Environmental Impact Statement

State Significant Development (41306367)
New Primary School at Gregory Hills
28 Wallarah Circuit, Gregory Hills (Lot 3257 DP 1243285)

PLANNING. URBAN DESIGN.
RETAIL AND ECONOMIC. HERITAGE

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DECLARATION

ENVIRONMENTAL IMPACT STATEMENT

Project details	
Project name:	New primary school at Gregory Hills
Application number:	SSD-41306367
Address of the Land in respect of which the development application is made:	28 Wallarah Circuit, Gregory Hills Lot 3257 Deposited Plan 1243285
Applicant details	
Applicant Name:	New South Wales Department of Education
Applicant ABN:	40300173822
Applicant Address:	259 George Street, Sydney NSW 2000
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Declaration by qualified practitioner	
Name:	David Kettle
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Organisation registration with:	Planning Institute of Australia
Declaration	The undersigned declares that this EIS: • has been prepared in accordance with Schedule 2 of the *Environmental Planning and Assessment Regulation 2021*; • contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates; • does not contain information that is false or misleading; • addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project; • identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments; • has been prepared having regard to the Department's State Significant Development Guidelines - Preparing an Environmental Impact Statement; • contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development; • contains a consolidated description of the project in a single chapter of the EIS; • contains an accurate summary of the findings of any community engagement; and • contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.
Signature:	
Date:	4 November 2022

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Abbreviations

AADT	annual average daily vehicle trips
AHIP	Aboriginal Heritage Impact Permit
APZ	Asset Protection Zone
AS	Australian Standard
ASS	acid sulfate soils
BC Act	*Biodiversity Conservation Act 2016*
BCA	Building Code of Australia
CIV	capital investment value
Council	Camden Council
DA	development application
DCP	development control plan
DFP	DFP Planning Pty Limited
DPE	NSW Department of Planning and Environment
DVT	daily vehicle trip
EFSG	*Educational Facilities Standards and Guidelines (EFSG)*
EP&A Act	*Environmental Planning and Assessment Act 1979*
EP&A Regulation	*Environmental Planning and Assessment Regulation 2021*
EPI	environmental planning instrument
ESD	ecologically sustainable development
FPL	flood planning level
GFA	gross floor area
GSC	Greater Sydney Commission
LEP	local environmental plan
LGA	local government area
NCC	*National Construction Code*
NPW Act	*National Parks and Wildlife Act 1974*
OEH	NSW Office of Environment and Heritage
PAD	potential archaeological deposit
PVT	peak hour vehicle trip
RFS	NSW Rural Fire Service
RF Act	*Rural Fires Act 1997*
RL	reduced level
SINSW	School Infrastructure NSW
PSI	Preliminary site investigation
SEARs	Secretary's Environmental Assessment Requirements
SEPP	state environmental planning policy
SSDA	State significant development application
TfNSW	*Transport for NSW*
TSC Act	*Threatened Species Conservation Act 1995*
vtph	vehicle trips per hour
WM Act	*Water Management Act 2000*
WSUD	water sensitive urban design

Summary

The site is identified in Turner Road Precinct Development Control Plan (DCP) as a location for a Primary School. The Department of Education acquired the site for the purpose of constructing a primary school to cater for 1,012 students and 60 staff.

The proposal comprises:

- 44 General Learning Spaces.
- 4 Support Learning Spaces.
- Administration, staff hub, amenity and building service areas.
- Library, communal hall and canteen.
- Outside School Hours Care (OSHC) services.
- Sport courts, outdoor play space, a Covered Outdoor Learning Area (COLA) and site landscaping.
- Dedicated bicycle and scooter parking.
- Three (3) kiss and drop spaces for Supported Learning Students (SLS) located on Wallarah Circuit.
- On-site car parking.
- Signage.
- Footpath widening on Wallarah Circuit.

The works have a capital investment value (CIV) exceeding $20 million and therefore the project is deemed to be State Significant Development under *State Environmental Planning Policy (Planning Systems) 2021*. The proposed works will generate up to 150 new construction jobs and 60 operational staff.

The new primary school will be located at 28 Wallarah Circuit, Gregory Hills, bound by Wallarah Circuit, Long Reef Circuit, Gregory Hills Drive and Sykes Creek riparian corridor and will replace the approved temporary primary school (DA2022/742/1) which caters for 300 students.

The site is zoned R1 General residential under *State Environmental Planning Policy (Western City Parklands) 2021-Appendix 2* (SEPP (WCP)) and development for the purpose of an Educational Establishment is permissible with consent in the R1 Zone.

School Infrastructure NSW (SINSW) and the project team have consulted with the local community, Aboriginal Elders, Camden Council and State government agencies throughout the design of the development. Feedback provided through this consultation process has been incorporated and addressed where possible in the final design and supporting documentation.

The proposal arranges the car park and single storey building along Wallarah Circuit and a three storey building along Long Reef Circuit which overlook the outdoor learning and recreational areas to the north west of the site (sports field, sports courts, and remnant bushland) (**Figure 1**).

The proposed building height exceeds the maximum building height of 9.5 metres under the SEPP (WCP) by approximately three (3) metres for the building along Wallarah Circuit. However, the proposed three (3) storey component of the development achieves acceptable environmental and amenity outcomes in terms of visual impact, overshadowing and privacy through the use of building setbacks and generous building separation from houses along Wallarah Circuit .

Breaks in the proposed three storey buildings have been incorporated for articulation of the built form to reduce the overall bulk and scale.

The site is partially identified as being bushfire prone as a result of vegetation located in the south-western corner of the site and on adjacent land adjoining the west/ south-west of the site. In order to address the bushfire hazard and achieve compliance with required standards, a 51-metre wide asset protection zone (APZ) is required to the south west of the site, and a 57.9m APZ will be provided to the vegetation within the south-western portion of the site. As an additional precaution, all buildings will be constructed to a BAL 12.5 standard.

Student and staff spaces are visually connected to nature and have been located for best use of the site within the APZ.

Summary

Figure 1 Site Plan-GF (Source Bennett and Trimble)

Protection of the Cumberland Plain Woodland (where practicable) has been a key consideration. Where tree removal is required due to the health of a tree, it will be supplemented by significant additional planting to provide a generous canopy. The wood is to be retained on site to respond to Aboriginal Elder commentary (refer **Appendix H**).

The site is biodiversity certified land. Notwithstanding an ecological assessment has been undertaken for the vegetation and potential threatened fauna on site.

Due to an APZ in the south-west corner of the site a canopy cover of 40% was unachievable as this is in direct conflict with Planning for Bushfire Protection 2019. Canopy cover has been designed to comply with the Bushfire consultant's recommendations in the inner and outer protection areas.

The site does not contain any State or local listed heritage items, and the site does not meet the threshold for local listing.

An Aboriginal Due Diligence Report prepared by Jacobs has determined that there is low risk of Aboriginal items on the site due to extensive previous disturbance. The Report recommends that an 'unexpected finds' procedure is implemented prior to the commencement of works. An AHIP was issued for the site in 2020 and expires on June 30, 2023.

Connecting with Country is detailed in the Architectural Design Statement and Engagement Report which informed the project design. Preparation of the reports involved engagement of the local Aboriginal community. A Smoking Ceremony was held to cleanse the site. Recommendations to acknowledge Country have been incorporated by integrating learning and recreation spaces within the natural landscape setting including a yarning circle.

SINSW will continue Connection to Country consultation and work with the design team to develop and incorporate strategies as the design moves into the detailed design phase.

The site is identified as flood prone and has a flood planning level of RL115.1m. Buildings are designed above the flood planning level with a minimum floor level of RL115.7m (hall) and RL116.1m (all other buildings). A stormwater strategy for the site has been designed to manage up to a 1% Annual Exceedance Probability (AEP) flood event. Down pipes and collection pits will convey stormwater to onsite stormwater detention (OSD) tanks across the site. An overland flow path to the west of the site will allow water to travel to the OSD basin (approved under DA2022/742/1) and an existing drainage easement to the north.

Summary

The school proposes to implement ecologically sustainable development (ESD) principles outlined in the Educational Facilities Standards and Guidelines (EFSG) and exceed the requirements of Section J of the National Construction Code (NCC) for energy-efficiency in building fabric and building services / systems. The project commits to a 5-Star green star rating. Initiatives include passive design with appropriate shading and thermal performance, energy and water efficient systems, rainwater reuse and a solar PV system.

SIDRA modelling was undertaken by Ason as well as a review of the *Roads and Maritime Services (now TfNSW) Trip Generation Surveys, Schools* (Schools Trip Generation Report) prepared by Ason Group. Based on the findings it was estimated that the school will have the following trip generation:

- AM School peak hour: 638 vehicle trips
- PM School peak hour: 527 vehicle trips

The report concludes that based on the analysis undertaken the key intersections would continue to operate at acceptable Levels of Service during the school AM and PM peak periods with the school development.

At a broad level, the community and public authorities are generally supportive of the proposed school design. As documented above, concerns and questions regarding specific elements of the proposal have been raised through the evolution of its design. These matters have been addressed in design and operational responses where desirable and mitigation measures have been proposed to minimise adverse impacts.

The proposed works have been assessed and on balance provide significant public benefit to the immediate local and surrounding district through the provision of new facilities.

This Environmental Impact Statement report has been prepared under Part 4 of the *Environmental Planning and Assessment Act 1979,* in accordance with the Secretary's Environmental Assessment Requirements (SEARs) and amended SEARs for SSD 41306367 issued by the Department of Planning and Environment, and Part 8 of the *Environmental Planning and Assessment Regulation 2021*. The works proposed under this SSDA will be subject to the recommendations of specialist reports to ensure appropriate outcomes are achieved.

The proposed works have been designed to, and will be carried out in, the interests of the public. The works will meet the project objectives to provide new state of the art educational facilities.

Accordingly, it is requested that the Minister for Planning grant approval to the proposed State Significant Development application as set out in this report.

1 Introduction

1.1 Overview

1.1.1 Purpose of Report

DFP Planning Pty Ltd (DFP) has been commissioned by School Infrastructure NSW (SINSW) on behalf of Department of Education (ABN: 40300173822) to assist in the planning and design of a Development Application to be assessed by the NSW Department of Planning and Environment (DPE). DFP Planning has prepared this Environmental Impact Statement (EIS) to accompany the State Significant Development Application (SSDA).

The proposed works include school facilities to accommodate up to 1012 students and 60 staff, including site preparation works, new classroom buildings, administration building, hall, canteen, sports facilities, carparking and landscaping works.

The proposed development is for a new school (educational establishment) with a Capital Investment Value (CIV) of more than $20 million and accordingly, is deemed to be State Significant Development (SSD) pursuant to Schedule 1 of *State Environmental Planning Policy (Planning Systems) 2021* (SEPP PS).

On 27 April 2022, the Secretary of the Department of Planning and Environment (DPE) issued Secretary's Environmental Assessment Requirements (SEARs) and on 1 November 2022 amended SEARs for project - SSD-41306367. **Appendix A** to this EIS references where each SEARs requirement can be found within this EIS or supporting documents.

This EIS has been prepared in accordance with the SEARs, Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and Part 8 of the *Environmental Planning and Assessment Regulation 2021* (the Regulation) to provide the DPE and relevant NSW State government agencies with the information necessary to assess the proposed development, and for the Minister to determine the DA in accordance with Section 4.38 of the EP&A Act.

1.1.2 Project Objectives and Summary

The project objective is to provide a new primary school for the Gregory Hills catchment to alleviate enrolment pressures on the surrounding school network. SINSW has determined that the following learning areas are required for the area:

- 44 x General Learning Areas
- 4 x Supported Learning Spaces
- Outdoor Learning Areas

The school will provide the 1,012 students (Kindergarten to year 6) and 60 staff with equitable access across the site with optional reliance on the use of any stairs.

1.1.3 Design Development

Development Design

Two options were initially prepared for the site, mainly due to the eastern area of the site being by a gas pipeline corridor located approximately 750m east of the site and the uncertainty at the time of whether school buildings could be located in the gas pipeline corridor. The stand of trees to the south-west corner were to be retained in both options.

A Safety Management Study was required to determine the suitability of the school design and siting within the affected area from the Gas Pipeline Corridor.

Three story development (exceeds height limit) has been proposed to minimise the building footprint, to allow for sufficient open space requirements and landscaping. Should the buildings comply with the height limit, open space and landscaping would be significantly reduced. The buildings are, however, still well below the 16m height limit that applies to the site for residential flat buildings.

1 Introduction

Option 1

Option 1 was designed so the built form addressed the streetscape and enclosed the open space space/ play areas away from the adjacent neighbouring properties. Locating the play areas/ open space to the north-west of the site also ensured recreational areas of the school are proximate to the adjoining recreational areas such as Howards Park and reduces the acoustic impact to adjacent residences from the sporting areas.

Built form is linear to the site boundary and provides defined areas of the school.

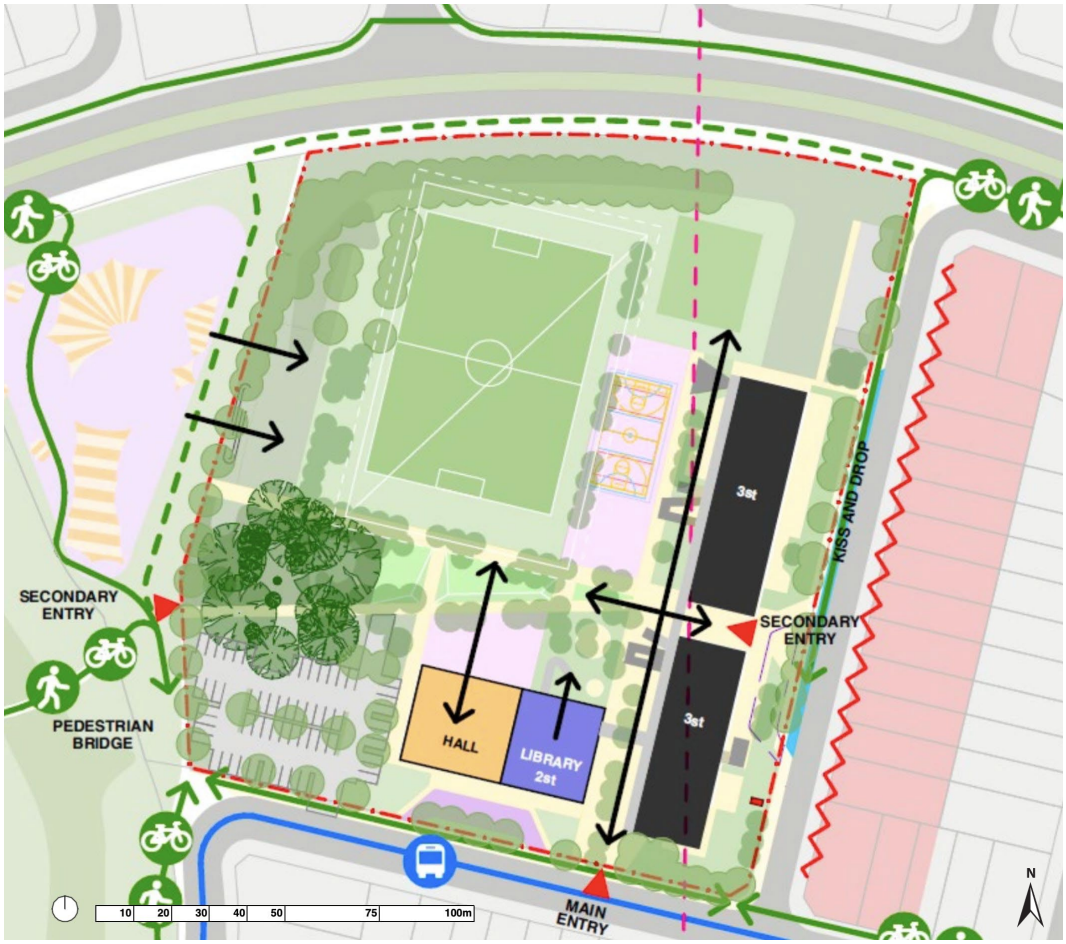

Figure 2 Option 1 layout (source Bennett and Trimble)

Option 2

Option 2 was designed to place school buildings outside of the impacted area from the gas pipeline corridor and to create various outdoor playing areas for students. Buildings are not linear to the site boundaries and do not address the streets and this layout results in many areas of usable/ wasted opportunities.

This option was not developed further as the playing fields and carpark adjacent residential properties were not considered a desirable option from an acoustic perspective and created a divide between the adjoining open space and recreational areas to the west and the proposed recreational areas of the school. Furthermore, consultation with Jemena Gas advised a Safety Management Study would be required for the development regardless of whether it was buildings or open play space and carparking in the affected area from the gas pipeline corridor.

The need to establish a temporary school for Gregory Hills has also influenced these options. The decision to proceed with a temporary school made Option 2 less practical to construct whilst the temporary school was operational school due to the overlap of temporary and

permanent buildings. Option 1 avoids the overlap of buildings and provides a better design outcome.

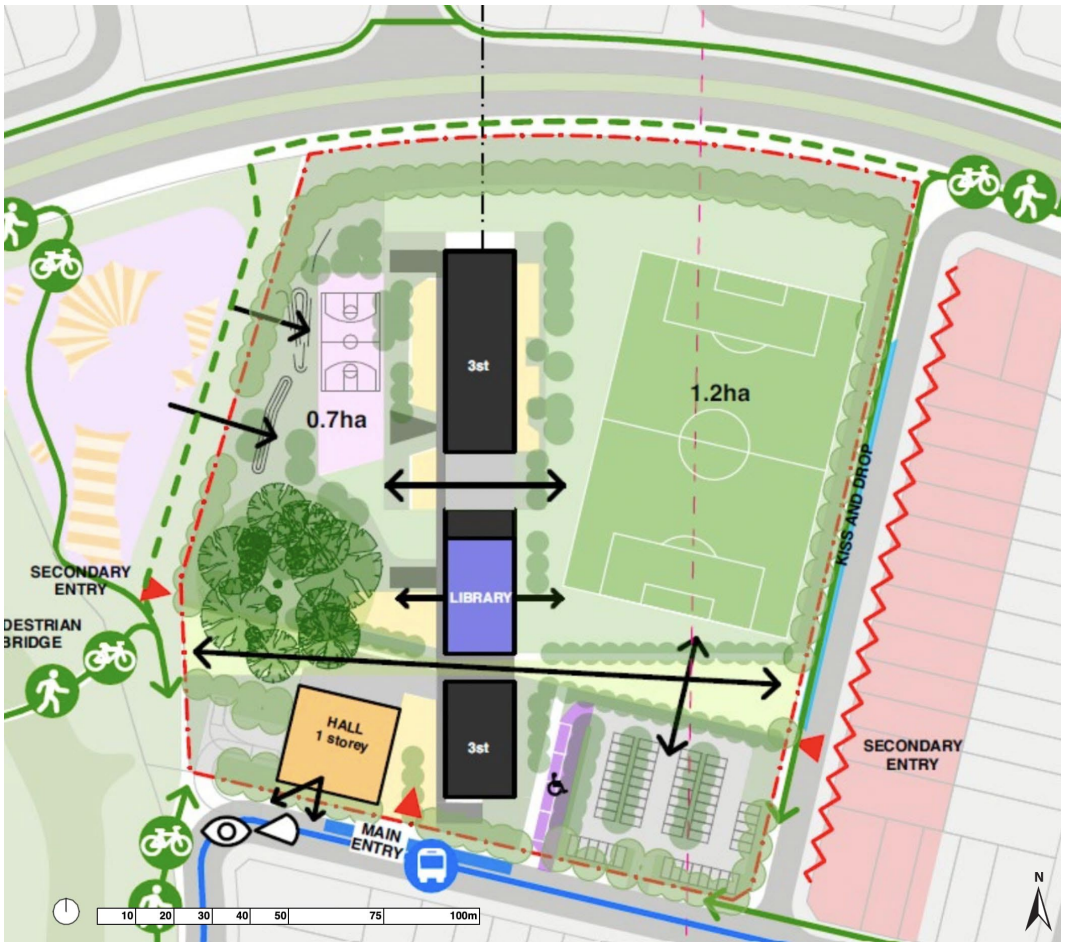

Figure 3 Option 2 layout (source Bennett and Trimble)

Development of Final Design

Option 1 was considered the preferred site planning response because there was better connection with built form of the residential development, and recreational areas are located adjacent existing residential areas. The final design also limits impacts to the approved temporary school, with the new school buildings being able to be built, whilst the temporary school is operating, and the landscaping to be completed on decommissioning of the temporary school, once the new school is constructed. Option 1 has been further refined based on further input from the project team specialist consultants and consultation with Jemena Gas.

Drawing inspiration from the indigenous custodians of the land and the importance of meeting places, the development of the preferred option gives primacy to a number of play spaces where students of different age groupings can meet, play and learn. These spaces are to be supported by logical pedestrian access corridors and includes a yarning circle.

Buildings are proposed to front the Wallarah Circuit and Long Reef streetscapes and flank the open space areas. The library and Hall are located along Wallarah Circuit for potential shared use with the community.

The location of the car park and footpaths have been redesigned to ensure that all healthy trees to the south-west of the site can be retained and structural root zones protected. Eight (8) trees are required to be removed due to the poor status of their health (dead or dying).

Buildings along Wallarah Circuit are located outside of the recommended Asset Protection zone of 51m from the bushfire prone land to the south-west corner.

1 Introduction

Buildings fronting Long Reef Circuit exceed the maximum height of building control of 9.5m and as such have been designed with a generous setback with a separation of 29m to residential boundaries to ensure no overshadowing of existing residential properties.

Table 1 provides an overview of the construction stages of the project relative to the approved temporary school. **Figures 4 and 5** illustrate the site planning for the proposed new primary school and the approved temporary school. The temporary and new primary school are located in different parts of the site to facilitate staging and decommissioning of the temporary school.

Table 1 Overview of proposed development

Construction staging	Project Detail
Construction	Site preparation and construction of facilities and associated works for the permanent school
Decommissioning	Remove temporary school facilities, excluding OSD basin, waste storage area and public domain works (including short stay parking on Long Reef Circuit).
Landscaping	Undertake landscape works, construct playing courts in location of temporary school once decommissioned. OSD and waste storage area established as part of the temporary school are to remain.

Figure 4 Proposed layout Ground Floor (Source: Bennett and Trimble)

1 Introduction

Figure 5 Location of temporary school approved under alternate pathway DA/2022/742/1 (source Bennett and Trimble)

1.1.4 Works Being Conducted Under Alternate Planning Pathways

In addition to the works being assessed as part of this SSDA, the works set out in **Table 2** are approved under alternative planning pathways.

