

Industry Assessments
Department of Planning, Industry & Environment
GPO Box 39
SYDNEY NSW 2001

ATTN: David Way

Dear Madam/ Sir,

New Request for Advice - Warakirri College, (SSD-10420) (Campbelltown)

Thank you for your correspondence via the Major Projects Portal (ref: PAE-2361) on 11 March 2020, requesting Transport for NSW (TfNSW) to review and comment on the above.

Legislation came into effect on 1 December 2019 that brings together Roads & Maritime Services and TfNSW. This response reflects the advice from the new organisation.

It should be noted that Sydney Trains comments and recommended conditions are also included.

The supporting documentation provided in support of the SSD has been reviewed, and detailed comments are provided in **ATTACHMENT A**.

Should you require clarification of any issue raised, please don't hesitate to contact Robert Rutledge, Principal Transport Planner, Land Use Planning and Development at Robert.rutledge@transport.nsw.gov.au.

Yours sincerely



8/4/2020

Mark Ozinga

Principal Manager, Land Use Planning & Development
Customer Strategy and Technology

CD20/02659

ATTACHMENT A

Active Transport Considerations

Comment

The Traffic and Car Parking Assessment, along with the Traffic Report Addendum provided in support of the proposed development application has not adequately addressed Active Transport considerations.

Recommendation

As part of the response to submissions, it is recommended that applicant updates the plans to demonstrate that consideration has been given to the needs of pedestrians and cyclists. In particular:

- Bicycle parking and end of trip facilities for staff and students should be provided in accordance with Campbelltown Council Development Control Plans, standards and guideline documents;
- Reference to Sydney's Cycling Future and Walking Future is outdated. Please instead refer to policy guidance in Future Transport 2056.
- Locate bicycle facilities in secure, convenient, accessible areas close to the main entries incorporating adequate lighting and passive surveillance and in accordance with Austroads guidelines;
- Provide signage/marked walkways to the school entrance from the car park; and
- Update the Architectural package to show where these facilities will be located.

Green/ Workplace Travel Plan

Comment

To better manage demand on the transport network, the recommendations below are provided to encourage the use of sustainable transport to the site, which will help minimise the use of single vehicle trips.

Recommendation

It is requested that prior to the issue of the first Occupation Certificate, the applicant be conditioned to prepare a Green Travel Plan in consultation with TfNSW for the proposed development which must be approved by TfNSW. The Travel Plan should:

- Identify the total number of staff and students and predicted mode share;
- Provide strategies that encourage the use of public and active transport and discourage the use of single occupant car travel to access the site; for staff and students;
- Determine a communication strategy for engaging staff, visitors and the local community regarding public and active transport use to the site;
- Map potential walking/ cycling routes and prepare a Transport Access Guide for staff and students providing information about the range of travel modes, access arrangements and supporting facilities that service the site;
- Include promotion of the health and wellbeing benefits of active travel to the site; and
- Identify the number of students within reasonable walking / cycling distance.

The applicant shall submit a copy of the final Travel Plan to the Coordinator General, Transport Coordination within TfNSW for endorsement.

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Rail Noise and Vibration

Comments

Part 8 of the SEARs available on DPIE's Major Projects refers to DPIE's Development Near Rail Corridors and Busy Roads Interim Guideline. However, the proposal does not appear to properly address how noise impacts on its learning and recreational facilities will be managed from nearby rail operations on the SSFL and Main South.

Review of the attached Acoustic Assessment (dated 19/02/2020) prepared by Acoustic Logic for the proposal identified:

- Table 4 sets out the relevant noise criteria for proposed learning facilities impacted by existing rail noise operations. The report does not clearly set out the relevant noise criteria for proposed recreational areas within the site.
- Noise monitoring comprised 1 week of unattended logging on site and one 15-minute period of attended measurements. Section 4.2.2 states that the unattended noise logger on site was partially shielded by the existing noise wall (see below). The Acoustic Assessment does not state the height of the existing noise wall, however the Street View image below indicates it may be around 3 metres high. The partial shielding from this noise wall would likely reduce the measured noise levels, while the second storey of the proposed building would likely receive no shielding from this noise wall.
- Section 4.2.3 states that the one 15-minute attended noise measurement was undertaken between 4:00pm and 5:00pm. It is noted that few or no freight trains would likely be operating on the shared freight/passenger Main South line during that time as passenger trains have priority during morning and afternoon commuter times. The SSFL is a dedicated freight line, however the report does not state how many freight trains were recorded (if any) during the 15-minute measurement.
- Table 5 summarises the results of the unattended train noise measurements. For the week 12th to 19 September 2019 the average Daytime LAeq15hr noise level is 61dBA and the Night-time LAeq9hr noise level is 60dBA. These noise levels are assumed to apply at 3 metres from the proposed site boundary ie 13 metres from the SSFL and 27 metres from the Main South rail line. The measured noise levels are approximately 3dB less than TfNSW's database of rail noise levels for similar track conditions (tangent, not steep gradient).
- Table 11 indicates that structure-borne noise from the adjacent rail operations will be marginally below the upper range of the noise criteria (ie LAMax(Slow) 45 dBA). While the report did not provide details on how the structure-borne noise levels were predicted, the results suggest occupants in the proposed building may be concerned by structure-borne noise (e.g rumbling as trains pass by) louder than airborne noise levels of LAeq(9hour) 40dBA. Mitigating structure-borne noise typically requires vibration levels within the building to be reduced, which can be very costly and in some cases not feasible. It is noted that the existing SSFL is very close (within 10 metres) to the site boundary and the acoustic report does not discuss re-orienting the building layout to maximise distance to the rail line and therefore reduce structure-borne noise in sensitive areas such as learning and recreational spaces.
- Section 5.2 refers to attended train vibration measurements undertaken on 12th September, however there is no detail about what was the time of measurement or how many freight train passbys were captured during the measurement.

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Recommendations

TfNSW advises that the Acoustic Report supplied as part of the EIS does not contain sufficient information in relation to noise and vibration at this stage of the review. It is requested that the Applicant amend the Acoustic Report to supply further information in regards to items listed below:

- Present the results of the attended noise measurement, including height of microphone, impact of noise wall attenuation on observed readings and describe how many freight trains were captured during that measurement. Additionally, report should confirm airborne noise levels in sensitive areas such as learning and recreational spaces above the height of the noise wall.
- Assess the impact of rail noise on recreational areas within the proposal, and describe what controls will be implemented to address identified noise impacts.
- Provide details about exact timing of the attended vibration measurement and how many freight train passbys were captured during the measurement.
- Consider vibration isolation and building layout and orientation to minimise structure-borne noise to below airborne noise levels in sensitive areas such as learning and recreational spaces.

Sydney Trains

Comments

Sydney Trains advises that whilst there was a requirement as part of the SEARs for consultation with Sydney Trains to be undertaken, this consultation has not occurred. Sydney Trains advises that the documentation supplied as part of the EIS is not entirely sufficient due to the lack of rail related information at this stage of the review.

Recommendations

In this regard, with consideration for the proposal, it is requested that either the Applicant consult with Sydney Trains and supply further information in regards to items listed under **Section A** for review, or alternatively that the following requirements as written in **Sections A & B** are imposed on the proposed development:

Section A

The Applicant shall prepare and provide to Sydney Trains for approval/certification the following **final version** items in compliance with relevant ASA Standards

(<https://www.transport.nsw.gov.au/industry/asset-standards-authority>):

1. Geotechnical and Structural report/drawings that meet Sydney Trains requirements. The Geotechnical Report must be based on actual borehole testing conducted on the site closest to the rail corridor, including a rail specific section on any potential impacts and mitigation measures.
2. Construction methodology with construction details pertaining to structural support during excavation. The Applicant is to be aware that Sydney Trains will not permit any rock anchors/bolts (whether temporary or permanent) within its land or easements.
3. Cross sectional drawings showing the rail corridor, sub soil profile, proposed basement excavation and structural design of sub ground support adjacent to the rail corridor. All horizontal and RL measurements are to be verified by a Registered Surveyor.
4. Detailed Survey Plan showing the relationship of the proposed development with respect to Sydney Trains rail corridor (land and/or easements).

