



## Section 4.55 Modification Report (MOD\_3)

State Significant Development (SSD-26876801)

Relocation of The Forest High School

Allambie Road, Allambie Heights



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Project Manager: K. Mackay  
Client: NSW Department of Education  
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- B. Stage 1 and Stage 2 Public Domain Drawings (*Henry and Hymas*)
- C. Supplementary Transport Impact Assessment Report (*SCT Consulting*)
- D. Construction Noise and Vibration Management Plan (*E-Lab Consulting*)
- E. Modified Construction Management Plan (*John Staff*)
- F. Section 4.55 Modification 3 Consultation Statement (*John Staff*)

## Abbreviations

AS	Australian Standard
Council	Northern Beaches Council
DA	development application
DCP	development control plan
DFP	DFP Planning Pty Limited
DPE	former NSW Department of Planning and Environment
DPHI	NSW Department of Planning, Housing and Infrastructure
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2021</i>
LEP	local environmental plan
LGA	local government area
SEPP	state environmental planning policy
SSDA	State significant development application
TFHS	The Forest High School

# 1 Introduction

## 1.1 Purpose of Report

DFP Planning Pty Ltd (DFP) has been commissioned by the NSW Department of Education (DoE) to prepare this Section 4.55(1A) Modification Report in respect of State Significant Development Application (SSDA) 26876801.

SSDA 26876801 was approved on 23 November 2023 by the then NSW Department of Planning and Environment (DPE), as delegate for the Minister for Planning and Public Spaces, for 'the construction and operation of a new government high school' at Allambie Road and Aquatic Drive, Allambie Heights, in order to relocate The Forest High School (TFHS) from its existing site at Frenchs Forest (see **Section 2.1** for further details).

SSDA 26876801 has been modified on two occasions to give effect to minor changes relating to internal and external building design, bicycle parking location, loading arrangements, plant location and tree removal and retention.

The modifications proposed under this modification application are detailed in **Section 4** of this Modification Report and generally comprise staged construction of the public domain and road works as follows:

- Stage 1 works comprising all works except the intersection upgrade to Aquatic Drive / Allambie Road, with minor adjustments to kiss and drop arrangements and bus stop arrangements and with a temporary pedestrian crossing on Aquatic Drive. These works are to be completed prior to occupation of the site by students; and
- Stage 2 works comprising the completion of the intersection upgrade with permanent pedestrian crossing facilities on Aquatic Drive and removal of temporary measures. These works are to be completed within 2 years of the date of initial occupation.

## 1.2 Site Identification

The site is located approximately 1 kilometre southeast of the Northern Beaches Hospital and the current site of The Forest High School, being the site of the proposed Frenchs Forest Strategic Centre (see **Figure 1**).

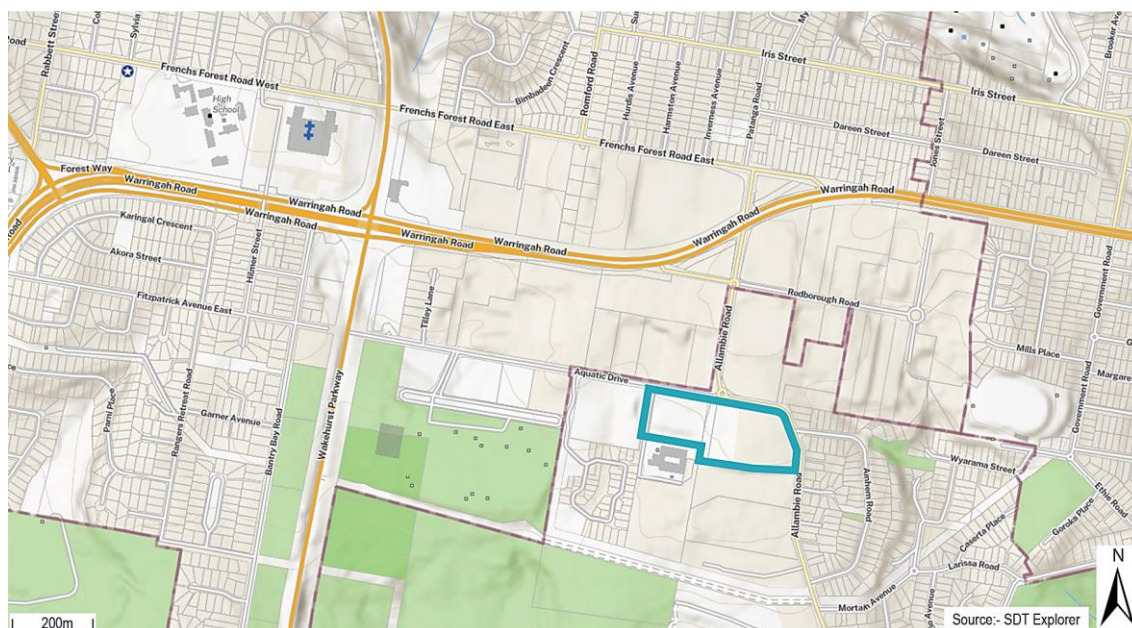


Figure 1 Site location.

# 1 Introduction

The site comprises 189 Allambie Road, Allambie Heights being Lot 6 and Lot 7 in Deposited Plan (DP) 1280781 and Lot 750 and Lot 751 in DP 1271174, and part of 5 Aquatic Drive, Allambie Heights, being part Lot 3 DP 1280781 (see **Figure 2**).

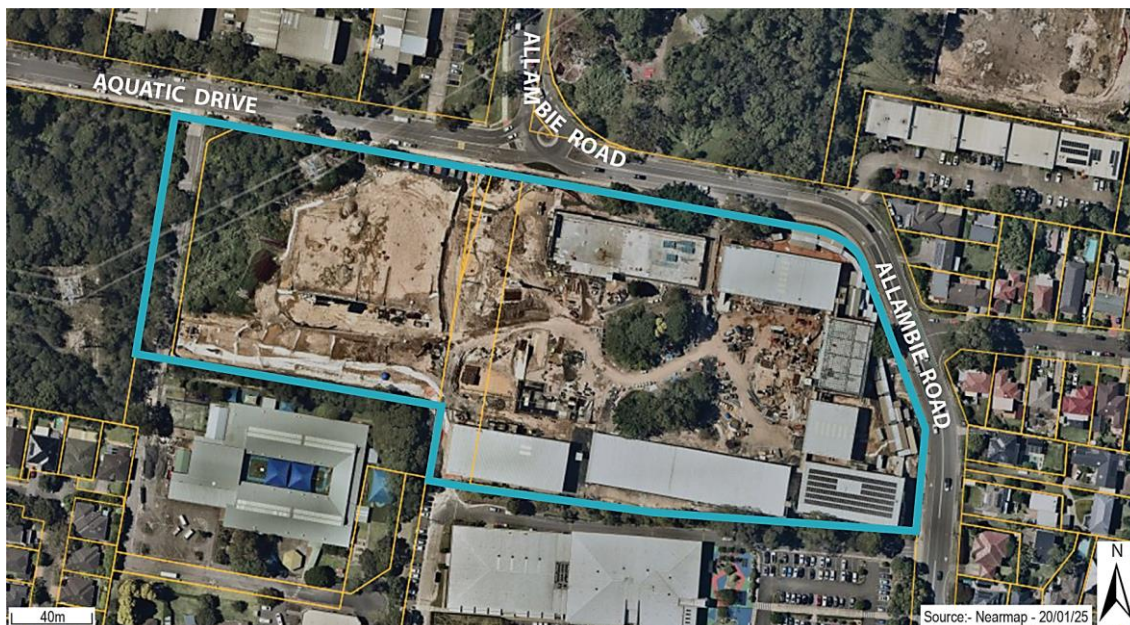


Figure 2 Aerial photograph of the site and surrounds.

Construction works associated with the approved development are well underway within the site with new school buildings erected and ancillary parking and sports fields commenced.

## 1.3 Purpose of this Modification Report

This Modification Report provides the NSW Department of Planning, Housing and Infrastructure (DPHI) and relevant NSW State Government Agencies with the relevant information necessary to assess the proposed modifications pursuant to Part 4 of the EP&A Act and the *Environmental Planning and Assessment Regulation 2021* (the Regulation) and for DPHI to determine the application in accordance with section 4.55(1A) of the EP&A Act.

## 1.4 Material Relied Upon

This report has been prepared by DFP based on the following modified and/or supplementary documentation:

- Stage 1 and Stage 2 Public Domain Drawings (*prepared by Henry & Hymas*);
- Supplementary Transport Impact Assessment Report (*prepared by SCT Consulting*);
- Supplementary Construction Noise and Vibration Management Plan (*prepared by E-Lab Consulting*);
- Modified Construction Management Plan (*prepared by John Staff*) including Supplementary Construction Traffic Management Plan (*prepared by TTPA*); and
- Section 4.55 Modification 3 Consultation Statement (*prepared by John Staff*).

