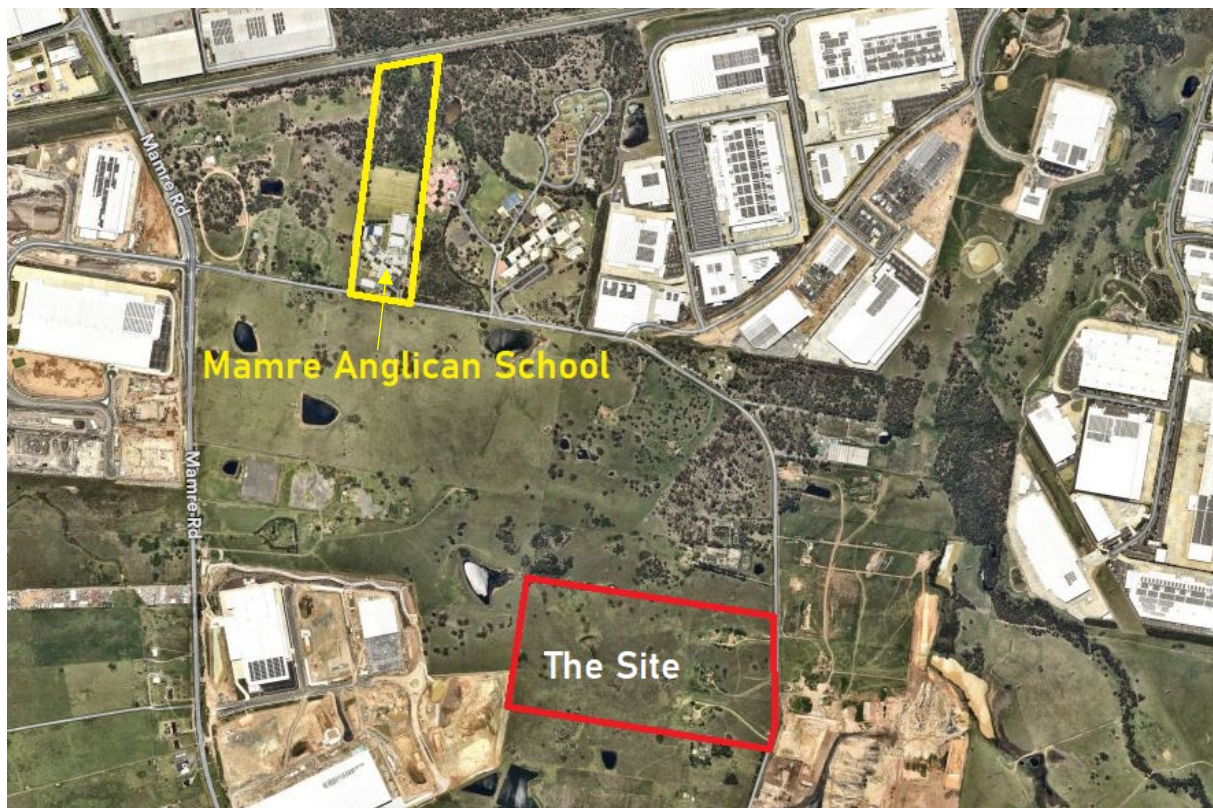
Director – Industry Assessments, Development Assessment and Infrastructure  
Department of Planning, Housing and Infrastructure  
4 Parramatta Square  
12 Darcy Street  
**PARRAMATTA NSW 2150**

Dear Mr Ritchie,

**Submission: SSD-32722834 Warehouse and Distribution Centre**  
**113-153 Aldington Road, Kemps Creek**

EPM Projects (EPM) has been engaged by The Anglican Schools Corporation (TASC), regarding the exhibition of State significant development (SSD) application SSD-32722834 for a proposed new warehouse and distribution centre, located at 113-153 Aldington Road, Kemps Creek (the site).

TASC was notified of the proposed SSD as the operator the Mamre Anglican School (the School), located at 45-59 Bakers Lane, Kemps Creek (**Figure 1**).



