

**ANGEL PLACE
LEVEL 8, 123 PITT STREET
SYDNEY NSW 2000**

URBIS.COM.AU
Urbis Ltd
ABN 50 105 256 228

RE: SOCIAL IMPACT ASSESSMENT ADDENDUM – REVIEW OF UPDATED AIR QUALITY ASSESSMENT FOR 13 ENDEAVOUR ROAD CARRINGBAH

INTRODUCTION

This addendum has been prepared by Urbis Ltd (Urbis). It relates to the Development Application (DA23/0721) for TripleTwoNine Estate, involving redevelopment of 13 Endeavour Road Carringbah. The proposal includes light industrial uses, warehouse and distribution facility with ancillary office space, an industrial retail outlet, commercial uses, a childcare facility and a café.

Urbis' Social Planning team undertook a Social Impact Assessment (SIA) and completed a SIA report for Aliro Group in October 2023, to assess social impacts in relation to the childcare facility. The assessment was documented in a SIA report that accompanied the Development Application.

This SIA was undertaken in accordance with relevant government assessment requirements, guidelines, and policies; in particular, the Social Impact Assessment Guideline and Technical Supplement (Department of Planning Housing and Infrastructure, 2023) and Chapter 41 of Sutherland Shire Council's Development Control Plan (DCP) (2015). In alignment with Council's DCP, the SIA was required to assess the proposed childcare facility in Building 5. The pre-Application Development (PAD) meeting also indicated the SIA should address particularly considerations around the use of a childcare facility, including social impacts related to:

- Adequate access to outdoor play areas
- Adequate access to solar and shade
- Road safety concerns regarding truck movement and proximity to busy roads
- Poor air quality.

In response to the DA, Sutherland Shire Council issued a Request for Information (RFI), dated 3 May 2024, which included the following requests:

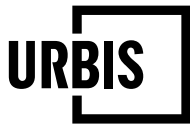
- The air quality report is to be updated to address comments provided by officers in response to the JBS&G methodology.
- Given the location of the childcare centre, the high sensitivity and the potential impact on young children's health, an Air Quality Management Plan is also required.

Aliro commissioned Urbis' Social Planning team to review the findings of additional air quality assessment works and an Operational Air Quality Management Plan, undertaken in response to Council's RFI, to assess implications for the SIA.

RFI RESPONSE AND PROPOSAL AMENDMENTS

Additional air quality testing and assessment

In response to the Council's RFI, Aliro commissioned SLR to address RFI items regarding the air quality assessment. It is noted that the consultant that undertook the initial Air Quality Impact Assessment (AQIA), JBS&G, were no longer undertaking AQIAs.



SLR undertook additional testing (utilising TfNSW Road Air Quality Screening Tool – RAQST), prepared a response letter outlining additional information and clarification (dated 11 October 2024), and prepared an Operational Air Quality Management Plan (OAQMP) (3 October 2024).

In summary, the letter prepared by SLR concludes:

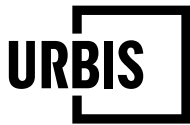
- The RAQST tests demonstrated that while NO₂ and PM₁₀ due to traffic emissions are not expected to exceed their NSW air quality criteria, relatively high PM_{2.5} concentrations are an issue for the site, and everywhere in the Sydney region and elsewhere. However, the higher PM_{2.5} concentrations are due to exceptional events such as bushfires increasing air pollutant concentrations across wide regions.
- Apart from vehicle traffic on Captain Cook Drive, the RAQST sensitivity tests included use of a high proportion of trucks using the internal delivery roads on the Caringbah site. The emissions from Captain Cook Drive and the internal truck traffic are located on either side of the childcare centre, such that air quality impacts from these two main sources would not occur simultaneously, i.e., not for any hourly-average wind direction. This means significant cumulative air quality impacts from these sources are not likely.
- Test results indicated air quality impacts at the Caringbah sensitive receptors and especially the childcare centre were acceptable, provided an Operational Environmental Management Plan is developed for the childcare centre.
- Given the location of the childcare centre and the high sensitivity of the receptors, an OAQMP is appropriate and emphasis on environmental assessment and management for the Caringbah project should be on the OAQMP.

Operational Air Quality Management Plan (OAQMP)

The OAQMP (SLR 2024) outlines the physical and operational measures that are to be employed by the childcare centre to minimise the risk of any exposure of children and staff to poor ambient outdoor air quality during operation of the site. These measures are outlined in section 'Review of Assessment of Potential Health and Wellbeing Impacts Related to Air Quality' on the following page.

Other proposal amendments

Minor amendments have also been made to the proposal following lodgement. These primarily relate to the amendments to GFAs for some uses. These amendments are not anticipated to result in any change to the social impacts previously assessed in the SIA. The amended proposal masterplan is included in Figure 1.



the traffic flows are lighter. At peak traffic times children should be moved indoors to avoid inhalation of emissions, especially from diesel engine powered vehicles.

- All mechanical air intakes will be located as far away as practicable from the roadsides.
- A solid balustrade will be constructed along the southern balcony of the outdoor play area.
- The key administrative control that will be used to manage air quality related risks at the site is the avoidance of outdoor play during periods of adverse background regional air quality.
- Monitoring of regional background air quality will be performed by review of real-time monitoring data available on DPHI's website. The selected website is to be displayed on a screen at the reception area in view of staff and visitors when the centre is operating and checked regularly to identify if the regional air quality is deteriorating, and if so, action is required to be taken in relation to outdoor play. The centre will also subscribe to the DPHI Air Quality Alert system to receive a daily update for air quality ratings and forecasts.
- The NSW EPA's General Advice for Groups Sensitive to Air Pollution has been adapted to outline a response to air quality ratings, which is included in the plan. This is to be displayed at the centre and will be activated in response to air quality ratings.
- The OAQMP is to be reviewed on an annual basis by the Centre Director and improved if required.
- Continuous improvement will be achieved by optimising the centre schedule to time outdoor play when air quality is consistently good.

Implementation of the above measures will assist to reduce the potential for the health and wellbeing of children and staff at the childcare centre to be impacted by air quality. With the assumption these measures are implemented, the impact remains assessed as low, given the unlikely likelihood and minor magnitude.

The above operational mitigation measures however will have some administrative and resourcing implications and impacts on the future childcare operator and staff. Recommendations to alleviate these impacts and further support the monitoring of air quality are provided below.

Recommendations

It is recommended that the proponent support the future operator and staff of the childcare centre in the monitoring of air quality and responses to air quality decline e.g. provision of equipment, information and materials (e.g. monitors, information displays and manuals); providing briefings or training in utilising data sources.

It is also recommended that the proponent install and maintain air quality monitors at the centre and in the childcare outdoor space to alert staff of air quality incidents and monitor air quality overtime.



AUTHOR'S DETAILS

This Social Impact Assessment addendum was prepared on 17 October 2024 by Sarah Braund.

Name	Sarah Braund
Organisation	Urbis
Role	Associate Director
Qualifications	Master of Policy Studies, University of New South Wales Bachelor of Landscape Architecture, Faculty of Built Environment, University of New South Wales
Signature	