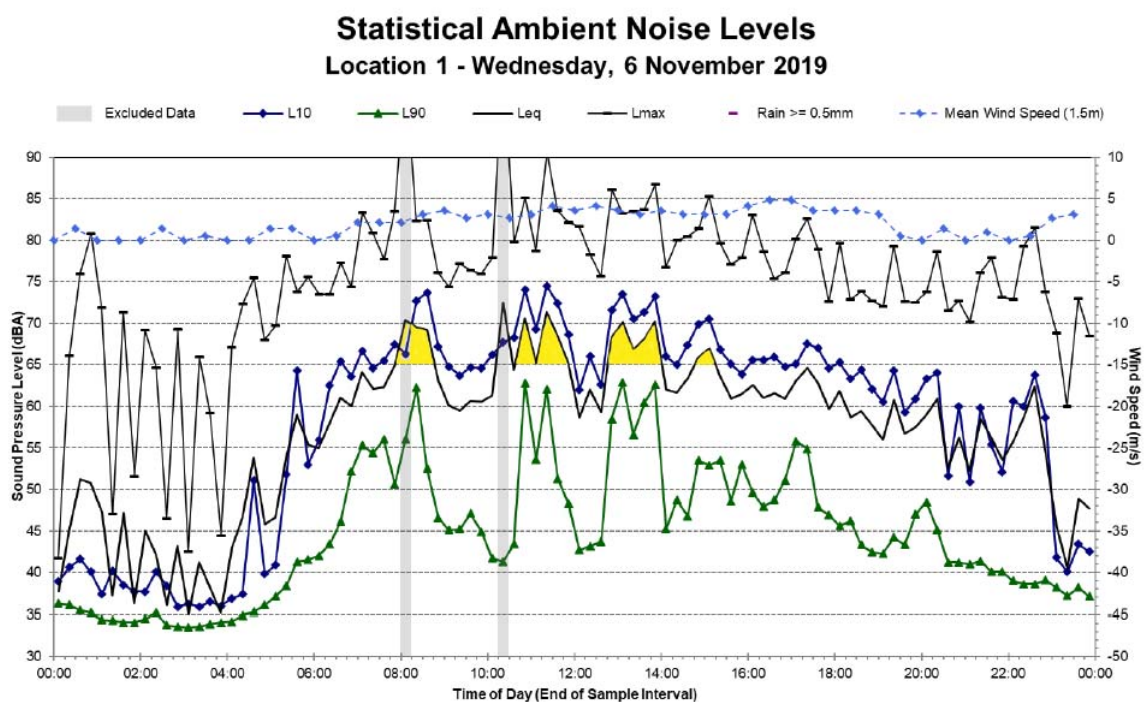


Residential noise amenity

The DPIE assessment states that the 2015 LEC judgement found that the increase in student numbers would result in cumulative noise impacts, but that noise was not the determinative issue in their refusal to approve a revised student cap of 1700 students. Indeed, the 2015 LEC judgement stated that noise was not raised as significant issue. However, as demonstrated by the one in five submissions raising a noise concern in relation to this SSD, residential noise amenity has substantially deteriorated since 2015. It seems to me that if each successive development application permits noise emissions at existing levels plus some (even +1dB), then non-compliant noise emissions can just keep continuing to increase until infinity. Further, the approval of this SSD is retrospectively approving noise that has become non-compliant since the school exceeded their 1500 student cap. Surely the acoustic assessment submitted at the time of the 2015 LEC judgement or the one that accompanied the last major development (2007) should be used the baseline for this SSD?

The applicant states that an increase of up to 2dBA during lunchtime is insignificant, however noise is not one dimensional measured on volume alone. Frequency and duration are also important factors. As mentioned above, since 2015 and exceedance of the 1500 student cap, the frequency and duration of excessive noise has become intolerable. This is largely due to overpopulation of the site; to the extent that recess/lunchtimes are now staggered. Residents living in close proximity to the school are currently in a situation where, as one recess break stops, another one starts up. After the recess noise has gone it's PE classes, accompanied by whistles and lots of shouting (often conducted 25-30m from residential properties) and then, it's lunch time. And again, just as one rowdy group of students depart another group appear. These double peaks of very high-volume recess/lunch sessions are clearly shown on the acoustic monitoring graphs.



As the draft approval stands, there do not appear to be any conditions that aim to mitigate noise emissions from ovals and other outdoor areas facing Victoria Street (including new active play area above Jubilee Drive). Approval is essentially granted for the school to determine all aspects of noise (volume, frequency and duration) emanating from ovals/outdoor areas facing residential premises, high volumes, all day/evening, every day of the week appear permissible. Relatedly, the new Seaview Street play area appears to have some restriction on volume (Draft Condition E17 limits number of students attending recess/lunch sessions), but frequency and duration are discretionary items.

