Environmental Impact Statement

Budawang School
(SSD 8845345)

Prepared on behalf of NSW Department of Education

April 2021

mecone

Project Planners

Georgia Sedgmen

29 April 2021

Project Planners

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Revision	Revision Date	Status	Authorised	
			Name	Signature
A		Draft	Georgia Sedgmen	

* This document is for discussion purposes only unless signed and dated by the persons identified. This document has been reviewed by the Project Director.

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Statement of validity

Applicant details

Name: Department of Education c/- Mecone Pty Ltd NSW

Address: Level 2, 3 Horwood Place, Parramatta NSW 2150

Site and proposal details

Site address: 17 Croobyar Road, Milton

Legal description: Part Lot 200 DP1192140

Proposed development: Establishment of a Budawang School in Milton to replace the existing Budawang School in Ulladulla

Prepared by

Name: Georgia Sedgmen

Qualifications: Master of Planning

Address: Mecone NSW Pty Ltd, Level 2, 3 Horwood Place, Parramatta NSW 2150

Certification

I certify that I have reviewed the content of this EIS and to the best of my knowledge:

- It is in accordance with Part 4 of the Environmental Planning and Assessment Act 1979 and Schedule 2 of the Environmental Planning and Assessment Regulation 2000;
- All available information that is relevant to the environmental assessment of the development to which the statement relates; and
- The information contained in the statement is neither false nor misleading.

Signature:

Name: Georgia Sedgmen

Date: 29 April 2021

Glossary and abbreviations

Term/acronym	Description
AEP	Annual Exceedance Probability
AS	Australian Standards
BCA	Building Code of Australia
BC Act	*Biodiversity Conservation Act 2016*
CEMP	Construction Environmental Management Plan
COLA	Covered Outdoor learning Area
Council	Shoalhaven Council
CPTED	Crime Prevention through Environmental Design
DA	Development Application
DCP	Development Control Plan
DoE	Department of Education
DPIE	Department of Planning Industry and Environment
EFSG	Educational Facilities Standards & Guidelines
EIS	Environmental Impact Statement
EP&A Act	*Environmental Planning and Assessment Act 1979*
ESD	Ecologically Sustainable Development
GFA	Gross Floor Area
Homebase	A primary school classroom
HVAC	Heating, Ventilation and Air Conditioning system
INP	Industrial Noise Policy
LALC	Local Aboriginal Land Council
LEP	Local Environmental Plan

Term/acronym	Description
LGA	Local Government Area
Lot	Lot 200 DP1192140, a portion of which contains the area of the proposed works
NCC	National Construction Code
Proposal	Establishment of a new school for specific purposes on the former Shoalhaven Anglican School in Milton, known as the Budawang School
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policies
Site	The location of the proposed works comprising a discrete area at the northeastern portion of Lot 200 DP1192140
SSD	State Significant Development
WSUD	Water Sensitive Urban Design

Executive Summary

Purpose of report

This Environmental Impact Statement (EIS) has been prepared on behalf of the NSW Department of Education (DoE) to accompany a development application for a new school for specific purposes (SSP) in Milton, NSW (Budawang School). This EIS is submitted to the Minister for Planning pursuant to Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The proposal is for a new school and is therefore classified as State significant development (SSD) in accordance with Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011*.

The EIS addresses the Secretary's Environmental Assessment Requirements (SEARs) issued by the Department of Planning, Industry and Environment (DPIE) on 10 December 2020.

Overview of the proposal

The proposal seeks approval for development of a new Budawang School in Milton to replace the existing Budawang School in Ulladulla.

The key objectives of the proposal are to:

- Expand capacity to meet the growing demand for special schools and programs in the area;
- Provide a contemporary, purpose-built facility that minimises health and safety risks and maximises educational outcomes; and
- Provide for a hydrotherapy facility on site for the benefit of students and the community.

The proposed works generally include:

- Site preparation works including demolition of existing structures, earthworks and tree removal;
- Construction of five buildings, including:
    - One-storey library and administrative building;
    - One-storey multi-purpose hall;
    - Two one-storey homebase buildings with capacity for up to 56 students;
    - One-storey hydrotherapy building;
- At-grade car park with 30 spaces; and
- Integrated landscaping, fencing and signage.

The site

The site is located at 17 Croobyar Road, Milton, and is legally described as part Lot 200 DP1192140. The site forms a discrete area within the northeastern portion of the lot.

The site is positioned on the southern urban edge of the Milton urban area, approximately 375m south of the town centre.

Existing development on the lot includes the former Shoalhaven Anglican School and a preschool. The site itself contains the preschool, one former high school building, a shed, gatehouse and landscaped area. The buildings on the site are currently vacant.

The site is relatively unconstrained, containing no significant biodiversity, flooding, bushfire, heritage or slope constraints.

Project background and need

The existing Budawang School is located on a small site in Ulladulla. The school is the only SSP serving students with acute disabilities in the southern region of the Shoalhaven local government area, with the nearest SSP being Havenlee School, which is situated 70km north of Nowra.

Since 2017, Budawang School has been operating at maximum capacity, and current waiting lists indicate significant demand for additional capacity. However, expansion at the current location is not possible given the constrained nature of the site.

Budawang School has five teaching spaces, including two demountable buildings that make up 40% of the total learning spaces on site. This is contrary to DoE policy, which states that support classes for students with disability should be delivered in permanent learning spaces.

Furthermore, the design of Budawang School is not contemporary, resulting in safety risks, inefficiencies, overcrowding and sub-optimal educational outcomes. Also, specialised facilities are not provided for the school for the hydrotherapy curriculum. Students are currently driven to the nearby aquatic centre five days a week, resulting in increased costs and decreased education time.

Given the demand for additional capacity and the inadequacies of the existing Budawang School, there is clearly a need for a new contemporary facility on a larger site.

Alternatives

DoE considered a number of alternatives to the proposal including:

A. Do nothing;

B. Upgrade the existing Budawang School;

C. Refurbish the former Shoalhaven Anglican School buildings on the site for use by Budawang School; and

D. New purpose built Budawang School at the former Shoalhaven Anglican School site.

Option A was discarded as the school would not address the additional demand for services. Option B was also discarded because it would also fail to meet demand; the school has outgrown its current location, and further expansion at the existing location is not possible. Option C was identified as a strong option but was ultimately discarded because of the difficulties and inefficiencies involved in retrofitting older buildings for specific purposes.

The option proposed in this application (i.e., construction of new purpose-built school) addresses the identified service need and allows for a new facility specifically designed to meet the needs of students. This option also maintains flexibility for additional school uses on the remainder of the lot.

Consultation

Pre-lodgement consultation was conducted with various stakeholders including Shoalhaven Council officers; State agencies including Government Architect NSW, Transport for NSW/Roads and Maritime Services; the local community; and local Aboriginal stakeholders. Comments provided by these stakeholders have been instrumental in the preparation of the EIS. Section 6 describes the consultation activities undertaken.

Planning context

The EIS has been prepared in accordance with the relevant legislative requirements of the EP&A Act and *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation). Section 5 of the EIS considers all applicable legislation in detail.

Shoalhaven Local Environmental Plan 2014 (the LEP) applies to the site. The proposal is permitted with consent in the RU1 Primary Production zone and is consistent with relevant planning provisions in the LEP.

Environmental impacts and mitigation measures

Sections 7 and 8 of the EIS provide an assessment of the environmental impacts of the proposal in accordance with the SEARs. The key environmental matters considered include:

- Built form and urban design;
- Environmental amenity;
- Transport and accessibility;
- Sustainability;
- Heritage;

- Aboriginal heritage;
- Noise and vibration;
- Soil and water;
- Contamination;
- Drainage;
- Aviation
- Bushfire hazard; and
- Biodiversity.

A range of mitigation measures have been recommended based upon the input of specialists. Section 10 sets out a consolidated list of the proposed mitigation measures.

Subject to implementation of the identified mitigation measures, the potential environmental impacts of the proposal will be acceptable and manageable.

Conclusion

The proposal has been designed to avoid environmental impacts where possible. The proposal minimises tree removal, respects the surrounding heritage items, avoids impacts on the adjacent riparian zone, and provides for a low scale built form compatible with the streetscape and local character. The proposal also demonstrates consistency with the former character of the site as an education facility, as the site was previously used as a school.

The EIS fulfils the requirements of the EP&A Act and EP&A Regulation, addresses all relevant matters for consideration prescribed by the SEARs and demonstrates that the potential impacts of the proposal can be satisfactorily managed or mitigated. Given the evident benefits of the proposal and lack of significant environmental impacts, it is recommended that consent be granted to the application.