## 2 Background and Engagement

### 2.1 Development Consent SSDA-35715221

On 23 November 2023 DPE granted development consent (SSD 26876801) for:

*The construction and operation of a new government high school, comprising:*

- *one and two storey buildings for the purposes of administration, general and specialist learning, special support unit facilities, a canteen, a library, a gymnasium and multi-purpose hall;*
- *outdoor sporting facilities including sporting field and games courts;*
- *covered outdoor learning area (COLA) and covered outdoor working area;*
- *underground staff car park, and bicycle and scooter parking spaces;*
- *associated earthworks, tree removal, landscaping, stormwater works, service upgrades, supporting infrastructure and signage; and*
- *use of facilities outside of school hours.*

SSD 26876801 was later modified on two separate occasions as follows:

- On 19 July 2024, SSD-26876801-MOD-2 was approved to remove an additional 11 trees and revise the Tree Retention and Removal Plan; and
- On 25 July 2024, SSD-26876801-MOD-1 was approved for external and internal design alterations, relocation of bicycle parking and plant location, and reconfiguration of the loading bay.

For reference, an extract of the approved site layout (as modified) is provided at **Figure 1** overleaf.

Construction works associated with the approved development are well advanced including completion of slabs and roofs on six of the seven buildings with interior fitout commenced on four of these buildings. In addition, piling works for the main carpark and sports fields are complete with formwork for the carpark slab commenced and retaining walls for the sport fields currently poured as of end March 2025.

All on-site works are scheduled for completion for a Day 1 Term 4 2025 (13 October 2025) initial occupation.

### 2.2 Authority Consultation

The Applicant and Project Team members have been consulting with TfNSW and Council regarding the detailed design and Roads Act approval for the public domain works since early 2024 and has also been consulting with TfNSW Bus Planning more recently relating to the relocation of school bus services to the new school site and bus stop requirements.

A detailed summary of consultation to date has been prepared in the Section 4.55 Modification 3 Consultation Statement prepared by John Staff which accompanies the modification application (see **Appendix F**) although the following subsections provide a brief overview.

#### 2.2.1 Transport for NSW and Council

On 16 February 2024, the project team submitted concept designs for the approved roadworks to TfNSW. This submission was acknowledged by TfNSW in mid-March 2024. A further updated submission was issued to TfNSW on 5 April 2024.

On 12 April 2024, the project team met with TfNSW to discuss the scope of road works and on 17 April 2024, the concept design was issued to Council for approval.

In June 2024, Council provided initial comments to the project team, primarily relating to the designs for the shared path on Allambie Road and the project team provided responses.

On 25 July 2024, Council provided further comments to the project team, with key comments again relating to the shared path, on-street parking arrangements and site access.

On 12 and 19 August 2024, the project team met with Council to discuss the road works designs and on 23 August 2024 a revised design was issued to Council.

## 2 Background and Engagement

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On 2 September 2024, Council provided in-principle support to the design, subject to the lodgement of a formal s138 application and the concurrence TfNSW.

During September and October 2024, the project team progressed the design work and road safety audit (RSA) for the purposes of preparing the s138 application with the RSA raising some matters that required further consultation with Council.

On 5 November 2024, the detailed design pack for s138 approval was issued to Council and TfNSW.

On 3 December 2024, the project team attended Council's Local Traffic Committee (LTC) meeting which raised concerns relating to whether replacement of the roundabout with a signalised intersection was the best option and other concerns relating to shared path connections. The LTC deferred further consideration of the matter pending receipt of additional information of these matters and other matters related to the design of bus stops, cycle lanes and kiss and drop zones.

On 14 January 2025, the project team met with Council to outline responses to the matters raised at the LTC meeting.

During February and March 2025, the project team met with Council to progress the public domain and road works designs.

On 1 April 2025, the project team attended the LTC meeting where the alternate design for the intersection upgrade was put forward, being an upgraded roundabout. Whilst a number of design matters required further advancement, in-principle support was given to the upgraded roundabout option.

### 2.2.2 Meetings with Transport for NSW (Bus Planning)

On 24 and 31 January 2025, the project team met with TfNSW Bus Planning to discuss relocation of the school bus services from the existing school location to the new school site.

During February 2025, TfNSW undertook surveys of bus usage at the existing school site to inform planning for the relocated services to the new site.

On 28 February 2025, TfNSW provided feedback to the project team regarding the number of bus bays and locations on the northern and southern sides of Aquatic Drive and on the eastern and western sides of Allambie Drive to meet TfNSW requirements.

On 20 March 2025, TfNSW provided support for the proposed bus stop strategy.

### 2.3 Pre-Application Meeting with DPHI

On 20 March 2025 and 2 April 2025 members of the project team met with DPHI Officers to discuss the proposed modifications and the following summarises the key points of discussion:

- All on-site works and the majority of off-site public domain works are proposed to be completed for initial occupation in October 2025;
- Some of the public domain works vary slightly from the approved design in order to meet Council and TfNSW requirements;
- The design of the Allambie Road/Aquatic Drive intersection upgrade is progressing although in order to meet Council's and TfNSW requirements, it will not be possible to complete this by October 2025. The modification application will need to demonstrate that existing intersection is capable of accommodating the demands of the initial occupation (reduced student capacity); and
- The arrangement of bus stops and the intersection upgrade works will require bus stops to move west along Aquatic Drive, reducing kiss and drop area in that location. The modification application will need to demonstrate that the quantum of spaces will meet the demands of the initial occupation (reduced student capacity) and the final occupation (full student capacity).

## 2 Background and Engagement



Figure 1 Approved Site Layout (Source: Architectus, 2023)

### 3 Strategic Context

**Table 1** provides a summary assessment of the project against the relevant provisions, goals and objectives of relevant State, regional and local strategies to provide an overall strategic context for the proposed modifications.

Table 1 Response to Provisions, Goals and Objectives of State Policies	
State Policy	Response
<b>The Greater Sydney Region Plan - A Metropolis of Three Cities</b>	<p>The proposed modified development contributes to the implementation of the Greater Sydney Region Plan and its five (5) districts. The districts are being planned to deliver growth and change in Greater Sydney, and the site forms part of the North City District.</p> <p>The proposed modified development is consistent with the North District Plan as it proposes to relocate and enlarge an existing school in an established urban area thereby supporting the local community with social infrastructure as it continues to grow and evolve in accordance with the plan. It is noted that the Northern Beaches LGA is anticipated to accommodate 16% (~3,450 children) of the growth in school aged children during the life of the plan.</p>
<b>Future Transport Strategy 2056 – Shaping the Future</b>  Relevant vision outcomes: <ul style="list-style-type: none"> <li>• Successful places</li> <li>• Accessible services</li> <li>• Sustainability</li> </ul>	<p>There are six (6) state-wide outcomes to guide investment, policy and reform and service provision, and the three (3) listed here have relevance to the proposal. The relevant vision outcomes for the project are:</p> <ul style="list-style-type: none"> <li>• Successful places</li> <li>• Accessible services</li> <li>• Sustainability</li> </ul> <p>The proposed modified development will support the relevant vision outcomes of this Strategy by providing increased school capacity in an accessible location in close proximity to existing road transport infrastructure with numerous bus connections. There is no increase in student numbers as a result of the modification and hence, the modifications do not prevent the objectives of the Strategy from being achieved.</p>
<b>North District Plan</b> A plan to manage growth and achieve the Greater Sydney regional plan vision, while enhancing liveability.	<p>The proposed modified development helps deliver the vision expressed in the North District Plan as it will facilitate the development of the Frenchs Forest Health and Education Precinct. In addition, the proposal will provide a high-quality learning environment for future generations of students.</p> <p>The project contributes to the following indicators and Planning Priorities in the District Plan,</p> <ul style="list-style-type: none"> <li>• A city supported by infrastructure: aligns with forecasted growth, adapts to meet needs, new investment, optimum usage;</li> <li>• Providing services and social infrastructure to meet people's changing needs;</li> <li>• Fostering healthy, creative, culturally rich and socially connected communities;</li> <li>• Services and infrastructure meet communities' changing needs;</li> <li>• Great places that bring people together;</li> <li>• Integrated land use and transport creates walkable and 30- minute cities;</li> <li>• Internationally competitive health, education, research and innovation precincts;</li> <li>• People and places adapt to climate change and future shocks and stresses;</li> <li>• Urban tree canopy cover and delivering Green Grid connections;</li> <li>• Delivering high quality open space;</li> <li>• Reduced transport related greenhouse gas emissions; and</li> <li>• Reduced energy use per capita.</li> </ul>
<b>Northern Beaches Local Strategic Planning Statement (LSPS) – Towards 2040</b>  The Council's 20-year land use planning vision that seeks to balances the need for growth with protecting and enhancing housing diversity, heritage and local character.	<p>The modified project will continue to deliver on the vision expressed in the LSPS by contributing to the following Priorities from the Plan:</p> <ul style="list-style-type: none"> <li>• World Class education facilities (PP 10); and</li> <li>• Community facilities and services that meet changing community needs (PP 11).</li> </ul>
<b>Frenchs Forest 2041 Place Strategy (DPIE 2021)</b>	<p>The Place Strategy identifies five (5) 'Big Moves' required to realise the full potential of the precinct. The first of the five (5) is "Relocate and construct a new high school". Consistent with the Place Strategy, the modification will facilitate:</p>