Since 2015, the school has increased noise emissions to the point that this is overly intrusive noise for suburban area (noting that background noise without the school was 58dB in 2015, see LEC proceedings). The approval of this SDD will result in noise (over the boundaries of outdoor play/sports areas) in ALL directions: East, West and North towards nearby residents and South towards the public domain (Yeo Park). While most residents living near schools would agree that it is reasonable to expect a higher level of noise when children are playing at recess/lunch, I doubt many would agree that schools should extend this into multiple recess/lunch breaks per day. To compensate for higher noise during the school term, residents living schools could reasonably expect some relief during weekends or school holidays, but unfortunately this is not the case at Trinity Grammar School. Saturdays are designated for sporting fixtures and between terms facilities are used for holiday sports programs, all the noisy maintenance work commences, and the vast majority of the ongoing development takes place when students are absent. Construction noise can hardly be defined as “temporary” at Trinity Grammar School. The only other time that residents currently get some relief from the playground noise the school generates is when it is raining (offset by significantly more traffic noise), but that relief will also be gone soon.

In order to reduce the negative noise impacts that have arisen from successive developments and increased student enrolments at Trinity Grammar School, I have installed double glazing on non-lead-lighted windows that face the street (I live on Victoria Street opposite Oval 2). I have also purchased noise cancelling headphones (currently required to be worn more than 2 hours per day). There is not much more I can do as a receiver, as installation of acoustic barriers on residences that surround the school (all directions) are prohibited under conservation zone restrictions. I am also of the view that it is an unreasonable burden to expect local residents to wear noise cancelling headphones due to the generation of non-compliant noise. While I, as a receiver, try my best to mitigate the negative impact of high volume, frequent noise emissions for lengthy periods, there does not appear to be any draft Conditions that restrict noise emissions from outdoor play areas facing Victoria Street at the source.

Conversely, volume, frequency and duration of noise from outdoor areas will increase with a 40% increase in students and several new noise emitting features that will add to the cumulative noise load. These include the new teaching and learning buildings that feature open stairways/balconies that face towards Victoria Street. Clearly these buildings should be closed-in and sound proofed to minimise noise as students change classrooms every time the bell rings and to prevent them

becoming “grandstands” when sporting games are played on Ovals. New undercover outdoor areas are being installed (agora, active play area above Jubilee Drive, neither assessed for noise or appearing in the schedule of uses), plus a new pavilion, more school-related traffic (noise associated with school generated traffic was assessed in 2015 but doesn’t appear to have been assessed in this SSD), increased delivery trucks, buses and installation of mechanical plant.

I am particularly concerned that the carpark exhaust stack will not remain located 80m from the nearest residence (with the 9m stack generating pollutants at roughly the same height as windows on many of two storey residences on Victoria Street) and that the school has not been honest when stating they have no plans to install floodlighting. I say this because a) the school already brings in portable floodlighting and b) if the school cannot manage recess/lunch breaks without staggering, how do they plan to manage demand for sports training for 2100 students without extending use of Ovals? Typically, SDDs are accompanied by numerous “modifications” once the initial approval is granted. A floodlighting modification is highly likely to be the first one sought (adding both frequency/duration of already non-compliant noise) unless this is specifically prohibited (including lighting Ovals through other means).

Schedule of uses, traffic management, green travel plans etc are all Trinity Grammar School internal documents. These are subject to revision or can be simply disregarded by the school, as currently occurs with the “traffic management plan” that is not enforced. TGS has existing approval for use of pools from 5.30am-10.00pm Monday to Friday and 5.30am-8.00pm on Saturdays. Ovals have no restrictions on hours or days of use. It is likely that conditions regarding hours of use of Ovals were deemed unnecessary because usage would be self-limiting while the school had an enrolment cap of 1500 students. Given this SDD is recommending removal of the 1500 enrolment cap, and existing noise levels are non-compliant, conditions that prevent increased frequency or expanded duration of noise generating activities must be included in this SSD from the outset.

As a receiver, I have done all I can to remedy the unacceptable noise (operational and traffic) impacts the school imposes in a residential area. I am already subject to extensive noise that is about to get considerably worse. Mitigation measures to prevent cumulative noise impacts associated with intensification of use (some of which has already occurred) are urgently required at the source. Conditions that prevent expansion of the frequency and duration of non-compliant noise must be included to prevent residential amenity deteriorating further.