Table 2 Works under Alternate Planning Pathways

Project Element	Planning Pathway
Temporary School for 300 students (includes waste storage area, short stay parking on Long Reef Circuit, boundary adjustment and OSD which will remain for permanent school)	Development Application DA2022/742/1 (approved)
Infrastructure services – (water, sewer and communication)	Development without Consent (approved)
Electrical (Endeavour Energy)	Development without Consent (approved)

1.2 Site History

Jacobs undertook research of past land uses as part of the Cultural Heritage Management Plan (CHMP).

In the CHMP it is noted that Gregory Hills and surrounding areas were cleared for agricultural purposes in the early 1800s. Prior to 1816 the area was used for grazing (cattle and sheep). After a change in ownership in 1816, the area was used for farming, such as dairy, meat, fruit and grain until the rural recession in 1970. After the 1970 recession, the State Government purchased the land and has subsequently developed the area, with Oran Park and Turner Road Precinct being one of the first major development areas within the South-West Growth Area.

1 Introduction

An Aboriginal Heritage Impact Permit (AHIP) has been issued for the site and its validity was extended until June 2023, therefore, is valid for the purposes of this proposal.

Table 3 describes the historical development of the site.

Table 3 Chronological History of the Site

Year	Development History
Prior to 2014	Vacant land used for agricultural purposes
2014	Bulk earthworks as part of Turner Road Precinct Development
2014-2018	Site used as contractors' earthworks compound
2018-2019	Earthworks compound decommissioned and all materials removed
2020	Validation assessment undertaken and deemed suitable for school use.
2022	Site vacant

1.3 Site Context

1.3.1 Site Description and location

The site is located in Dharawal Country at 28 Wallarah Circuit, Gregory Hills NSW 2557, and is legally described as Lot 3257 DP1243285.

The site is located within the Camden Local Government Area and is within the Turner Road Precinct of the South-West Growth Centre.

The site has an area of approximately 2.926ha (by Deposited Plan) and falls from the south-east corner (RL116.5) to the north- west corner (RL113).

The site has three (3) street frontages:

- Wallarah Circuit (southern boundary)
- Gregory Hills Drive (northern boundary)
- Long Reef Circuit (eastern boundary)

The site is primarily vacant land, with the exception of an existing group of trees that have been retained in the southwest corner of the site that pre-date the subdivision and development of the precinct. There is also an existing electrical substation located on the south-eastern boundary.

There are easements of varying widths located along the northern boundary identified for drainage.

A temporary school will be located on the north/north-western section of the site (temporary school does not form part of the works proposed under this SSDA, approved under DA2022/742/1). It is anticipated that the temporary school will be removed during construction/on completion of the permanent school, excluding OSD, waste area, short stay parking and other public domain works, which are to remain under this SSDA to service the permanent school.

1 Introduction

Figure 6 Site location (source Six Maps)

Figure 7 Site aerial map (source Bennett and Trimble)

1.3.2 Surrounding Development

To the north, east and south of the site is emerging and recently completed residential development.

To the east of the residential area fronting Long Reef Circuit are high voltage power lines within an easement which include pedestrian paths and cycleways.

To the west of the site, beyond Sykes Creek and Howard Park is the Gregory Hills town centre. A pedestrian bridge links Wallarah Circuit with the town centre across Sykes Creek.

1 Introduction

Figure 8 Surrounding Development (source Nearmap)

1.3.3 Surrounding Transport Network

Rail Services

The site is not within walking distance of a train station. However, the existing bus services (discussed below) provide connections to local train stations. Leppington Station is approximately 8km to the northeast of the site and Minto Station approximately 6km east of the site (refer **Figure 9**).

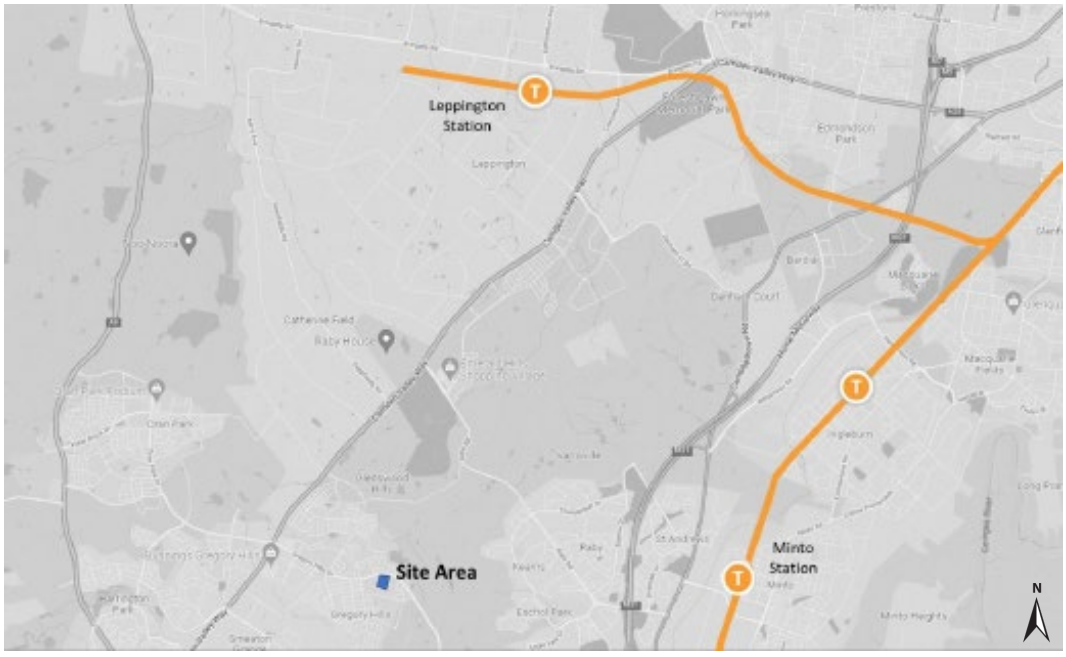

Figure 9 Train Stations (source Ason Group) Not to scale

Bus Services

Four (4) bus stops are located within 400m (walking distance) of the site, serviced by route 840 (Oran Park to Campbelltown) and 841 (Narellan to Leppington via Gregory Hills). Route 840 provides 2 services per hour and route 841 provide 4 services per hour. The bus routes relative to the site are illustrated in **Figure 10**.

1 Introduction

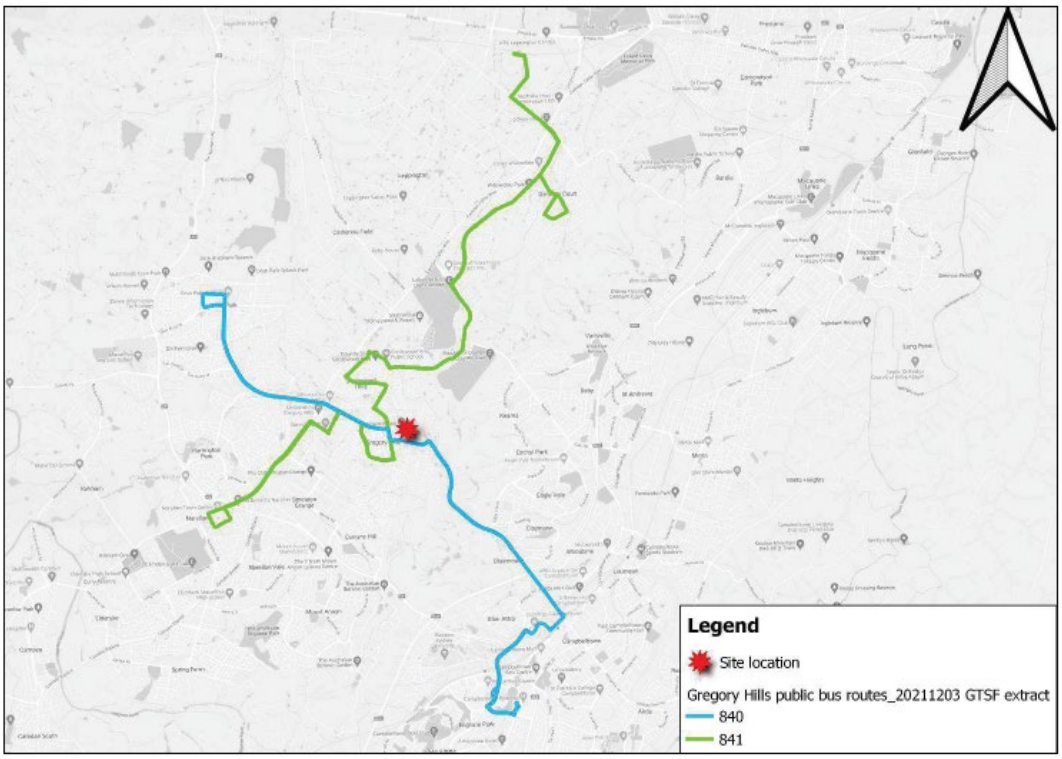

Figure 10 Public Bus Service (source Ason Group) Not to scale

2 Strategic Context

2.1 Strategic Justification and Project Need

The NSW Government has increased their 'School Building Program' investment to $17.7 billion with $8.6 billion allocated over the next four years to deliver new and upgraded schools to support communities across NSW. 23 major capital works projects and additional minor works are included in the budget.

The site was identified in Turner Road DCP as a primary school site and SINSW has acquired the site for the development of a school.

SINSW are moving towards 'Modern Methods of Construction' for future schools, which will enable the rapid delivery of high quality, sustainable, contemporary learning environments for teachers and students.

Students living within Gregory Hills along with population growth in surrounding areas are resulting in the surrounding school network operating over capacity. SINSW has revised the school catchment boundaries, including a stand-alone catchment boundary for Gregory Hills to relieve pressures on existing school, resulting in the need for the new school.

2.2 Strategic Plans

Table 4 provides a summary assessment of the project against the relevant provisions, goals and objectives of relevant State and regional plans and policies, along with local plans and policies to provide an overall strategic context.

Table 4 Response to Provisions, Goals and Objectives of State Polices

State Policy	Response
NSW State and Premier's priorities • Improving education results for children (Education Standards) • Increase number of Aboriginal young people reaching learning potential (Education Standards) • Greener public spaces (Better Environment) • Greening our city (Better Environment)	There are 14 NSW State and Premier's priorities at July 2022, and the four (4) listed opposite have relevance to education. The proposal supports the relevant priorities as it will: • Provide a high-quality learning environment to support the education of children, including Aboriginal children, children with special needs support and people with a disability. • Encourage local schooling with additional capacity and reduce the need for students to travel further afield. • Provide educational infrastructure to support the growing population in the locality. • Provide landscaping and tree planting scheme to green the school environment. • Provide a safe learning environment and education regarding personal protection and welfare.
The Greater Sydney Regional Plan A Metropolis of Three Cities	The project 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 Western City District. The project is consistent with the Western City District Plan as it proposes a new school in a growing urban area thereby supporting the local community with social infrastructure as it continues to grow and evolve. It is noted that students currently living in Gregory Hills are travelling to surrounding schools.
Future Transport Strategy 2056 – Shaping the Future Relevant vision outcomes: • Successful places • Accessible services • Sustainability	There are six (6) state-wide outcomes to guide investment, policy and reform and service provision, and the three (3) listed opposite have relevance to the proposal. The proposal will support the relevant vision outcomes of this Strategy by providing additional school capacity in an accessible location in close proximity to existing road transport infrastructure with nearby bus connections. The proposed development does not prevent the objectives of the Strategy from being achieved.
Western City District Plan	The project contributes to the implementation of the Western City District Plan as it facilitates the development of the new educational establishment.

2 Strategic Context

Table 4 Response to Provisions, Goals and Objectives of State Polices	
State Policy	**Response**
	Planning for the school has responded to growth and changing demand such as more efficient use of land, contemporary design, flexible learning spaces and providing spaces and facilities for shared use. Safe walking and cycling have also been carefully considered to encourage young people to be more active and reduce traffic congestion.
State Infrastructure Strategy 2018-2038 Building the Momentum (Infrastructure NSW 2018)	The proposal is consistent with this Strategy as it provides modern, digitally-enabled learning environments for all students.
Koala Habitat Protection Guideline (DPIE 2020)	The Koala Habitat Protection Guideline was the implementation tool for the Koala Habitat Protection SEPPs. As SEPP (Biodiversity and Conversation) 2021 is now in force, the SEPP is the overarching legislation relevant to this proposal. Chapter 3 and 4 of the B&C SEPP do not apply to the site.
Sydney's Cycling Future 2013 - Cycling for everyday transport	This Plan is focused on Sydney CBD, major centres and public transport interchanges, however, provides for better planning, design and construction of new urban area for cyclists. The proposal includes a Preliminary School Travel Plan (**Appendix P**) aimed at encouraging more children to cycle to school and the physical works proposed include cycle parking and end of trip facilities to support and encourage cycling to school by students, families and staff.
Sydney's Walking Future 2013 – Connecting people and places	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. The proposal includes a Preliminary School Travel Plan (**Appendix P**) aimed at encouraging more children to walk to school and the physical works proposed include footpaths to the street frontages of Long Reef Circuit and Wallarah Circuit to connect the existing footpath/ cycle way network to the proposed school to support and encourage walking to school by students, families, and the staff.
Sydney's Bus Future 2013 – simpler, faster, better bus services	Students and staff can access public bus transport for travel to and from school as outlined in **Section 1.3.3**.
Crime Prevention Through Environmental Design Principles	The project is an opportunity to incorporate CPTED principles into the planning of the school site and the works. Buildings can be designed and situated with safety and crime prevention in mind for places, spaces and movement pathways. An assessment in regard to CPTED matters is provided at **Section 6.17** of this EIS report and **Appendix F**.
Better Placed: An integrated design policy for the built environment of NSW (GANSW 2017) This policy sets 7 key objectives: • Better fit • Better performance • Better community • Better for people • Better working • Better value • Better look and feel	This is an integrated design policy for the built environment and its objectives help focus key considerations in the design of the built environment. The project team met with key stakeholders on several occasions to assist with the development of design concept. The project meets the objectives of this policy as follows: • Fit: The site is identified in the Turner Road DCP as a primary school. Educational infrastructure has been designed at a scale necessary to accommodate the planned and anticipated student enrolments over the years, while respecting the suburban environment within which it is located, with building setbacks and tree plantings to the boundaries (fences) to help soften the school's visual presence.

2 Strategic Context

Table 4 Response to Provisions, Goals and Objectives of State Polices	
State Policy	**Response**
	• Performance: The principles of ESD have been incorporated into the design of the project. See **Section 6.5** and **Appendix N** for the ESD Report. • Community: The design allows for potential shared use of sporting areas and the school hall and library. • People: The buildings are designed with innovative spaces that provide high amenity in a flexible and adaptable environment for the enjoyment of the school community. The main entry to the School defines the public-private interface, which provides controlled surveillance while accessing the site. CPTED principles have been applied in the planning and design of the site and buildings. • Working: The project addresses the design of buildings, so they are comfortable for staff and students and are state-of-the-art for learning environments. The design and layout of learning spaces encourages collaboration and efficiency of circulation. • Value: The project will allow the School to operate effectively in line with current educational design standards and deliver value for staff, students and the community. • Look and Feel: The design principles and approach that have informed the design of the buildings are detailed in the Architectural Design Report by Bennett and Trimble (see **Appendix H**).
Health Urban Development Checklist, NSW Health	The project is consistent with the Checklist, as it will: • Make use of a site identified for a primary school • Provide recreation facilities, which promote and encourage physical activity and exercise; • Promote walking and cycling through the local school catchment; • Promote access by public transport and encourage of active transport; • Provide access to school within the locality, thereby reducing trip generation from homes and car dependence; • Be built, and monitored and safe for people with CPTED principles applied; • Meet the growing community need for educational facilities in the locality and region; • Minimise disturbance to health effects associated with noise, odour and light pollution; • Provide for special needs school community, whether students or teachers.
Draft Greener Places Design Guide (GANSW) This draft guide provides advice for design pertaining to open space, urban tree canopy, ecological health and green infrastructure	The Guide provides information on how to design, plan and implement green infrastructure in urban areas in the public domain. Design advice in the Guide has been applied as follows: • inclusion of solar power and long lasting, low maintenance materials into buildings' location, orientation, sun shading and passive thermal design elements; • designing entrance points to the school at grade for visual inclusivity, accessibility, and connectivity to the School site and locality; • developing a landscape design to respond to the site's narrative and integrate with the surrounding public domain.
Design Guide for Schools (GANSW, 2018). Policy aims to:	Schedule 8 Schools (design quality principles) of the Transport and Infrastructure SEPP sets out the seven (7) design quality principles that must be addressed as part of a DA for a school. The works have been designed with careful consideration for context, built form and landscape, sustainability principles,

2 Strategic Context

Table 4 Response to Provisions, Goals and Objectives of State Polices	
State Policy	**Response**
• Promote and champion good design processes and outcomes for schools; • Deliver schools that respond to the physical, social and environmental context; • Support the delivery of excellent learning environments.	accessibility, health and safety, amenity, whole-of-life cycle and aesthetics. The Architectural Design Report provides an analysis of the design against the design quality principles and finds that the proposal satisfies the principles, including response to heritage context, biodiversity values, site circulation/accessibility, safety and security, amenity of learning spaces, adaptability of learning environments, and quality of character and materiality (see **Appendix H).**
Environmental Design in Schools (GANSW, 2018) This policy aims to provide school principals and school communities with a holistic understanding of environmental design.	The Guide presents strategies for passive design as opportunities for making positive, sustainable change in the building or running of a school. The strategies set out in the Guide have been incorporated into the proposal with common objectives with the EFSG and green star system, seeking to achieve ESD and ensure its integration into school development. The proposal implements ESD principles into the new buildings. See **Section 6.5** and **Appendix N** relating to ESD measures.
Camden Council Local Strategic Planning Statement (LSPS) The Council's 20-year land use planning vision emphasises on land use, transport and sustainability objectives to meet the communities needs over the next 20 years.	The project helps deliver on the vision expressed in the Camden LSPS, by contributing to the following Priorities from the Plan: • Working in partnership to deliver a more liveable, productive and sustainable Camden (Pg 34) • Providing services and facilities to foster a healthy and socially connected community (Pg 46) • Increasing the quantity and diversity of local jobs, and improving access to jobs across the Western City District (Pg 54) • Protecting and restoring environmentally sensitive land and enhancing biodiversity (Pg 73) • Reducing emissions, managing waste and increasing energy efficiency (Pg 74)
Camden Sustainability Strategy	This strategy has five (5) key themes: • Building sustainable communities; • Creating sustainable urban environments; • Improving resilience to climate change; • Protecting our natural environments; • Leading by example. The proposal has been designed with Modern Method of Construction and has been designed to meet the SINSW EFSG, including the installation of solar panels and achieving a 5-star rating. With the exception of dead or dying trees, the trees onsite will be retained. The proposal will increase the overall tree canopy on the site through additional landscaping and planting of trees.
Camden Economic Development Strategy	This strategy has four (4) directions: • Facilitating business and industry growth; • Strengthening education; • Training and career pathways; • Attracting investment. The proposal is consistent with this strategy as is proposes to construct an Education Establishment for 1012 students and will provide career opportunities for 60 staff.
Camden Asset Management Strategy	This document relates to Council's management of their assets and is not relevant to this proposal.

2 Strategic Context

2.3 Analysis of Alternatives

2.3.1 Do nothing

If the proposed development was not pursued, then the surrounding schools would become further overpopulated and would not be able to offer the educational needs of the growing communities.

Accordingly, to do nothing is not considered a viable alternative.

2.3.2 Temporary facilities

A temporary school was investigated and pursued via a Development Application (DA2022/742/1) to Camden Council to accommodate 300 students to alleviate the burden of surrounding schools which are currently catering for students living in Gregory Hills. This is a short-term solution until a permanent school is constructed to cater for the growing population within the new Gregory Hills School Catchment area. A Condition of Consent will only allow operation of the temporary school for three (3) years.

This outcome is only viable as an interim solution.

2.3.3 Develop the Site

The site is identified in the Turner Road DCP Indicative Layout Plan (ILP) as a primary School.

Accordingly, the only viable option for SINSW is to develop the site to cater for a permanent Core 35 school which will accommodate 1,012 students, subsequently, alleviating enrolments at surrounding schools.

As detailed in **Section 1.1.3** of this EIS report, various options for development within the site have been considered and on balance, the preferred option provides for the best economic, educational and amenity outcomes whilst aligning most closely with SINSW teaching and learning priorities.

3 Project Description

3.1 Project Overview

The key aspects and features of the proposal are set out in **Table 5.**

Table 5 Summary of Key Aspects of Project[1]

Aspect	Description
Site Area	2.926ha Once Long Reef Circuit is widened under DA2022/742/1, the site area will be reduced to 2.907ha.
Site Description	28 Wallarah Road, Gregory Hills Lot 3257 DP 1243285
Use	Educational establishment
Project Summary	Site preparation, removal of dead/ dying trees, construction of new school buildings, outdoor covered learning areas, covered walkways, landscaping, core facilities and associated works. The project will accommodate 1,012 students and 60 full time equivalent (FTE) staff. Decommissioning of the temporary school buildings (under DA2022/742/1).
Site Preparation	• Removal of eight (8) dead/ dying trees; and • Civil works, including cut of 350m^3 and fill of 4290m^3. **Appendix U**
Built Form and Signage	Single storey building– located on Wallarah Circuit • Library • Communal hall • Canteen • Outdoor Covered Learning Area to north of building Three storey building – located Long Reef Circuit • Administration and staff hub • Support learning spaces at ground level • 44 General learning spaces • Amenities • Services room The main school entry is off Wallarah Circuit where one (1) sign is proposed at 3m high x 1.5m wide this sign will be up lit by a light at ground level, The eastern 500mm of the sign is for digital signage (illuminated wording). Two (2) secondary entries are provided, one off Long Reef Circuit and one-off Howard Park, no signs are proposed at these entry points.
Landscaping	Landscaping works including the planting of 108 new trees, 396 large and small-medium shrubs, 1,050 ground covers, grasses and includes a yarning circle and play areas.
Utility Infrastructure	Site services have been provided to the site via a separate pathway under Part 5 of the EP&A Act (REF). One electrical pad mounted substation is existing to the southeast corner of the site. An additional electrical pad mounted kiosk substation is proposed to the southeast of the site under a separate REF pathway. Fire hydrant boosters are proposed to the south of the site.
Open space Public Domain Works	Increase footpath along Wallarah Circuit from approved 1.2m under DA 2022/742/1 to 3m. Relocation/ removal and replanting of street trees where required to suit footpath. Vehicle cross over for carpark and SLS Kiss and Drop.
Capacity	• 1,012 students (increased from 300 in temporary school) • 60 FTE staff (increased from 25 in temporary school)
Maximum Height	The maximum building height is 12.49m.
Proposed Open Play Space	14,007m^2 (13.8m^2 per student)

[1] *Note: Supplementary packages of work will be undertaken via alternative planning pathways in order to facilitate the construction of the proposal. These works do not form part of this SSD application and are referenced only for context in regard to the preparation of the site for the works now proposed. Refer to 1.1.4 for more information.*

3 Project Description

Table 5 Summary of Key Aspects of Project[1]	
Aspect	**Description**
Access	Vehicular access for parking via the western end of Wallarah Circuit. Kiss and drop facility on site located off Wallarah Circuit for supported learning students, separately signposted. Waste storage area access via northern end of Long Reef Circuit (approved under DA2022/742/1) Access to short stay parking for student arrival departure along Long Reef Circuit (approved under DA2022/742/1).
Car parking	60 car parking spaces (including 1 accessible car parking space)
Bicycle parking	60 bicycle parking spaces (in 30 racks)
Hours of operation	Operational hours will be 6.00am – 6.00pm Monday - Friday (this includes before and after school care) School bell times are as follows: • 8.40am - morning playground duty begins (students in playground) • 9.10am - classes begin • 11.10am - K-2 recess starts • 11.40am - K-2 recess ends, 3-6 recess begins • 12.10pm - 3-6 recess ends • 1.10pm - K-2 lunch begins • 1.40pm - K-2 lunch ends, 3-6 lunch begins • 2.10pm - 3-6 lunch ends • 3.10pm - classes end Hall operating hours • School use – Ordinary school hours • Outside of School Hours care – 6.00am – 8.40am and 3.10pm – 6.00pm
Community Use	The Multi-Purpose Hall will also be used for Outside of School Hours Care. The school oval will be available for community use upon agreement with the School.
Construction Staging	Stage 1 • Solid Timber A-Class hoarding to boundary of temporary school • All works within site boundary outside of temporary school area • SLS Kiss and Drop • Vehicle cross over for carpark and SLS Kiss and Drop • Extend width of pathway along Wallarah Circuit and associated works. Stage 2 • Removal of temporary school buildings • Construction of all buildings and associated works located within the area of the site previously occupied by the temporary school, including infrastructure and landscaping works.
Construction hours	• 7:00am – 6:00pm Monday to Friday • 8:00am – 2:00 Saturday • No works to occur on Sundays and public holidays • No construction deliveries between 8.00am to 9:30am, and between 2.00pm to 3:30pm on school days. • If required, approval for construction works outside of the above hours will be sought from the relevant authorities.
Anticipated date of operation	2024
Jobs	Up to 60 full time equivalent operational jobs. Up to 150 (direct and indirect) full time construction jobs. 1-year construction period
CIV	Over $20 million (**Appendix G**)

3 Project Description

3.2 Project Description

3.2.1 Physical Layout and Design

Architectural Plans (**Appendix B**) and a supporting Architectural Design Report (**Appendix H**) have been prepared by Bennett and Trimble which show the physical layout and design of the proposal in technical detail.