1 Introduction

This Environmental Impact Statement (EIS) has been prepared by Mecone NSW Pty Ltd on behalf of the NSW Department of Education (DoE) to support an application for State Significant Development (SSD).

DoE is seeking approval for a new school for specific purposes (SSP) in Milton, NSW (Budawang School). The proposed school is to replace the existing Budawang School located in Ulladulla.

The proposal is for a new school and is therefore classified as SSD in accordance with Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP).

The EIS has been prepared in accordance with the requirements of the *Environmental Planning and Assessment Act 1979* (EP&A Act), the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation) and the Secretary's Environmental Assessment Requirements (SEARs).

1.1 Project overview

The key components of the proposal include:

- Site preparation works including demolition of existing structures, earthworks and tree removal;
- Construction of five buildings, including:
    - One-storey library and administrative building;
    - One-storey multi-purpose hall;
    - Two one-storey homebase buildings with capacity for up to 56 students;
    - One-storey hydrotherapy building;
- At-grade car park with 30 spaces; and
- Integrated landscaping, fencing and signage.

1.2 Proposal objectives

The key objectives of the proposal are to:

- Expand capacity to meet the growing demand for special schools and programs in the area;
- Provide a contemporary, purpose-built facility that minimises health and safety risks and maximises educational outcomes; and

- Provide for a hydrotherapy facility on site for the benefit of students and the community.

1.3 Project background and need

The existing Budawang School is located on a small site at Camden and Narrawallee Street, Ulladulla, leased to DoE from a private landowner. It is the only SSP serving students with acute disabilities in the southern region of the Shoalhaven LGA, with the nearest SSP, Havenlee School, situated approximately 70km north in Nowra.

Since 2017, the Budawang School has been operating at maximum capacity. As of 9 March 2021, there were 31 students at the school. Current waiting lists and growth in special programs offered by schools in the area indicate increased enrolment potential if capacity is available. However, further expansion at the current location is not possible given the constrained nature of the site.

The Budawang School has five teaching spaces, including two demountable buildings that make up 40% of the total leaning spaces on site. This is contrary to DoE policy, which states that support classes for students with disability should be delivered in permanent learning spaces.

The design of the existing Budawang School is not contemporary, resulting in increased safety risks to staff and students, inefficiencies, overcrowding and sub-optimal educational outcomes. The school has several design issues that are a risk to both students and staff. For example, learning spaces do not provide line-of-sight for teachers to monitor students, and breakaway spaces, storage spaces and core staff facilities are very limited in size and function.

Moreover, the school does not have specialised facilities for its hydrotherapy curriculum. Students are driven to the nearby aquatic centre five days a week. Additional staff are required to transport students using the school bus, which takes 1.5 hours for a return journey each day. With such a long return journey, students have reduced instructional time in class with teachers. Also, the school finds it difficult to schedule their visits to the aquatic centre during busy periods (after lunch).

Given the above, there is clearly a need for an alternative site with a larger purpose-built school with its own hydrotherapy facility.

1.4 Alternatives considered

DoE undertook a structured approach in assessing options to meet the identified service need. The options considered are outlined in Table 1-1.

Table 1-1 Options considered

Option	Description	Analysis
A	No upgrades to existing Budawang SSP and no works at the subject site	Should the project not proceed, the school would not be able to meet the demand of the student catchment.

Option	Description	Analysis
B	Maintain Budawang School in existing location with functional upgrades and dispose of the Shoalhaven Anglican School site	The school has outgrown its current site location, and any functional upgrades would not be capable in meeting demand of the student catchment.
C	New SSP facility at the Shoalhaven Anglican School site involving refurbishment of existing buildings	This was identified as a strong option; however, there is an inherent risk that refurbishment may not provide the most appropriate specialised facilities for students with additional needs. As such, this option was not progressed.
D	New SSP facility on the Shoalhaven Anglican School including purpose-built facilities and installation of a hydrotherapy facility	This option best addresses the identified service need and allows for a new facility designed to meet the needs of students. This option also maintains flexibility for other potential uses on the remainder of the lot.

1.5 SEARs

The project SEARs were first issued on 7 September 2020 and then updated on 10 December 2020. The updated SEARs include an additional requirement to consider aviation impacts. The table below identifies where the SEARs are addressed within the EIS.

Table 1-2 Project SEARs

SEAR	Location in EIS
The Environmental Impact Statement (EIS) must be prepared in accordance with and meet the minimum requirements of clauses 6 and 7 of Schedule 2 the Environmental Planning and Assessment Regulation 2000 (the Regulation).	Throughout EIS
Notwithstanding the key issues specified below, the EIS must include an environmental risk assessment to identify the potential environmental impacts associated with the development.	Section 9
In addition, the EIS must include: • an executive summary	Executive summary (front of report)
• a complete description of the development, including: o the need for the development o justification for the development o suitability of the site	Section 1 Section 3 Appendix 2a Appendix 3

SEAR	Location in EIS
○ alternatives considered ○ likely interactions between the development and existing, approved and proposed operations in the vicinity of the site ○ a description of any proposed building works ○ a description of existing and proposed operations, including: - staff and student numbers, hours of operation, and details of any proposed before/after school care services and/or community use of school facilities ○ site survey plan, showing existing levels, location and height of existing and adjacent structures/buildings and site boundaries ○ a detailed constraints map identifying the key environmental and other land use constraints that have informed the final design of the development ○ plans, elevations and sections of the proposed development ○ cladding, window and floor details, including materials ○ a site plan showing all infrastructure and facilities (including any infrastructure that would be required for the development, but the subject of a separate approvals process) ○ plans and details of any advertising/business identification signs to be installed, including size, location and finishes ○ any staging of the development ○ details of construction and decommissioning including timing ○ an estimate of the jobs that would be created during the construction and operational phases of the development along with details of the methodology to determine the figures provided.	Appendix 4
• a detailed assessment of the key issues identified below, and any other significant issues identified in the risk assessment, including: ○ a description of the existing environment, using sufficient baseline data and methodology to establish baseline conditions ○ an assessment of the potential impacts of all stages of the development on all potentially impacted environments, sensitive receivers, stakeholders and future developments. The assessment must consider any relevant legislation, policies and guidelines	Section 7

SEAR	Location in EIS
○ consideration of the cumulative impacts due to all other developments in the vicinity (completed, underway or proposed) ○ identification of all proposed monitoring or required changes to existing monitoring programs ○ measures to avoid, minimise and if necessary, offset predicted impacts, including detailed contingency plans for managing any significant risks to the environment and triggers for each action ○ details of alternative measures considered.	
• a consolidated summary of all the proposed environmental management and monitoring measures, identifying all commitments included in the EIS	Section 10
• ·the reasons why the development should be approved and a detailed evaluation of the merits of the development, including consequences of not carrying out the development.	Section 1.3 Section 11
The EIS must be accompanied by a report from a qualified quantity surveyor providing a detailed calculation of the capital investment value (CIV) (as defined in clause 3 of the Regulation) of the proposal, including details of all assumptions and components from which the CIV calculation is derived.	Appendix 1
Key issues	
The EIS must address the following specific matters: **1. Statutory and Strategic Context** Address the statutory provisions contained in all relevant environmental planning instruments, including but not limited to: • State Environmental Planning Policy (State and Regional Development) 2011 • State Environmental Planning Policy (Infrastructure) 2007 • State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 • State Environmental Planning Policy No 64 – Advertising and Signage • State Environmental Planning Policy No 55 – Remediation of Land • State Environmental Planning Policy (Koala Habitat Protection) 2019 • Draft State Environmental Planning Policy (Remediation of Land) • Draft State Environmental Planning Policy (Environment) • Shoalhaven Local Environmental Plan 2014. Having regard to the relevant environmental planning instruments:	Section 4 Section 5 Appendix 32