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Section B

1. No scaffolding is to be used facing the rail corridor unless prior written approval has been obtained from Sydney Trains. To obtain approval the Applicant will be required to submit details of the scaffolding, the means of erecting and securing this scaffolding, the material to be used, and the type of screening to be installed to prevent objects falling onto the rail corridor. Unless agreed to by Sydney Trains in writing, scaffolding shall not be erected without isolation and protection panels.
2. Prior to the commencement of any works appropriate fencing must be in place along the rail corridor to prevent unauthorised access to the rail corridor during construction works. Details of the type of fencing and the method of erection are to be to the satisfaction of Sydney Trains prior to the fencing work being undertaken.
3. The Applicant must ensure that all drainage from the development is adequately disposed of and managed and not allowed to be discharged into the railway corridor unless prior written approval has been obtained from Sydney Trains.
4. Unless advised by Sydney Trains in writing, all excavation, shoring and piling works within 25m of the rail corridor are to be supervised by a geotechnical engineer experienced with such excavation projects and who holds current professional indemnity insurance.
5. Prior to the commencement of any works a Registered Surveyor shall peg-out the common property boundary between the development site and RailCorp's land and easements. A copy of the survey report indicating the location of pegs must be provided to Sydney Trains prior to the commencement of works.
6. No rock anchors, rock bolts, ground anchors or rock ties, piles, foundations, rock pillars, transfer structures, basement walls, slabs, columns, beams, cut rock faces, are to be installed into RailCorp/Sydney Trains property or easements. The Principal Certifying Authority is not to issue the Construction Certificate until written confirmation has been received from Sydney Trains confirming that this condition has been satisfied.
7. No work is permitted within the rail corridor (including airspace), or any easements which benefit Sydney Trains/RailCorp, at any time, unless the prior approval of, or an Agreement with, Sydney Trains/RailCorp has been obtained by the Applicant. The Principal Certifying Authority is not to issue the Construction Certificate until written confirmation has been received from Sydney Trains confirming that this condition has been satisfied.
8. Prior to the issue of a Construction Certificate, a Risk Assessment/Management Plan and detailed Safe Work Method Statements (SWMS) for the proposed works are to be submitted to Sydney Trains for review and comment on the impacts on rail corridor. The Principal Certifying Authority is not to issue the Construction Certificate until written confirmation has been received from Sydney Trains confirming that this condition has been satisfied.
9. There is a need to ensure that the roots and foliage of trees being planted beside the rail corridor do not have an impact on the rail corridor or rail operations. A final landscaping and planting plan demonstrating measures to ensure compliance with this condition must be prepared to the satisfaction of Sydney Trains. No construction certificate can be issued until written confirmation has been received from Sydney Trains confirming that this condition has been complied with.
10. Prior to the issue of a Construction Certificate, a track (and/or ground vibration)

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monitoring plan (including instrumentation and the monitoring regime during excavation and construction phases) is to be submitted to Sydney Trains for review and endorsement. The Principal Certifying Authority is not to issue a Construction Certificate until written confirmation has been received from Sydney Trains that the monitoring plan has been endorsed.