The proposed school campus is arranged with a 60-space carpark and single storey building along Wallarah Circuit and a three (3) storey building along Long Reef Circuit. The building placement creates a 'L-shape' which defines the recreational areas and outdoor learning spaces to the north west of the site, including a sports field, sports courts and remnant bushland. Waste storge is located to the north-east of the site as per approved DA2022/742/1(**Figure 11**), however may require some augmentation on decommissioning of the temporary carpark.

The administration building and hall are located along Wallarah Circuit to allow for community use, whilst restricting general community access to the remainder of the school.

The carpark has been located to the south-west corner of the site for the best utilisation of the APZ area.

Figure 11 Site plan Ground Floor (source Bennett and Trimble) Not to scale

3 Project Description

3.2.2 Built Form

The proposal is characterised by lower scale single storey built form along Wallarah Circuit and larger scale three (3) storey built form along Long Reef Circuit, with perimeter landscaping **Figure 12** and **Figure 13.**

Figure 12 Wallarah Circuit perspective (source Bennett and Trimble) Not to scale

Figure 13 Long Reef Circuit Perspective (Source Bennett and Trimble) Not to scale

3 Project Description

A ‘block and stack’ approach under Modern Method of Construction is being used for the construction of the school (**Figure 14 and Figure 15**).

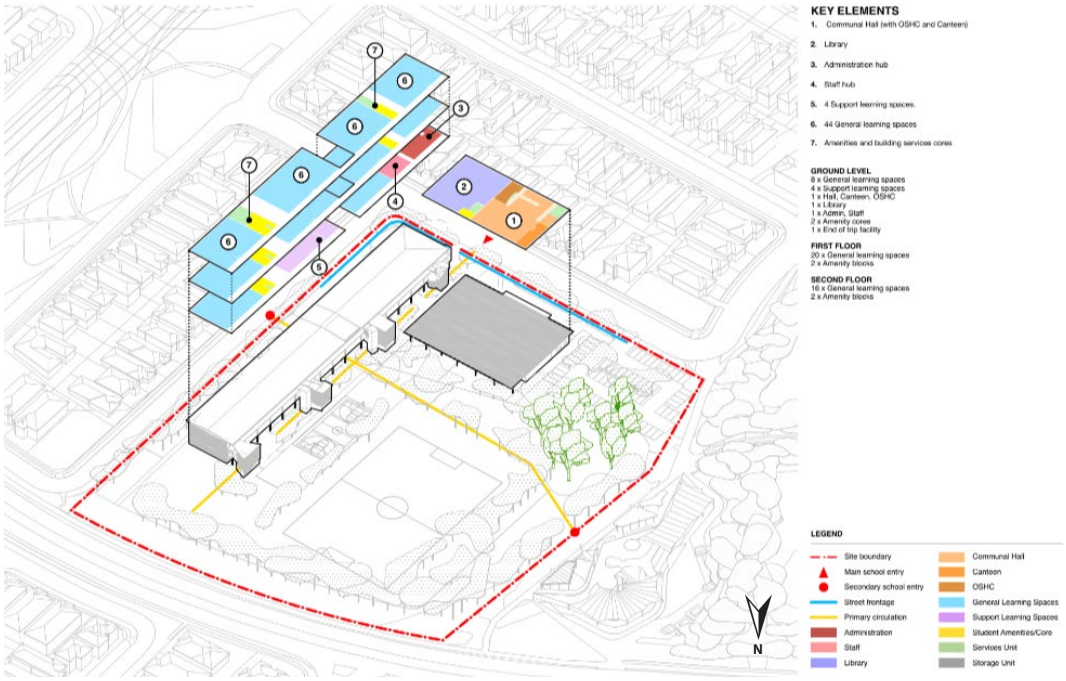

Figure 14 Block and stack diagram (source Bennett and Trimble) Not to sclae

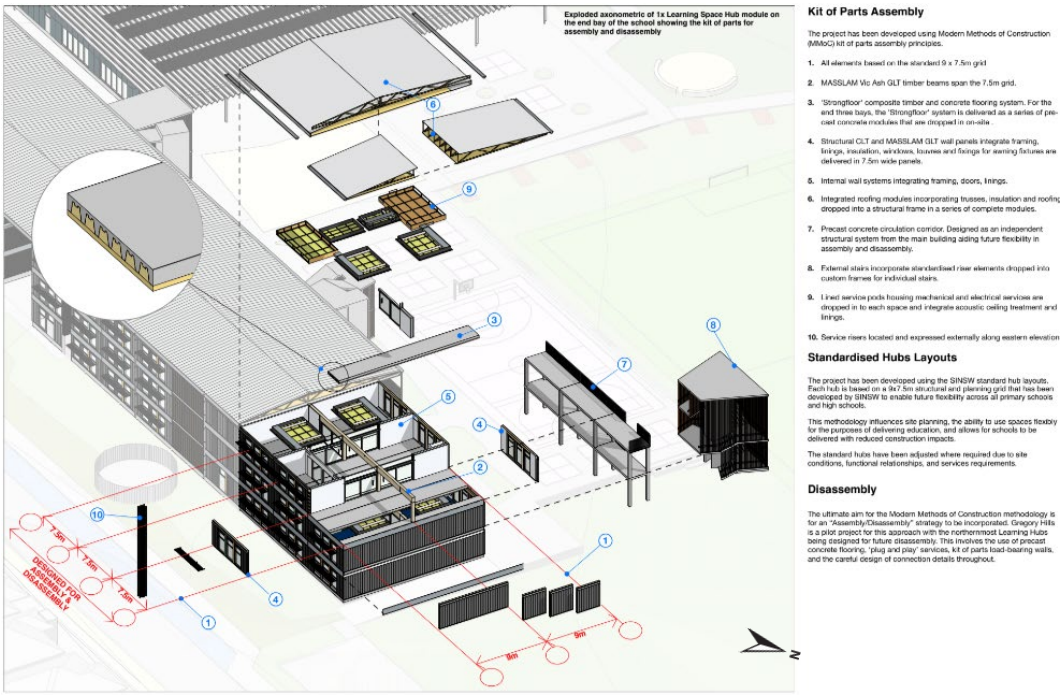

Figure 15 Modern Methods of Construction Diagram (source Bennett and Trimble) Not to scale

A variety of materials and elements including shading louvres/fins and balustrade railing create articulation in the building façades as shown in **Figure 16.**

The colour palette for the new primary school has been derived from the surrounding bushland and Howard Park.

3 Project Description

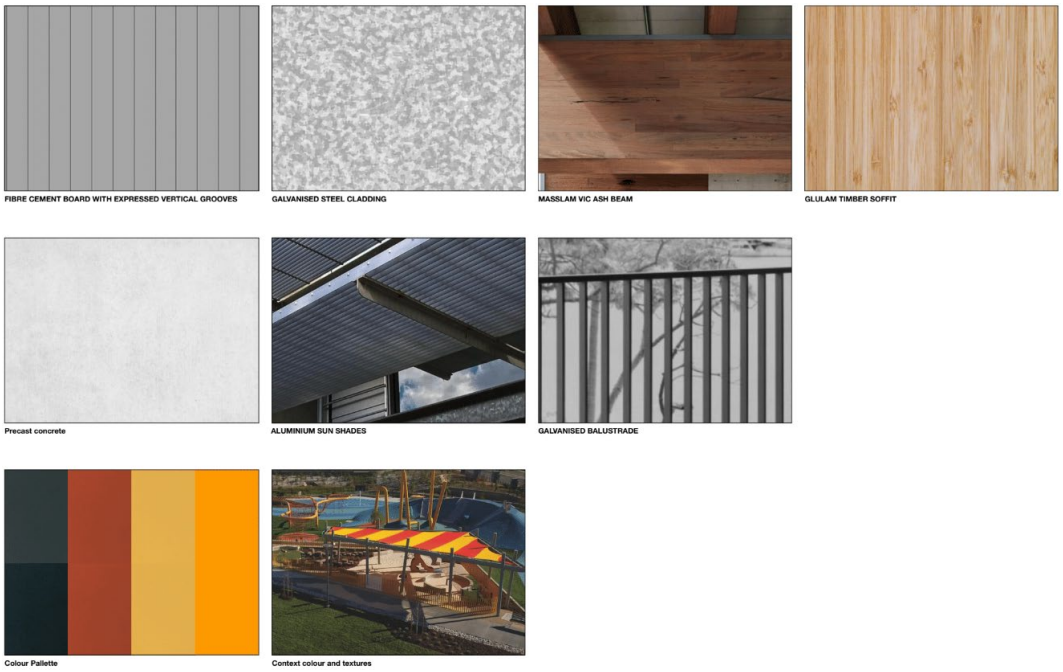

Figure 16 Material Palette (Source Bennett and Trimble)

3.2.3 Landscaping

Taylor Bremmar has prepared a landscaping strategy and landscaping plan for the proposal (see **Appendix M**).

Plant species have been chosen to complement the existing Cumberland Plain Woodland and are compliant with Camden Council Indicative Planting List.

Suitable species of the Cumberland Plain Woodland have been selected and provide great educational value. This will enhance to the school perimeter in informal groups to provide a vegetation buffer to surrounding roads.

Deciduous have been selected throughout the design for their colours and to provide shade during summer and sunlight during winter.

Trees within the carpark have been chosen to provide the greatest amount of shade whilst complying with Planning for Bushfire Protection measures.

For safety reasons the shrubs and groundcovers species selected are not sharp or poisonous. Shrubs and groundcover species are also suitable climatically and are low maintenance.

In total 108 trees, 396 Shrubs, 1,050 groundcovers, grasses and a selection of paving material is proposed.

The proposal provides a range of open spaces to facilitate students' learning, physical activity, socialising and wellbeing where adjacencies of uses and circulation patterns have been closely considered. The proposal provides a total of 14,007m^2 of open space (13.8m^2 per student).

The landscape design incorporates elements of Country (as per the Connection to Country consultation) including protection of existing trees (where practicable) and integration of remnant bushland, provision of seating, and sandstone blocks to communicate indigenous narratives, and provision of outdoor gathering spaces including a yarning circle (**Figure 17**). The wood of the dead/dying trees to be cut down is to be retained on site to respond to Aboriginal Elder commentary (refer **Appendix H**).

These design elements provide opportunities for learning in nature, reflect seasonal changes, storytelling and support education of cultural significance.

3 Project Description

Figure 17 Landscape Concept (Source Taylor and Bremmar) Not to scale

Figure 18 Landscape Precedent (source Taylor and Bremmar) Not to scale

3.2.4 Signage

Proposed signage includes the school's name and a digital panel to display intermittent information. **Figure 19** below shows the location of the main entry sign (shown as 1), a plan view with dimensions (shown as 2) and an elevation (shown as 3). The sign is located at the main entry along Wallarah Circuit. See **Appendix B.**

The main entry sign is free standing and comprises of a up lit 1m wide panel and a 500mm digital panel and stands at 3m in height. The lettering would have total length of 2m and is 180mm wide (see **Figure 19**) There is no school signage at secondary access points.

Way finding signage strategy has been considered, however, will be detailed at Crown Certificate Stage (see **Figure 20**).

3 Project Description

Figure 19 Proposed Signage (source Bennett and Trimble) Not to scale

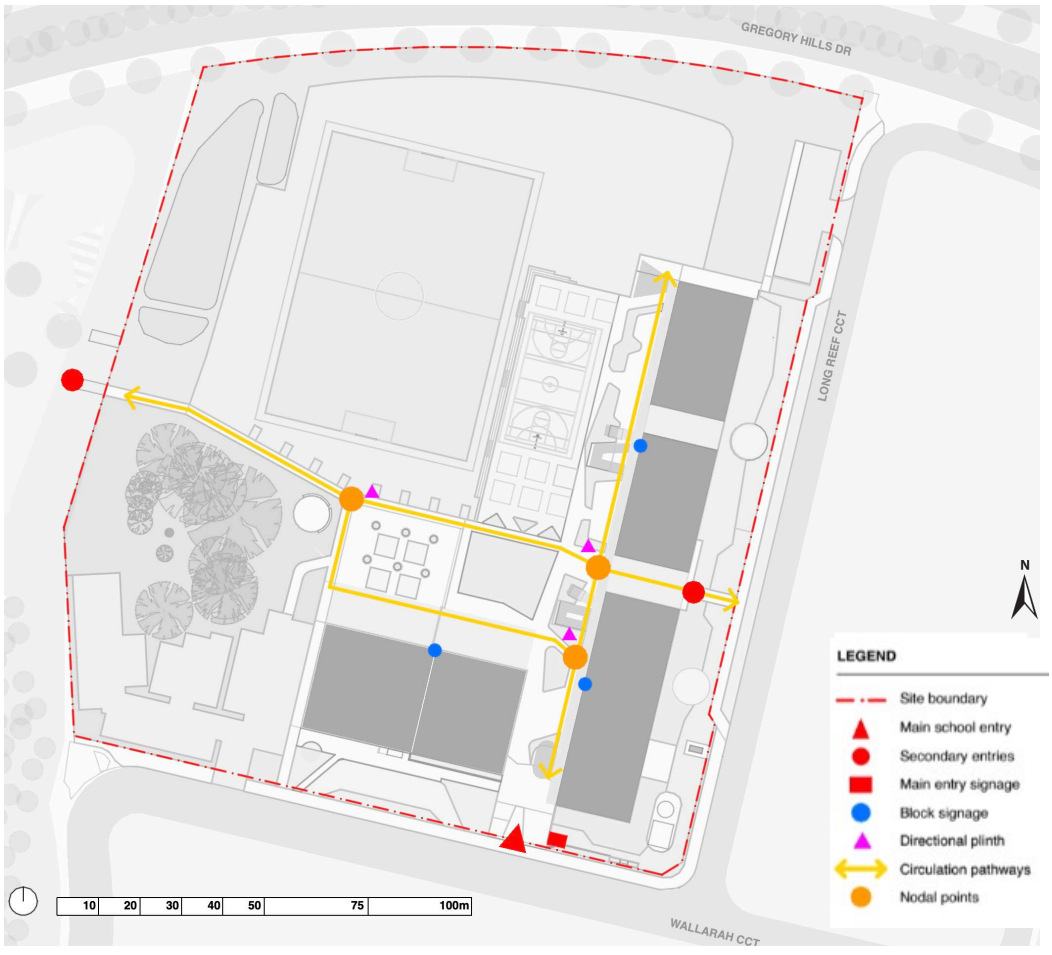

Figure 20 Way finding signage strategy (source Bennett and Trimble)

3 Project Description

3.2.5 Public Domain

The widening of the footpath on the northern side of Wallarah Circuit from 1.2m (approved under DA2022/742/1) to 3m wide is proposed as an outcome of consultation with Council and TfNSW: Relocation/ removal and replanting of street trees to suit widened footpath. Vehicle cross over for car park and SLS Kiss and Drop.

4 Statutory Context

4.1 Planning Approval Pathway

Schedule 1(15)(1) of *State Environmental Planning Policy (Planning Systems) 2021* (SEPP PS) provides that development is state significant if it is:

(1) Development that has a capital investment value of more than $20 million that—

(a) is for the purpose of a new school, or

(b) involves the erection of a building for an existing school on land that, immediately before the commencement of the development, was not used for the purposes of a school.

The proposed works comprise construction of a new school with a capital investment value exceeding $20 million. Accordingly, the planning approval pathway is a State Significant Development Application.

4.2 Permissibility

The site is zoned R1 General Residential under Appendix 2 – Oran Park and Turner Road Precinct of *State Environmental Planning Policy (Precincts – Western Parkland City) 2021 (SEPP WPC).*

Educational Establishments are permissible with consent in the R1 zone under the SEPP. In addition, the R1 zone is a prescribed zoned for the purposes of a school under Section 3.34 and permitted with consent under Section 3.36 of *State Environmental Planning Policy (Transport and Infrastructure) 2021.*

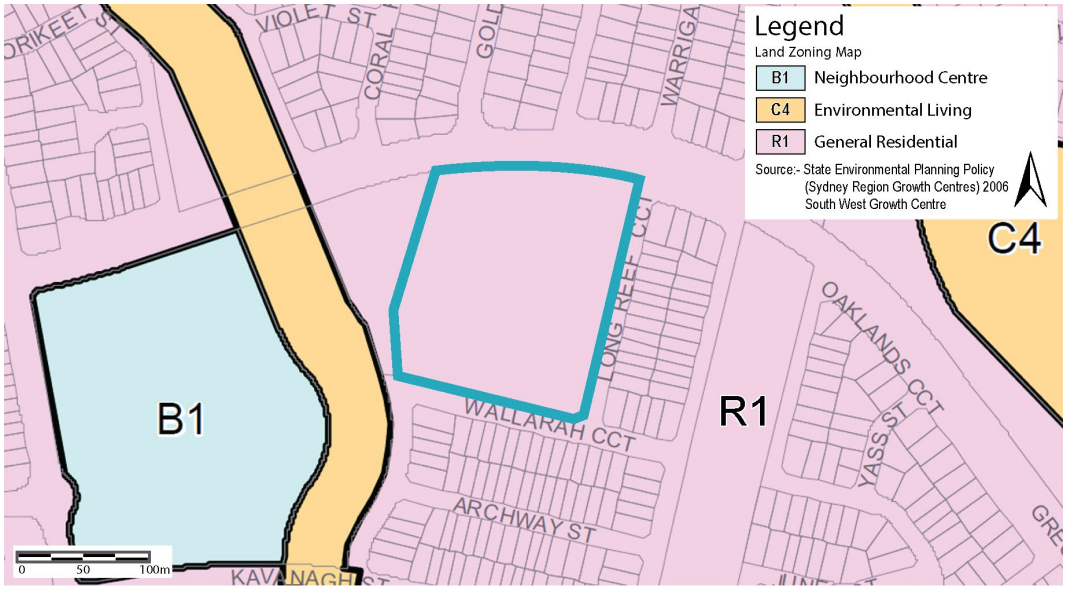

Figure 21 Extract from the SEPP WPC zoning map (source SEPP (SRGC)) Not to scale

4.3 Statutory Approvals

4.3.1 Commonwealth Department of Environment and Energy

Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act)

Chapter 3, Part 3, Division 1, Subdivision C of the EPBC Act provides, amongst other things, that a person must not take an action that has or will have a significant impact on:

- a listed threatened species included in the extinct in the wild category, critically endangered, endangered or vulnerable categories; or
- a listed threatened ecological community included in the critically endangered or endangered categories.

4 Statutory Context

Any of the above 'actions' require an approval under Section 133 of the EPBC Act. The Commonwealth Minister for the Environment and Energy is responsible for the decision on such an approval.

The Site contains a small stand of trees in the south-western part of the Site, which is part of a vegetation community mainly on the adjacent site. The Site is part of an area that is Biodiversity Certified Land, and the certification was conferred by the (then) Minister for Environment and Water on 11 December 2007 (under the then *Threatened Species Conservation Act 1995* now the *Biodiversity Conservation Act 2016*). The Certification was obtained at the rezoning stage for the Turner Road Precinct.

Because the Site is within and area that has been Biodiversity Certified, it is considered that a Biodiversity Development Assessment Report (BDAR) is not required for the small stand of trees in the south-western part of the Site, which will be retained, where safe to do so, and integrated into the proposal. DPE requested in the SEARs Response (Industry Specific SEARs: Schools) dated 1 November 2022 that a BDAR or BDAR Waiver be submitted. The SEARs also state this is not required if the site is on biodiversity certified land. The site is subject to the *South West Growth Centre Biodiversity Certification,* Refer **Figure 22.**

To support the retention of the trees (where safe to do so), ecological advice was provided by Kleinfelder and Rain Tree Consulting on the protection of the trees to demonstrate consistency with the relevant biodiversity measures in the Biodiversity Certification (see **Section 6.3** and **Appendix L and Q).** Eight (8) trees within the stand of vegetation are recommended for removal by Rain Tree Consulting due to the unsafe nature of the trees (dying or dead). The remains of these trees are intended to be retained at the site.