SEAR	Location in EIS
• address the permissibility of the development, including the nature and extent of any prohibitions • identify compliance with the development standards applying to the site and provide justification for any contravention of the development standards • adequately demonstrate and document how each of the provisions in the listed instruments are addressed, including reference to necessary technical documents.	
2. Policies Address the relevant planning provisions, goals and strategic planning objectives in all relevant planning policies including but not limited to the following: • NSW State Priorities • State Infrastructure Strategy 2018 – 2038 Building the Momentum • Future Transport Strategy 2056 • Crime Prevention through Environmental Design (CPTED) Principles • Better Placed: An integrated design policy for the built environment of New South Wales (Government Architect NSW (GANSW), 2017) • Healthy Urban Development Checklist (NSW Health, 2009) • Draft Greener Places Design Guide (GANSW) • Illawarra-Shoalhaven Regional Plan 2036 • Shoalhaven Development Control Plan 2014.	Section 4
3. Built Form and Urban Design • Address: o the height, density, bulk and scale, setbacks and interface of the proposal in relation to the surrounding development, topography, streetscape and any public open spaces o design quality and built form, with specific consideration of the overall site layout, streetscape, open spaces, façade, rooftop, massing, setbacks, building articulation, materials and colours o how Crime Prevention through Environmental Design (CPTED) principles are to be integrated into development o how good environmental amenity would be provided, including access to natural daylight and ventilation, acoustic separation, access to landscape and outdoor spaces and future flexibility o how design quality will be achieved in accordance with Schedule 4 Schools – design quality principles of State Environmental Planning Policy (Educational Establishments	Section 3 Section 7.1 Appendix 4 Appendix 21 Appendix 29

SEAR	Location in EIS
and Child Care Facilities) 2017 and the GANSW Design Guide for Schools (GANSW, 2018) o how services, including but not limited to waste management, loading zones, and mechanical plant are integrated into the design of the development.	
• ·Provide: o a detailed site and context analysis to justify the proposed site planning and design approach including massing options and preferred strategy for future development a visual impact assessment that identifies any potential impacts on the surrounding built environment and landscape including views to and from the site and any adjoining heritage items.	Section 2 Section 7.1 Appendix 4
4. Tree Removal and Landscaping • · Provide: o an arboricultural impact assessment, prepared by a Level 5 (Australian Qualifications Framework) Arborist in accordance with the Australian Standard 4970 Protection of trees on development sites (AS 4970), which details the number, location and condition of trees to be removed and retained and existing canopy coverage on-site o a detailed site-wide landscape strategy, that: - details the proposed site planting, including location, number and species of plantings, heights of trees at maturity and proposed canopy coverage - considers equity and amenity of outdoor play spaces, and integration with built form, security, shade, topography and existing vegetation - demonstrates how the proposed development would contribute to long term landscape setting in respect of the site and the streetscape o a detailed landscape plan prepared by a suitably qualified person. Relevant Policies and Guidelines: • Draft Greener Places Design Guide (GANSW)	Section 3.2 Section 3.4 Appendix 5 Appendix 10
5. Environmental Amenity • Assess amenity impacts on the surrounding locality, including solar access, visual privacy, visual amenity, overshadowing, wind impacts and acoustic impacts. A high level of environmental amenity for any surrounding residential land uses must be demonstrated	Section 7.2 Appendix 4

SEAR	Location in EIS

• Provide:
  ○ shadow diagrams
  ○ a view analysis of the site from key vantage points and streetscape locations and public domain including photomontages or perspectives showing the proposed and likely future development
  ○ an analysis of proposed lighting that identifies measures to reduce spill into the surrounding sensitive receivers	

6. Transport and Accessibility
Include a transport and accessibility impact assessment, which includes, but is not limited to the following:
• analysis of the existing transport network, including:
  ○ road hierarchy
  ○ pedestrian, cycle and public transport infrastructure
  ○ details of current daily and peak hour vehicle movements based on traffic surveys and / or existing traffic studies relevant to the locality
  ○ existing performance levels of nearby intersections utilising appropriate traffic modelling methods (such as SIDRA network modelling).
• details of the proposed development, including:
  ○ a map of the proposed access which identifies public roads, bus routes, footpaths and cycleways
  ○ vehicular access arrangements, including for service and emergency vehicles and loading/unloading, including swept path analysis demonstrating the largest design vehicle entering and leaving the site and moving in each direction through intersections along the proposed transport routes
  ○ car parking, bicycle parking and end-of-trip facilities
  ○ drop-off / pick-zone(s) and bus bay(s)
  ○ pedestrian or road infrastructure improvements or safety measures.
• analysis of the impacts due to the operation of the proposed development, including:
  ○ proposed modal split for all users of the development including vehicle, pedestrian, cyclist, public transport and other sustainable travel modes
  ○ estimated total daily and peak hour vehicular trip generation
	Section 7.3
	Appendix 6a
	Appendix 6b
	Appendix 6c

SEAR	Location in EIS
○ a clear explanation and justification of the: - assumed growth rate applied - volume and distribution of proposed trips to be generated - type and frequency of design vehicles accessing the site ○ details of performance of nearby intersections with the additional traffic generated by the development both at the commencement of operation and in a 10-year time period (using SIDRA network modelling) ○ cumulative traffic impacts from any surrounding approved development(s) ○ adequacy of pedestrian, bicycle and public transport infrastructure to accommodate the development ○ adequacy of car parking and bicycle parking provisions when assessed against the relevant car / bicycle parking codes and standards ○ adequacy of the drop-off / pick-up zone(s) and bus bay(s), including assessment of any related queuing during peak-hour access ○ adequacy of the existing / proposed pedestrian infrastructure to enable convenient and safe access to and from the site for all users. • measures to ameliorate any adverse traffic and transport impacts due to the development based on the above analysis, including: ○ travel demand management measures to encourage sustainable transport (such as a Green Travel Plan and / or specific Workplace Travel Plan) ○ infrastructure improvements, including details of timing and method of delivery. • a preliminary operational traffic and access management plan for the site, the drop-off / pick-up zone(s) and bus bay(s) • analysis of the impacts of the traffic generated during construction of the proposed development, including: ○ construction vehicle routes, types and volumes ○ construction program (duration and milestones) ○ on-site car parking and access arrangements for construction ○ emergency and construction worker vehicles ○ cumulative impacts associated with other construction activities in the locality (if any)	

SEAR	Location in EIS
○ road safety at identified intersections near the site due to conflicts between construction vehicles and existing traffic in the locality ○ measures to mitigate impacts, including to ensure the safety of pedestrian and cyclists during construction. ○ a preliminary Construction Traffic and Pedestrian Management Plan. Note: Further guidance is provided in the TfNSW advice attached to the SEARs. Relevant Policies and Guidelines: • Guide to Traffic Generating Developments (Roads and Maritime Services, 2002) • EIS Guidelines - Road and Related Facilities (Department of Urban Affairs and Planning (DUAP), 1996) • Cycling Aspects of Austroads Guides • NSW Planning Guidelines for Walking and Cycling (Department of Infrastructure, Planning and Natural Resources (DIPNR), 2004) • Guide to Traffic Management Part 12: Integrated Transport Assessments for Developments (Austroads, 2020) • Australian Standard 2890.3 Parking facilities, Part 3: Bicycle parking (AS 2890.3). in the TfNSW advice attached to the SEARs.	
7. Ecologically Sustainable Development (ESD) • Detail: ○ how ESD principles (as defined in clause 7(4) of Schedule 2 of the Regulation) would be incorporated in the design and ongoing operation phases of the development ○ proposed measures to minimise consumption of resources, water (including water sensitive urban design) and energy ○ how the future development would be designed to consider and reflect national best practice sustainable building principles to improve environmental performance and reduce ecological impact. This should be based on a materiality assessment and include waste reduction design measures, future proofing, use of sustainable and low-carbon materials, energy and water efficient design (including water sensitive urban design) and technology and use of renewable energy ○ how environmental design will be achieved in accordance with the GANSW Environmental Design in Schools Manual (https://www.governmentarchitect.nsw.gov.au/guidance/environmentaldesign-in-schools).	Section 7.4 Appendix 30

SEAR	Location in EIS

• Include:
  o an assessment against an accredited ESD rating system or an equivalent program of ESD performance. This should include a minimum rating scheme target level
  o a statement regarding how the design of the future development is responsive to the CSIRO projected impacts of climate change
  o an Integrated Water Management Plan detailing any proposed alternative water supplies, proposed end uses of potable and non-potable water, and water sensitive urban design.
Relevant Policies and Guidelines:
• NSW and ACT Government Regional Climate Modelling (NARCliM) climate change projections.	