11. Prior to the issuing of a Construction Certificate, the Applicant must submit to Sydney Trains a plan showing all craneage and other aerial operations for the development and must comply with all Sydney Trains requirements. If required by Sydney Trains, the Applicant must amend the plan showing all craneage and other aerial operations to comply with all Sydney Trains requirements. The Principal Certifying Authority is not to issue the Construction Certificate until written confirmation has been received from the Sydney Trains confirming that this condition has been satisfied.
12. Prior to the issue of a Construction Certificate the Applicant is to engage an Electrolysis Expert to prepare a report on the Electrolysis Risk to the development from stray currents. The Applicant must incorporate in the development all the measures recommended in the report to control that risk. A copy of the report is to be provided to the Principal Certifying Authority with the application for a Construction Certificate. The Principal Certifying Authority must ensure that the recommendations of the electrolysis report are incorporated in the construction drawings and documentation prior to the issuing of the relevant Construction Certificate.
13. The Applicant shall prepare an acoustic assessment demonstrating how the proposed development will comply with the Department of Planning's document titled "Development Near Rail Corridors and Busy Roads- Interim Guidelines". The Applicant must incorporate in the development all the measures recommended in the report. A copy of the report is to be provided to the Principal Certifying Authority and Council prior to the issuing of a Construction Certificate. The Principal Certifying Authority must ensure that the recommendations of the acoustic assessment are incorporated in the construction drawings and documentation prior to the issuing of the relevant Construction Certificate.
14. Prior to the issue of an Occupation Certificate (whether an interim or final Occupation Certificate), a report must be prepared and submitted to the Certifying Authority, Council and Sydney Trains certifying that the completed development meets the requirements of State Environmental Planning Policy (Infrastructure) 2007 and with the Department of Planning and Infrastructure's Development Assessment Guideline titled "Development Near Rail Corridors and Busy Roads - Interim Guidelines" as set down in the subject condition of this consent. Such a report must include external and internal noise levels to ensure that the external noise levels during the test are representative of the typical maximum levels that may occur at this development, and that internal noise levels meet the required dB(A) levels. Where it is found that internal noise levels are greater than the required dB(A) level, necessary corrective measures must be carried out to ensure that internal noise levels are compliant with the requirements of this consent.
15. The development shall have appropriate fencing fit for the future usage of the development site to prevent unauthorised access to the rail corridor by future occupants of the development. Prior to the issuing of an Occupation Certificate the Applicant shall liaise with Sydney Trains regarding the adequacy of any existing fencing along the rail corridor boundary or design and construction of new fencing. Details of the type of new fencing to be installed and the method of erection are to be to the satisfaction of Sydney Trains prior to the fencing work being undertaken.

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16. If required, prior to the issue of a Construction Certificate the Applicant is to contact Sydney Trains Engineering & Maintenance Interface to determine the need for public liability insurance cover. If insurance cover is deemed necessary this insurance be for sum as determined by Sydney Trains and shall not contain any exclusion in relation to works on or near the rail corridor, rail infrastructure and must be maintained for the duration specified by Sydney Trains. The Applicant is to contact Sydney Trains Engineering & Maintenance Interface to obtain the level of insurance required for this particular proposal. Prior to issuing the Construction Certificate the Principal Certifying Authority must witness written proof of this insurance in conjunction with Sydney Trains written advice to the Applicant on the level of insurance required.
17. The Applicant/Developer must give Sydney Trains written notice at least 5 business days before, and on the day of, commencing works which occur adjacent to the rail corridor.
18. The Applicant must ensure that at all times they have a representative (which has been notified to Sydney Trains in writing), who:
 - a. oversees the carrying out of the Applicant's obligations under the conditions of this consent and in accordance with correspondence issued by Sydney Trains;
 - b. acts as the authorised representative of the Applicant; and
 - c. is available (or has a delegate notified in writing to Sydney Trains that is available) on a 7 day a week basis to liaise with the representative of Sydney Trains, as notified to the Applicant.
19. Without in any way limiting the operation of any other condition of this consent, the Applicant must, during demolition, excavation and construction works, consult in good faith with Sydney Trains in relation to the carrying out of the development works and must respond or provide documentation as soon as practicable to any queries raised by Sydney Trains in relation to the works.
20. Where a condition of consent requires consultation with Sydney Trains, the Applicant shall forward all requests and/or documentation to the relevant Sydney Trains external party interface team. In this instance the relevant interface team is West Interface and they can be contacted via email on West_Interface@transport.nsw.gov.au.
21. Where a condition of consent requires Sydney Trains or Transport for NSW endorsement the Principal Certifying Authority is not to issue a Construction Certificate or Occupancy Certificate, as the case may be, until written confirmation has been received from those entities that the particular condition has been complied with. The issuing of staged Construction Certificates dealing with specific works and compliance conditions can be issued subject to written agreement from those entities to which the relevant conditions applies.

General Comments

TfNSW also provides the following advisory comments for consideration by the Department of Planning, Industry and Environment:

- It is unclear whether private vehicle trips with students as passengers has been included in modelling provided in the EIS. Please confirm.
- Please confirm the operational hours of the school.