4 Statutory Context

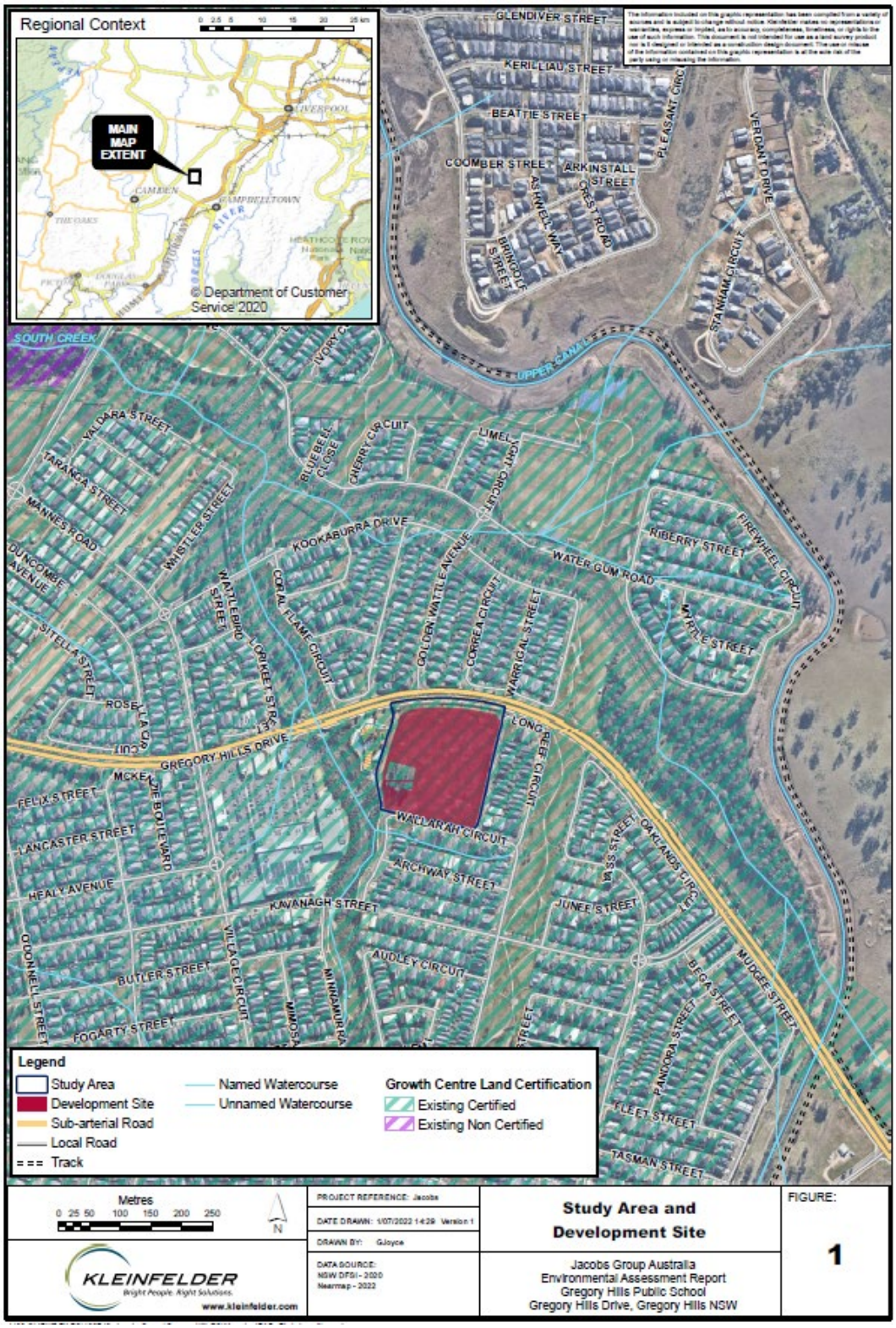

Figure 22 South West Growth centre Land Certification Map (source Kleinfelder)

4.3.2 NSW Department of Planning and Environment (DPE)

Heritage Act 1977

The *Heritage Act 1977* contains provisions relating to the protection of items of State heritage significance or items of potential significance. The site is not identified as a State Heritage Item or a site subject to an interim heritage order under this Act.

National Parks and Wildlife Act 1974 (NPW Act)

The NPW Act contains the primary statutory controls relating to Aboriginal heritage in NSW.

Notwithstanding that Section 90 of the NPW Act does not apply to SSD (pursuant to Section 4.41 of the EP&A Act), provisions relevant to Section 90 of the NPW Act have been considered in the EIS.

The Site is heavily disturbed and an AHIP (1101808) has been issued for the Site which is valid until 30 June 2023. As such an ACHAR has not been prepared, however, aboriginal due diligence has been prepared by Jacobs. The findings in the Due Diligence report are discussed in detail in **Section 6.12.**

4.3.3 Transport for New South Wales (TfNSW) - NSW Roads and Maritime Services

Roads Act 1993

Section 138(1) of the *Roads Act 1993* relates to works associated with public roads and provides that a person must not:

(a) erect a structure or carry out a work in, on or over a public road, or

(b) dig up or disturb the surface of a public road, or

(c) remove or interfere with a structure, work or tree on a public road, or

(d) pump water into a public road from any land adjoining the road, or

(e) connect a road (whether public or private) to a classified road,

otherwise, than with the consent of the appropriate roads authority.

The Site has public road access on two boundaries, being Wallarah Circuit and Long Reef Circuit both of which are local roads for which Camden Council is the road authority. The Site also fronts Gregory Hills Drive, although no pedestrian or vehicular access is available from this road.

The proposed works will require vehicular cross overs on Wallarah Circuit for a carpark entry and supported learning drop off area. These proposed works have been discussed with Council and TfNSW through Transport Working Groups and the details of this consultation and an assessment of traffic and parking impacts are discussed in **Sections 5 and 6.6** of this EIS.

An existing cross over on Long Reef Circuit will remain for the waste storage area, which will be constructed under approved DA2022/742/1 and does not form part of this application.

4.4 Mandatory Matters for Consideration

4.4.1 Environmental Planning and Assessment Act 1979

Section 1.3 – Objects of the EP&A Act

The project is consistent with the Objects of the Act as it:

- Promotes the social and economic welfare of the community;
- Allows the orderly and economic use and development of land;
- Promotes good design;
- Delivers community services and facilities; and

- Is consistent with the principles of ecologically sustainable development.

An assessment in this regard is provided at **Appendix 4** which concludes that the proposal is consistent with the Objects of the Act.

Section 1.7 – Application of Part 7 of Biodiversity Conservation Act 2016 and Part 7A of Fisheries Management Act 1994

Section 1.7 of the EP&A Act has effect subject to the provisions of Part 7 of the *Biodiversity Conservation Act, 2016* and Part 7A of the Fisheries Management Act, 1994 that relate to the operation of the EP&A Act in connection with the terrestrial and aquatic environment.

The site is Biodiversity Certified land (see **Section 4.3.1**) on the basis that the proposal is not likely to have any significant impact on biodiversity values.

Section 4.22 – Concept Development Applications

The proposal is not a Concept Development Application (CDA).

Section 4.33 – Determination of Crown Development Applications

The proposed development is submitted by the NSW Department of Education and is therefore classified as a *Crown development application* under Section 4.32. Section 4.33 of the EP&A Act sets out matters to be considered by consent authorities in the determining or imposition of a condition upon a Crown development application.

Section 4.37 – Staged State Significant Development

This section provides for a CDA that is also SSD, in that the consent authority may determine a subsequent stage of the development is to be determined by the council, and subsequent stages of development ceases to be SSD and the council is the consent authority.

The proposal is not a Concept DA and therefore this provision is not relevant.

Section 4.38 – Consent for State Significant Development

This section outlines how a consent authority may determine an SSD development application by granting consent to the development as proposed, or subject to modifications, and/or by imposing conditions or, alternatively, by refusing consent. The section also provides for other SSD application matters like permissibility, part prohibition of SDD on land, requirement for development consent and planning proposals to permitting SSD on land.

Section 4.41 – Approvals etc Legislation that Does Not Apply

Section 4.41 outlines that a range of authorisations that are not required for SSD. A bushfire safety authority under the *Rural Fires Act 1997* is the only authorisation listed under Section 4.41 that would otherwise have been required for the proposed development if not SSDA. However, as the site is identified as being affected by bushfire, a Bushfire Assessment has been prepared to identity the relevant Asset Protection Zones and construction requirements amongst other recommendations. The findings in the Bushfire Assessment are discussed in detail in **Section 6.9.**

Section 6.28 – Crown Subdivision, Building, Demolition and Incidental Work

The EP&A Act requires that Crown building work cannot commence until it is certified that the work complies with the Building Code of Australia (BCA). As discussed in **Section 6.17** and set out in **Appendix J**, the proposed works are capable of satisfying the provisions of the BCA.

4.4.2 Environmental Planning and Assessment Regulation 2021

Section 173 – Application to Planning Secretary for environmental assessment requirements

This section relates to obtaining the Planning Secretary's assessment requirements (SEARs) for an application that requires an EIS.

Section 190 - Form of environmental impact statement

This section outlines the required content for an EIS and in the circumstances of the matter, must be prepared having regard to the *State Significant Development Guidelines* for SSD.

Section 191 – Compliance with environmental assessment requirements

This EIS complies with the SEARs issues by the Planning Secretary.

Section 192 – Content of Environmental Impact Statements

This section outlines the matters that must be contained or addressed in an EIS. This EIS complies with the requirements of section 192.

Section 193 - Principles of ecologically sustainable development

This section requires the principles of ecologically sustainable development to be considered and the use of the precautionary principle where there are threats of serious and irreversible environment damage and the like.

The EIS has addressed the above-mentioned provisions of the *EP&A Regulations 2021* (see also **Section 6**).

4.4.3 Biodiversity Conservation Act 2016

Part 7 of BC Act sets out provisions relevant to biodiversity assessment and approvals under the Act. Specifically, Section 7.9 applies to a development application under Part 4 of the Act for SSD. This includes the proposed development.

Section 7.9(2) and (3) set out the following requirements:

(2) *Any such application is to be accompanied by a biodiversity development assessment report unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values*.

(3) *The environmental impact statement that accompanies any such application is to include the biodiversity assessment required by the environmental assessment requirements of the Planning Agency Head under the Environmental Planning and Assessment Act 1979.*

The site is subject to the *South West Growth Centre Biodiversity Certification,* and as such is biodiversity certified land, refer **Figure 22.** The proposed development is not likely to have any significant impact on biodiversity values and therefore, a BDAR is not required for this SSDA.

Notwithstanding, an assessment of the proposal's impacts on vegetation is provided at **Section 6.3** of this EIS.

4.4.4 State Environmental Planning Policy (Resilience and Hazards) 2021

Chapter 4 of SEPP RH provides for the remediation of contaminated land and requires, amongst other things, investigations to be undertaken as part of the development assessment process, to determine whether the subject land is likely to be contaminated and if so, what remediation work is required.

Douglas Partners has prepared a Geotechnical Report (Contamination) and a Preliminary Site investigation (Contamination) in 2022 (**Appendix S** and **Y**), which entailed a review of previous geotechnical reports (dated from 2007 -2013) prepared by Douglas Partners for the site and a Validation Assessment Report, dated 2020 (post decommissioning of the site as an earthworks compound) and subsequently deemed the site suitable for use as an educational establishment. No further contamination investigations are required for the site.

4.4.5 State Environmental Planning Policy (Planning Systems) 2021

Chapter 2 of the SEPP PS identifies certain types of development and/or development on certain land as being State Significant Development (SSD) or regionally significant development.

4 Statutory Context

Pursuant to Schedule 1 Clause 15(1) of SEPP PS (see **Appendix 4**) the proposal involves development for the purpose of a new school that has a capital investment value (CIV) of more than $20 million and accordingly, is deemed to be SSD.

4.4.6 State Environmental Planning Policy (Transport and Infrastructure) 2021

Chapter 2 Infrastructure

Chapter 2 of the Transport and Infrastructure SEPP provides for the effective delivery of infrastructure. Part 2.3 sets out development controls for specified types of infrastructure, including development in or adjacent to road corridors and road reservations (Division 17, Subdivision 2).

Section 2.120 relates to development for, amongst other things, an educational establishment on land in or adjacent to a road corridor for freeway, tollway, transit way or any other road and have an average daily traffic volume of more than 20,000 vehicles (based on the traffic volume data published on the website of TfNSW) and that the consent authority considers is likely to be adversely affected by road noise or vibration.

All roads in the immediate vicinity of the Site are local roads managed by Camden Council. The Traffic Impact Assessment prepared by Ason Group indicates that the only surrounding road to have an average daily traffic volume of more than 20,000 is Gregory Hills Drive. Section 2.120(2) requires that a consent authority must take into guidelines that are issued by the Planning Secretary for the purposes of this section and published in the Gazette.

Section 2.122 relates to 'traffic-generating development' being development with a relevant size or capacity as defined by Schedule 3 of the SEPP. As the proposal will generate more than 200 vehicle trips per hour the application must be referred to TfNSW. As discussed in this EIS, consultation with TfNSW has been undertaken in the preparation of the EIS and the traffic impacts of the proposed development are discussed in more detail in **Section 6.6** of this EIS report.

Chapter 3 Educational establishments and child care facilities

Chapter 3 of *SEPP TI* sets out planning approval pathways and other provisions to facilitate the effective delivery of educational establishments in the State. **Table 6** and **Appendix C** to this EIS includes a detailed assessment of the proposal against the provisions of Chapter 3 and concludes that the proposal is consistent with all relevant provisions.

Table 6 Transport and Infrastructure SEPP - Schools

Requirement	Response
Section 3.36(6)(a): Evaluation of design quality principles in Schedule 8	Bennet and Trimble have prepared an Architectural Design Statement (**Appendix H**) which provides an evaluation of the proposal against the design quality principles under Schedule 8 and demonstrates consistency with the principles in Schedule 8.
Section 3.36(6)(b): Does development enable shared community use of school facilities	The proposed development will enable the shared community use of some school facilities (refer **Section 3.1**).
Section 3.36(9): DCP controls relating to Section 35 subclauses (1), (2), (3), or (5) does not apply	Noted, but notwithstanding, an assessment against DCP controls has been provided at **Section 4.4.11** of this EIS.
Section 3.43: Development consent may be granted even though development would contravene a development standard imposed by this or any other EPI.	The proposal contravenes the maximum height of building development standard, however, under Section 3.43 a consent can still be granted for the proposal as it is State Significant Development. Accordingly, A Clause 4.6 Variation Request has not been prepared. The site has two (2) maximum building heights, 16m for residential flat buildings and 9.5m for all other developments which applies in this instance. The

4 Statutory Context

Table 6 Transport and Infrastructure SEPP - Schools	
Requirement	**Response**
	proposed maximum height of the development is 12.49m and exceeds the applicable 9.5m building height standard. Assessment on built form is contained in **Section 6.1** of this EIS. The variation to the maximum building height achieves a superior site planning / development outcome.
Section 3.58 Traffic generating development: Referral to TfNSW required if development will result in educational establishment being able to accommodate 50 or more additional students on a site that has direct vehicular or pedestrian access to any road.	The proposal will result in accommodation of up to 1,012 students for a new school. Accordingly, DPE is required to give written notice of the application to the TfNSW. As discussed at **Section 5.4.1** of this EIS, the project team has carried out consultation with TfNSW and has incorporated that feedback into the body of this SSDA submission.

Transport for NSW have been consulted through the design process. Their input and the project team's responses are addressed in **Section 5.4.1** and **Section 6.6** of the EIS.

4.4.7 State Environmental Planning Policy (Industry and Employment) 2021

Chapter 3 – Advertising and Signage aims to ensure that signage is safe, compatible in its character setting, and effective in its communication.

The proposed signage is of a scale which is considered suitable for the length and height of the built form and the size of the site and will not dominate the streetscape.

Signage is outlined in the Architectural plans and Architectural Design Statement prepared by Bennett and Trimble (**Appendix B & H**). A more detailed assessment is provided in the Statutory Compliance Table at **Appendix C**.

The proposed signage is consistent with the aims of Chapter 3 and assessment criteria in Schedule 5.

Schedule 5 Assessment

1. The sign is compatible with the future character of the area as the site is identified in the Turner Road Precinct DCP for a Primary School. The proposed sign identifies the school's name and has an additional section to display important information.
2. The proposed sign does not detract from amenity or visual quality of environmentally sensitive areas, heritage, or conservation areas.
3. The proposed sign does not dominate the skyline or obscure important views.
4. The proposed sign is 3m high and 1.5m wide (1m sign and 500mm digital board) and located at the school entry with surrounding fences of similar heights. The sign does not protrude above the 7.25m height of the single storey school buildings and does not require ongoing vegetation management.
5. The proposed sign is compatible with the scale of the proposed school buildings.
6. The sign is not proposed for advertising purposes. It is proposed as an identification and information sign for the school.
7. The proposed main school sign be lit by lighting at ground level. The digital panel will include illuminated digital wording 500mm wide information panel to the east of the school's name on the sign. The illuminated area of the sign is minimal and would not affect safety for pedestrians or vehicles. The digital signage and ground lighting have the ability to be switched off when not in use.

8. The location of the proposed sign is to the east of the main entry of Wallarah Circuit. The sign is located to ensure the sightlines for pedestrians and vehicles are not obscured.

4.4.8 State Environmental Planning Policy (Biodiversity and Conservation) 2021

Chapter 2 - Vegetation in non-rural areas

Chapter 2 of SEPP BC relates to vegetation in non-rural areas and provides that a council can issue permits for the clearing of such vegetation in accordance with the requirements of a development control plan. Camden DCP prescribes the trees and vegetation which may be removed without Council approval (exempt species).

The Site is subject to certification under the *Growth Centres Biodiversity Certification* and as such the proposed development must be compliant with the provisions of the certification.

An ecological Assessment prepared by Kleinfelder determines "*that the vegetation within Vegetation Zone 1 does meet the definition of the Critically Endangered Ecological Community Cumberland Plain Woodland in the Sydney Bioregion as listed under the New South Wales Biodiversity Conservation Act 2016. However, the community is very low condition owing to historical clearing and management'. The vegetation within Vegetation Zone 1 does not meet the definition of the Critically Endangered Ecological Community Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest as listed under the Commonwealth's Environment Protection Biodiversity Conservation Act 1999*".

Consent is sought for removal of 8 trees due their health, either dead or dying.

Chapter 3 and 4 – Koala habitat protection 2020 and 2021

Chapter 3 and 4 of SEPP BC relates to Koala Habitat Protection.

Chapter 3 does not apply to Camden LGA as it is a LGA that is not specified in Schedule 1 of State Environmental Planning Policy (Koala Habitat Protection) 2021 and the site is not zoned RU1 Primary Production, RU2 Rural Landscape or RU3 Forestry.

Chapter 4 does not apply to this proposal as Camden LGA is not listed in Schedule 4 as an applicable LGA and the Site is not zoned RU1 Primary Production, RU2 Rural Landscape or RU3 Forestry and the Site is biodiversity certified land.

Chapter 6 – Bushland in urban areas

Chapter 6 of SEPP BC relates to bushland in urban areas and, amongst other things, requires development consent to disturb bushland zoned or reserved for public open space and requires consideration to be given to development on land adjoining such bushland. The site adjoins land zoned C4 Environmental Living and is therefore not zoned for public open space but does adjoin bushland.

Consent for removal of trees is only sought for trees recommended by the project arborist due their poor health, being either dead or dying and not safe to remain in a school setting. All healthy trees will be retained, and tree protection measures put in place as per the arborist recommendations.

Chapter 9 – Hawkesbury-Nepean River

Chapter 9 applies to the site. The site has been considered in a regional context at state level and was identified in Turner Road DCP as a location for a primary school. The land is not contaminated, and a site validation certificate has been issued for the site, which deemed the site suitable for use as an educational establishment.

4.4.9 State Environmental Planning Policy (Precincts – Western Parkland City) 2021

The site is zoned R1 General Residential under *SEPP (WPC) 2021-Appendix 2* and educational establishments are permissible with development consent in this zone.

A detailed assessment of the proposal against the relevant provisions of *SEPP (WPC)-Appendix 2* is provided at **Appendix C** although the following are key considerations.

4 Statutory Context

Height

Section 4.3 and the Height of Building Map under *SEPP (WPC)-Appendix 2* identifies a maximum height of building development standard of 16m for residential flat buildings and 9.5 metres for all other developments, although under Section 3.43 of SEPP TI, development consent may be granted for development for the purpose of a school that is State significant development even though it would contravene a development standard imposed under any EPI. Accordingly, development consent may be granted to the proposal and a clause 4.6 variation request is not required.

Notwithstanding, an assessment of the objectives of Section 4.6 of SEPP (WPC) is provided below and **Section 6** of this EIS report gives consideration to the potential impacts of the proposed height associated with the development, which exceeds the SEPP building height development standard by approximately three (3) metres, having a maximum height on the three (3) storey building of 12.49m along the Wallarah Circuit frontage. In summary, the proposed building height is suitable in the context of the site, with generous setbacks being incorporated along Wallarah Circuit to reduce impacts from the height on any residential neighbours, with no significant adverse privacy loss or overshadowing impacts.

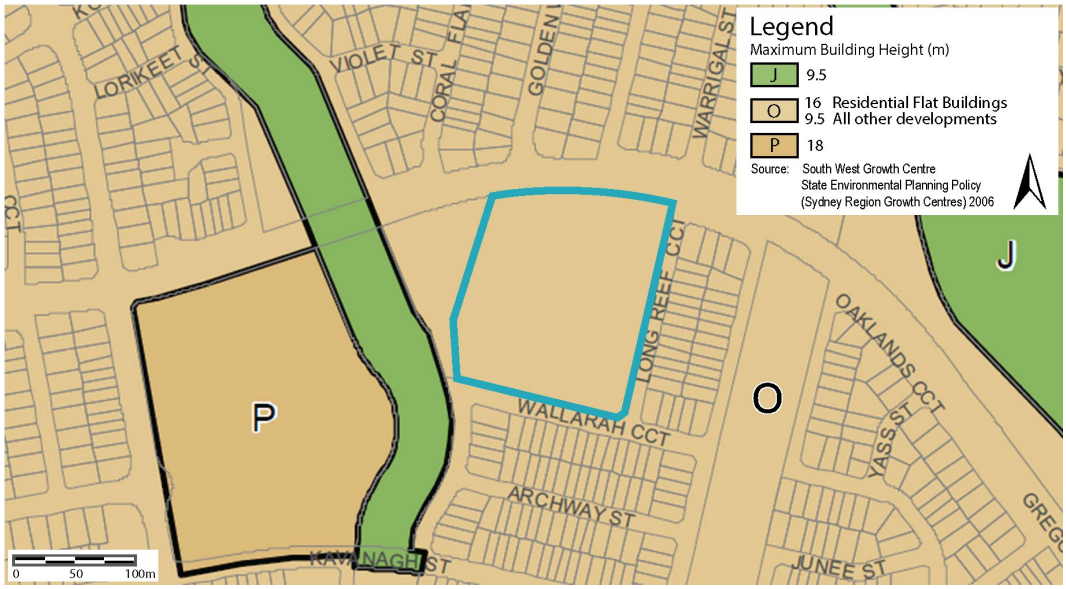

Figure 23 Height of building map (source SEPP (SRGC))

SEPP (WPC) Section 4.6 Objectives

The contravention the maximum height of building Development Standard occurs on the three storey building. As noted above, pursuant to Section 3.43 of SEPP TI, a Section 4.6 variation is not required. Notwithstanding, an assessment of the proposed contravention has been carried out generally in accordance with the objectives of Section 4.6 of SEPP (WPC) Appendix 2 which required a variation request to justify the contravention by demonstrating:

> *(a) that compliance with the development standard is unreasonable or unnecessary in the circumstances of the case, and*
>
> *(b) that there are sufficient environmental planning grounds to justify contravening the development standard.*

Compliance with the standard is unreasonable and unnecessary in the circumstances of this case because, notwithstanding the contravention, the proposal is consistent the objectives of the maximum height of building Development Standard, noted below:

> *(a) to preserve the amenity of adjoining development in terms of solar access to dwellings, private open space and bulk and scale,*

The proposal incorporates setbacks of between 12.5m to 14.5m to ensure no solar impact to existing residential properties between 9am and 3pm at mid-winter. The setbacks also allow

for screen landscaping to assist with the setting of the building to moderate bulk and scale. The separation from the residential property boundary of adjoining houses to the proposed built form is 29m provide good separation of built form. The proposed building height is below the maximum height of 16m for a residential flat building which is a permissible land use on the site and therefore not inconsistent with the built form that is anticipated in the zone.