### 3 Strategic Context

**Table 1 Response to Provisions, Goals and Objectives of State Policies**

State Policy	Response
	<ul style="list-style-type: none"> <li>a new state-of-the art high school, where students will enjoy easy connections to transport, open space and sporting fields;</li> <li>opening up more than 60,000m<sup>2</sup> of ideally located land for a bustling new town centre.</li> </ul>
<b>Hospital Precinct Structure Plan (Northern Beaches Council 2017)</b>	<p>The Structure Plan envisaged the delivery of 5,360 new dwellings and 2,300 new jobs over and around the current high school campus. The structure plan proposed the relocation of The Forest High School to the site of the Warringah Aquatic Centre at Aquatic Drive to facilitate the development of the new town centre.</p> <p>The modified proposal is consistent with the Structure Plan as it will facilitate the approved relocation of the school to facilitate the new town centre.</p>
<b>Sydney's Cycling Future 2013 - Cycling for everyday transport</b>	<p>This Plan is focused in Sydney CBD, major centres and public transport interchanges however, it provides for better planning, design and construction of new urban area for cyclists.</p> <p>The initial proposal included a School Travel Plan aimed at encouraging more children to walk and cycle to school and the physical works proposed include cycle parking and end of trip facilities and new shared paths along the frontage and near the school to support and encourage cycling to school by students and staff. There is no increase to the student or staff numbers or the intended modes of travel or parking arrangements proposed as part of this modification application and hence, there is no change to the approved School Travel Plan. In addition, the proposal will facilitate widened shared paths along parts of the school frontage which will be beneficial to cyclists.</p>
<b>Sydney's Walking Future 2013 - Connecting people and places</b>	<p>This plan aims to get people walking for transport purposes more often and this will be done by (a) promoting walking for transport; (b) connecting people to places through safe walking networks around centres and public transport interchanges; and (c) engaging with partners across government, with councils, non-government organisations and the private sector to maximise our effectiveness.</p> <p>The initial proposal included a School Travel Plan aimed at encouraging more children to walk and cycle to school and the physical works proposed include cycle parking and end of trip facilities and new shared paths along the frontage and near the school to support and encourage walking to school by students and staff. There is no increase to the student or staff numbers or the intended modes of travel or parking arrangements proposed as part of this modification application and hence, there is no change to the approved School Travel Plan. In addition, the proposal will facilitate widened shared paths along parts of the school frontage which will be beneficial to pedestrians.</p>
<b>Sydney's Bus Future 2013 - simpler, faster, better bus services</b>	<p>Students and staff can access school and public bus transport for travel to and from school. This modification supports the use of public transport by providing for appropriately located bus zones on Aquatic drive and Allambie Road.</p>

## 4 Proposed Modifications

### 4.1 Overview

The proponent has been progressing the design of the Allambie Road/Aquatic Drive intersection upgrade in consultation with Council and TfNSW.

Part of the design deliberations has been the possibility that the intersection be upgraded in a different manner to that which has been approved, in order to improve the efficiency of the intersection and to minimise disturbance to significant utility infrastructure within the road reserve. Accordingly, the proponent is required to undertake further investigations which will delay the delivery of the intersection upgrade as approved.

Notwithstanding, even if the intersection design were to remain unchanged, the time to complete the design specifications, obtain the requisite approvals under the *Roads Act 1993* and relocate utility infrastructure means that the physical works could not be completed prior to the intended commencement of school operations in October 2025.

Accordingly, it is proposed that the school commence operation in October 2025 without completion of the intersection upgrade and with several interim arrangements to enable the efficient use of the intersection and the safe management of pedestrians.

### 4.2 Stage 1 Public Domain and Road Works

The proposed Stage 1 public domain and road works will comprise:

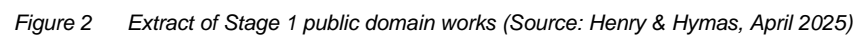
- all previously approved works except the intersection upgrade to Aquatic Drive / Allambie Road;
- minor adjustments to kiss and drop arrangements and bus stop arrangements; and
- a temporary at-grade pedestrian crossing on Aquatic Drive approximately 50m to the west of the intersection with Allambie Road, along with temporary kerb blisters, pedestrian islands, signage and temporary pedestrian fencing around the north-west corner of the intersection.

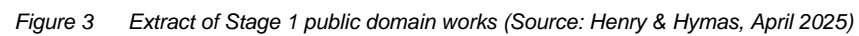
These works are to be completed prior to occupation of the site by students.

The physical measures are shown in the extracts of the Stage 1 public domain plans at **Figures 2-6** for ease of reference only. For greater detail, refer to the Stage 1 public domain plans at **Appendix B**.

### 4.3 Stage 2 Public Domain and Road Works

The proposed Stage 2 public domain and road works will entail completion of the intersection works as currently approved and as shown on Sheet 108 in the Stage 2 public domain plans at **Appendix B**.





## 4 Proposed Modifications

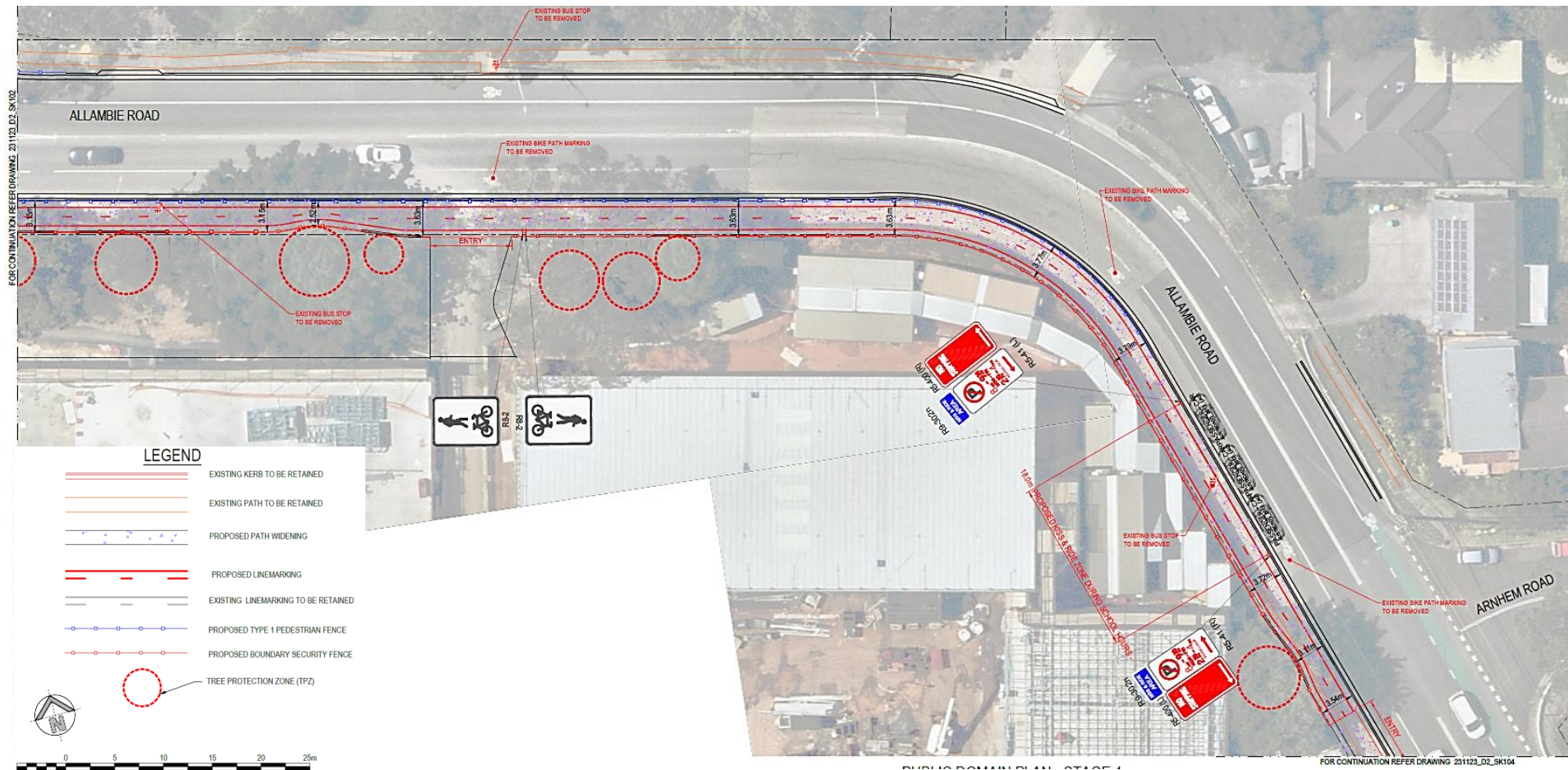
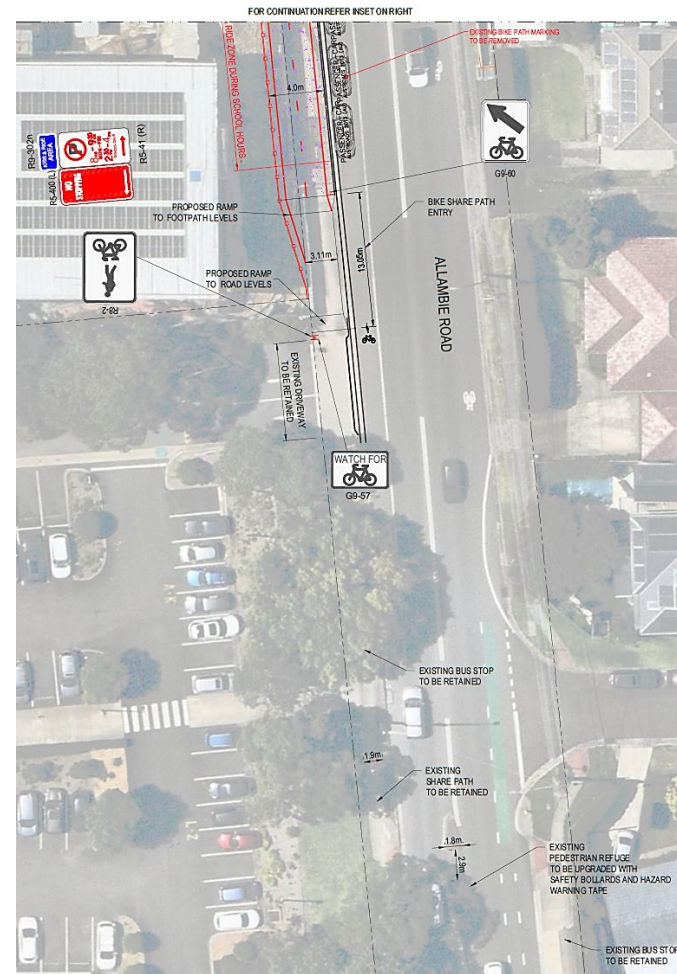


