

Mr Navdeep Singh Shergill
Planning Officer
Social and Other Infrastructure
Department of Planning, Industry and Environment
GPO Box 39
Sydney NSW 2001

Dear Mr Singh Shergill

Lindfield Learning Village (SSD 8114)
EPA advice on Supplementary Response to Submissions and Amended Proposal

I am writing to you in reply to the invitation to the Environment Protection Authority (EPA) to provide advice on the Supplementary Response to Submission (RtS) and amended proposal to replace the proposed loop road with an internal two-way road.

The EPA reviewed the documents *Response to Submissions Exhibited Phases 2 & 3 of Lindfield Learning Village*, prepared by Urbis dated 16 June 2020 (supplementary RtS), and the *Revised Noise Impact Assessment*, prepared by White Noise Acoustics dated 22 April 2020 (revised NIA), and has ongoing concerns regarding the noise and vibration assessment. In summary these are:

1. Procedures used to derive Project Noise Trigger Levels (PNTLs)
2. The need for community consultation in the construction noise mitigation strategy
3. Mechanical plant assessment
4. Traffic noise assessment
5. Assessment of offsite impacts from internal noise activity and cumulative noise levels
6. Outdoor Play.

Derived Project Noise Trigger Levels (PNTLs)

The revised NIA has addressed some of the EPA's concerns raised regarding the initial RtS (EPA letter dated 11 December 2019). The EPA is satisfied that the PNTLs (referred to as 'project specific noise levels' in our letter) have been updated based on monitoring undertaken during Phase 1. However, the revised NIA contains incorrect Project Amenity Noise Levels (PANLs).

The PANLs contained with Table 4 of the revised NIA have not been correctly determined as per the procedure in Section 2.4 of the *Noise Policy for Industry* (EPA, 2017) (NPfI). The Table 4 figures are the 'Recommended Amenity Noise Levels' from Table 2.2 of the NPfI, however the procedure for determining the PANL requires several more steps. The PANLs presented within Table 4 – which in turn determine the PNTLs for the project – are considered too high.

The calculations used to determine PANLs should be corrected. If not, then sufficient justification should be provided as to why the 'Recommended Amenity Noise Levels' have been used in lieu of complete application of the NPfI procedure. **As this will likely modify the PNTLs, the EPA would**

expect that all other calculations relating to acceptable noise levels at the receiver locations will also require modification, including those from the use of the extended driveway and the use of the internal spaces within the development.

Community Consultation

The EPA notes that a quantitative assessment of noise levels from construction has now been included in the revised NIA (Table 16). However, **the mitigation strategy shown within Section 7.4 of the assessment does not contain adequate planning for community consultation and communication**. This is important for this development due to the proximity of the receivers and the likelihood of those receivers being “noise affected” and/or “highly noise affected”.

Mechanical Plant

The EPA acknowledges that the design of the mechanical plant may not yet be advanced enough to predict noise levels. However, **an in-depth assessment should be made as to the likely scope and severity of the noise control measures required**, given that the noise from the development is already likely to be at or just below the PNTLs *without* the inclusion of mechanical plant noise. It is considered that the design of the mechanical plant mitigation will be important and should be based upon any revision to the PNTLs derived from a correct application of the NPfl.

On-site Traffic Noise Impacts

The EPA acknowledges that the loop road entering off Dunstan Avenue is no longer proposed and is to be replaced with an “extended driveway with bus turnaround and new car pick up road” on the eastern side of the site (supplementary RtS, Table 5). **The supplementary RtS report does not include an assessment of the revised on-site traffic arrangements against the NPfl criteria**, which was included in the White Noise Acoustic report dated 20 November 2019 (submitted as Appendix I to the original RtS). **On-site traffic movements remain relevant for assessment against the requirements contained in the NPfl**. The noise levels contained within Table 7 of the RtS acoustic report (White Noise, 20.11.19) indicate that the use of the loop road would be non-compliant with the PNTLs derived from the NPfl. As such, an assessment of reasonable and feasible mitigation measures is required.

Internal Noise Assessment and Phase 1 Cumulative Noise Levels

There is no quantitative assessment of noise from the internal spaces of the school presented within the report. There are details within Section 6.5 of the revised NIA outlining the nominal performance requirements of the façades, however there is no assessment of whether existing façades are meeting the nominated requirements. The noise reduction performance of the existing façades should be determined through detailed inspection and /or field acoustic testing.

The areas listed within the report, including the auditorium, squash courts, woodworking and performing arts room will all have significant potential to contribute to the overall noise level from the development. **A quantitative assessment of these spaces is required to be undertaken, including predicted internal source noise levels within relevant internal spaces at the school, and predicted noise levels at the receivers. This assessment is required to determine whether existing building facades will require upgrades to meet acceptable off-site noise levels.**

In addition to the above, all noise predictions made within the revised NIA for Phase 2 and 3 are to include the cumulative impact of Phase 1, 2 and 3.

Outdoor Play

The revised RtS indicates that the extended driveway option will have positive benefits in terms of increased outdoor play areas. The applicant needs to confirm that the increased outdoor play areas have been considered in the revised noise impact assessment. Further, the revised NIA identifies

that outdoor play area noise goals will be significantly exceeded however no physical mitigation measures are proposed. Any planning determination for this project will need to consider the potential impacts of outdoor play areas and consider these impacts in the project's determination.

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

Yours sincerely



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