(b) to provide for a range of residential building heights in appropriate locations that provide a high quality urban form,

This objective relates to residential buildings and is therefore not directly relevant to a school building. Residential flat buildings have a permissible height of building of 16m on the site. The proposed height is 12.49m being below the maximum permissible height for larger scale buildings. Whilst the school is not a residential flat building, the location of the school site is appropriate having regard to the planning controls applying to the land and the adjoining residential area, parkland and town centre.

(c) to facilitate higher density neighbourhood and town centres while minimising impacts on adjacent residential areas,

This objective is not applicable to the proposal.

(d) to provide appropriate height controls for commercial and industrial development.

This objective is not applicable to the proposal.

Flooding

A minor area within the site has been identified as being flood prone in a 1 in 100-year flood event. This area is limited to the south-western corner and does not impact on the footprint of any proposed buildings. The flood planning level of the site is RL115.1m, the lowest ground floor RL (hall) is RL115.7m, the remainder have ground floor RL of 116.1m.

In addition, the flood affectation does impact on the ability for users of the site to appropriately leave the site in the event of a flood event or other emergency. This is discussed in more detail in the Flood Assessment Report at **Appendix V** and in **Section 6.8.1** of this EIS report.

Bushfire

A minor area within the site has been identified as being affected by bushfire risk. This area is limited to the south-western corner and does not impact on the footprint of any proposed buildings. In addition, the bushfire risk does impact on the ability for users of the site to appropriately leave the site in the event of a bushfire. This is discussed in more detail in the Bushfire Impact Assessment at **Appendix GG** and in **Section 6.9** of this EIS report.

4.4.10 Draft State Environmental Planning Policy (Western Parkland City) 2021

There is no draft version of this document at the time of writing this report.

4.4.11 Turner Road Precinct Development Control Plan

As indicated in **Section 4.4.5** of this EIS report, Section 2.10 of *SEPP PS* provides that a DCP (whether made before or after the commencement of the SEPP) does not apply to SSD and accordingly, *Turner Road Precinct DCP* does not apply to the proposal.

Notwithstanding, a detailed assessment of the proposed development against the provisions of this DCP is provided in **Appendix C** wherein it is assessed that the proposal is generally consistent with the provisions of the DCP.

As detailed in **Section 6.6** of this EIS and the Traffic Impact Assessment prepared by Ason Group (see **Appendix O**), the proposal is considered to adequately cater for the car parking demands of the school subject to completion of the proposed carpark , short stay parking provided under DA2022/742/1, supported learning kiss and drop and implementation of the Preliminary School Travel Plan (see **Appendix P**).

5 Engagement

5.1 General

In accordance with the amended SEARs issued by the Department of Planning and Environment on 1 November 2022 the project team has carried out consultation with a wide range of stakeholders, including neighbouring and surrounding landowners, State agencies, Camden Council, the Aboriginal community and other community groups. The advice received throughout the consultation process to date has been integral to the development of this proposal.

Consultation was carried out from December 2020 to September 2022. WSP has prepared a Community Engagement Report (**Appendix D**), which details all consultation carried out for the proposal. Details of the consultation carried out by the project team are set in the following sections.

The engagement report prepared by WSP notes that all engagement has been undertaken in accordance with 'Undertaking Engagement guidelines for State Significant Projects – November 2021 (Engagement Guidelines)'.

5.2 Community Engagement

Consultation and engagement with the community has been undertaken to achieve the following objectives:

- Promote the benefits of the project;
- Build key school community stakeholder relationships and maintain goodwill with the community;
- Manage community expectations and build trust by delivering on commitments to deliver a school to the community;
- Provide timely information to impacted stakeholders and broader communities;
- Address and correct misinformation in the public domain;
- Reduce the risk of project delays caused by negative third-party intervention; and
- Leave a positive legacy in the community.

5.2.1 School Community Engagement

A Project Review Group (PRG) was established to undertake meetings, workshops and school tours with representatives from two local school communities including Principals, parents and students.

The PRG acts as a communication channel through which to feed information between the wider school community and project team.

The primary role of the PRG is to discuss aspects of the design, consultation and construction approach, whilst seeking feedback and input from members.

5.2.2 Community and Community Groups

The following community engagement channels, tools and activities were undertaken to facilitate engagement with the local community:

- Project update public announcements (December 2020 - August 2022)
- Online community survey (10 May 2022 - 10 June 2022)
- Community information session (11 May 2022 & 16 August 2022)
- SIA consultation (3 June 2022)

Key feedback from community and community groups includes the following topics:

- Disappointment with the proposed schedule of delivery

- Lack of shading in the school grounds
- Location of the kiss and drop area being opposite residential dwellings
- Whether buses would be able to navigate street surrounding the site
- Proposed catchment excludes areas north of Gregory Hills Drive (within Gregory Hills suburb)
- Lack of high school options in the area
- Enquiries about enrolments at the new school
- Access points for temporary and permanent school
- Questions regarding bus services
- Complaints around intake area not including houses opposite Gregory Hills Drive
- Carparking for parents at both the temporary and permanent school
- Questions about the temporary school and facilities
- Questions around play space and inclusion of a playground

Community Consultation resulted in 151 responses from the community, all of which were from within 100km of the site. 8.6% of respondents lived adjacent to the site and 17.9% lived within Gregory Hills. 57.6% were from other suburbs within the 2577 postcode (Rossmore, Gledswood Hills, Catherine Fields). The remaining 15.9% were from suburbs further afield.

Key findings from the Social Impact Assessment survey include:

- *Respondents were primarily parents/carers of students from Gledswood Hills PS,Barramurra PS, Oran Park PS, or other government or non-government schools in the area (76.7%) or parents/carers of future primary school aged children (36.4%).*
- *40.3% plan to send their children to the new primary school at Gregory Hills if it is the designated school for their address, while 34.9% do not plan to, and 26.4% are unsure.*
- *The major perceived benefits of the project include relief on existing nearby public schools (88.7%) and greater availability of public primary school spaces in the local area (80.7%).*
- *The major concern for respondents is traffic congestion and parking constraints around the school once operational (78.4%).*
- *The most common mitigation and enhancement measures suggested by respondents was to fast track building the school to deliver as soon as possible without staged delivery and to plan extensively for parking and drop off/ pick up systems*
- *Many respondents also suggested that the area desperately needs a public high school.*

5.3 Registered Aboriginal Parties

The following connecting to Country processes that have taken place from 21 March 2022 to present:

- Initial meeting on site with representatives of Traditional Owners, Jacobs, Bennett and Trimble, McIntosh Phelps on 21 March 2022.
- Meeting of the working group on site with representatives of Traditional Owners, members of the Aboriginal Education Consultative Group (AECG), Burraga, Jacobs, Bennett and Trimble on 4 May 2022. The meeting resulted with key themes being raised and to be addressed for Connection to Country.

- A cleansing ceremony on site conducted by representatives of Traditional Owners, in the presence of Peter Sidgreaves (Camden MP), SINSW, Jacobs, Bennett and Trimble, McIntosh Phelps on 23 May 2022. The ceremony was cut short due to heavy rain and postponed to 31 May 2022.
- The cleansing ceremony was completed by representatives of Traditional Owners in the presence of SINSW, Jacobs and Bennett and Trimble on the 31 May 2022.

Matters discussed during the AECG meeting on 4 May 2022 included:

- Site context for Aboriginal people
- Project overview
- Services to be provided by AECG (Cultural Cleansing)
- Recommendations:
    - Retain cluster of trees
    - Local building materials to be used where possible
    - Yarning circle
    - Engagement of local Indigenous artists for signage
    - Incorporation of Dharawal language
    - Early notification to prepare for ceremony
    - Connecting with Country in design
    - Native planting from Dharawal Country

5.4 Public Authority Engagement

5.4.1 Camden Council and TfNSW

The project team consulted with several different departments within Camden Council (Council) including:

- Camden Council - Development Assessment Reps 29 April 2022

The matters discussed during this meeting related to providing a project overview, project status, project timeline, design update, building heights and setbacks, risks, EIS/SSDA due diligence. Community and agency consultation, traffic and parking, visual language of the eastern elevation, shared use of open space.

- Camden Council - Development and Assessment, Certification, Traffic and Road Safety 6 July 2022

The matters discussed during this meeting related to providing a project overview of the permanent school and the temporary school, the planning context, options for the temporary school, application and determination process for the temporary school, car park and kiss and ride for temporary school, Transport and Traffic Assessment for the temporary school, flood studies, timing of temporary school application, Panel for determination.

- Transport Working Group (TWG) – Traffic and Road Safety reps, TfNSW Network and Safety reps 4 July 2022

The matters discussed during this meeting related to a project overview, TWG purpose, travel mode analysis, parking options, bus stops and vehicle access, mini-bus parking for OHSC support units, pedestrian crossings, Gregory Hills Drive signal crossing.

Refer to Engagement Report (**Appendix D**) for detailed engagement responses.

5 Engagement

5.4.2 Government Architect NSW and State Design Review Panel

The first SDRP review of the early planning for the project was undertaken on 23 March 2022. Advice and recommendations arising from the design review session included:

- Support for several elements of the design including early engagement with the Aboriginal community, shared use opportunities, extension of shared cycle path, entry locations, conservation of tree cluster, and provision of natural turf space.
- Strategic matters to be addressed as priority include:
    - Establishing impacts of high-pressure gas line on masterplan options
    - More compelling approach to integrating Country into the design
    - More effective approach for creating climatically comfortable environments (provision of shade and cooling in short and long term)

The first meeting was held on 23 March 2022 and matters discussed included Integration with Howard Park, Masterplan options (Option 1 preferred), transport and access, edges and boundaries, landscape including shade and cooling, open spaces, upper-level outdoor walkway widths for COLA/play spaces, sustainability and climate change, further SDRP review required.

A second SDRP review of the project was undertaken 21 July 2022. Advice and recommendations arising from the design review session included:

- Strategic matters to be addressed as priority include:
    - site-wide cooling strategy to ensure school performs well on days of extreme heat
    - Character and identity through resolution of facades

Other matters discussed include:

- Alternative location of carpark for larger number of trees in that area
- Landscape design
    - East-west pedestrian path cutting through tree cluster
    - Site-wide Water Sensitive Urban Design (WSUD) strategy recommended
- Transport and access
    - No capacity for buses in adjacent streets – recommends plan showing walking distances and routes from bus stops to school
- Architecture
    - Increase stair/landing widths for informal gathering, playing, and learning spaces
    - Language and character of facades

Refer to Engagement Report (**Appendix D**) for detailed engagement responses.

5.4.3 Western Parkland City Authority

A meeting was held on 6 July 2022 with Western Parkland City Authority (WPCA) comprised of WPCA representatives, SINSW representatives, Planning representatives, Architects and project team. The matters discussed included:

- Project overview (permanent school and temporary school)
- Planning context (SEARs, DCP, SSDA)
- Project timeline
- Business case and funding

5 Engagement

- Stakeholder engagement to date
- Fencing
- Temporary and permanent school staging and capacity
- Shared use of facilities
- Building heights and setbacks
- Hazards
- Transport and connectivity.

All of the above feedback has been used to formulate the final design of the permanent school as proposed in this SSDA, as well as the preparation/approval of the temp school under separate DA to deal with immediate demands.

Refer to Engagement Report (**Appendix D**) for detailed engagement responses.

6 Assessment and Mitigation of Impacts

6.1 Built Form and Urban Design

6.1.1 Site and Design Context

Bennett and Trimble has prepared a Architectural Design Report which is included at **Appendix H** which explains the design approach.

Placement, orientation and scale of the proposed buildings has been influenced by surrounding land uses, notably including built form to the east and south and recreation, riparian land to the west and existing vegetation on site, along with bushfire and flooding constraints.

The layout provides large sheltered outdoor open spaces that expand on to the sports field and playing courts to the north-west.

Internal facing walkways, corridors and learning spaces are open to the recreational and outdoor learning areas with balustrades and large windows to connect to this green passive outdoor setting. Circulation around the buildings, provides a continuous accessible walkway around the school facility.

The carpark provides a buffer to bushfire prone land and provides for the required APZ, along with being the most appropriate aspect of the school to be located in the minimal flood affected land.

6.1.2 Building Height

Bulk and scale have been carefully considered through the design process. Adopting a three (3) storey building allows the building footprint over the site to be minimised whilst providing equitable access between and through all buildings.

Although the proposed building height exceeds the maximum building height of 9.5 metres under the SEPP (WPC) by approximately three (3) metres, the proposed three (3) storey development achieves acceptable amenity outcomes in terms of visual impact, overshadowing and privacy by providing a 29m setback from residential boundaries on the adjacent side of Long Reef Circuit and Wallarah Circuit. The building height development standard for residential flat development on the site (and adjoining land) is 16m. the proposed height is less than the overall maximum height permitted for residential flat buildings **Figure 25** and **Figure 26**).

Whilst the proposal exceeds the maximum height of building, Section 3.43 of the T&I SEPP provides that consent can still be granted for the proposal as it is State Significant Development. Refer **Section 4.4.9** of this EIS.

If the buildings were to achieve strict compliance with the height control, they would need to be two (2) storey in height. This would significantly increase the building footprints, reduce available outdoor play space, landscaping opportunities and compromise the ability to provide outdoor sports facilities for school and community use.

Accordingly, the proposed maximum three (3) storey-built form is considered to be the most appropriate design response for the site and flexibility in compliance with the maximum building height allows a superior outcome for the development.

6 Assessment and Mitigation of Impacts

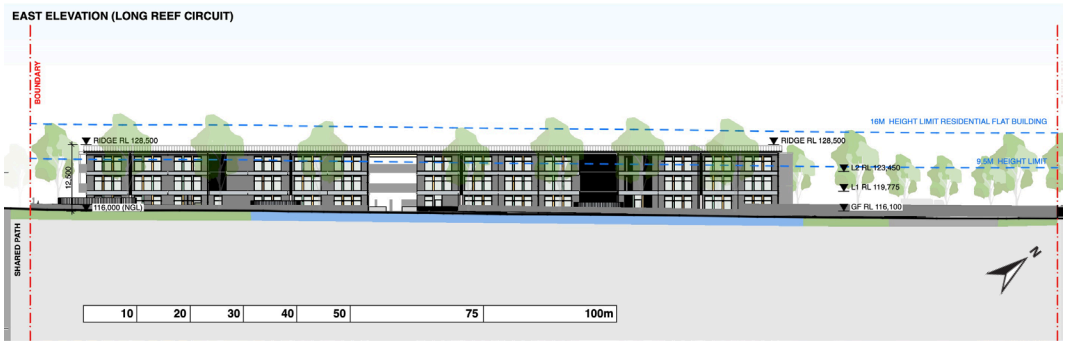

Figure 24 Long Reef Circuit Elevation (Source Bennett and Trimble)

Figure 25 9.5m Height Plane (Source Bennett and Trimble) Not to scale

Figure 26 16m Height Plane (Source Bennett and Trimble) Not to scale

6.1.3 Streetscape and Character

The single storey building fronting Wallarah Circuit is consistent with the existing scale of the surrounding residential streetscape.

The three (3) storey building fronting Long Reef Circuit exceeds the existing streetscape character by one (1) storey; however, this has been countered with extensive setbacks to residential property boundaries (29m) and will also be softened by perimeter tree planting along this setback/frontage.

From Gregory Hills Drive, the majority of the site will be viewed as vegetated open space.

6.2 Environmental Amenity

6.2.1 Visual Privacy and Views

To ensure privacy of adjacent dwellings, the three storey buildings along Long Reef Circuit and on the corner of Long Reef Circuit/ Wallarah Circuit corner, have been setback 29m from the residential lot boundaries along Wallarah Circuit (refer **Figure 27**). The building setback is between 12.5m to 14.5m from the property boundary allowing for significant vegetation to be proposed along the school boundary to increase privacy to adjoining residential properties from student learning areas.

6 Assessment and Mitigation of Impacts

Figure 27 Separation to residential properties (source Bennett and Trimble)

Bennet and Trimble have prepared visual analysis samples from various viewpoints to the site with existing and proposed conditions. There is no significant view loss from surrounding areas as demonstrated in **Figure 28 to Figure 33.**

Figure 28 Existing view looking north along Long Reef Circuit (Source Bennett and Trimble) Not to scale

6 Assessment and Mitigation of Impacts

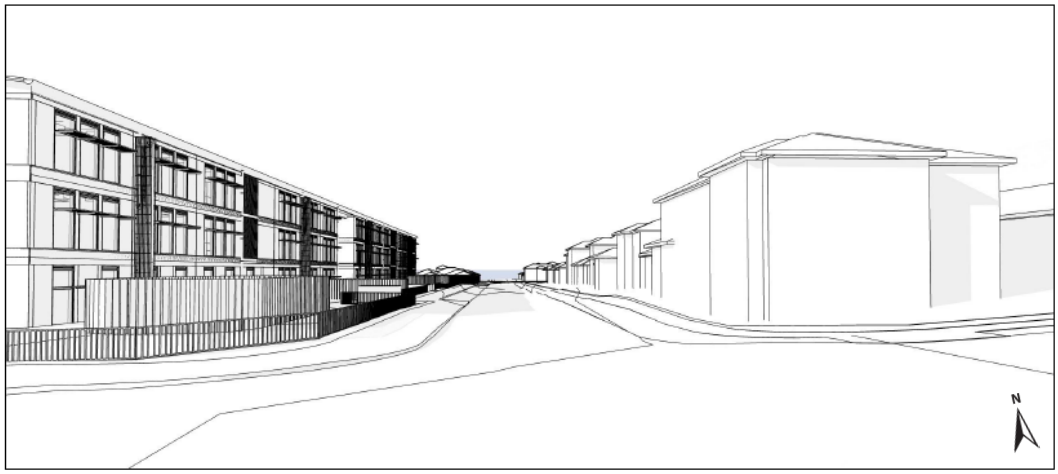

Figure 29 Proposed view looking north along Long Reef Circuit (source Bennett and Trimble) Not to scale

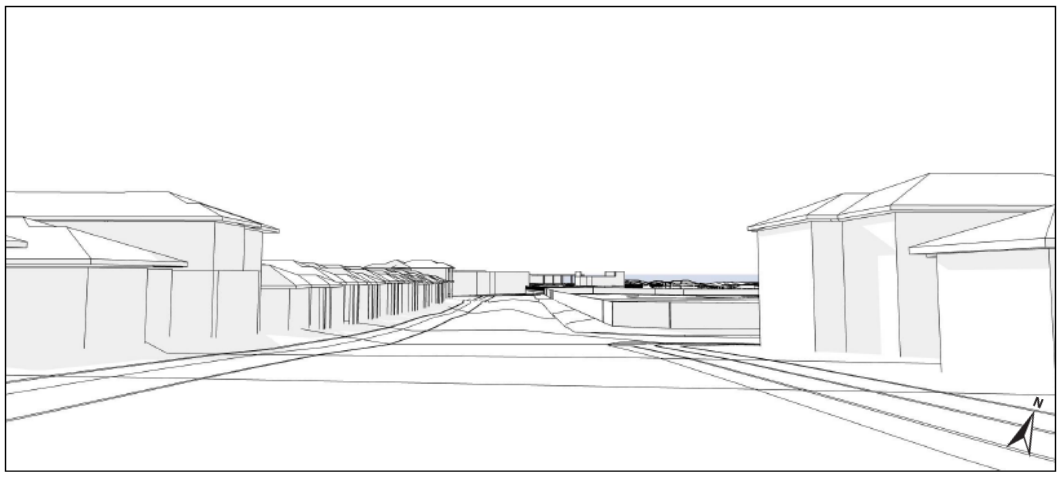

Figure 30 Existing view looking west on Wallarah Circuit (Source Bennett and Trimble) Not to scale

Figure 31 Proposed view looking west on Wallarah Circuit (Source Bennett and Trimble) Not to scale

6 Assessment and Mitigation of Impacts

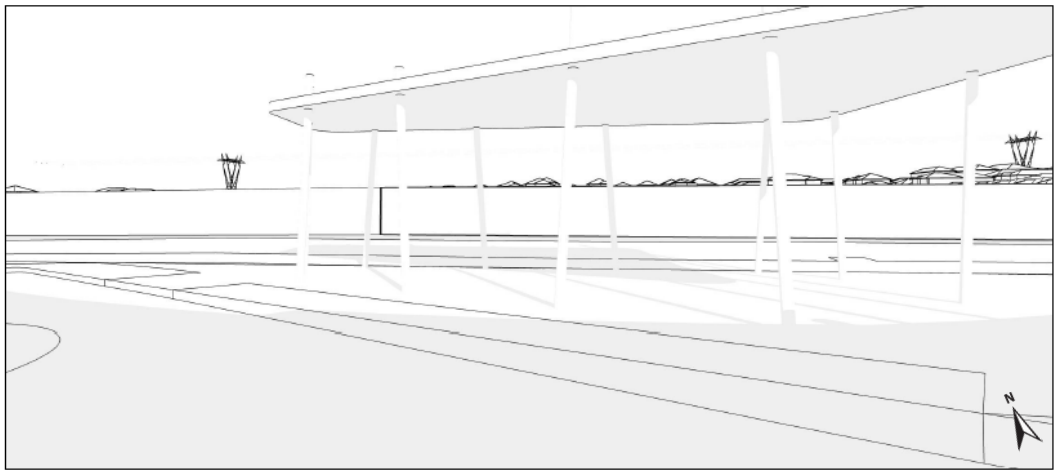

Figure 32 Existing view looking east from Howard Park (Source Bennett and Trimble) Not to scale

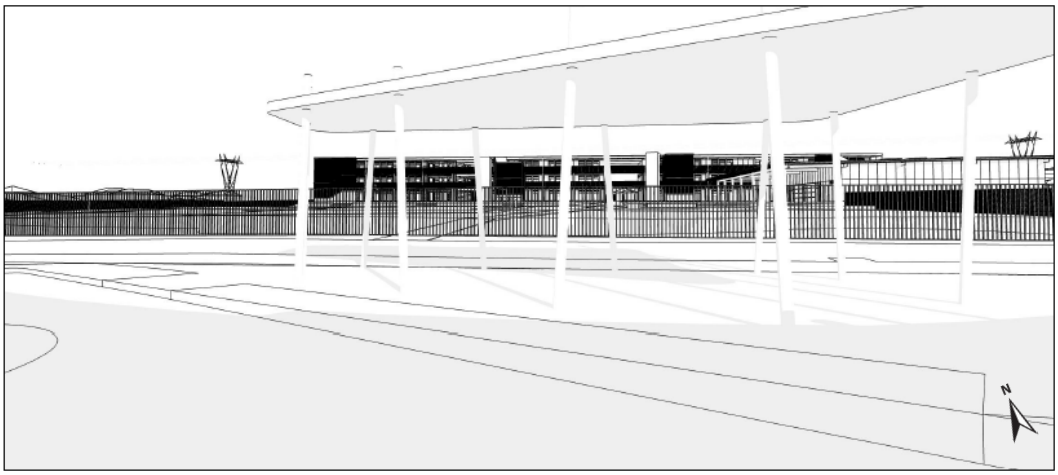

Figure 33 Proposed view looking east from Howard Park (Source Bennett and Trimble) Not to scale

6.2.2 Overshadowing

Overshadowing from the proposed development extends onto Wallarah Circuit and Long Reef Circuit, however, generous setbacks ensure the proposal does not impact on adjacent residential properties.