Figure 4 Extract of Stage 1 public domain works (Source: Henry & Hymas, April 2025)



**LEGEND**

- EXISTING KERB TO BE RETAINED
- EXISTING PATH TO BE RETAINED
- PROPOSED PATH WIDENING
- PROPOSED LINEMARKING
- EXISTING LINEMARKING TO BE RETAINED
- PROPOSED TYPE 1 PEDESTRIAN FENCE
- PROPOSED BOUNDARY SECURITY FENCE
- TREE PROTECTION ZONE (TPZ)

## 4 Proposed Modifications

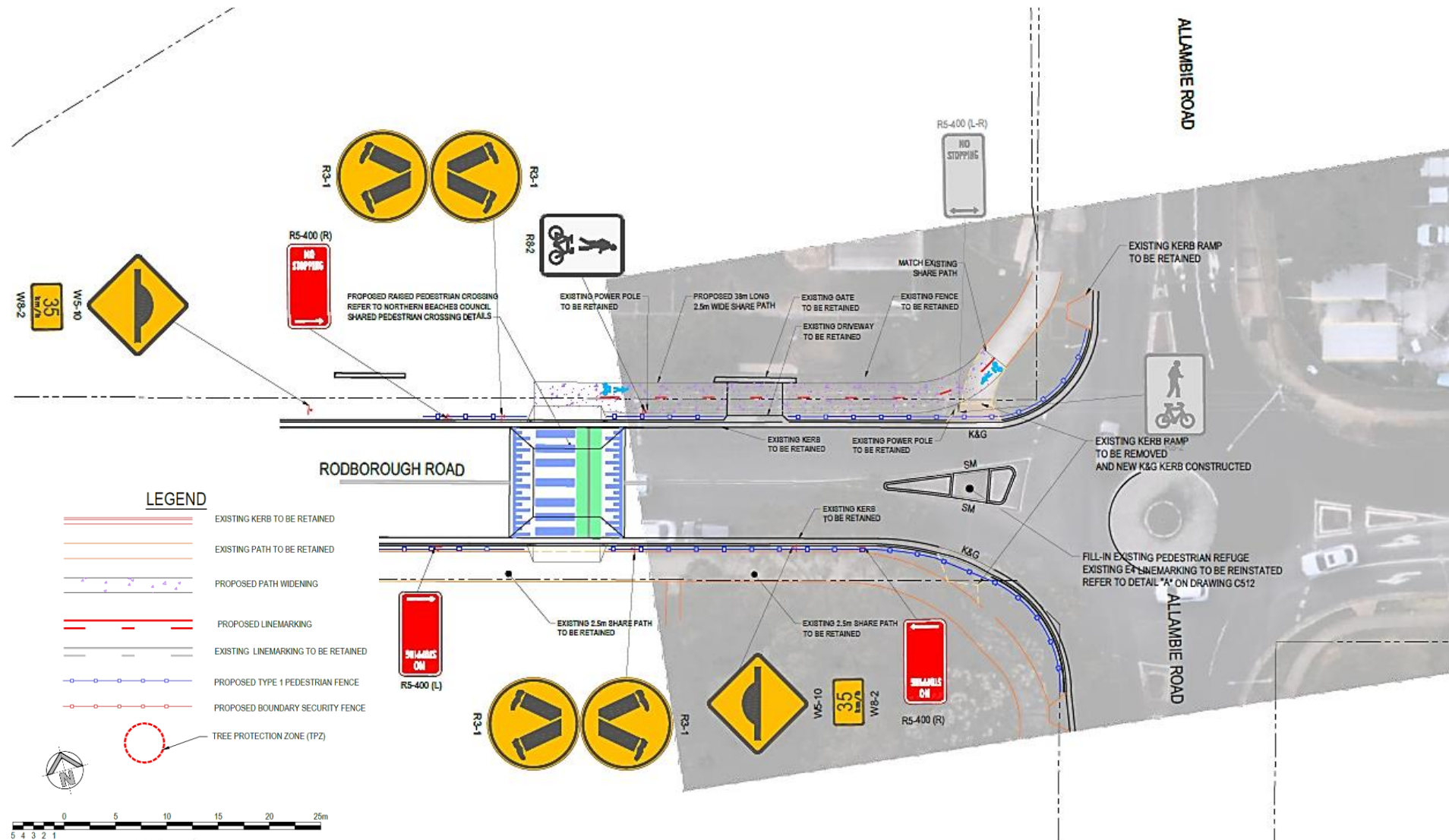


Figure 6 Extract of Stage 1 public domain works (Source: Henry & Hymas, April 2025)

## 4 Proposed Modifications

### 4.4 Modifications to the Conditions of Development Consent

#### 4.4.1 Definitions

To reflect the modified mitigation measures at **Appendix A** to this report it is proposed to modify the definition of “*Management and mitigation measures*” as follows:

**Management and mitigation measures**      The management and mitigation measures set out in **Attachment B Updated Mitigations Measures of the RfS Appendix A Modified Mitigation Measures of the Section 4.55 Modification Report (MOD 3)**

#### 4.4.2 Schedule 2 Condition A2 – Terms of Consent

The proposed modifications to provide for interim public domain works will require a modification to Schedule 2 Condition A2 of the Development Consent to refer to the modified drawings as follows, where modification are shown in red typeface:

A3. The development may only be carried out:

- (a) in compliance with the conditions of this consent;
- (b) in accordance with all written directions of the Planning Secretary;
- (c) generally in accordance with the EIS, Response to Submissions, supplementary information provided as part of Request for Information (RFIs) and SSD-26876801-Mod-2, ~~and~~ SSD-26876801-Mod-1 ~~and~~ SSD-26876801-Mod-3;
- (d) in accordance with the approved plans in the table below:

Architectural Plans prepared by Architectus			
Dwg No.	Rev	Name of Plan	Date
SSDA-0504	B	Demolition Plan	09/09/2022
TFHS-ARC-SSDA-0701	D	Areas - Lower Ground Plan 2	21/12/2023
TFHS-ARC-SSDA-0702	E	Areas - Lower Ground Plan 1	31/01/2024
TFHS-ARC-SSDA-0703	E	Areas - Ground Plan	31/01/2024
TFHS-ARC-SSDA-0704	E	Areas - Level 1 Plan	31/01/2024
TFHS-ARC-SSDA-1001	D	Site Plan	21/12/2023
TFHS-ARC-SSDA-1002	D	Lower Ground Plan 2	21/12/2023
TFHS-ARC-SSDA-1003	E	Lower Ground Plan 1	31/01/2024
TFHS-ARC-SSDA-1004	E	Ground Floor Plan	31/01/2024
TFHS-ARC-SSDA-1005	E	Level 1 Plan	31/01/2024
TFHS-ARC-SSDA-1006	E	Roof Plan	31/01/2024
TFHS-ARC-SSDA-2001	E	Site Elevations 1 (North and South)	21/12/2023
TFHS-ARC-SSDA-2002	E	Site Elevations 2 (East and West)	21/12/2023
TFHS-ARC-SSDA-2511	E	Site Sections	21/12/2023
TFHS-ARC-SSDA-2512	C	Site Sections	21/12/2023
TFHS-ARC-SSDA-9301	H	Fencing Location Plan	31/01/2024
SSDA-9401	C	Signage Location Plan	28/09/2022
SSDA-9402	B	Signage Location Elevations	09/09/2022
Landscape Plans prepared by Oculus			
Dwg No.	Rev	Name of Plan	Date
L001	B	Legend	22/02/2024
L002	B	Materials and Finishes Schedule	22/02/2024
L003	B	Master Plant Schedule	22/02/2024
L101	C	Tree Retention and Removal Plan	08/05/2024
L200	C	General Arrangement Plan Overall Site	08/05/2024
L201	B	General Arrangement Plan - Sheet 1 of 5	22/02/2024
L202	B	General Arrangement Plan - Sheet 2 of 5	22/02/2024
L203	C	General Arrangement Plan - Sheet 3 of 5	08/05/2024
L204	B	General Arrangement Plan - Sheet 4 of 5	22/02/2024
L205	B	General Arrangement Plan - Sheet 5 of 5	22/02/2024
L701	B	Sections and Elevations	22/02/2024
L702	B	Sections and Elevations	22/02/2024

