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15 April 2024

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

Dear Mr Ritchie,

Submission: SSD-30628110 Summit at Kemps Creek

706–752 Mamre 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-30628110 for an industrial estate development proposal at 706–752 Mamre Road, Kemps Creek (the site).

The concept proposal comprises of nine (9) buildings with a total gross floor area (GFA) of up to 244,413m^2 and a Stage 1 development of three buildings with a total GFA of 79,263 m^2.

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**).

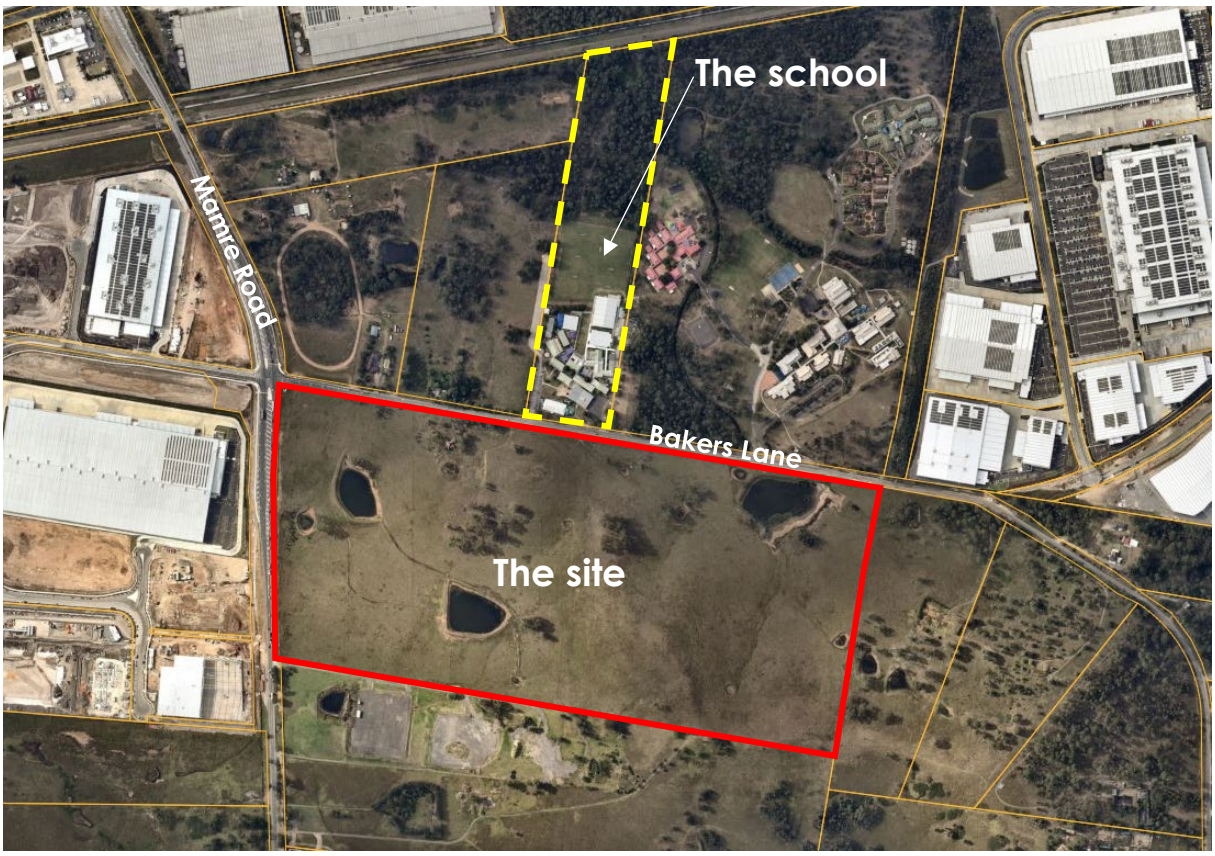

Figure 1: *The school in relation to the site (Source: Near Map, markups by EPM)*

1. About Mamre Anglican School

The school was founded in 1978 (previously Mamre Christian College) and has been managed by TASC 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 with approximately 620 students, 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 below that are of significant impact to the School and that are required to addressed in the SSD application.