Overshadowing of Wallarah Circuit is limited to a small section and only affects the southern side of Wallarah Circuit at 9am on June 21st. Overshadowing of Long Reef Circuit extends for approximately 75% of the length of road frontage at 3pm on the 21st June.

Accordingly, the proposal would not result in significant adverse overshadowing of adjoining properties with shadows between 9am and 3pm at the winter solstice falling on the road and overshadowing of the public domain (road reserve) is considered reasonable.

6 Assessment and Mitigation of Impacts

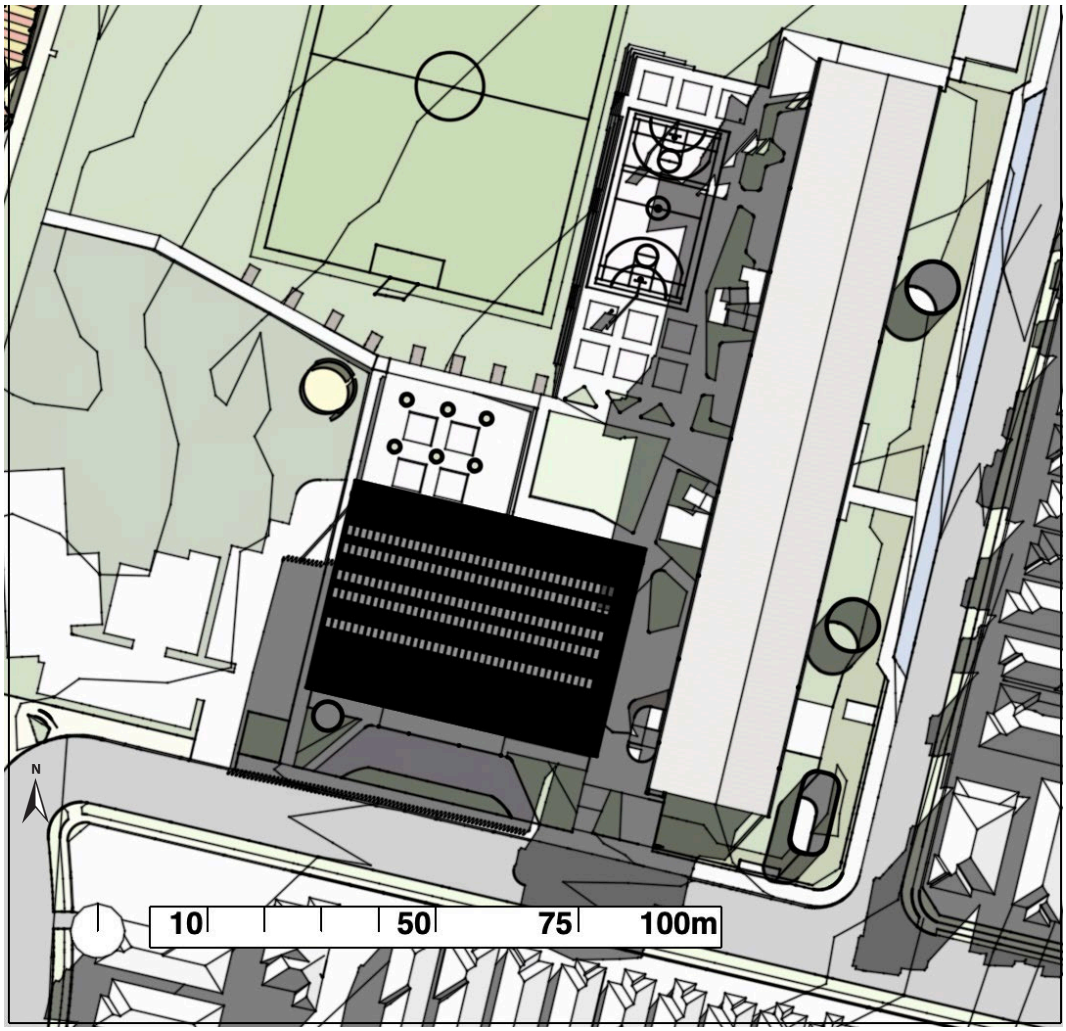

Figure 34 Proposed overshadowing 9am June 21st (source Bennett and Trimble) Not to scale

6 Assessment and Mitigation of Impacts

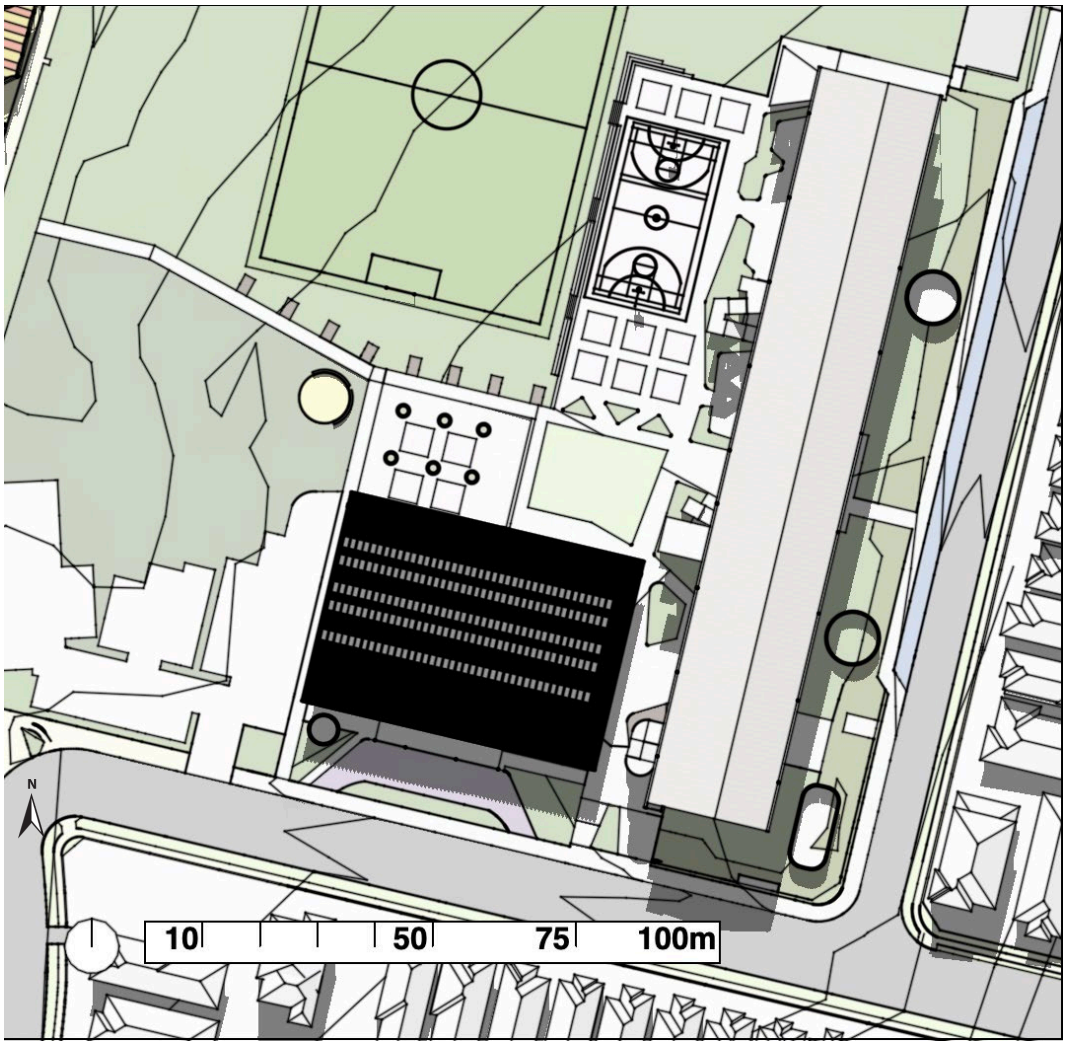

Figure 35 Proposed overshadowing 12pm June 21st (source Bennett and Trimble) Not to scale

6 Assessment and Mitigation of Impacts

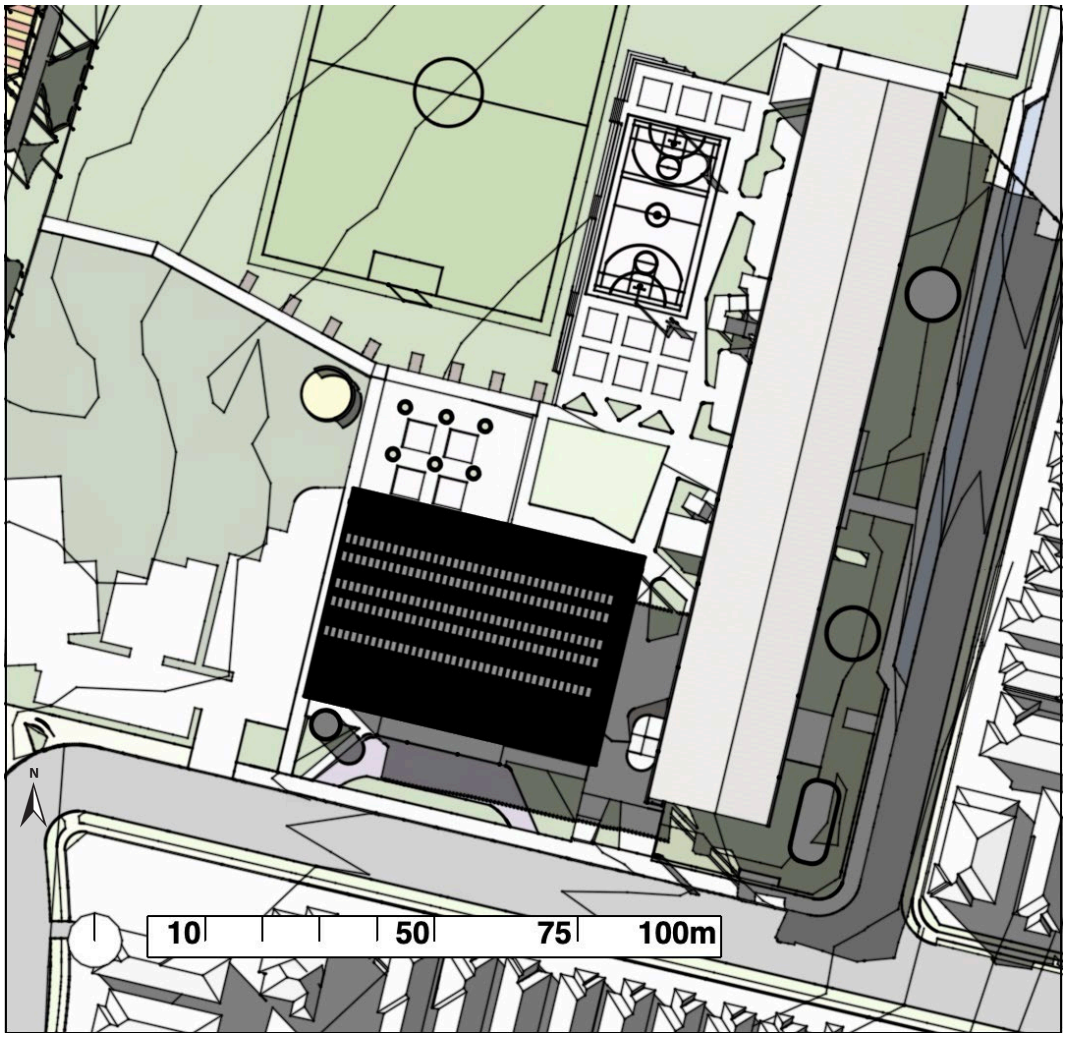

Figure 36 Proposed overshadowing 3pm June 21st (source Bennett and Trimble) Not to scale

6.3 Biodiversity

A stand of Cumberland Plain Woodland (20 trees) is located in the south west corner of the site, extending on to adjoining land. Notwithstanding, the site being biodiversity certified land, an assessment was carried out by Rain Tree Consulting on each tree to determine their health and viability **(Appendix L).** The assessment determined that four (4) trees were deemed to have low retention values, one (1) tree was at high risk of failure and three (3) trees were dead (see **Table 7**). These eight (8) trees were deemed unsafe for a school setting.

The remaining 12 trees were deemed to have high retention value and will be retained as part of this proposal.

An Ecological Assessment was undertaken by Klienfelder **(Appendix Q),** which concluded:

> *'A detailed vegetation and habitat assessment was conducted within the Study Area on the 20 June 2022 by a Senior Ecologist. The vegetation within the Study Area was characterised by managed exotic grassland and a patch of remnant woodland commensurate with PCT3320-Cumberland Shale Plains Woodland and Cumberland Plain Woodland in the Sydney Bioregion Critically Endangered Ecological Community (CCEC) as listed under the New South Wales BC Act 2016. No threatened species or their habitats were recorded within the Study Area'.*

6 Assessment and Mitigation of Impacts

6.4 Trees and Landscaping

6.4.1 Tree Removal

An Arboricultural Impact Assessment has been prepared by Rain Tree Consulting (**Appendix L**) which documents the inspection of 20 trees in the south-west corner of the site and the potential impact of the proposal.

In consultation with the project arborist, the new school has been designed to retain and protect as many existing trees as possible, especially those with the highest retention value. However, a total of eight (8) trees are proposed to be removed as detailed in **Table 7**. These trees were deemed unsafe for a school setting as set out in **Appendix L**. They are not required to be removed for the purpose of providing the APZ.

Table 7 Trees proposed for removal

Retention Value	Number of trees
Dead	3 trees (Tree Nos: 8,10 and 19)
High Risk of Failure	1 tree (Tree No: 13)
Low	4 trees (Tree Nos: 14, 15, 16 and 18)
Total Trees for Removal	**8 trees (deemed unsafe for a school setting)**

A Tree Protection Plan for trees to be retained is contained in the Arboricultural Impact Assessment.

Replacement planting will be undertaken as indicated in the landscaping plans at **Appendix M** and discussed at **Section 6.4.3.**

Tree removal identification is shown in **Figure 37** below.

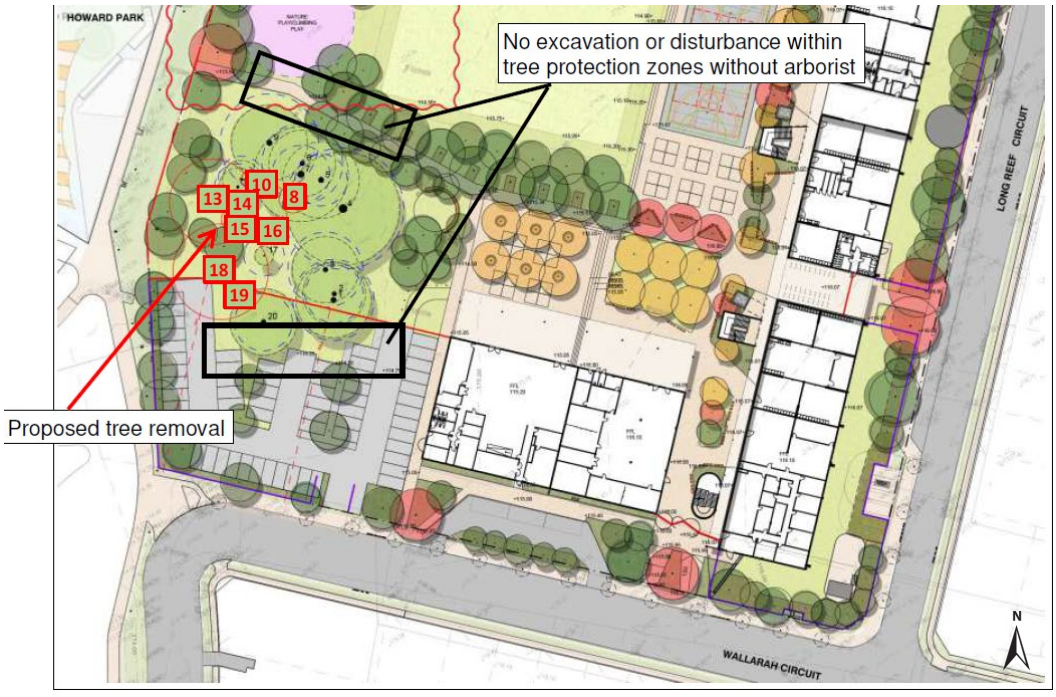

Figure 37 Tree Removal identification (source Rain Tree Consulting) Not to scale

6.4.2 Tree retention

A total of 12 trees are proposed to be retained as summarised in **Table 8**. All of these trees are subject to low impact (<10% TPZ encroachment) or no impact.

Table 8 Trees proposed for retention	
Retention Value	**Number of trees**
High	12 trees (Tree Nos: 1, 2, 3, 4, 5, 6, 7, 9, 11, 12, 17 and 20)
Total Trees for Removal	**12 trees**

6.4.3 Landscaping

A landscape strategy has been developed by Taylor Brammer to provide a high level of amenity across the site for the benefit of staff, students and visitors. The Landscape Plans and Report (**Appendix L**) provides a breakdown of the design development and justification for design decisions.

Landscaping has been designed to capitalise of opportunities for outdoor learning and recreation, to foster connections to the natural environment and to respond to SDRP and Connecting with Country input.

Landscaping complements the architectural design of built form by providing outdoor gathering spaces, including a yarning circle and visual connections to indoor spaces. This is especially the case with the design of the yarning circle proximate to the existing stand of trees and tiered seating and turfed lawns adjacent school buildings for outdoor learning experiences.

The landscape design for the campus has had consideration for the bushfire hazard present on site and has incorporated performance objectives of an Inner Protection Area and Outer Protection Area. Accordingly, the Inner Protection Area (as shown in **Figure 41**) has canopy cover of no greater than 15% and the Outer Protection Area has canopy coverage of no greater than 30%.

The landscaping across the site incorporates a mix of evergreen trees, native trees, deciduous trees, mulch beds, turf, seating, yarning circle, games court and concrete paving.

New planting provides shade in passive recreation spaces and supplements remnant bushland that is being protected (where possible) on site.

Landscaping works promote the movement of students between formal and natural outdoor areas. The landscape design has had careful consideration for how the site interacts with the public domain and adjoining land uses, ensuring the open space areas are located adjacent to the existing Howard Park and Sykes Creek riparian corridor. It provides passive wayfinding, a sense of arrival and softens built form elements.

The landscaping incorporates water sensitive urban design by retaining the existing OSD basin (approved under 2022/742/1) and facilitating OSD tanks and overland flow as discussed in **Section 6.8.2** of this EIS and with appropriate plant species selection.

Surface finishes and materials incorporate connecting to Country narratives have also been selected for their robustness and durability to minimise maintenance and maximise longevity.

6.5 Ecologically Sustainable Development

The proposal is committed to achieving a certified 5 Star rating under the Green Star Design & As Built v1.3 rating tool.

Compliance with the *Educational Facilities Standards and Guidelines*, the *National Construction Code* and *SINSWs Sustainable Development Plan Guide* is demonstrated in an Ecologically Sustainable Development Plan prepared by Norman Disney & Young (**Appendix N**).

The principles of ESD as set out under Section 193 of the *Environmental Planning and Assessment Regulation 2021* are addressed below:

- ***The Precautionary Principle:*** The proposal aims to reduce the environmental impacts typically associated with buildings during the construction and ongoing operational phase. Sustainability measures have been incorporated comprising the efficient use of resources (energy, water and materials), enhancing indoor environmental quality and occupant comfort and minimising ecological impacts. The head contractor will implement an Environmental Management Plan (EMP) and a climate change risk assessment has been undertaken and design strategies have been implemented to mitigate any anticipated impacts of climate change.
- ***Inter-Generational Equity***: The works demonstrate a strong commitment to the preservation of environmental health, diversity and productivity by incorporating environmental quality design features. Indigenous design elements such as aboriginal artwork, language elements and engagement with Aboriginal workers during construction. Opportunities will be investigated for community use of school facilities after hours. Universal design principles will be implemented to provide equitable and safe access. Multi-modal transport will be prioritised to reduce carbon emissions from the occupants.
- ***Conservation of Biological Diversity and Ecological Integrity:*** The proposal has considered design strategies to minimise the urban heat island effect and improve the ecological value of the site such as the use of light-coloured external finishes and landscaping including native and endemic vegetation. Opportunities to promote cognitive function, physical health and psychological well- being (biophilia) on the project will be developed through detailed design with assistance of the landscaping and architectural teams.
- ***Improved Valuation, Pricing and Incentive Mechanisms***: Operational savings will be achieved through sustainable energy, water and waste requirements taking into consideration whole-of-life costing. The economic cost benefits will be achieved through a short term and long-term view to deliver the best environmental and use benefits on budget. Strategies to reduce operational waste include the implementation of a waste management plan and separation of waste streams.

The key commitment of the project will include a 5 Star Green Certification, SINSW FWSG compliance and NCC Section J compliance. The design has responded to all the key issues identified in the SEARs to deliver an ecological sustainable development. The proposed development aims to go beyond minimum building statutory requirements to provide a progressive sustainability outcome for the community.