8. Heritage • Provide a statement of significance and an assessment of the impact on the heritage significance of the heritage items on and adjacent to the site in accordance with the guidelines in the NSW Heritage Manual (Heritage Office and DUAP, 1996) and Assessing Heritage Significance (OEH, 2015) • Address any archaeological potential and significance on the site and the impacts the development may have on this significance.	Section 7.6 Appendix 7

9. Aboriginal Cultural Heritage
• Provide a Aboriginal Cultural Heritage Assessment Report (ACHAR) that:
  o identifies and describes the Aboriginal cultural heritage values that exist across the site
  o includes surface surveys and test excavations where necessary
  o has been prepared in accordance with the Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW (OEH, 2011) and Code of Practice for Archaeological Investigations of Aboriginal Objects in NSW (OEH, 2010)
  o incorporates consultation with Aboriginal people in accordance with Aboriginal Cultural Heritage Consultation Requirements for Proponents (Department of Environment, Climate Change and Water, 2010)
  o documents the significance of cultural heritage values of Aboriginal people who have a cultural association with the land
	Section 7.5
	Appendix 8

SEAR	Location in EIS
○ identifies, assesses and documents all impacts on the Aboriginal cultural heritage values ○ demonstrates attempts to avoid any impact upon cultural heritage values and identify any conservation outcomes. Where impacts are unavoidable, the ACHAR and EIS must outline measures proposed to mitigate impacts. Any objects recorded as part of the assessment must be documented and notified to the Environment, Energy and Science Group of the Department of Planning, Industry and Environment. Note: Further guidance is provided in the Heritage NSW advice attached to the SEARs.	
10. Social Impacts • Prepare a social impact assessment, which: ○ identifies and analyses the potential social impacts of the development, from the points of view of the affected community/ies and other relevant stakeholders, i.e. how they expect to experience the project ○ considers how potential environmental changes in the locality may affect people's way of life; community; access to and use of infrastructure, services, and facilities; culture; health and wellbeing; surroundings; personal and property rights; decision-making systems; and fears and aspirations, as relevant and considering how different groups may be disproportionately affected ○ assesses the significance of positive, negative, and cumulative social impacts considering likelihood, extent, duration, severity/scale, sensitivity/importance, and level of concern/interest ○ includes mitigation measures for likely negative social impacts, and any proposed enhancement measures ○ details how social impacts will be adaptively monitored and managed over time.	Section 7.7
11. Noise and Vibration • ·Provide a noise and vibration impact assessment that: ○ includes a quantitative assessment of the main noise and vibration generating sources during demolition, site preparation, bulk excavation and construction ○ details the proposed construction hours and provide details of, and justification for, instances where it is expected that works would be carried out outside standard construction hours ○ includes a quantitative assessment of the main sources of operational noise, including consideration of any public-address system, school bell, mechanical services (e.g. air	Section 7.8 Appendix 11

SEAR	Location in EIS
conditioning plant), use of any school hall for concerts etc. (both during and outside school hours) and any out of hours community use of school facilities o outlines measures to minimise and mitigate the potential noise impacts on nearby sensitive receivers o considers sources of external noise intrusion in proximity to the site (including, road rail and aviation operations) and identifies building performance requirements for the proposed development to achieve appropriate internal amenity standards o demonstrates that the assessment has been prepared in accordance with polices and guidelines relevant to the context of the site and the nature of the proposed development. Relevant Policies and Guidelines: • NSW Noise Policy for Industry 2017 (NSW Environment Protection Authority (EPA) • Interim Construction Noise Guideline (Department of Environment and Climate Change, 2009) • Assessing Vibration: A Technical Guideline 2006 (Department of Environment and Conservation, 2006) Note: Further guidance is provided in the EPA advice attached to the SEARs.	
12. Biodiversity • Provide a Biodiversity Development Assessment Report (BDAR) that assesses the biodiversity impacts of the proposed development in accordance with the requirements of the Biodiversity Conservation Act 2016, Biodiversity Conservation Regulation 2017 and Biodiversity Assessment Method, except where a BDAR waiver has been issued in relation to the development or the development is located on biodiversity certified land • Where a BDAR is not required because a BDAR waiver has been issued in relation to the development, provide: o a copy of the BDAR waiver and demonstrate that the proposed development is consistent with that covered in BDAR waiver o an assessment of flora and fauna impacts where significant vegetation or flora and fauna values would be affected by the proposed development. Note: Further guidance is provided in the Biodiversity and Conservation Division Standard Environmental Assessment Requirements attached to the SEARs.	Section 7.9 Appendix 9
13. Contributions	Section 5.10

SEAR	Location in EIS
• Identify: o any Section 7.11/7.12 Contribution Plans, Voluntary Planning Agreements or Special Infrastructure Contribution Plans that affect land to which the application relates or the proposed development type o any contributions applicable to the proposed development under the identified plans and/or agreements. Justification is to be provided where it is considered that the proposed development is exempt from making a contribution o any actions required by a Voluntary Planning Agreement or draft Voluntary Planning Agreement affecting the site or amendments required to a Voluntary Planning Agreement affected by the proposed development.	
14. Staging • Assess impacts of staging where it is proposed and detail how construction works and operations would be managed to ensure public safety and amenity on and surrounding the site.	Section 3.7
15. Utilities • In consultation with relevant service providers: o assess of the impacts of the development on existing utility infrastructure and service provider assets surrounding the site o identify any infrastructure upgrades required off-site to facilitate the development and any arrangements to ensure that the upgrades will be implemented on time and be maintained o provide an infrastructure delivery and staging plan, including a description of how infrastructure requirements would be co-ordinated, funded and delivered to facilitate the development.	Section 7.18 Appendix 12
16. Stormwater Drainage • Provide: o a preliminary stormwater management plan for the development that: - is prepared by a suitably qualified person in consultation with Council and any other relevant drainage authority - details the proposed drainage design for the site including onsite detention facilities, water quality measures and the nominated discharge point - demonstrates compliance with Council or other drainage authority requirements.	Section 7.10 Appendix 13 Appendix 14

SEAR	Location in EIS
○ stormwater plans detailing the proposed methods of drainage without impacting on the downstream properties. • Where drainage infrastructure works are required that would be handed over to Council, provide full hydraulic details and detailed plans and specifications of proposed works that have been prepared in consultation with Council and comply with Council's relevant standards. Relevant Policies and Guidelines: • Guidelines for developments adjoining land managed by the Office of Environment and Heritage (OEH, 2013).	
17. Flooding • Identify any flood risk on-site in consultation with Council and having regard to the most recent flood studies for the project area and the potential effects of climate change, sea level rise and an increase in rainfall intensity • Assess the impacts of the development, including any changes to flood risk onsite or off-site, and detail design solutions to mitigate flood risk where required. Relevant Policies and Guidelines: • NSW Floodplain Development Manual (DIPNR, 2005).	Section 7.13 Appendix 15
18. Soil and Water • Provide: ○ an assessment of potential impacts on surface and groundwater (quality and quantity), soil, related infrastructure and watercourse(s), riparian land, and groundwater dependent ecosystems where relevant and measures proposed to reduce and mitigate these impacts. details of measures and procedures to minimise and manage the generation and off-site transmission of sediment, dust and fine particles ○ an assessment of salinity and acid sulphate soil impacts, including a Salinity Management Plan and/or Acid Sulphate Soils Management Plan, where relevant. Relevant Policies and Guidelines: • Managing Urban Stormwater - Soils and Construction Volume 1 (Landcom, 2004) • Approved Methods for the Modelling and Assessment of Air Pollutants in NSW (EPA, 2016) • Guidelines for development adjoining land managed by the Office of • Environment and Heritage (OEH, 2013).	Section 7.14 Appendix 18 Appendix 19

SEAR	Location in EIS
Note: Further guidance is provided in the Water and Natural Resources Access Regulator advice attached to the SEARs.	
19. Waste • Identify, quantify and classify the likely waste streams to be generated during construction and operation • Describe the measures to be implemented to manage, reuse, recycle and safely dispose of this waste • Identify appropriate servicing arrangements (including but not limited to, waste management, loading zones, mechanical plant) for the site. Relevant Policies and Guidelines: • Waste Classification Guidelines (EPA, 2014).	Section 7.15 Appendix 20 Appendix 21
20. Contamination • Assess and quantify any soil and groundwater contamination and demonstrate that the site is suitable for the proposed use in accordance with SEPP 55. This must include the following prepared by certified consultants recognised by the NSW Environment Protection Authority: o Preliminary Site Investigation (PSI) o Detailed Site Investigation (DSI) where recommended in the PSI o Remediation Action Plan (RAP) where remediation is required. This must specify the proposed remediation strategy o Preliminary Long-term Environmental Management Plan (LEMP) where containment is proposed on-site. o Provide a hazardous materials survey of existing aboveground buildings that are proposed to be demolished or altered. Relevant Policies and Guidelines: • Managing Land Contamination: Planning Guidelines - SEPP 55 Remediation of Land (DUAP, 1998) • Sampling Design Guidelines (EPA, 1995) • Guidelines for Consultants Reporting on Contaminated Sites (OEH, 2011) • National Environment Protection (Assessment of Site Contamination) Measure (National Environment Protection Council, as amended 2013) Note: Further guidance is provided in the EPA advice attached to the SEARs.	Section 7.16 Appendix 17