2. Community Consultation

The EIS provides that the following community engagement was undertaken regarding schools in the area:

> *"A community newsletter was sent on Wednesday 30 March 2022 to 476 all residents and businesses located nearby the proposed site. The newsletter outlined key features of the Proposal and invited feedback. It included details of the project email and phone number managed by Urbis Engagement to answer questions and collect feedback.*
>
> *On 7 June 2022, ISPT met with these school groups to discuss the potential impacts of the Proposal to the local road network and proposed mitigations. Further, LOG-N (including the Applicant) met with the schools on 21 November 2023. During this meeting, LOG-N provided schools with an update on the proposed road network and invited feedback on the Proposal."*

TASC and the school have advised they do not have any record of the meeting mentioned as being held on 21 November 2023. Further to this, the meeting held on 7 June 2022 was found by TASC to be somewhat unclear in terms of the scope of the proposal.

For such a significant development proposal, directly opposite the school's campus, it is requested that a consistent level of engagement be maintained with the school, as would be a requirement of the SEARs. This is critical to keep the school community informed. All ongoing management documentation must identify the school as a key stakeholder. The engagement outcomes report which forms Appendix P to the Environmental Impact Statement (EIS) for the project advises:

> *"ISPT welcome feedback on the proposal. ISPT will continue to keep stakeholders and the community informed of the project approval process through the exhibition and determination phases by:*
>
> - *Providing information through a letterbox drop on how the community's views have been addressed*
> - *Enabling the community to seek clarification about the project through the two-way communication channels."*

This should explicitly detail how the school and all other relevant stakeholders will be engaged and at what stages of the development.

3. Traffic Impacts

TASC and the School have raised significant concerns with the Department over traffic impacts in the Mamre Road precinct as it continues to be developed. 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 matters for consideration in any aspect of the precinct's ongoing development. The safety of the School's students, staff and community is paramount.

Approximately 2,000 students make their way to/from schools within the precinct each day (including Trinity Catholic College and Emmaus Catholic College, both also on Bakers Lane). The construction traffic management plan (part of the Transport Management and Accessibility Plan at Appendix Q of the EIS) shows construction vehicles will be using Bakers Lane to enter and exit the site. Up to 600 truck movements per day will be taking place on Bakers Lane, this is a critical safety issue for the school and its community.

During school drop off (7:30am-9:30am) and pick up (2:00pm-4:30m), there will be a significant conflict arising between construction and school community traffic, along with pedestrian safety concerns. There are very limited alternative modes of transport to the school, as such students make their way to school via car or bus. Construction traffic using Bakers Lane is not considered to be appropriate.

The site has significant frontage to Mamre Road, consideration must be given to construction traffic entering the site from its western boundary to reduce construction traffic conflicts and safety concerns.

In terms of ongoing traffic and transport issues with Bakers Lane and the locality in general, the school has provided the following comments/recommendations:

> *"It is important to note that the currently proposed modifications to Bakers Lane are insufficient to control the increase in traffic due to school buses and vehicles during drop-off and pick-up hours. The substantial vehicle traffic coming from nearby warehouses could lead to unsustainable travel delays at the intersection of Mamre Road and Bakers Lane on school days.*
>
> *Required changes to Bakers Lane:*
>
> - *Install a stop sign where the proposed new road merges with Bakers Lane.*
> - *Bakers Lane is to remain as the main road, not merge with the new road to keep the school and warehouse/ industrial traffic separated.*
> - *All heavy vehicles be restricted from Mamre Road and Bakers Lane during drop-off and pick-up times on school days."*

TASC and the school wish to maintain an ongoing and open dialogue with the Department and the proponent to ensure traffic impacts in the Mamre Road precinct are continually monitored and evaluated. TASC seeks that the school be informed of any proposed changes and/or developments associated with works to Bakers Lane.