## 4 Proposed Modifications

<b>Architectural Plans prepared by Architectus</b>			
<b>Dwg No.</b>	<b>Rev</b>	<b>Name of Plan</b>	<b>Date</b>
L703	B	Sections and Elevations	22/02/2024
L704	C	Sections and Elevations	08/05/2024
<b>Public Domain Plans prepared by Enstruct</b>			
<b>Dwg No.</b>	<b>Rev</b>	<b>Name of Plan</b>	<b>Date</b>
CV-0301	D	Public Domain Plan – Sheet 1	10/02/2023
CV-0302	E	Public Domain Plan – Sheet 2	14/02/2023
CV-0303	E	Public Domain Plan – Sheet 3	14/02/2023
CV-0304	E	Public Domain Plan – Sheet 4	14/02/2023
<b>Public Domain Plans prepared by Henry &amp; Hymas</b>			
<b>Dwg No.</b>	<b>Rev</b>	<b>Name of Plan</b>	<b>Date</b>
231123_D2_SK101	01	Public Domain Plans – Stage 1, Sheet 1 of 5	8 April 2025
231123_D2_SK102	01	Public Domain Plans – Stage 1, Sheet 2 of 5	8 April 2025
231123_D2_SK103	01	Public Domain Plans – Stage 1, Sheet 3 of 5	8 April 2025
231123_D2_SK104	01	Public Domain Plans – Stage 1, Sheet 4 of 5	8 April 2025
231123_D2_SK105	01	Public Domain Plans – Stage 1, Sheet 5 of 5	8 April 2025
231123_D2_SK108	01	Public Domain Plans – Stage 2	8 April 2025

### 4.4.3 Schedule 2 Condition B17 – Construction Environmental Management Plan

The proposed modifications will entail staging of several public domain and road works which will require a modification to Schedule 2 Condition B17 of the Development Consent to also refer to the supplementary construction noise and vibration management plan as follows:

*B17. The Construction Noise and Vibration Management Sub-Plan must address, but not be limited to, the following:*

- (a) *generally in accordance with the recommendations in the Forest High School - Noise and Vibration Impact Assessment, Rev F dated 10 March 2023 and prepared by Resonate and the Construction Noise and Vibration Impact Assessment, Rev 5 dated 29 April 2025 and prepared by E-LAB Consulting;*
- (b) *be prepared by a suitably qualified and experienced noise expert;*
- (c) *describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009);*
- (d) *describe the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers;*
- (e) *include strategies that have been developed with the community for managing high noise generating works;*
- (f) *include a process for unattended noise monitoring along the northern boundary of the Arranounbai School (i.e. boundary of the formal and informal play areas along the length of the boundary) during the construction works including a process for monthly review by the PCG and review on the occasion of a complaint;*
- (g) *describe the community consultation undertaken to develop the strategies in condition B17(e);*
- (h) *include a complaints management system that would be implemented for the duration of the construction; and*
- (i) *include a program to monitor and report on the impacts and environmental performance of the development and the effectiveness of the implemented management measures in accordance with the requirements of condition B13.*

### 4.4.4 Schedule 2 Condition B32 – Roadwork and Pedestrian Access Improvement

As described above, as it is proposed to complete the public domain and road works in stages to enable some to be provided for the initial occupation of the school, with others to be delivered within 2 years of initial. Accordingly, it is proposed to modify Schedule 2 Condition B32 and to insert a new condition as follows:

*B32A. Prior to the commencement of construction for the Stage 1 external roadworks and pedestrian infrastructure listed below proposed in the EIS and RfS, the Applicant must*

## 4 Proposed Modifications

submit plans and technical specifications for these proposed works to the satisfaction of the relevant roads authority (Council or TfNSW, as relevant) ~~as part of the s138 application:~~

- (a) ~~deleted signalisation of intersection at Aquatic Drive and Allambie Road;~~
- (b) ~~pedestrian crossing on Rodborough Road adjacent to Allambie Road with associated pedestrian fencing and any associated streetlighting on the western boundary of Rodborough Road approaching the pedestrian crossing;~~
- (c) ~~new bus zones on the northern and southern sides of Aquatic Drive to the west of the new pedestrian signalised intersection with Allambie Road on Aquatic Drive;~~
- (d) ~~temporary pedestrian crossing on Aquatic Drive to the west of the intersection with Allambie Road relocation and expansion to existing bus zone on the east side of Allambie Road;~~
- (e) ~~on-street pick-up/drop-off bays on the northern and southern sides of Aquatic Drive to the west of the temporary pedestrian crossing and on the western side of Allambie Road;~~
- (f) ~~deleted an accessible on-street pick-up/drop-off zone adjacent to the main pedestrian entry to the school on Allambie Road;~~
- (g) ~~widening of existing shared path adjacent to the school along Aquatic Drive and Allambie Road; and~~
- (h) ~~generally in accordance with the Stage 1 Public Domain Plans prepared by Henry & Hymas Enstruet as listed in condition A2.~~

Note: The relevant roads authority must not unreasonably withhold issue of a s138 approval if the plans and technical specifications submitted are generally in accordance with the plans and details approved under this Consent.

B32B. Prior to the commencement of construction for the Stage 2 external roadworks and pedestrian infrastructure listed below, the Applicant must submit plans and technical specifications for the proposed works to the satisfaction of the relevant roads authority (Council or TfNSW, as relevant) as part of the s138 application:

- (a) ~~signalisation of intersection at Aquatic Drive and Allambie Road; and~~
- (b) ~~generally in accordance with the Stage 2 Public Domain Plan prepared by Henry & Hymas as listed in condition A2.~~

Note: The relevant roads authority must not unreasonably withhold issue of a s138 approval if the plans and technical specifications submitted are generally in accordance with the plans and details approved under this Consent.

### 4.4.5 Schedule 2 – Condition B35 – Public Domain Works

In order to provide clarity that the public domain works are to be constructed in stages, it is proposed to modify Schedule 2 Condition B35 of the Development Consent as follows:

~~B35A. Prior to the commencement of the Stage 1 any footpath or public domain works, the Applicant must consult with Council and demonstrate to the Certifier that the streetscape design and treatment meets the requirements of Council, including addressing pedestrian management. The Applicant must submit documentation of approval for each stage from the relevant road authority Council to the Certifier.~~

B35B. Prior to the commencement of the Stage 2 public domain works, the Applicant must submit documentation of approval from the relevant road authority to the Certifier.

### 4.4.6 Schedule 2 – Condition D12 - Post-construction Dilapidation Report – Protection of Public Infrastructure

In order to provide clarity that the public domain works are to be constructed in stages, it is proposed to modify Schedule 2 Condition D12 and to insert a new condition as follows:

D12A. Prior to the commencement of operation, the Applicant must engage a suitably qualified and experienced expert to prepare a Post-Construction Dilapidation Report. This Report must:

- (a) ~~ascertain whether the construction works within the site or the Stage 1 public domain created any structural damage to public infrastructure by comparing the results of the Post-Construction Dilapidation Report with the Pre-Construction Dilapidation Report required by condition B5 of this consent;~~

## 4 Proposed Modifications

- (b) have, if it is decided that there is no structural damage to public infrastructure, the written confirmation from the relevant public authority that there is no adverse structural damage to their infrastructure (including roads);
- (c) be submitted to the Certifier;
- (d) be forwarded to Council for information; and
- (e) be provided to the Planning Secretary within 48 hours when requested.

D12B. Within 12 weeks of completion of the Stage 2 public domain works, the Applicant must engage a suitably qualified and experienced expert to prepare a Post-Construction Dilapidation Report. This Report must:

- (a) ascertain whether the Stage 2 public domain works created any structural damage to public infrastructure by comparing the results of the Post-Construction Dilapidation Report with the Pre-Construction Dilapidation Report required by condition B5 of this consent;
- (b) have, if it is decided that there is no structural damage to public infrastructure, the written confirmation from the relevant public authority that there is no adverse structural damage to their infrastructure (including roads);
- (c) be submitted to the Certifier;
- (d) be forwarded to Council for information; and
- (e) be provided to the Planning Secretary within 48 hours when requested.

### 4.4.7 Schedule 2 – Condition D14 – Road Damage

In order to provide clarity that the public domain works are to be constructed in stages, it is proposed to modify Schedule 2 Condition D14 and to insert a new condition as follows:

*D14A. Prior to the commencement of operation, the cost of repairing any damage caused to Council or other Public Authority's assets in the vicinity of the subject site as a result of construction works associated with the approved development must be met in full by the Applicant.*

D14B. Within 12 weeks of completion of the Stage 2 public domain works, the cost of repairing any damage caused to Council or other Public Authority's assets in the vicinity of the subject site as a result of construction works associated with the approved development must be met in full by the Applicant.