SEAR	Location in EIS
21. Bush fire • Provide a bush fire assessment that details proposed bush fire protection measures and demonstrates compliance with Planning for Bush Fire Protection (NSW RFS, 2019).	Section 7.12 Appendix 22
22. Aviation • Provide a report prepared by a suitably qualified Aviation expert that identifies and assesses the potential operation or construction impacts of the development on the aviation operations of any nearby on shore helicopter landing sites and associated flight paths in accordance with the relevant sections of the National Airports Safeguarding Framework (NASF). Relevant Policies and Guidelines: • National Airports Safeguarding Framework	Section □ Appendix 27
Plans and documents	
The EIS must include all relevant plans, architectural drawings, diagrams and relevant documentation required under Schedule 1 of the Regulation. Provide these as part of the EIS rather than as separate documents. Any plans and diagrams included in the EIS must include key dimensions, RLs, scale bar and north point.	Throughout appendices
In addition to the plans and documents required in the General Requirements and Key Issues sections above, the EIS must include the following: Section 10.7(2) and (5) Planning Certificates (previously Section 149(2) and (5) Planning Certificate)	Appendix 23
• Design report to demonstrate how design quality would be achieved in accordance with the above Key Issues including: o architectural design statement o diagrams, structure plan, illustrations and drawings to clarify the design o intent of the proposal o detailed site and context analysis o analysis of options considered to justify the proposed site planning and design approach o summary of feedback provided by GANSW and NSW State Design Review Panel (SDRP) and responses to this advice o summary report of consultation with the community and response to any feedback provided.	Appendix 4
• Geotechnical and Structural Report	Appendix 16

SEAR	Location in EIS
• Accessibility Report.	Appendix 25
Consultation	
During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups, relevant special interest groups, including local Aboriginal land councils and registered Aboriginal stakeholders and affected landowners. In particular, you must consult with: • the relevant Council • Government Architect NSW (through the NSW SDRP process) • Transport for NSW. Consultation should commence as soon as practicable to inform the scope of investigation and progression of the proposed development. The EIS must describe and evidence the consultation process and the issues raised and identify where the design of the development has been amended in response to these issues. Where amendments have not been made to address an issue, a short explanation should be provided.	Section 6 Appendix 24
If you do not lodge a development application and EIS for the development within two years of the issue date of these SEARs, you must consult further with the Planning Secretary in relation to the preparation of the EIS.	Noted
The assessment of the key issues listed above must consider, but not be limited to, relevant guidelines, policies, and plans as identified.	Relevant guidelines, policies and plans considered in assessment of key issues

2 Site analysis

2.1 Regional context

The site is located in the South Coast region of NSW, approximately 100km southwest of Wollongong and 175km southwest of the Sydney central business district (CBD). A regional context map is provided at Figure 2-1.

Figure 2-1 Regional context plan
Source: Draft Illawarra Shoalhaven Regional Plan 2041

2.2 Local context

The site is located just outside the Milton urban area within the Shoalhaven City Council local government area (LGA). Milton town centre is approximately 375m north of the site.

The local context is low-density and rural in nature. Residential uses are located to the north and east, while rural and light industrial uses are located to the south and west. A local context map is provided at Figure 2-2.

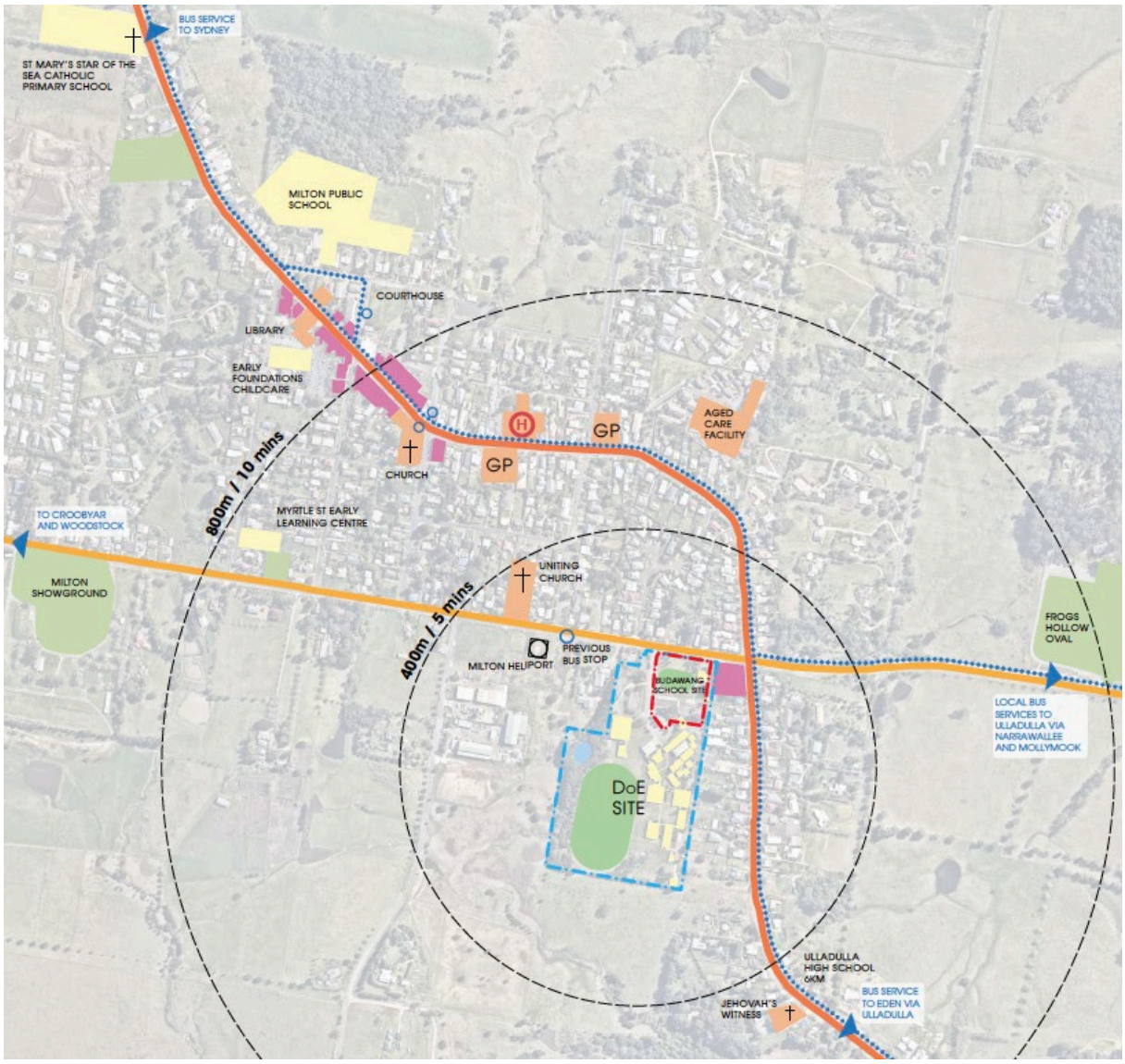


Figure 2-2 Local context map
Source: Mecone

2.3 Site description

The site is located at 17 Croobyar Road, Milton, and is legally described as part Lot 200 DP1192140. The site is irregular in shape and has an area of approximately

10,206m^2. The entire lot is 7.76ha in area. The site has a frontage of approximately 89m to Croobyar Road.

The site is located in the northeast portion of the lot. Figure 2-3 shows the lot outlined in blue and the site outlined in red.

Figure 2-3 Site aerial image
Source: Nearmap

Note: Throughout this report, "the site" refers to the area of the proposed Budawang School, while "the lot" refers to the entire existing lot in which the site is located.

2.4 Existing development

The lot contains the former Shoalhaven Anglican School, which closed in 2017 when the site was purchased by DoE. The school grounds comprise a collection of one- to two-storey buildings generally located in the eastern portion of the lot and a sports oval in the southwest portion. All buildings on the site are vacant.