**Figure 1: The School in relation to the site (Source: Near Map, markups by EPM)**

The School has been in operation in the Kemps Creek area for the past 15 years, it contains several buildings, structures, infrastructure and improvements associated with the use of the site a K-12 School, generally including:

- Onsite carparking;
- Covered outdoor learning areas and shade structures;
- General learning areas (classrooms);
- Multi-purpose hall;
- Staff and administration areas; and
- Sports fields and playgrounds.

On behalf of TASC, this submission to the Department raises matters that are considered to be of significant impact to the School and that must be addressed by the proponent of the SSD application.

### **Acoustic Impacts**

The School has not been identified as a sensitive receiver for the purposes of the acoustical assessment/study undertaken by Acoustic Dynamic (provided at Appendix S of the EIS). School learning environments are highly susceptible to intrusive acoustic impacts, classroom amenity is critical to student learning and the proposed development should consider this in an updated acoustic impact assessment/study.

The revised acoustic impact/study should address the acoustic requirements of the NSW Department of Education's '*Education Facilities Standards & Guidelines*', the Association of Australasian Acoustical Consultants '*Guideline for Educational Facilities*' and relevant Australian Standards (such as AS2107:2016) in demonstrating that the School will be able to maintain its current levels of amenity without the intrusion of external noise from the proposed development (both during construction and at the operational phase). Cumulative acoustic impacts associated with previously approved developments in the locality should also be considered, in accordance with the Cumulative Impact Assessment Guidelines for State Significant Projects.

### **Traffic Impacts**

The draft construction traffic management plan (dCTMP) forming Appendix D to the Transport Management & Accessibility Plan (Appendix M to the EIS), indicates that construction traffic will enter and exit the site from/onto Arlington Road and travel south to link back to Mamre Road. Should development consent be granted, it is requested that conditions of consent ensure all construction traffic (both light and heavy), leave the site and turn right to travel south along Arlington Road. This is a critical matter for the School with a view to avoiding conflict between school pedestrians, school traffic and construction traffic, also assisting in mitigating amenity impacts.

Section 3.9 of the dCTMP should be updated to identify the School as a consultation stakeholder. This is to ensure that the School can appropriately inform its community on local traffic conditions and possible changes arising. It also ensures that the School is included in the consultation process for this project as it is commenced and carried out.

It is noted that interim traffic movements to and from the site during the future operational phase of the development (until further road works are completed in the precinct) are via Arlington Road. Specifics on operational travel routes to the site are not provided. There are concerns that a considerable number of additional vehicles will be distributed past the School during this interim phase. The safety of the School's students, staff and community is paramount.

During school drop off and pick up periods, having additional traffic on Bakers Lane will be detrimental to school student, staff and community safety. Approximately 2,000 students are making their way to/from schools within the locality each day (including Trinity Catholic College and Emmaus Catholic College, both on Bakers Lane). Preventing further traffic movements along Bakers Lane is therefore critical to safety and an efficient traffic network.

It is requested that the Transport Management & Accessibility Plan address this matter, with a view for operational traffic to also traverse in a similar manner to construction traffic until such time further infrastructure in the locality is completed.

Similar to the Acoustic Impacts discussed above, cumulative impacts associated with the previously approved developments in the locality, reflecting current traffic movements (not just forecasts or assumptions which would have formed part of earlier SSD approvals) should also be considered, in accordance with the Cumulative Impact Assessment Guidelines for State Significant Developments.

### **Conclusion**


The School acknowledges that the locality is undergoing change. However, the school is an established sensitive land use within the locality which benefits from existing use rights, as such, its amenity and safety concerns are critical matter for the proposed development to address. The matters identified within this submission, if adequacy addressed, will assist with mitigating the Schools amenity and safety concerns.

Should you have any questions regarding the above please contact Dennis Macan of from TASC via [dmacan@tasc.nsw.edu.au](mailto:dmacan@tasc.nsw.edu.au) to discuss further.

Yours faithfully,



Kendall Clydsdale  
**Associate Planner**



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