### 4.4.8 Schedule 2 – Conditions D15 & D16 – Post-Construction Survey – Adjoining Properties

In order to provide clarity that the public domain works are to be constructed in stages, it is proposed to modify Schedule 2 Condition D15 and to insert a new condition as follows:

*D15A. Where a pre-construction survey has been undertaken in accordance with condition B7, prior to the commencement of operation the Applicant must engage a suitably qualified and experienced expert to undertake a post-construction survey and prepare a Post-Construction Survey Report. This Report must:*

- (a) document the results of the post-construction survey and compare it with the pre-construction survey to ascertain whether the construction works caused any damage to buildings surveyed in accordance with condition B7;
- (b) be provided to the owner of the relevant buildings surveyed;
- (c) be provided to the Certifier; and
- (d) be provided to the Planning Secretary when requested.

D15B. Where a pre-construction survey has been undertaken in accordance with condition B7, within 12 weeks of completion of the Stage 2 public domain works the Applicant must engage a suitably qualified and experienced expert to undertake a post-construction survey and prepare a Post-Construction Survey Report. This Report must:

- (a) document the results of the post-construction survey and compare it with the pre-construction survey to ascertain whether the construction works caused any damage to buildings surveyed in accordance with condition B7;
- (b) be provided to the owner of the relevant buildings surveyed;
- (c) be provided to the Certifier; and
- (d) be provided to the Planning Secretary when requested.

## 4 Proposed Modifications

In order to provide clarity that the public domain works are to be constructed in stages, it is proposed to modify Schedule 2 Condition D16 as follows:

- D16. Where ~~a the~~ Post-Construction Survey Report ~~required under either Condition D15A or Condition D15B~~ determines that damage to the identified property occurred as a result of the construction works, the Applicant must repair, or pay the full costs associated with repairing the damaged buildings, within an agreed timeline between the owner of the identified property and the Planning Secretary. Alternatively, the Applicant may pay compensation for the damage as agreed with the property owner.*

### 4.4.9 Schedule 2 – Condition D17 - Public Domain Works and School/Pedestrian Crossing Facilities

Schedule 2 Condition D17 requires modification, and a new condition is proposed, to reflect the proposed modifications to Schedule 2 Conditions B32A and B32B (see above) as follows:

- D17A. Prior to the commencement of operation, evidence must be submitted to the Certifier that demonstrates that the Applicant has completed the public domain and pedestrian improvement works required under condition B32A and as authorised by the relevant road authority to the satisfaction of the relevant road authority (Council or TfNSW, as relevant).*
- D17B. Within two (2) years from the date of commencement of school operations for students or prior to exceeding a capacity of 1,200 students (whichever occurs first), evidence must be submitted to the Certifier that demonstrates that the Applicant has completed the public domain and pedestrian improvement works required under condition B32B and as authorised by the relevant road authority to the satisfaction of the relevant road authority (Council or TfNSW, as relevant).*

### 4.4.10 Schedule 2 – Condition D20 - School/Pedestrian Crossing Facilities

It is proposed to delete Schedule 2 Condition D20 as it repeats the requirements under Schedule 2 Condition D17. Alternatively, Schedule 2 Condition D20 could be modified and a new condition could be inserted as follows:

- D20A. Prior to commencement of operation, evidence must be submitted to the Certifier that demonstrates that school/pedestrian crossings have been installed on surrounding roads in accordance with ~~the public domain and pedestrian improvement works required under condition B32A and as authorised by the relevant road authority~~ ~~the relevant design standards and warrants met~~ to the satisfaction of the relevant road authority, as required under Condition B32A.*
- D20B. Within two (2) years from the date of commencement of school operations for students or prior to exceeding a capacity of 1,200 students (whichever occurs first), evidence must be submitted to the Certifier that demonstrates that school/pedestrian crossings have been installed on surrounding roads in accordance with the public domain and pedestrian improvement works required under condition B32B and as authorised by the relevant road authority to the satisfaction of the relevant road authority, as required under Condition B32B.*

## 5 Statutory Context

### 5.1 General

Section 4.55 of the EP&A Act contains the provisions that must be considered by a consent authority in determining an application to modify a Development Consent. In this regard, the relevant provision is section 4.55(1A) of the EP&A Act.

This application is lodged under section 4.55(1A) as the amendments proposed are considered to be minor in nature and have only minimal environmental impact.

In addition to the EP&A Act, sections 99 and 100 of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) set out the manner in which an application to modify a consent must be made and the information that must be submitted with the application. The requirements under the EP&A Act and EP&A Regulation in the following subsections.

### 5.2 Section 4.55(1A) of the Act

Section 4.55(1A) of the Act applies to modifications where a minimal environmental impact may occur and provides that a consent authority may, on application being made by the applicant or any other person entitled to act on a consent granted by the consent authority and subject to and in accordance with the regulations, modify the consent subject to the consent authority being satisfied with regard to certain matters. These matters are considered in **Table 2**.

**Table 2 Matters to be Considered under s4.55(1A)**

Requirement	Assessment
(a) It is satisfied that the proposed modification is of minimal environmental impact	The proposed modifications will have minimal environmental impact as the minor adjustments to public domain works are required to meet Council and TfNSW requirements and the staging of some public domain works has been assessed as being acceptable with regard to traffic and pedestrian impacts, subject to the proposed modified conditions limiting student capacity until all works have been completed.
(b) It is satisfied that the development to which the consent as modified relates is substantially the same development as the development for which the consent was originally granted and before that consent as originally granted was modified (if at all)	The proposed development remains for the purpose of a school and there is no change to the footprint of approved buildings, overall student capacity or carparking provision and the public domain adjustments are to meet the requirements of Council and TfNSW.
(c) It has notified the application in accordance with: (i) The regulations, if the regulations so require, or (ii) A development control plan, if the consent authority is a council that has made a development control plan that requires the notification or advertising of applications for modifications of a development consent".	Modification applications to State Significant Development that involve minimal environmental impact (Section 4.55(1A)) are placed on public notification for 14 days (if exhibited).
(d) It has considered any submissions made concerning the proposed modification within any period prescribed by the regulations or provided by the development control plan, as the case may be	Should DPHI notify the subject application in accordance with section 4.55(1A)(c), it must consider any submissions made during a notification period.

## 5 Statutory Context

### 5.3 Section 4.55(3) of the Act

Section 4.55(3) of the EP&A Act requires that such of the matters referred to in section 4.15(1) of the EP&A Act as are of relevance to the proposed modification must be taken into consideration in determining the application for modification. These relevant matters are addressed in **Section 6** of this Report.

The consent authority must also take into consideration the reasons given by the consent authority for the grant of the consent that is sought to be modified.

In determining SSD-26876801, the DPHI provided the following reasons why consent was granted:

*The key reasons for granting consent to the development application are as follows:*

- *the project would provide a range of benefits for the region and the State as a whole, including the provision of a new educational facilities, 120 operational jobs, 163 construction jobs and \$112,497,000 capital investment;*
- *the project is permissible with development consent, and is consistent with NSW Government policies including:*
  - o *Greater Sydney Commission (GSC) Greater Sydney Regional Plan: A Metropolis of Three Cities Central City District Plan;*
  - o *Transport for NSW's Future Transport Strategy 2056;*
  - o *Infrastructure NSW's State Infrastructure Strategy 2022-2042 Staying Ahead;*
- *the impacts on the community and the environment can be appropriately minimised, managed or offset to an acceptable level, in accordance with applicable NSW Government policies and standards. Conditions of consent are recommended to address key impacts associated with traffic, transport and parking, flooding, noise and landscaping;*
- *engagement on the project is considered to be in line with Undertaking Engagement Guidelines for State Significant Projects, including the community participation objectives outlined in these guidelines; and*
- *weighing all relevant considerations, the project is in the public interest.*

The proposal is for minor modifications to the physical form of some public domain works and the timing of delivery of several road works, neither of which will substantially alter the final form of the approved development or give rise to significant impacts that have not already been assessment as part of the original consent or as part of this modification application. Accordingly, the proposed modifications do not offend any of the reasons for the original granting of consent.

### 5.4 Sections 99 & 100 of the EP&A Regulation 2021

In accordance with section 99 of the EP&A Regulation, this application will be made in the form approved by the Planning secretary via the NSW Planning Portal and is accompanied by all necessary information and documents required by the EP&A Regulation.

Pursuant to section 100(1) of the EP&A Regulation, **Table 3** provides the information required to be submitted with an application to modify a development consent under section 4.55.