The site itself contains two buildings, namely a former preschool fronting Croobyar Road (plus associated shed and gatehouse) and Building L of the former Shoalhaven Anglican School. The preschool is a single storey double brick building, while Building L is a single storey brick and weatherboard building with metal roof.

An existing site plan is shown at Figure 2-4, and photographs of the site and existing buildings are provided at Figure 2-5 to Figure 2-9.

Figure 2-4 Site plan existing
Source: Group GSA

Figure 2-5 Existing preschool north side
Source: Tocomwall

Figure 2-6 Building L east and north sides
Source: Tocomwall

Figure 2-7 Preschool shed
Source: Tocomwall

Figure 2-8 Site looking S towards remainder of lot
Source: Group GSA

Figure 2-9 Site looking E towards preschool building
Source: Group GSA

2.5 Surrounding development

The lot is bound by Croobyar Road to the north, by commercial (bakery) and low density residential uses to the east, by rural land to the south, and by rural land to the immediate west. On the other side of Croobyar Road to the north is low density residential development, a cemetery and an exercise clinic.

The bakery to the east is local heritage item no. 296 "Two Storey Victorian rendered masonry store", and the cemetery across Croobyar Road is local heritage item no. 264 "Milton Church of England Cemetery".

There is an area of industrial land further to the west that includes a concrete batching facility, auto repair shop, steel fabrication shop and hardware store. The industrial land is approximately 60m from the lot boundary but more than 200m from the proposed school. Also, the Milton Helipad, which services Milton-Ulladulla Hospital, is located approximately 135m west of the site.

The photos below show the key surrounding development.

Figure 2-10 Neighbouring heritage store
Source: Group GSA

Figure 2-11 Dense boundary planting between site and neighbouring heritage store
Source: Group GSA

Figure 2-12 Residential development to the NE
Source: Group GSA

Figure 2-13 Heritage cemetery memorial across Croobyar Road
Source: Group GSA

Figure 2-14 Development to the northwest across Croobyar Road
Source: Group GSA

2.6 Transport infrastructure

Princes Highway, a classified road forming the main north-south arterial connection through Milton and along the South Coast, is less than 60m to the east of the site.

Milton is serviced by public transport but at a relatively low level given its rural location. Premier Coachlines run a service along the Princes Highway between Eden on the South Coast and Sydney CBD. Additionally, Ulladulla Buslines operates the 740 bus between Milton and Ulladulla, which runs several times per day, Monday to Saturday.

The Milton Helipad, which services Milton-Ulladulla Hospital, is located approximately 135m west of the site. The hospital itself, located approximately 375m northwest of the site on the north side of Princes Highway, is a small 25-bed rural acute facility.

2.7 Vegetation, topography and natural features

The site slopes east to west by approximately 5m, with a high point of 52.5m AHD and a low point of 47.5m AHD

As shown in the natural features map at Figure 2-15, the site is largely free of vegetation, though there are a number of trees scattered along the periphery.

To the west of the site, within the lot and across the existing driveway, is a densely vegetated area along a natural watercourse. This watercourse (Category 3) runs across the western edge of the lot and includes a small dam.

The lot is affected by Buffer and Category 2 bushfire prone land at the southeast corner, but the site itself contains no bushfire prone land.

Figure 2-15 Natural features map
Source: Eco Logical

2.8 Easements

As illustrated in the figure below, two easements run through the lot:

- A sewer line easement, which runs diagonally across the western end of the site; and
- An overhead power line easement, which runs north-south to the west of the side on the other side of the existing driveway.

The proposed building footprints are located outside of the easements. The proposal will not require relocation of the easements.

Figure 2-16 Easement diagram
Source: Group GSA

3 Description of proposed development

The table below provides a summary of the key elements of the proposed development. The elements are described in further detail in the subsections below the table.

Table 3-1 Summary description of the development

Proposal element	Brief description
Demolition	The proposal requires demolition of the preschool building, Building L, several other small structures and hardstand areas.
Tree retention and removal	The proposal requires removal of 53 trees. 11 trees within the site will be retained.
Earthworks	The proposal requires earthworks in the order of 1,970m^3 of cut and 4,100m^3 of fill. The soil from areas of cut will be reused on site, and therefore approximately 2,310m^3 of imported fill is required overall.
Built form	The proposal consists of three single storey school buildings arranged in a U-shape around a central courtyard, plus a separate single storey hydrotherapy building.
Site area	10,206m^2
Gross floor area (GFA)	2,325m^2
Maximum height	Single storey 6.8m above ground level 58m AHD
Land use	School
Student capacity	56 students
Access	Access to the site will be via the existing crossover off Croobyar Road. A new roundabout will be built near the entry point, providing access to the proposed school and the remainder of the lot.
Car parking	30 on-site car parking spaces are proposed including two disability space.

Proposal element	Brief description
	One minibus bay is proposed along the Croobyar Road frontage.
Landscaping	44 new trees proposed, plus numerous shrubs and groundcovers. 23% of site covered by tree canopy.
Jobs	Construction: 64 Operation: 24
Construction hours	Monday to Friday: 7.00am to 5.00pm Saturdays: 8.00am to 1.00pm No work on Sunday or public holidays
Hours of operation	8:55am to 3:00pm Monday to Friday (as per hours of existing Budawang School)

3.1 Demolition

The proposal requires demolition of all buildings and structures on the site including:

- Preschool building;
- Shed and gatehouse associated with the preschool;
- Building L;
- Hardstand and parking; and
- Playground and shade sail.

Figure 3-1 below shows an extract of the demolition plan.

Hazardous materials inspections for the preschool and Building L are attached at **Appendix 28.**

Figure 3-1 Demolition plan
Source: Group GSA

3.2 Tree retention and removal

The proposal includes retention of 11 trees and removal of 53 trees within the site, as shown in the demolition plan at Figure 3-1 above. The tree management plan within the landscape drawings at **Appendix 5** of the EIS also identifies the trees to be removed and retained.

The trees proposed to be removed are located within the development footprint or will be subject to major encroachment by the proposed works. All trees to be removed are landscaped specimens rather than remnant vegetation. For further details on the site's trees, refer to the Arboricultural Impact Assessment Report by Allied Tree Consultancy at **Appendix 10**.

As discussed at section 7.9 of the EIS, the tree removal is not anticipated to have any unacceptable biodiversity impacts.

Built form

3D views prepared by the architect are provided at Figure 3-2 to Figure 3-4. Further discussion on the proposal's built form is provided in the following subsections.

Figure 3-2 Aerial view
Source: Group GSA

Figure 3-3 View from Croobyar Road pedestrian entrance
Source: Group GSA

Figure 3-4 View from Croobyar Road pedestrian entrance
Source: Group GSA

3.2.1 Location within lot

During the early stages of the project, the architect undertook an assessment of the entire school site to assess the optimal location for the proposed school. The selected positioned was deemed most suitable for the following reasons:

- It is outside of the flood level for the riparian zone;
- It features minimal land slope, which is important for achieving level access for wheelchair users while minimising bulk earthworks;
- It allows for easy access from Croobyar Road and utilisation of the existing driveway;
- It allows for retention of existing educational buildings that are in good condition and can be easily reused; and
- It avoids the electrical easement on the lot.

Figure 3-5 Site location plan
Source: Group GSA

3.2.2 Building layout

The proposed buildings are arranged in an inverted U-shape around a central courtyard, with the carpark located to the north and a separate hydrotherapy building at the eastern end of the carpark, as shown in the site plan at Figure 3-6.