The proposed design for the development incorporates sustainability measures that have far reaching benefits from the perspective of energy, water and waste reduction as well as providing a good indoor environment quality, thermal and visual comfort, thereby having a positive impact on the health and wellbeing of the students and staff occupying the building.

The Green Star pathway and associated relevant design details will be incorporated into project contract documentation as the final pathway is still under review and will be further developed during later design stages. The head contractor will be responsible for ensuring the Green 5 Star outcome is achieved.

The Ecologically Sustainable Development Plan prepared by Norman Disney & Young outlines that through early design input from sustainability professionals, key initiatives incorporated in the proposed development include:

- *Passive design elements, such as high performance façade, effective shading and natural ventilation to reduce the energy demand of the buildings and improve indoor environment quality for students and staff.*
- *Energy efficient building systems and on-site renewable energy to reduce greenhouse gas emissions.*

- *Preliminary consideration of the building design's resilience and adaptation to climate change impacts.*
- *High indoor air quality, acoustic design principles, visual amenity and thermal comfort to support the site functions as training and teaching spaces and private staff areas.*
- *Best practice waste management principles in operation, and construction and demolition waste diversion from landfill.*
- *Water efficient fixtures and fittings (high WELS ratings), and rainwater collection from the roof and stored for use on-site (landscaping irrigation, toilet flushing) to reduce potable water consumption.*
- *Incorporation of stormwater management systems and water sensitive urban design (WSUD) to minimise peak stormwater flows and pollutants.*
- *Social sustainability initiatives such as incorporation of indigenous design elements, implementation of universal design principles and providing community benefits via community use of the school facilities.*

6.6 Traffic, Transport and Accessibility

6.6.1 Access

Staff carparking will be provided in the south-western corner of the site and will be accessed from Wallarah Circuit to the south via a two-way driveway. The carpark is restricted to staff parking only.

A dedicated drop-off facility comprising a total of three (3) car parking spaces for supported learning students/ accessible access will be provided off Wallarah Circuit. Access to these spaces will be via the western crossover and exit via the eastern crossover.

A short stay parking facility comprising a total of 17 spaces will be provided along Long Reef Circuit (approved under DA2022/742/1). The short stay facility does not form part of this SSDA and will be constructed under a separate DA.

A 36m long kerbside traffic lane with an occasional bus stop along Wallarah Circuit frontage has been approved under DA22/742/1 and will be signposted accordingly. The traffic lane will be located between the support learning drop off facility exit and Long Reef Circuit. Chartered buses will be arranged to serve the school from the kerbside traffic lane bus stop for excursions.

A dedicated waste collection area is located in the north-eastern corner of the school site and waste vehicle access will be accessible from Long Reef Circuit. The truck will enter the School in a forward direction, reverse into the loading bay from within the turnaround area on-site and exit in a forward direction. The waste area vehicle cross over is approved under DA2022/742/1 and does not form part of this SSDA, however some augmentation may be required to the waste storage area upon decommissioning of the temporary carpark.

Service vehicles will utilise the on-street short stay parking facilities along Long Reef Circuit. Deliveries are to occur outside of school drop off/ pick up peak hours.

Emergency vehicles will utilise the short-term parking facilities which have been approved under DA22/742/1 and will be signposted accordingly along school frontage roads for access to and from the Site.

It is proposed to provide three (3) entries for pedestrians to the Site as follows:

- Main entry - Wallarah Circuit pedestrian entry is located on the school's south frontage to the east of the supported learning drop-off.
- Howard Park pedestrian entry to the school's western boundary is proposed via a shared path connection to Howard Park. This is a similar arrangement to the approved temporary school.

- Long Reef Circuit pedestrian entry is located on the school's east frontage in the short-stay parking bays which have been approved under DA22/742/1 and will be signposted accordingly.

6.6.2 Parking

The Camden Council DCP requires parking spaces to be provided at the following rates:

- 1 car parking space per full time equivalent staff member, plus
- 1 car parking space per 100 students, plus
- 1 car parking space per 5 students in Year 12 where appropriate;
- On-street car parking cannot be considered a parking; and
- Adequate space is also required for delivery vehicles, a drop-off/pick-up area and buses as appropriate.

In accordance with the DCP provisions a total of 60 car parking spaces are required to be provided. It is proposed to provide a total of 80 car parking spaces as follows:

- Staff – 60 car parking spaces located in the south-western corner and accessed off Wallarah Circuit.
- Student/Parents – 3 car parking spaces located at the Wallarah Circuit Support Learning Drop-off area; and
- 17 car parking spaces located at the Long Reef Circuit Short Stay parking area (approved under DA2022/742/1).

As there are no specific accessible parking rates for educational establishments in the DCP the National Construction Code has been referred to for accessible parking requirements. One (1) accessible space is proposed to be located in the staff car park and included as part of the 60 spaces.

The Camden Council DCP does not provide bicycle parking rates however the Planning Guidelines for Walking and Cycling 2004 (PGFW&C) provides the following rates for primary and secondary schools:

- Long Term Spaces – 3% to 5% of staff members
- Short Term Spaces – 5% to 10% of staff members

Based on the upper end of these rates a total of 3 long-term and 6 short-term bicycle parking spaces are required to be provided. However, it is proposed to provide 60 undercover bicycle parking spaces at the Long Reef Circuit access to the school.

6.6.3 Traffic Impacts

The key roads in the proximity of the site are:

- Camden Valley Way which is an arterial road with a speed limit of 80km/h
- Gregory Hills Drive is a local road with a speed limit of 60km/h,
- Long Reef Circuit and Wallarah Crescent are local roads with a speed limit of 50km/h.

Intersection turning movement counts were undertaken by Ason Group on 12 May 2022 between the hours of 6:30am to 10:30am and 2:00pm to 6:00pm at the following intersections:

- Gregory Hills Drive and Village Circuit
- Gregory Hills Drive and Golden Wattle Avenue
- Gregory Hills Drive and Kavanagh Street
- Kavanagh Street and Oaklands Circuit
- Kavanagh Street and Junee Street

- Kavanagh Street and Audley Circuit
- Kavanagh Street and Wallarah Circuit
- Kavanagh Street and Village Circuit
- Village Circuit and Healy Avenue

Based on the traffic count data the network peak hours have been determined to be:

- AM Network Peak: 8:15am to 9:15am
- PM Network Peak: 4:45pm to 5:45pm

The proposed school operations are 8.40am – 3:10pm. An assessment was undertaken based on the following school peak times:

- AM School Peak: 8:15am to 9:15am
- PM School Peal: 2:30pm to 3:30pm

In conjunction to the traffic movement counts Ason also completed a pedestrian movement survey. Appendix A of the Ason report documents the school AM and PM peak hours intersection turning and pedestrian movement counts.

The site is not situated within walking distance of a train station. Leppington Station is located approximately 8km to the northeast of the site and Minto Station is approximately 6km to the east which both present opportunities for future serviceability either by public bus, shuttle or chartered services.

There are four (4) public bus stops located within 400m of the Site along Village Circuit and Kavanagh Street. The Site demonstrates adequate serviceability by public transport within the school catchment and accordingly, it is not anticipated to require the provision of additional school bus services.

The report outlines a predominant modal dependency on private motor vehicle usage of 88%.

SIDRA modelling was undertaken by Ason as well as a review of the *Roads and Maritime Services (now TfNSW) Trip Generation Surveys, Schools* (Schools Trip Generation Report) prepared by GTA Consultants. Based on the findings it was estimated that the school will have the following trip generation:

- AM School peak hour: 638 vehicle trips
- PM School peak hour: 527 vehicle trips

According to the RMS guidelines, roads operating at a Level of Service (LOS) D or better are generally considered to have acceptable flow conditions because they are below capacity.

The results of the baseline SIDRA Intersection assessment in terms of LOS are as follows:

- Gregory Hills Drive and Village Circuit – LOS B
- Gregory Hills Drive and Golden Wattle Avenue – LOS B
- Gregory Hills Drive and Kavanagh Street – LOS A
- Kavanagh Street and Oaklands Circuit – LOS A
- Kavanagh Street and Junee Street – LOS A
- Kavanagh Street and Audley Circuit – LOS A
- Kavanagh Street and Wallarah Circuit - LOS A
- Kavanagh Street and Village Circuit - LOS A
- Village Circuit and Healy Avenue - LOS A

Therefore, based on the analysis undertaken the report concludes that the key intersections would continue to operate at acceptable Levels of Service during the school AM and PM peak periods with the school development.

6.6.4 Construction Traffic Management Plan

A Preliminary Construction Traffic Management Plan (PCTMP) has been prepared for the Site. At this stage a preliminary CTMP has been prepared due to the fact that the construction details and programme for the development have not yet been finalised.

The Preliminary Construction Management Plan (Preliminary CMP) outlines the principles that shall be adopted by the appointed contractors for the project subject to a detailed CTMP that will form part of a Construction Management Plan (CMP) which will be prepared and commissioned by the incumbent contractor.

A minimum of 40 parking spaces will be provided on site, to the south of the temporary school for contractor parking.

The overall principles of traffic management during construction include:

- Minimising the impact on pedestrian and cyclist safety and movements
- Maintaining appropriate public transport and school bus access
- Minimising the impact on existing traffic on adjacent roads and intersections
- Minimising the loss of on-street parking
- Maintaining access to/from adjacent properties
- Restricting construction vehicle movements to designated roads to/from the site
- Managing and controlling construction vehicle activity near the site
- Ensuring construction activity is carried out in accordance with the Council's approved hours of work.

The report indicates that the development would generate a moderate increase in traffic on the surrounding road network and provides some mitigation measures to minimise the impacts of the construction activities of the development.

These include:

- A construction fence and suitably classed hoarding shall be provided along site boundaries/works area boundaries to provide safe pedestrian access. The fencing/hoardings should be maintained for the duration of the construction program associated with the stage of works being undertaken.
- Traffic control would be required to manage and regulate traffic movements into and out of the site during construction, with pedestrian priority provided during peak hour periods and to maintain access to public transport facilities.
- Disruption to road users should be kept to a minimum by scheduling intensive delivery activities outside of road network peak hours.
- Supervised traffic control will be required where two-way flow is restricted over any length of the roadway, depending on the number of truck movements required and would be managed outside of peak hour vehicle and pedestrian activity.

The report concludes that the proposed development is considered supportable on traffic and transportation planning grounds, and it is not anticipated to result in any adverse impacts on the surrounding road network.

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6.7 Noise and Vibration

Norman Disney & Young has prepared a Noise and Vibration Impact Assessment (**Appendix R**) to determine the impact of noise and vibration generated during the construction and operational stages of the proposed development and to assist the project team in maximising amenity by limiting noise and vibration intrusion within the site and to surrounding land uses. The findings of this report are summarised below.

Methodology – existing noise levels

Noise surveys and site inspection were conducted to determine the existing background/ambient noise levels at the nearest sensitive receivers. Noise levels were measured using noise loggers. (Table 1) of the Acoustic Report provides information relating to each noise logger/sound level meter.

The noise loggers were configured to record all relevant noise parameters including background noise (LA90) and equivalent continuous noise levels LAeq. Samples were recorded at 15-minute A-weighted continuous intervals. The noise monitor responses were set to fast response. The analysers were Class 1 and comply with AS IEC 61672.2-2004.

The assessed sensitive receivers in close proximity to the site are listed in (Table 2) of the acoustic report

Figure 38 shows the location of the sensitive receivers in relation to the subject site.

Figure 38 Sensitive receiver location (source Norman, Disney & Young) Not to scale

The measured noise data was processed into the following time periods.

- Daytime: 0700 – 1800 hrs;
- Evening: 1800 – 2200 hrs;
- Night-time: 2200 – 0700 hrs.

LA90 represents the measured background noise levels and equivalent continuous (LAeq) noise levels during these defined time periods. The LA90 noise levels presented are Rating Background Levels (RBLs), being the median of the background LA90 (i.e., of the lowest 10th percentile of samples) in each daytime, evening and night-time measurement period, for each 24-hour period during the noise survey.

The LAeq noise levels presented are the logarithmic average of all the LAeq samples taken in each of the daytime, evening and night-time periods.

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The noise survey measured the ambient and background noise levels at the closest residential boundary at 38 Oaklands Circuit and 49 Minnamura Drive, respectively. The NSW Noise Policy for Industry, 2007 (NSW NPfI) recommends that "*intrusive noise levels are only applied to residential receivers*".

The project intrusive noise levels at both 38 Oakland Circuit and 49 Minnamura Drive were found to be lower than the project amenity levels during the daytime (0700-1800) and equal to the project amenity levels during the evening (1800-2200) and lower than the project amenity levels at night time (2200-0700).

In accordance with the NSW NPfI the potential for sleep disturbances from maximum noise levels events from premises during night-time periods need to be considered as follows.

> *Where the subject development/premises nigh-time noise levels at a residential location exceed:*
>
> - *LAeq,15min 40dB(A) or the prevailing RBL plus 5dB, whichever is the greater, and/or*
> - *LAFmax 52 dB(A) or the prevailing RBL plus 15 dB, whichever is the greater,*
>
> *A detailed maximum noise level event assessment should be undertaken".*

A detailed assessment was undertaken for these two premises which are the nearest residential receivers to determine the sleep disturbance noise limits.

The projected noise levels where within the acceptable ranges of *LAeq,15min 40dB(A)* and *LAFmax 52 dB(A).*

6.7.1 Construction Noise and Vibration

Construction noise criteria has been set in accordance with NSW Interim Construction Noise Guideline.

Construction Noise

A construction methodology has not yet been developed for the site however, the construction noise is predicted to exceed the noise affected level, therefore reasonable steps to reduce noise should be taken. Once the construction methodology has been developed for the site it is recommended that further investigation be undertaken, and a construction noise and vibration management plan (CNVMP) be prepared.

Construction Vibration

A construction methodology has not yet been developed for the site and whilst it is likely that some detectable vibration will be experienced during construction due to the use of handheld jackhammers and rock breakers, the specific construction equipment to be used is not yet known.

Accordingly, a detailed vibration assessment cannot yet be undertaken. It is therefore recommended that a CNVMP be prepared by the Contractor when final details of the vibration management controls required for the works have been determined.

Refer to **Appendix E** for Construction Noise mitigation measures.

6.7.2 Operational Noise

Operational Noise criteria were set in accordance with NSW NPfI.

External Mechanical Plant

Noise emissions from building services equipment will be attenuated through the use of typical acoustic treatment items such as internally lined ductwork, attenuators, acoustic louvres and the like as required.

Land Use

The main contributors to noise emission are expected to be from short stay parking, noise from amplified music and speech during outside of school hours events and the waste collection area. Noise impacts from vehicular activities at the short stay parking are

6 Assessment and Mitigation of Impacts

considered to be compliant with New South Wales Road Noise Policy 2011 (NSW RNP). Noise control mitigation actions have been provided to reduce vehicular noise emission from short stay parking to meet the 55 dBA criteria.

Provided activities have a sound power level not greater than 86 dBA it is considered that noise generated by waste collection activities will comply with project level noise triggers.

Refer to **Appendix E** for Operational Noise mitigation measures.

6.8 Flooding and Stormwater Drainage

6.8.1 Flooding

As noted in the Flood Study by Robert Bird Group, a minor area within the site has been identified as being flood prone in a 1 in 100-year flood event. This area is limited to the south-western corner and does not impact on the footprint of any proposed buildings. The flood planning level of the site is RL115.1m. The lowest ground floor RL (hall) is RL115.7m, the remaining ground floor RLs are 116.1m, which is consistent with the 1 in 100 Annual Recurrence Interval (ARI) plus 500mm freeboard requirement. Refer **Figure 39.**

Flood modelling was undertaken which identified post development flows only affected the flood by <+/-1mm, compared to pre development flow in both the 1 in 100-year flood and Probable Maximum Flood (PMF) events.

In addition, the flood affectation does impact on the ability for users of the site to appropriately leave the site in the event of a flood event or other emergency. This is discussed in more detail in the Flood Assessment Report at **Appendix V**.

In a flood emergency, the site is accessible by pedestrians from Long Reef Circuit, being the high point of the site, vehicles can still access the site via the east of Wallarah Circuit and then travel south. A Flood Emergency Response Plan will be prepared post approval and prior to the operation of the school.

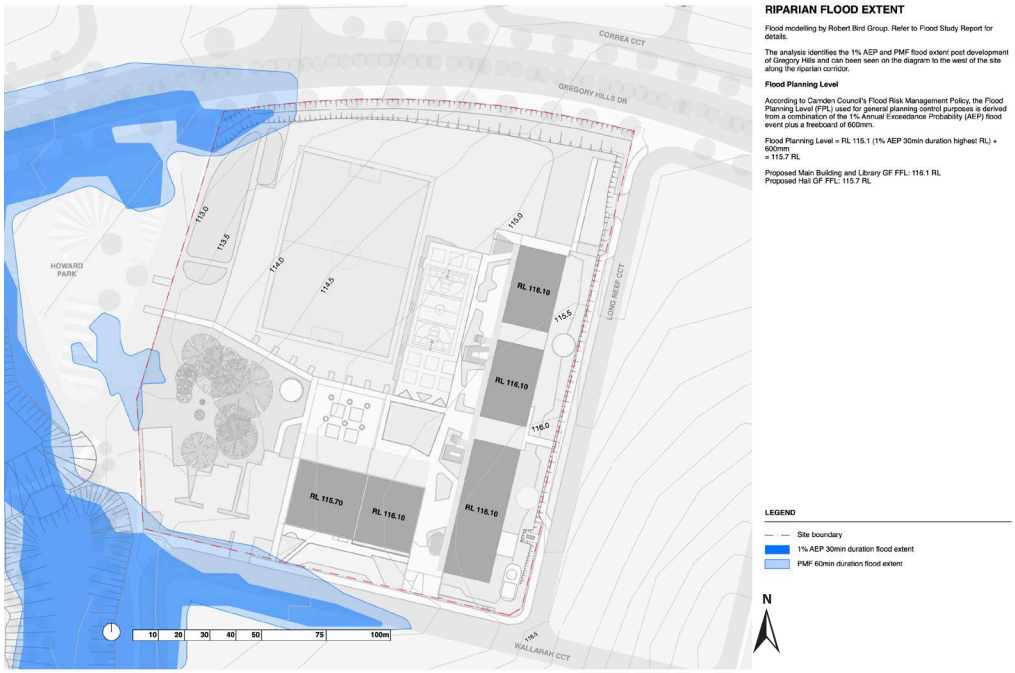

Figure 39 Flood Impact Map (source Bennett and Trimble) Not to scale

6.8.2 Stormwater Drainage

An Integrated Water Management Plan has been prepared by Robert Bird Group **(Appendix U)** and details the proposed stormwater drainage concept for the proposal.

Nine catchments are proposed and will include swales and pit and pipe systems. These account for minor storm discharge. Major storm discharge will surcharge into existing and proposed overland flow paths to the north (existing drainage easement) and west (proposed overland flow path) of the site. Stormwater discharge will be via the existing discharge pit in the northwest corner of the site.

A 30kl rainwater tank will be connected to two (2) separate on site detention (OSD) tanks and is proposed for re-use.

An existing OSD basin is located to the northwest corner, approved under DA2022/742/1 and will be utilised for the proposed works.

6.9 Bushfire

As detailed in the Bushfire Hazard Assessment prepared by Blackash Bushfire Consulting (see **Appendix GG**), the site is identified as 'bushfire prone land'. The area of the site affected is located to the southwest and is adjacent to a constructed riparian corridor.

Bushfire hazard (vegetation) was assessed for distance of 140m from the site and the slope for 100m of the site to determine the required Asset Protection Zone and Building Attack Level.

The Effective slopes from the southwest corner were determined to be:

- Effective Slopes to the west – Downslope 5 – 10-degree range;
- Effective Slopes to the east – no vegetation;
- Effective Slopes to the south – no vegetation; and
- Effective Slopes to the north – no vegetation.

Vegetation is classed as forest type vegetation and is deemed to have limited fire run potential due to the surrounding commercial and residential development and the width of the vegetation. As such an APZ of 51m has been recommended, being a 26m inner protection area and 25m outer protection area. The proposal incorporates a 57.9m APZ, (see **Figure 40** and **Figure 41**).

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Figure 40 Recommended APZ (source Blackash)

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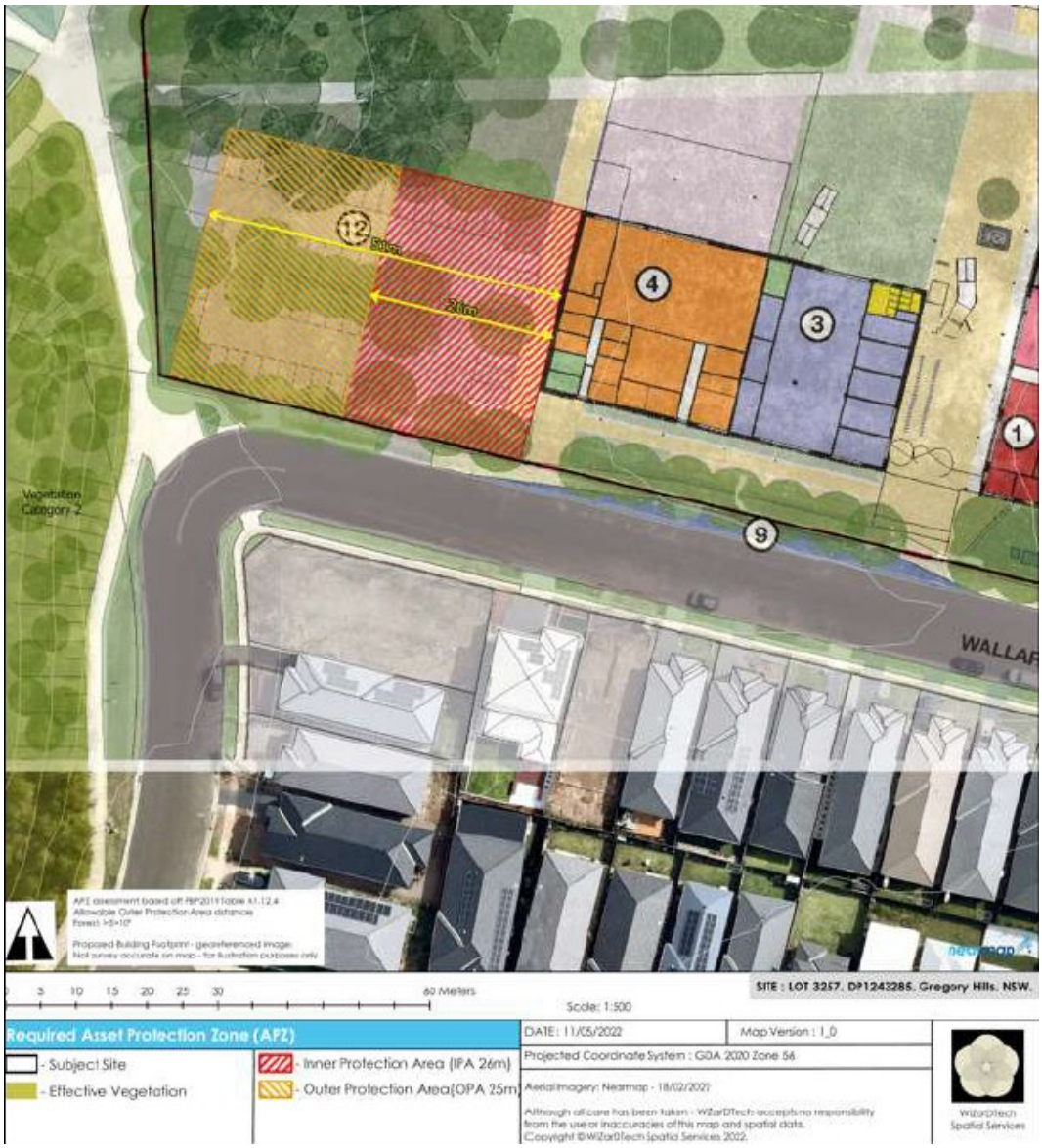

Figure 41 Proposed APZ (source Blackash)

6.10 Geotechnical

Geotechnical Conditions

A Geotechnical investigation has been undertaken by Douglas Partners Pty Ltd. The investigation provides information on subsurface conditions of the site to inform the footings and floor slab design and excavation conditions for the proposed development.