## 5 Statutory Context

**Table 3 Information Required by Section 100(1) of the EP&A Regulation**

Requirement	Details
(a) Name and address of applicant	NSW Department of Education Level 9, 259 George Street, Sydney, NSW 2000 GPO Box 33, Sydney, NSW 2001
(b) Description of development	<i>The construction and operation of a new government high school, comprising:</i> <ul style="list-style-type: none"> <li>• one and two storey buildings for the purposes of administration, general and specialist learning, special support unit facilities, a canteen, a library, a gymnasium and multi-purpose hall;</li> <li>• outdoor sporting facilities including sporting field and games courts;</li> <li>• covered outdoor learning area (COLA) and covered outdoor working area;</li> <li>• underground staff car park, and bicycle and scooter parking spaces;</li> <li>• associated earthworks, tree removal, landscaping, stormwater works, service upgrades, supporting infrastructure and signage; and</li> <li>• use of facilities outside of school hours.</li> </ul>
(c) Site address and folio identifier of the land	<ul style="list-style-type: none"> <li>• 189 Allambie Road, Allambie Heights being Lot 6 and Lot 7 in DP 1280781 and Lot 750 and Lot 751 in DP 1271174; and</li> <li>• Part of 5 Aquatic Drive, Allambie Heights, being part Lot 3 DP 1280781</li> </ul>
(d) Description of the proposed modifications	The proposed modifications to the approved development are detailed in Section 4 of this Modification Report and entail staged construction of the public domain and road works as follows: <ul style="list-style-type: none"> <li>• Stage 1 works comprising all works except the intersection upgrade to Aquatic Drive / Allambie Road, with minor adjustments to kiss and drop arrangements and bus stop arrangements and with a temporary pedestrian crossing on Aquatic Drive. These works are to be completed prior to occupation of the site by students; and</li> <li>• Stage 2 works comprising the completion of the intersection upgrade with permanent pedestrian crossing facilities on Aquatic Drive and removal of temporary measures. These works are to be completed within 2 years of the date of initial occupation.</li> </ul>
(e) Statement describing intent of modification	Modification under Section 4.55(1A) of the EP&A Act as outlined in this Modification Report.
(f) Description of expected impacts	The proposal relates to modifications to the staging of public domain works to enable initial occupation of the school until the final intersection design is completed to the satisfaction of the road authority and constructed and the assessment under this Modification Report demonstrates that the proposal will have minimal environmental impacts.
(g) Undertaking that the development will remain substantially the same as that originally approved	The proposed development remains for the purpose of a school and there is no change to the footprint of approved buildings, overall student capacity or carparking provision and the public domain adjustments are to meet the requirements of Council and TfNSW. Accordingly, it is considered the development as proposed to be modified will remain substantially the same as that originally approved.
(h) Biodiversity credits	N/A
(i) Owner's consent	Owner's consent accompanies the application.
(j) Application to Court or Consent Authority	The modification application is being lodged with the consent authority – DPHI.

Subsection 100(3) of the EP&A Act Regulation requires that if an application for modification under section 4.55(1A) or section 4.55(2) of the EP&A Act relates to development for which the development application was required to be or was accompanied by a BASIX certificate, the application for modification must also be accompanied by the BASIX certificate or a new BASIX certificate if the current BASIX certificate is no longer consistent with the development.

The approved SSDA does not relate to a BASIX affected building and hence s100(3) does not apply in this instance.

## 5 Statutory Context

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### 5.5 Permissibility

The site is zoned SP1 Special Activities (Health Services Facilities, Seniors Housing Community Facilities, Education Establishments) (the SP1 Zone) pursuant to *Warringah Local Environmental Plan 2011* (the LEP).

Educational establishments are permissible with development consent on the site as educational establishments are shown as being a purpose on the Land Zoning Map.

In addition, the SP1 Zone is a prescribed zone for the purposes of a school under Section 3.34 of *State Environmental Planning Policy (Transport and Infrastructure) 2021* (SEPP TI) and development for the purposes of an educational establishment may be carried out within this zone with development consent.

The proposed modifications do not change the nature of the approved land use which remains permissible with consent.

### 5.6 Statutory Considerations

The proposed modifications do not alter the assessment contained within the original EIS with regards to the statutory considerations for the development for the following reasons:

- The proposed land use is permissible with consent;
- There is no change to the approved height of buildings and therefore no substantive change to the potential visual impact, privacy impacts or overshadowing impacts;
- There is no change to the approved development footprint which would alter the contamination assessment that the site is suitable for the development;
- The approved number of students and staff is not proposed to be modified;
- The number of carparking spaces is not proposed to be modified, nor is the approved driveway access points;
- The minor changes to the public domain staging do not impact any biodiversity considerations.

## 6 Assessment of Relevant Impacts

### 6.1 Biodiversity, Trees and Landscaping

No additional tree removal or impact to existing trees arises from the staging of public domain works.

### 6.2 Traffic, Transport and Accessibility

The proposed modifications to stage the delivery and slightly modify the design of the public domain and transport arrangements have been assessed in the Transport Statement prepared by SCT Consulting (**Appendix C**). The findings and recommendations of the report as summarised below.

- There will be no change to the overall length of kiss and drop zones (or number of kiss and drop car spaces) albeit that some kiss and drop will be located on Allambie Road. All kiss and drop will be provided at initial occupation and has been designed to comply with the relevant design standards;
- There will be no change to the total number of bus parking bays to service the school albeit that an addition bay will be provided on the north side of Aquatic Drive. All bus bays will be provided at initial occupation and have been designed to comply with the relevant design standards;
- The capacity of the existing roundabout at Allambie Road / Aquatic Drive to cater for occupation prior to completion of the intersection upgrade has been modelled, including an allowance for background traffic network growth to 2028 when the Stage 2 public domain and road works are anticipated to be completed. In this scenario, it is assumed that the school population will not exceed 1,200 students. The results indicate that the intersection will operate at satisfactory levels as shown below:

Intersection	Delay	LoS	DoS	Delay	LoS	DoS
	Weekday AM peak			Weekday PM peak		
Existing scenario						
Allambie Rd   Warringah Rd	48.7s	D	0.90	42.2s	C	0.86
Allambie Rd   Rodborough Rd	19.4s	B	0.65	16.4s	B	0.55
Allambie Rd   Aquatic Dr	17.0s	B	0.87	15.5s	B	0.78
Allambie Rd   Mortain Ave	11.5s	A	0.68	9.4s	A	0.57
Allambie Rd   Fleurs St	9.7s	A	0.58	7.4s	A	0.44
2025 with project and 1,200 students						
Allambie Rd   Warringah Rd	48.7s	D	0.88	54.6s	D	0.96
Allambie Rd   Rodborough Rd	20.1s	B	0.78	18.0s	B	0.65
Allambie Rd   Aquatic Dr	16.9s	B	0.90	12.6s	A	0.84
Allambie Rd   Mortain Ave	11.5s	A	0.60	9.7s	A	0.54
Allambie Rd   Fleurs St	9.6s	A	0.53	7.9s	A	0.46

- Minor adjustments have been made to the School Travel Plan to address the interim arrangements between initial occupation and full occupation and these are included in the SCT report.

Accordingly, the SCT assessment demonstrates that with completion of the kiss and drop and bus infrastructures prior to initial occupation, there will be no adverse impacts to the operation of the surrounding road network as a consequence of staging the approved road works.

As detailed in **Section 4.4**, the proposed modified conditions of consent will act to ensure that the works are completed within two years from initial occupation by students or before the school enrolment exceeds 1,200 students, whichever occurs first.

For the ongoing works within the school site and the Stage 1 Public Domain and Road Works, there is no change proposed to the construction traffic management measures that were identified in the original EIS and supporting documents or the approved mitigation measures relating to construction

## 6 Assessment of Relevant Impacts

traffic. Many of these will also relate to the Stage 2 Public Domain and Road Works and have therefore been incorporated into the modified Mitigation Measures at **Appendix A**.

For the Stage 2 Public Domain and Road Works, a Preliminary Construction Traffic Management Plan (CTMP) has been prepared by TTPA and included within the Stage 2 CMP prepared by JohnStaff (see **Appendix E**). The CTMP outlines the key measures that will be required to manage this phase of the works. This includes an additional mitigation measure requiring the Stage 1 temporary pedestrian crossing to be managed by traffic controllers during school pickup and drop-off – i.e. between the hours of 8:00am and 9:30am and between 2:30pm and 4:00pm Mondays to Fridays – to ensure the safe management of pedestrians during these peak periods. This measure has also been incorporated into the modified Mitigation Measures at **Appendix A**.

### 6.3 Noise and Vibration

A Construction Noise and Vibration Management Plan has been prepared by E-LAB Consulting to specifically assess the impacts of staging the approved public domain works (**Appendix D**).

It should be noted that this assessment is supplementary to the initial noise and vibration impact assessment prepared by Reasonate as part of the original SSDA and does seek to replicate or replace the original assessment with regard to impacts arising from on-site construction activities or the impacts from off-site works on surrounding receivers.

The purpose of the E-LAB Consulting report is to assess the impacts of undertaking the Stage 2 public domain works (i.e. intersection upgrade works) on the school occupants. Notwithstanding, the noise modelling undertaken also addresses nearby receivers as shown in **Figure 7**.