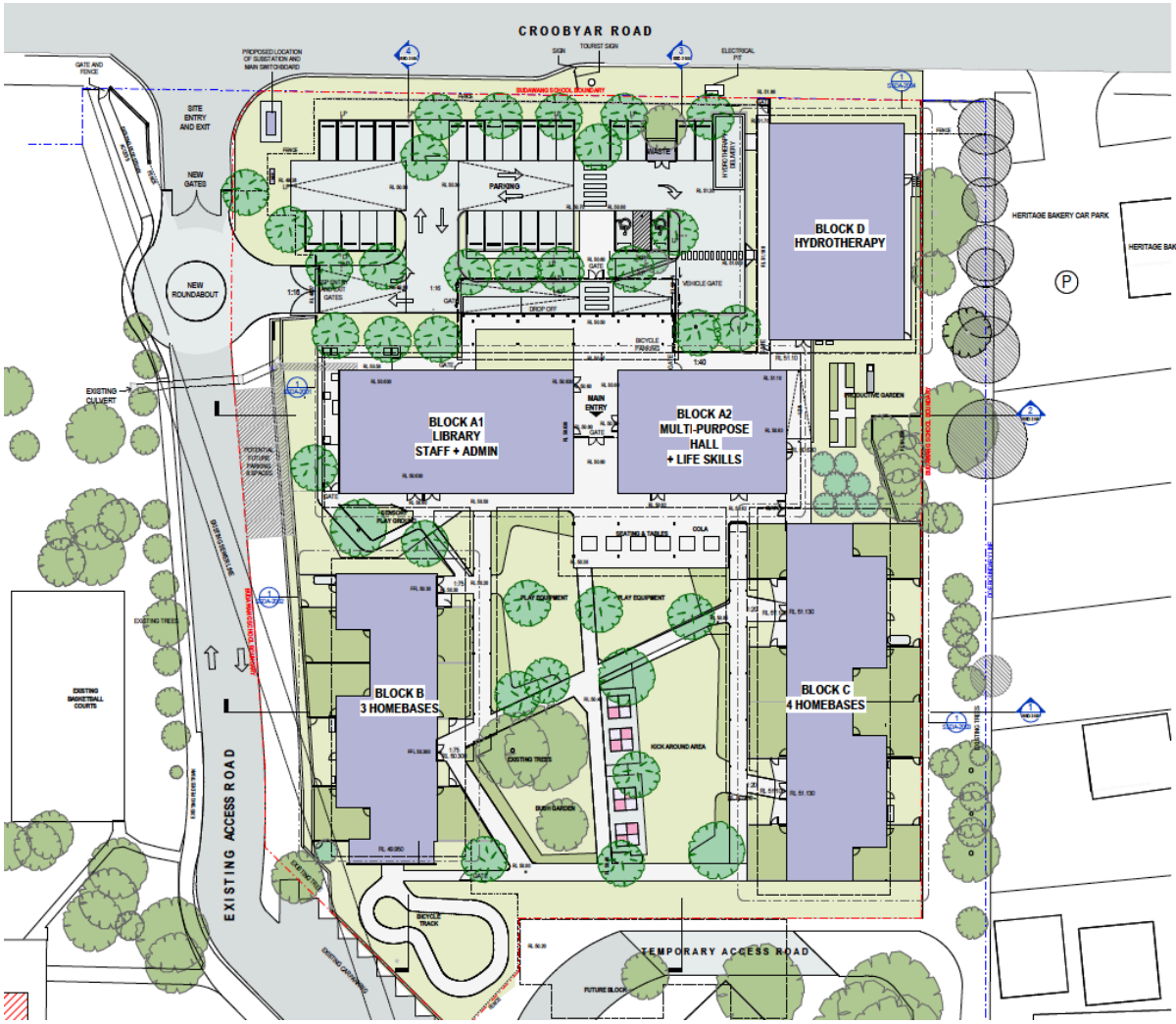


Figure 3-6 Site plan
Source: Group GSA

The base of the "U" comprises a core block (Block A) featuring two sub-blocks, namely Block A1, which includes the library, administration and staff areas, and Block A2, a multi-purpose hall and life skills area. This block provides a public façade for the school and is positioned adjacent to the carpark for easy access.

The legs of the "U" comprise the homebase areas, namely Block B on the western side, which includes three homebases, and Block C on the eastern side, which includes four homebases.

The separate hydrotherapy building is located at the eastern end of the carpark along the Croobyar Road frontage. This location allows for easy access for school and community users. This building also forms a public façade for the school.

The overall effect of the arrangement is to separate the site into public and private zones, with the public zone comprising the carpark, Block A frontage and hydrotherapy building, and the private zone comprising the homebase buildings and central courtyard.

3.2.3 Internal design

The internal design of the buildings supports special needs learning within an environment that promotes the dignity, comfort and safety of students and staff. Key internal features include:

- Robust materials and fixtures;
- Escape routes for staff and students in the case of aggressive student behaviour;
- Boundary design to restrict student movement for their safety;
- Ease of transition between rooms and activities, and between indoor and outdoor spaces;
- Spaces for retreat during difficult situations;
- Linear block arrangement to maximise passive supervision from homebases and staff areas over the central play area;
- Outdoor breakout areas to both the front and back of each homebase to offer sufficient options for student separation and outdoor learning;
- Views from homebases into both front and back garden areas;
- Internal windows between practical activities area, with withdrawal rooms and homebases for passive supervision;
- Operable walls between selected homebases to enable team teaching;
- Accessible WC/shower/change room for every homebase with full-sized change table;
- Laundry to be accessed directly off every change room that is attached to a homebase; and
- Homebases and ancillary spaces cater for needs of all students from the highly active to those with severe physical disabilities.

Floor plan extracts are provided below, while full-sized versions are provided at **Appendix 2**.

Figure 3-7 Block A floor plan
Source: Group GSA

Figure 3-8 Block B floor plan
Source: Group GSA

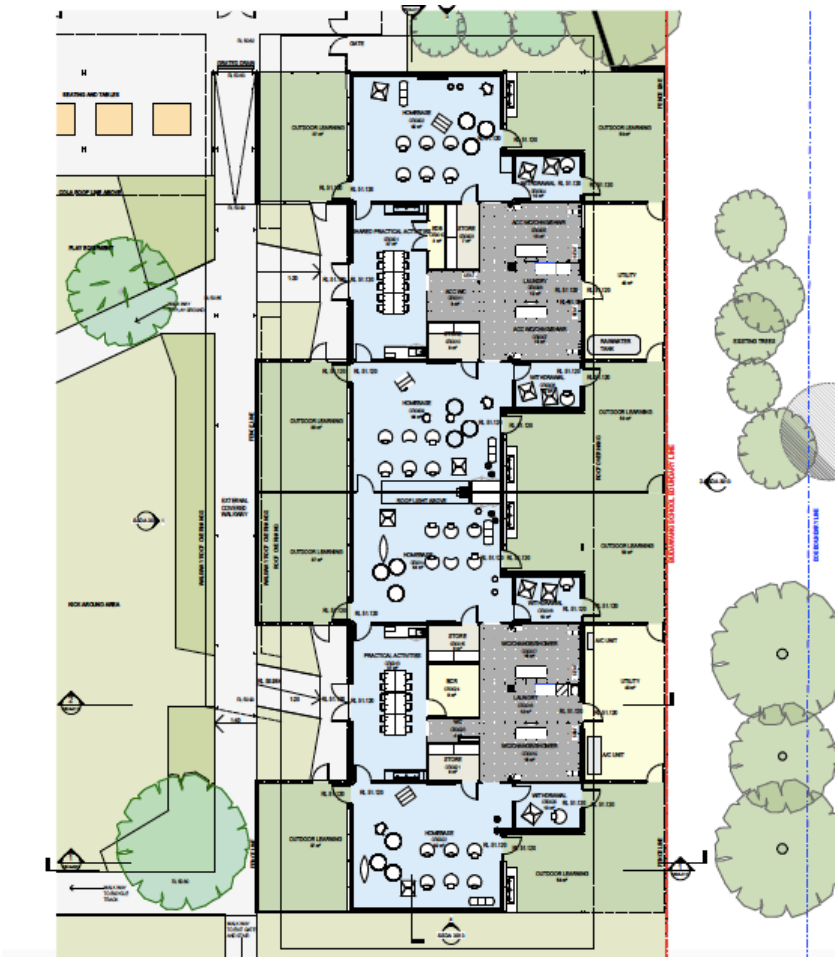


Figure 3-9 Block C floor plan
Source: Group GSA

3.3 Hydrotherapy building

The proposed building includes a single large pool (272m^2) with separate change facilities, staff office and plant rooms.

The building will function firstly as a purpose-built therapeutic facility for students and secondly as a high quality aquatic facility for the local community.

The building is intentionally located at the front of the site off the carpark, allowing community users to access the building without entering the main school campus.