The Geotechnical investigation confirms that the site is underlain by Bringelly Shale comprised of shale, carbonaceous claystone, laminite, fine to medium-grained lithic sandstone and some minor coaly bands which weather to form clays of high plasticity.

The methodology used for the field investigation comprised a combination of boreholes and test pits.

The underlying site comprises:

- A surficial layer of topsoil fill over most of the site;
- Controlled fill typically comprising silty clay with some sand and gravel to depths of up to 1.6m
- Residual clays of very stiff to hard consistency underlying the existing fill.

- Weathered rock (siltstone) underlying the residual clay at depths of 0.5m and
- Groundwater at depths of 3.8-5.0m.

The existing fill on the site was placed in April 2019 and is considered to be controlled fill. The site is gently sloping with an average grade of 1:60 which indicates an extremely low risk of instability of any natural slopes.

The geotechnical investigations undertaken indicates that the site generally comprises topsoil, filling and natural clays overlying shale bedrock and is considered suitable for the proposed development however once the design has been progressed it is recommended that Douglas Partners further review and comment on the suitability thereof.

Contamination

A validation certificate for the site was issued in 2020 and deemed the site suitable for use as an educational establishment.

6.11 Waste

6.11.1 Operational Waste Management

An Operational Waste Management Plan has been prepared by EcCell Environmental Pty Ltd. The report has adopted the EPA's Waste and Sustainable Materials Strategy 2041 Stage 1:20021-2027 which are to:

1. Increase recycling rates at 80% for municipal solid waste; and
2. Reduce total waste generated by 10% per person by 2030.

The report has estimated the amount of waste to be generated by the school by using waste generated from comparable schools. The following assumptions have been applied:

- The occupancy rate = 5 days per week (with students present during the NSW DoE designated active term dates);
- Number of students proposed = 1012;
- Mobile garbage bins (MGBs) for waste streams and separation will be used for the storage of waste on the waste pad – Bin Size in **Table 9** is referring to the size of MGB;
- Reference was made to the waste generated from comparable schools listed in Table 6 of the Operational Waste Management Plan; and
- Weekly collection has been assumed for each waste stream; however, the frequency of waste collection will be made once final waste contractor agreements are in place.

Table 9 Summary of Operational Waste Requirements

Waste Stream	Volume to be generated (Litres per week)	Bin Requirements	Collection Frequency
General Waste	2125	2 x 1100	Weekly
Cardboard/Paper Recyclables	1501	2 x 1100	Weekly
Commingled Recyclables	1682	2 x 1100	Weekly
Organics	300	3 x 120	Weekly
Return & Earn	180	1 x 240	Weekly
Soft Plastic	1622	2 x 1100	Weekly

A rectangular sealed waste pad of approximately 4.4m x 9.1m (40m^2) will be provided for the storage of mobile garbage bins to contain the applicable waste streams which will be located to the north of the main school building.

The waste storage area will be suitably screened from public view by using materials such as fencing, natural shrubs or a hedge row.

Signage will be provided in all waste disposal, storage and collection areas demonstrating how to use the waste management system and include what materials are acceptable in each bin. All waste streams will be stored in clearly labelled; colour coded bins as appropriate to ensure that waste streams are not inadvertently mixed. Signage will be prepared and located on site in accordance with the Australian Standard (AS 1319) for safety signs, and the NSW EPA and Australian Standard for recycling signage.

6.11.2 Construction Waste Management

EcCell Environmental Pty Ltd prepared a Construction Waste Management Plan which addresses Waste Management as required by the SEARs issued for the project.

The report identifies, quantifies and classifies the likely waste streams to be generated during construction as follows:

Excavation

Aside from the new three storey building's excavations and pilings, the proposed excavations on-site are minor excavations for piers and footings. It is estimated at being 330m^3 of Excavated Natural Material (ENM) that will either be stockpiled and re-used on site or sent to a re-purposing facility after it is assessed and assigned a waste classification.

Construction

The waste generated as a result of construction is considered to be proportionately reduced as it is for a modular three storey building and partial fit-out.

The materials will comprise the following:

Table 10 – Construction Waste

Material Type	Estimated Weight (t) or Volume (m^3)			On—site Treatment
	Reuse	Recycling	Landfill	
Concrete, Brick, Block Work, Render, Tiles		84 (m^3)		Co-mingled Bins
Metals		60 (m^3)		Co-mingled Bins
Timber Off-Cuts		74 (m^3)		Co-mingled Bins
Cardboard		24 (m^3)		Co-mingled Bins
Plasterboard		80 (m^3)		Co-mingled Bins
Containers, Plastics, Plastic Packaging		87 (m^3)		Co-mingled Bins
Pallets and Reels	40 units			Co-mingled Bins
Liquid Waste			24 (m^3)	Separated Container/Bins
General Waste			54 (m^3)	General Waste Bins
Subtotal		**409(m^3)**	**78 (m^3)**	
Total		**487 (m^3)**		

6 Assessment and Mitigation of Impacts

The waste management strategy for the project will operate over the design, procurement and construction including the fit-out of the project.

The Architect, Engineer, Builder and Sub-Contractors will be responsible for the design and procurement phase. The Builder and Waste Contractor will be responsible for the pre-construction phase and the Builder, Sub-Contractor and Waste Contractor will be responsible for the Construction on-site phase.

6.12 Aboriginal Cultural Heritage

Jacobs has prepared an Aboriginal Due Diligence Report **Appendix CC**. As part of this assessment, no AHIMS registered sites were located within 200m of the site. Jacobs attended site on 20 June 2022 and conducted a site walkover. Jacobs determined that the site displayed clear signs of previous and extensive modification and that no Aboriginal objects were identified during the inspection and considered it highly unlikely Aboriginal objects would still be present on site.

As part of previous works, an AHIP (1101808) was issued over the site, which allows harm to all Aboriginal objects in, or under the land. The AHIP is valid until June 2023 and is subject to conditions. Jacobs recommend the project comply with the conditions of the AHIP, notably:

Condition 4

The AHIP holder must ensure that all persons involved in activities or works covered by this AHIP (whether employees, contractors, sub-contractors, agents or invitees) are made aware of and comply with the conditions of this AHIP.

SINSW requirements relevant to this condition:

Dart West Developments are the holder of AHIP no 1101808. In order to comply with this condition, they have provided a copy of the AHIP to SINSW. SINSW must read and understand the conditions of the AHIP, ensure that all conditions are complied with and make a copy of the AHIP available to any employees, contractors, sub-contractors, agents or invitees to the project area. It is recommended this is provided as part of a site induction.

Condition 5

The AHIP holder must ensure that all persons involved in activities or works covered by this AHIP are provided with information relating to the Aboriginal cultural heritage values of the AHIP area, the location of any protected Aboriginal objects, the location of any protected areas and the protocols that are to be followed for the management and protection of any protected area and/or the protected Aboriginal objects specified in Schedule B (of the AHIP).

SINSW requirements relevant to this condition:

Dart West Developments are the holder of AHIP no 1101808. In order to comply with this condition, they have prepared a Site Induction Information Sheet on Aboriginal Heritage Matters (Appendix C of Aboriginal Due Diligence Report). This sheet provides a summary of the Aboriginal Cultural Heritage Values for the whole of the Turner Road South AHIP area, as well as providing details about the protected areas and how they are being managed. This has been provided to SINSW. SINSW should provide a copy of the Site Induction Information Sheet on Aboriginal Heritage Matters to any employees, contractors, sub-contractors, agents or invitees to the project area. It is recommended that this is provided as part of any site induction.

In addition, protocols for unexpected finds should be implemented, refer to the mitigation measures contained in **Appendix E**.

6 Assessment and Mitigation of Impacts

6.13 Social Impact

A Social Impact Assessment (SIA) has been prepared by WSP (**Appendix DD**) in accordance with the *Social Impact Assessment Guideline for State Significant Development Projects.* The key considerations and findings of this report are summarised below.

The SIA has considered the site within the context of State, regional and school catchments level. It has relied on a review of available documentation, stakeholder engagement, analysis of demographic data and a site visit.

Social Baseline

Some key findings of the SIA include:

- There is considerable demand for the proposed new primary school at Gregory Hills due to the demographical age of at least 24% of the population expecting to attend primary school over the next four (4) years. The suburbs are still developing, and it is expected that the proportion of primary school aged children will likely continue to rise.
- Around 54% of students have language backgrounds other than English and six children have no English at all. The new school will need to cater for these groups in the community.
- There is a need for many children from Gregory Hills with higher learning needs and behavior problems as well as long-term health conditions.
- Higher proportion of preschool and primary school attendees compared to the LGA and NSW.
- Primary education is in the top three industries of employment in Gregory Hills.

Assessment of Impacts

The proposal will result in a number of positive social impacts. The proposal will respond to existing and future demands for public primary school places and will benefit a greater number of students with special needs. The project will relieve pressures on other primary schools and provide a sense of community and belonging. Outside school care services will be available for local families and the project will provide employment opportunities which will benefit the livelihoods and overall wellbeing of the future workforce and their families.

The project may reduce current traffic congestion and travel times to school for parents/carers and children.

There will be an opportunity for shared use of facilities for non-school community members.

The provision of flexible learning spaces and opportunities for innovative pedagogy with positive social and educational outcomes. There will be green open spaces provided for sport, recreational and educational activities which will result in positive health and wellbeing.

The sustainable design will provide high levels of thermal comfort by providing shading thereby mitigating urban heat island and associated temperatures within the school.

CPTED principles have been implemented to ensure safe movements for all users of the site and local area during and after hours.

Mitigation Measures

To minimise negative social impacts, the SIA has outlined a number of recommendations and mitigation measures that can be implemented. However, the SIA outlines that many of the negative impacts of high significance are able to be downgraded and many of the positive impacts are able to be maximised as identified in the report.

A Social Impact Management Plan (SIMP) has been developed by WSP and is provided as an attachment to the SIA. The SIMP provides an assessment of all identified impacts both pre and post mitigation or enhancement measures.

6 Assessment and Mitigation of Impacts

6.14 Infrastructure Requirements and Utilities

Infrastructure services have been approved under a separate application via the REF pathway to service the site for the approved temporary school (DA2022/742/1). Some augmentation of these services may be required.

6.15 Contributions and Public Benefit

Oran Park and Turner Road Section 94 Contributions Plan 2021 applies to the site.

As part of the proposal, SINSW will provide upgrades to footpaths as well as provide a new sports field, sports courts and facilities for community uses.

Section 7.12(1) of the EP&A Act states that:

> *A consent authority **may** impose, as a condition of development consent, a requirement that the applicant pay a levy of the percentage, authorised by a contributions plan, of the proposed cost of carrying out the development.*

Despite the provisions of the adopted plan, the Minister (or DPE delegate), as the consent authority, has the discretion of whether or not to impose a Section 7.12 contribution levy.

Noting the significant upgrades to local infrastructure including footpaths and community spaces that would be provided by the proposal, and noting the works are wholly associated with a new school, it would not be considered reasonable to impose a Section 7.12 contribution condition on an approval for this SSD.

The new school is of public benefit as it provides new educational facilities for a growing suburb, where student currently have to travel to overpopulated surrounding schools. There is also public benefit, in the shared use of the library, hall and upgrades to the surrounding footpaths and increase to the overall landscaped area of the local vicinity.

6.16 Operational Management

Operational hours of the school will be 6.00am – 6.00pm Monday - Friday (this includes before and after school care)

School bell times are as follows:

- 8.40am - morning playground duty begins (students in playground)
- 9.10am - classes begin
- 11.10am - K-2 recess starts
- 11.40am - K-2 recess ends, 3-6 recess begins
- 12.10pm - 3-6 recess ends
- 1.10pm - K-2 lunch begins
- 1.40pm - K-2 lunch ends, 3-6 lunch begins
- 2.10pm - 3-6 lunch ends
- 3.10pm - classes end

Hall operating hours

- School use – Ordinary school hours
- Outside of School Hours care – 6.00am – 8.40am and 3.10pm – 6.00pm

The school will cater for 1,012 students and 60 staff.

An Operational Management Plan will be prepared at Crown Certificate stage which will include but not limited to:

- Hours of operation

- Management of Waste
- Management of Deliveries
- Emergency Flood Evacuation (Proposed at Post Approval stage)
- Maintenance works and responsibilities

6.17 Other Environmental Issues

An assessment of other environmental issues associated with the proposed development is provided in **Table 11**.

Table 11 Assessment of Other Environmental Issues

Issue	Assessment Findings
Building Code of Australia (BCA)	As evidenced by the BCA and Access Assessment Report prepared by MBC Group (**Appendix J and K**), the proposed development can readily achieve compliance with the Building Code of Australia.
Accessibility	The new school has been designed to provide equitable access for all users with minimal requirements for the use of stairs. A BCA and Access Assessment Report prepared by Blackett Maguire + Goldsmith (**Appendix J and K)** reviewed the proposal against the relevant Australian Codes and Standards under the Commonwealth Disability Discrimination Act (DDA) and the Building Code of Australia (BCA), and provides advice as to how to improve access for all people. Blackett Maguire + Goldsmith finds that appropriate accessibility outcomes can be achieved subject to the implementation of recommendations and mitigation measures outlined in their report.
Crime Prevention Through Environmental Design	A detailed CPTED Assessment has been carried out at **Appendix F**, which outlines that the proposed development has been designed having regard to the CPTED principles. The proposed includes the following crime prevention initiatives: • Territorial re-enforcement – fencing, landscaping, built form and signage to distinguish between the public and private domain. Perimeter fencing has been designed with a separate security line for spaces accessible to the community outside of school hours; • Surveillance – the proposal promotes strong natural surveillance of both the public domain and interior of the site through placement of administration facilities, placement and design of windows, walkway and paths, and an external lighting strategy. • Access control – electronic access control will be provided to all perimeter gates and nominated building entries and will include audio-visual intercoms, gate control panels, motorised gates and a battery backup. • Space/ Activity Management - the proposed development will utilise physical barriers, including fencing, gates, built form and landscaping to provide access control. Symbolic barriers will be utilised including signage, landscaping, waste servicing areas and natural direction of pedestrian traffic to the administration office.
Wind Impacts	The proposed development is limited to three (3) storeys in height and therefore a wind environmental assessment is not required by the SEARs and is not considered necessary.
Aircraft Noise	The site is not affected by aircraft noise. Refer **Appendix HH**
Air Quality	The potential risks to receptors from air emissions from the construction of the proposed development is considered to be low and can be appropriately managed by appropriate mitigation measures (**Appendix E**).
Gas Pipeline Corridor	A Safety Management Study was prepared and identified the school was at the edge of the gas pipeline corridor and safe for use as a school (**Appendix X**).
Electrical Transmission lines	A Preliminary Hazard Analysis was undertaken and deemed the site was not at risk from the electrical transmission lines to the east of the site and a buffer was provided by residential development (**Appendix W).**
European Heritage	The site is heavily disturbed and contains no State or locally listed heritage items or conservation areas.

6 Assessment and Mitigation of Impacts

Table 11 Assessment of Other Environmental Issues	
Issue	**Assessment Findings**
Staging	Construction staging will be required to allow the areas of the site occupied by the temporary school to be redeveloped to have the permanent sports courts, landscaping etc built once the temporary school works are decommissioned.
Contamination	A Site Validation Certificate has been issued for the site and is deemed suitable for the purposed of an educational facility.
Earthworks	Excavation is required for the carpark, entry points, building footings and piers to ensure accessibility across the site. Cut and fill plan is located in **Appendix U**. Cut/ fill is proposed at 350m^3 (cut) and 4290m^3 (fill), therefore requiring an additional 3940m^3 of fill. Maximum excavation depth does not reach the groundwater level of 3.8m below ground.

6.18 Public Interest

In accordance with Section 4.15(1)(e) of the EP&A Act, the proposed development is in the public interest as it:

- Will meet the current and future education demands for residents of the Gregory Hills catchment area;
- Provides joint use facilities for recreation, creativity and educational use;
- Will provide high quality learning and teaching spaces with flexible layout arrangements and durable finishes ensuring the proposal operates as a long-life, high utility and low maintenance educational establishment;
- Has been designed in accordance with the visions, objectives and expectations of the community, the Department of Education and design experts;
- Incorporates appropriate design and urban design analysis to ensure the best design outcome is achieved for the site, students and surrounds in the interests of all stakeholders for the long-term;
- Is permissible in the land use zones and is consistent with relevant planning controls and legislation;
- Will minimise the potential for environmental amenity impacts through both the construction and operational phases;
- Achieves appropriate environmental performance outcomes in relation to acoustic amenity, traffic movements, stormwater drainage and waste management;
- Protects the highest value vegetation and biodiversity on site where practicable;
- Will be provided with adequate connection to necessary infrastructure and servicing to ensure the development operates smoothly at full capacity; and
- Is capable of meeting the deemed to satisfy provisions of the BCA and intent of the DDA.

7 Project Justification

This section of the report provides justification and evaluation for the project as a whole having regard to the potential economic, environmental and social impacts of the project and the principles of ecological sustainable development.

7.1 Environmental Impact

The environmental impact of the proposal has been assessed in detail in **Section 6** of this report.

7.2 Economic Impact

The proposal will directly create 150 construction jobs (as confirmed by the CIV report (**Appendix G**). The operation of the new primary school will, at full capacity, employ 60 Full Time Equivalent staff.

The project has weighed up budget cost benefits for the efficient allocation of public money.

There are further economic benefits in the ongoing social and educational outputs of the proposed new primary school with superior learning, development, sporting, recreation, cultural and accessibility outcomes for students and the community more broadly. These benefits are detailed in the SIA (**Appendix DD**).

7.3 Social Impact

The proposal is unlikely to generate any long term negative social impacts. Temporary negative impacts are likely to be associated with construction. Traffic, parking and noise impacts on surrounding residential properties can be addressed through specific design and operational measures. The visual impact of the proposal is considered to be low to moderate given there is only direct interface to 23 adjacent properties and the remaining frontages are to recreational areas and Gregory Hills Drive.

The proposal will have positive social impact through students being able to attend a local school, potential walking and cycling to school, increasing exercise and establishing a social network within their local area.

7.4 Mitigation of Impacts

Environmental impacts of the proposal have been assessed and are capable of mitigation to achieve acceptable levels of impact subject to a number of measures being adopted, as set out in the assessment material supporting this EIS. Mitigation measures proposed under this project are provided at **Appendix E**.

7.5 Consistency with Strategic Context

An assessment of the proposal against the relevant strategic plans are summarised in **Section 2.2** of this EIS. The proposal is consistent with the relevant strategic plans.

7.6 Compliance with Statutory Context

An assessment of the proposal against the relevant statutory planning considerations is summarised in **Appendix C** and in **Section 4** of this EIS.

The proposal is inconsistent with the height of building control under SEPP (WPC) with a proposed building height of up to 12.49m. However, the proposed height (to up three storeys) is considered to be appropriate as it is achieving acceptable amenity outcomes in terms of visual impact, overshadowing, privacy and view sharing and efficient site planning to deliver recreational facilities and open space.

7 Project Justification

7.7 Consultation

The project team has carried out consultation in accordance with the SEARs including with community and public authorities. The process and outcome of this consultation is provided in **Appendix D** and **Section 5** of this EIS.

7.8 Compliance Monitoring

Subject to the implementation of the mitigation measures in **Appendix E** there is no specific need for this project for any ongoing compliance monitoring.

7.9 Impact Assessment Uncertainties and Resolution

The EIS and supporting documentation respond in full to the SEARs. The potential impacts of the proposal have been documented and the DPE has sufficient information to be able to assess and determine the SSDA.

The proposed works have been designed to, and will be carried out in, the interests of the public. The works will meet the project objectives to provide new state of the art educational facilities.

Accordingly, it is requested that the Minister for Planning grant approval to the proposed State Significant Development application as set out in this report.

8 References

Better Placed Design Guide for Schools, Government Architect NSW, 2018.

Building Momentum State Infrastructure Strategy 2018-2038, Infrastructure NSW, 2018.

Western City District Plan, Greater Sydney Commission, 2018.

Connecting with Country Draft Framework to improve planning, design, and delivery of built environment projects in NSW, Government Architect NSW, 2021.

Draft Greener Places Design Guide, Government Architect NSW, 2020.

Environmental Design in Schools, Government Architect NSW, 2018.

Future Transport Strategy 2056, Transport for NSW, 2021

Greater Sydney Region Plan: A metropolis of three cities, Greater Sydney Commission, 2018.

Greener Places, Government Architect NSW, 2020.

Healthy Urban Development Checklist, NSW Health, 2009.

NSW Planning Guidelines for Walking and Cycling, Transport for NSW, 2021.

NSW Road Noise Policy, NSW Department of Environment, Climate Change and Water, 2011.

NSW State and Premier's priorities, Department of Premier and Cabinet, 2019.

Social Impact Assessment Guidelines for State Significant Projects, Department of Planning and Environment, 2021.

Sustainable Transport, Green Building Council of Australia, 2015.

Sydney's Bus Future 2013 –simpler, faster, better bus services, Transport for NSW, 2013.

Sydney's Cycling Future 2013 - Cycling for everyday transport, Transport for NSW, 2013.

Sydney's Walking Future 2013 – Connecting people and places, Transport for NSW, 2013.

Camden Council Local Strategic Planning Statement.

Camden Sustainability Strategy.

Camden Economic Development Strategy.

Camden Asset Management Strategy.

Waste Classification Guidelines Part 1: Classifying Waste, NSW Environment Protection Authority, 2009.