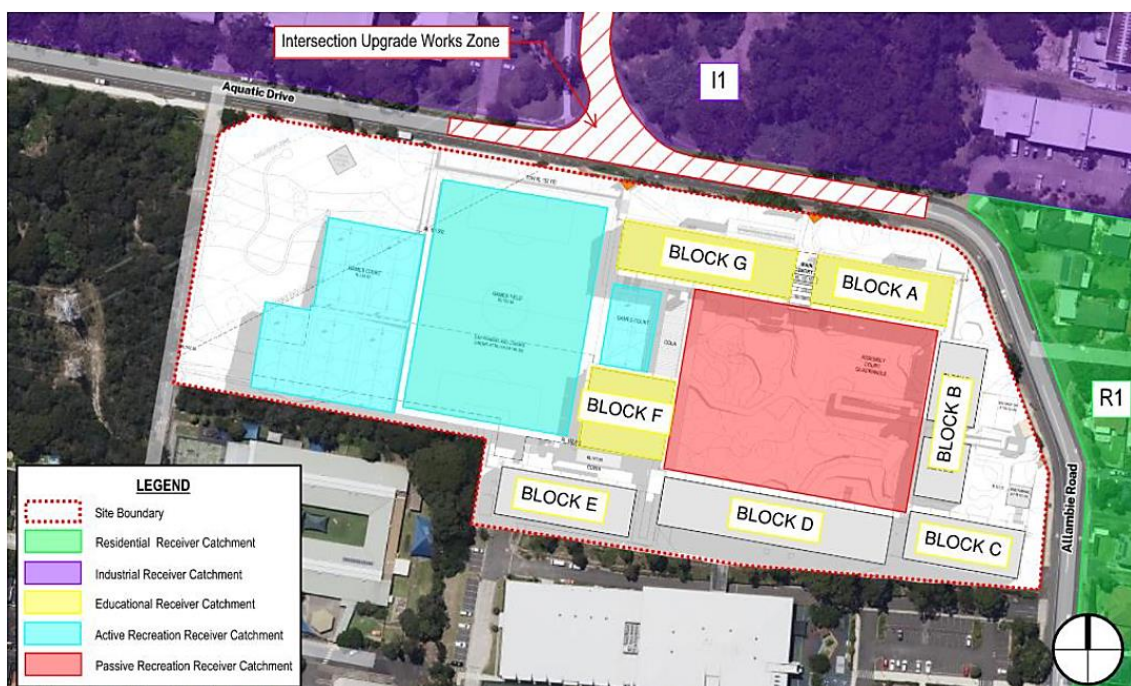


Figure 7 Noise Receiver locations (Source: E-LAB Consulting, April 2025)

**Figure 8** and **Figure 9** summarise the modelled noise impacts from the minor demolition and construction works within the road reserve as determined by E-Lab Consulting.

## 6 Assessment of Relevant Impacts

ID	RECEIVER TYPE	PREDICTED NOISE LEVEL RANGE, L <sub>Aeq,15min</sub> dB(A)	NOISE MANAGEMENT LEVEL L <sub>Aeq,15min</sub> dB(A)	NOISE MANAGEMENT LEVEL EXCEEDANCE, dB	EXCEEDS HIGHLY NOISE AFFECTED LEVEL (YES/NO)
R1	Residential	55	55 dB(A)	0	No
I1	Industrial	73	75 dB(A)	0	N/A
BLOCK A	Educational	37-39 (Internal – Windows Closed) 47-49 (Internal – Windows Open) 57-59 (External Facade)	45 (Internal) 55 (External)	See discussion.	N/A
BLOCK F	Educational	37-39 (Internal – Windows Closed) 47-49 (Internal – Windows Open) 57-59 (External Facade)	45 (Internal) 55 (External)	See discussion.	N/A
BLOCK G	Educational	41-43 (Internal – Windows Closed) 51-53 (Internal – Windows Open) 61-63 (External Facade)	45 (Internal) 55 (External)	See discussion.	N/A
QUADRANGLE	Passive Recreation	55	60	0	N/A
GAMES COURT (EAST)	Active Recreation	59	65	0	N/A
GAMES FIELD	Active Recreation	68	65	Up to 3dB	N/A
GAMES COURT (WEST)	Active Recreation	59	65	0	N/A

Figure 8 Extract of roadworks minor demolition works noise impacts (Source: E-LAB Consulting, April 2025)

ID	RECEIVER TYPE	PREDICTED NOISE LEVEL RANGE, L <sub>Aeq,15min</sub> dB(A)	NOISE MANAGEMENT LEVEL L <sub>Aeq,15min</sub> dB(A)	NOISE MANAGEMENT LEVEL EXCEEDANCE, dB	EXCEEDS HIGHLY NOISE AFFECTED LEVEL (YES/NO)
R1	Residential	55	55 dB(A)	N/A	No
I1	Industrial	75	75 dB(A)	0	N/A
BLOCK A	Educational	45-47 (Internal – Windows Closed) 55-57 (Internal – Windows Open) 65-67 (External Facade)	45 (Internal) 55 (External)	See discussion.	N/A
BLOCK F	Educational	41-43 (Internal – Windows Closed) 51-53 (Internal – Windows Open) 61-63 (External Facade)	45 (Internal) 55 (External)	See discussion.	N/A
BLOCK G	Educational	51-53 (Internal – Windows Closed) 61-63 (Internal – Windows Open) 71-73 (External Facade)	45 (Internal) 55 (External)	See discussion.	N/A
QUADRANGLE	Passive Recreation	61	60	Up to 1dB	N/A
GAMES COURT (EAST)	Active Recreation	67	65	Up to 2dB	N/A
GAMES FIELD	Active Recreation	72	65	Up to 7dB	N/A
GAMES COURT (WEST)	Active Recreation	65	65	0	N/A

Figure 9 Extract of roadworks construction works noise impacts (Source: E-LAB Consulting, April 2025)

As can be seen from the above results:

- The predicted noise levels at the nearest Residential Receiver (R1) on the eastern side of Allambie Road will not exceed the project specific noise management level;
- The predicted noise level at the nearest Industrial Receivers on the northern side of Aquatic Drive and Allambie road will not exceed the project specific noise management level;
- The maximum predicted noise levels at Blocks A, F and G within the school site will be during the construction activities and although in some cases these will not exceed the project specific noise management level with windows on the northern facades closed, there will be exceedances of project specific noise management level with windows open;
- There will be some exceedances of the project specific noise management levels within the active and passive recreation areas within the site; and
- Blocks B, C, D and E will not be adversely impacted by construction noise.

To mitigate these impacts during the Stage 2 intersection works, the following measures are proposed:

- The contractor must co-ordinate with the school to schedule especially noisy works outside of noise-sensitive periods such as exams, music performances and assemblies;

## 6 Assessment of Relevant Impacts

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- Respite periods from especially noisy works must be provided and must include the school lunch period and at least one other hour during the school day;
- The contractor must co-ordinate with the school to schedule, wherever practicable, noise sensitive activities away from the north and west facades of Blocks A, F and G which are in direct line of sight of the works zone; and
- Especially noisy works must be scheduled outside of core school hours wherever practicable or where the above mitigation measures are not possible.

Accordingly, the above mitigation measures for Stage 2 public domain works have been included in the modified Mitigation Measure at **Appendix A**.

With respect to vibration impacts, the E-LAB report demonstrates that all receivers are located beyond the required minimum safe working distance (maximum of 22m) for cosmetic damage, with the nearest structure (Block G within the site) being 40m from the works zone. Accordingly, no mitigation measures or dilapidation/building condition surveys are required.

With respect to human comfort, the E-LAB report indicates that some industrial receivers and several areas within the school site will be within the guideline distance of 73m of the works zone.

Accordingly, it is recommended that attended vibration monitoring be undertaken at the commencement of work and in the event of a complaint, in order to verify the safe working distances. If the levels exceed those listed in Section 4.2 of the E-LAB Report all reasonable and feasible mitigation measures must be employed to minimise vibrations impacts.

These recommendation are included in the modified Mitigation Measure at **Appendix A**.

### 6.4 Stormwater Drainage and Flooding

The proposed modifications do not alter the approved stormwater design or warrant any further assessment in regard to stormwater drainage infrastructure of flooding.

### 6.5 Social Impact

The proposed modifications do not result in an increase to student or staff numbers, nor any change to the approved carparking numbers or overall traffic generation, therefore, there will be no additional or different social impacts in the final design arrangement that would warrant further social impact assessment.

With respect to the interim arrangements, all students of the approved school and surrounding educational establishment will be provided with appropriate crossing facilities and vehicular access.

### 6.6 Infrastructure Requirements and Utilities

There is no change to the approved utilities or services infrastructure required to facilitate the modifications.

## 7 Justification of Modified Project

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### 7.1 Assessment of Potential Impacts

The environmental impact of the proposal was assessed in detail in the original EIS and further assessment is provided in **Section 6** of this report where it is concluded that there is no substantial change to the proposal and hence no additional impacts.

### 7.2 Mitigation of Impacts

The impacts of the approved development as modified can continue to be mitigated, minimised or managed as assessed in the original EIS although to accommodate the staging of public domain works, several additional mitigation measures are recommended by the project team and these are included in the modified mitigation measures at **Appendix A**.

### 7.3 Consistency with Strategic Context

As detailed in **Section 3** of this report, the proposed amendments are consistent with relevant strategic plans/ policies.

### 7.4 Compliance with Statutory Context

The proposal complies with the relevant statutory planning considerations as detailed in the original EIS and further assessed in **Section 5** of this report.

### 7.5 Consultation

As part of the original EIS, the project team carried out consultation in accordance with the SEARS including with community and public authorities and further consultation regarding the proposed modifications was undertaken with DPHI Officers, Council and TfNSW.

### 7.6 Compliance Monitoring

Subject to the implementation of the modified mitigation measures in **Appendix A** to this report, there is not considered any change to ongoing compliance monitoring as already required by the Consent.

### 7.7 Impact Assessment Uncertainties and Resolution

The potential impacts of the modified proposal have been documented and the DPHI has sufficient information to be able to assess and determine the modification application.

## 8 References

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E-LAB Consulting (April 2025), Supplementary Construction Noise and Vibration Management Plan

Henry & Hymas (April 2025), Public Domain Drawings

JohnStaff (April 2025), Modified Construction Management Plan

JohnStaff (May 2025), Consultation Statement

SCT (April 2025), Supplementary Traffic and Parking Report

TTPA (April 2025), Supplementary Construction Traffic Management Plan