4. Acoustic Impacts

The school is identified as a sensitive receiver for the purposes of the noise impact assessment (provided at Appendix V of the EIS).

In terms of construction noise, it is noted in the assessment that the school is "…..*within the human comfort minimum working distance and occupants of these buildings may be able to perceive vibration impacts at times when vibratory rollers or rockbreakers are in use nearby.'*

The following noise related worst-case predictions are also shown in the assessment:

- *"Noise levels during construction are expected to exceed the NMLs at the nearest receivers during certain stages of the work.*
- *The highest exceedances are seen during work which uses noise intensive equipment, such as wood chippers or rockbreakers. Exceedances of around 20 dB are predicted when these items of equipment are being used in areas of the site near to receivers in NCA02 and NCA03, during activities such as vegetation clearing or hard rock excavation. Noise intensive equipment is likely to only be required for relatively short durations.*
- *Noise levels during less noisy activities or in NCAs that are further from the site are predicted to result in lower impacts or be compliant with the goals.*
- *No receivers are predicted to be highly noise affected (ie ≥75 dBA) during any of the construction work."*

- *It is noted that all work is expected to be completed during standard daytime construction hours.*

In terms of future operational noise, the assessment identifies that the concept masterplan and the stage 1 development will both result in noise criteria exceedances that will impact the school, even post implementation of recommended mitigation measures provided within the report. The noise impact assessment at Section 6.2.1 states:

> *"The NPfI (Noise Policy for Industry) defines residual noise impacts as exceedances of the Project Noise Trigger Levels which remain after all source and pathway feasible and reasonable mitigation measures have been considered. Residual noise impacts that exceed the Project Noise Trigger Levels by ≤2 dB are considered negligible and would not be discernible by most people. Exceedances of ≥3 dB are considered potentially significant and may require further consideration."*

As seen in **Figure 2** below, the school will be subject to residual noise impacts of ≥3 dB.

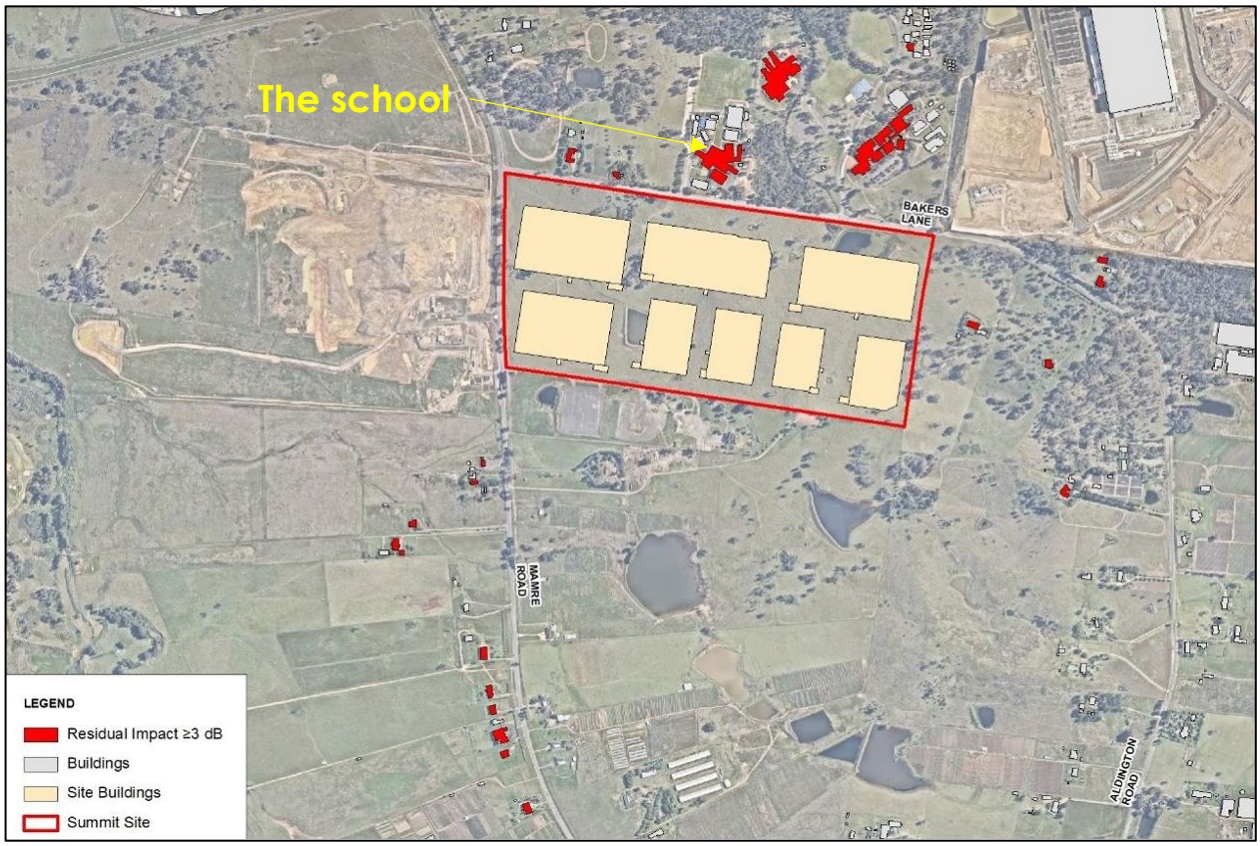

Figure 2: *Residual noise impacts (Source: Noise Impact Assessment provided at Appendix V of the EIS).*

School learning environments are highly susceptible to intrusive vibration and acoustic impacts, classroom amenity is critical to student learning and the proposed development must provide an updated acoustic impact assessment/study which takes a more practical and detailed approach to addressing the identified noise exceedances such that mitigation measures are sufficient to ensure the school learning environments are not significantly adversely impacted.

There will be potentially significant acoustic impacts to the school arising from the proposed development during operation. As the report states *"Exceedances of ≥3 dB are considered potentially significant and may require further consideration"*. These considerations must be addressed now as part of the SSD. Whilst the site of the school is located within the Mamre Road precinct, it enjoys existing use rights. The current levels of amenity enjoyed by the school must be adequately addressed and not reduced.

School learning environments are highly susceptible to intrusive vibration and acoustic impacts, classroom amenity is critical to student learning and the proposed development must provide an updated acoustic impact assessment/study.

A revised noise 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 vibration and noise from the proposed development (both during construction and at the operational phase).

If construction and operational noise impacts able to be adequately addressed, a Construction Noise and Vibration Management Plan (CNVMP) must be prepared in consultation with the school and nominate the school as a key stakeholder.

5. Air Quality

On-going air quality monitoring must be undertaken at the school by the proponent throughout construction to ensure dust, fumes, soot and the like do not impact the health and safety of the school community. This should form part of a construction management plan for the site (see below).

6. Construction Management Plan

It is noted that the SSD is accompanied by a 'construction environmental management plan' at Appendix BB of the EIS, however, this appears to deal with environmental protection only. There does not appear to be a preliminary construction management plan (PCMP) provided with the SSD. A PCMP is considered critical for a proposed development of this scale to:

- Identify key stakeholders (such as the school) for ongoing consultation during construction;
- Outline how construction impacts would be appropriately managed and mitigated (i.e. a consolidation source of impact mitigation measures); and
- Demonstrate how public safety will be maintained during construction, including any public safety measures that will be implemented.

7. Conclusion

A major industrial development such as that proposed opposite the school will result in significant land use conflict outcome. 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 potential traffic and noise impacts are significant and need to be addressed in the application.

The matters identified within this submission, if adequately 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 to discuss further.

Yours faithfully,

Kendall Clydsdale
Associate Planner

Stephen Earp
Head of Planning

BPlan (Hons), UWS
Registered Planner Plus (EIA)