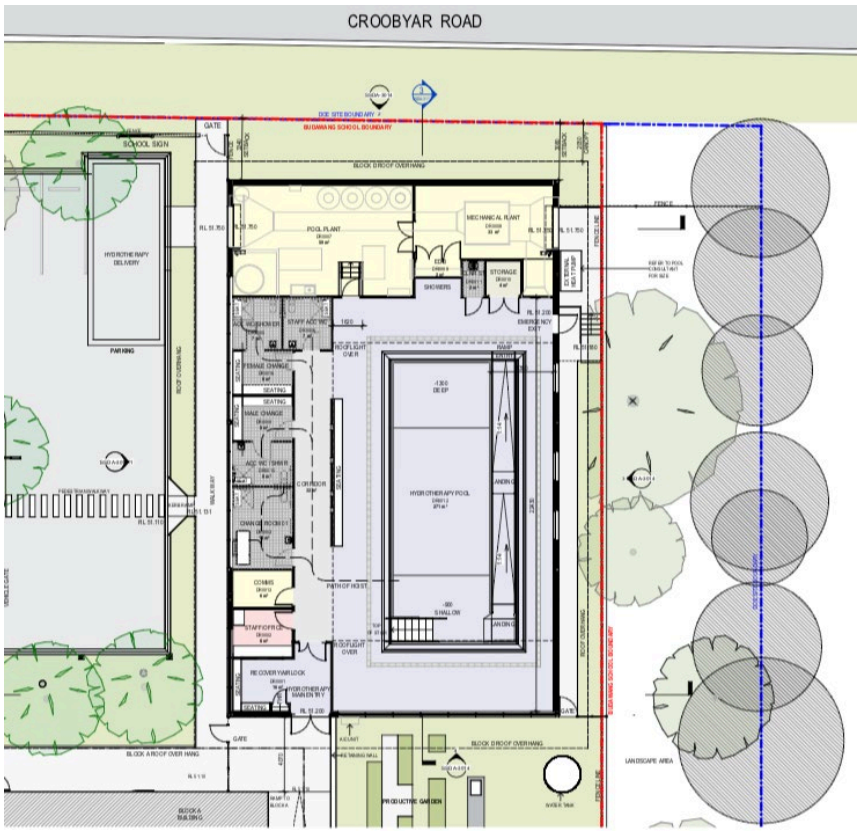


Figure 3-10 Hydrotherapy building floor plan
Source: Group GSA

3.3.1 External materials and finishes

The proposal features a range of simple yet robust materials that are suitable to the use and compatible with the local character.

The roofs will be metal sheeting, reflective of the wide use of the material in the area. Building soffits of the roof overhangs will be clad in timber-effect panels to create a warmer, domestic aesthetic. The roof material will be Lysaght KlipLok Hi Strength 700, and the colour will be Colorbond "Shale Grey", which has been selected to reduce solar absorption. However, as a darker aesthetic was preferred for the school, fascias and gutters will be Colorbond "Monument" to match exposed columns and window frames.

The facades will be precast concrete, which was selected for its durability and robustness. The concrete will be imbued with a colour mix to reference the aesthetic of rammed earth or local sandstone, which is used on nearby historical buildings and can be seen in the rock formations of the Budawang Ranges. The sandstone effect will be emphasised through the application of a textured form liner.

The structure of the buildings will be expressed and will be painted Colorbond "Monument" to contrast against the concrete.

The proposed materials are illustrated at Figure 3-11 below.

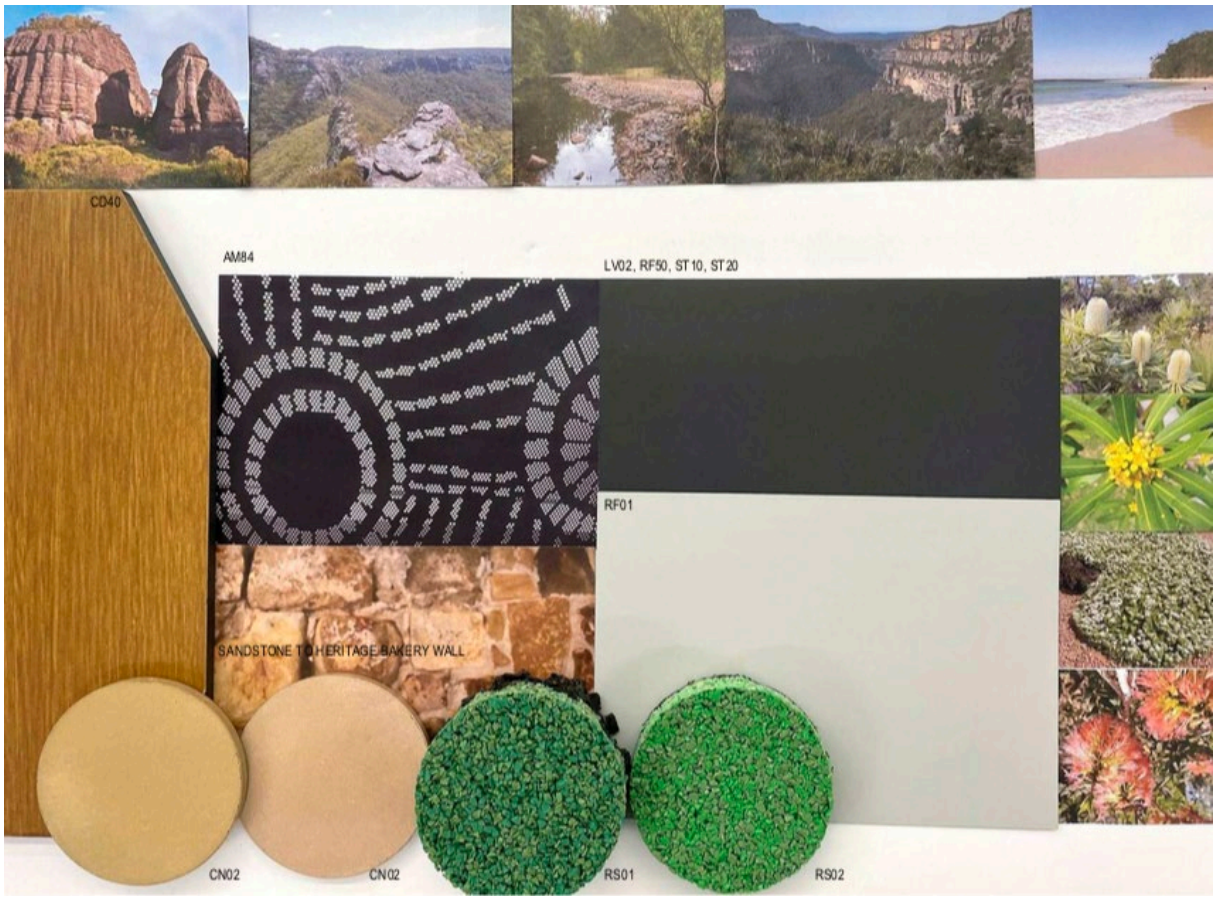


Figure 3-11 Sample external materials and inspiration
Source: Group GSA

3.4 Landscaping

Integrated landscaping is a driving feature of the design, with a central green courtyard forming the "heart" of the development. This layout allows for extensive views over, and easy access to, green outdoor spaces.

As shown in the landscape plan extract at Figure 3-12, the primary landscaped areas include:

- Central courtyard including playground space, handball courts and bush garden/play area/yarning circle, which will be planted with trees and groundcovers, with an emphasis on hardy native species;
- Productive garden on the eastern edge of the site, to the south of the hydrotherapy building;
- Outdoor library/reading area located between Block A1 and Block B; and
- Cycle track at the southwestern corner of the site, below Block B.

A total of 44 trees are proposed to be planted to compensate for the proposed tree removal.

Boundary plantings in the form of lilly pilly, bottlebrush, water gum and coastal rosemary are proposed along the north, east and west boundaries to minimise the visual impact of the school. The car park will be planted with a mix of blueberry ash, dwarf yellow bloodwood and water gum to soften the appearance of the hardstand area and reduce summer heat.

The landscape design utilises native plantings only, with the exception of the productive garden, which will feature a number of exotic herbs.

The landscape design retains approximately 11 trees within the site, including two large significant trees within the central courtyard.

Also importantly, the row of trees along the heritage store boundary will not be affected by the proposal.

The full landscape plans are attached at **Appendix 5**.

Figure 3-12 Landscape plan
Source: Group GSA

3.5 Security and fencing

The proposal includes a comprehensive fencing strategy to ensure the privacy and safety of students and staff. The fences have been designed to consider the specific condition of their location, specifically:

- The street frontage fence along Croobyar Road and the existing site access road will be planted to minimise the impact of the car park;
- Fences to the back of homebases consider the students' need for privacy;
- Fences to outdoor learning spaces consider the need for maximising visibility from the homebases to the central courtyard; and
- Fences with bars will be avoided in the homebase outdoor learning areas and instead a dark coloured mesh will be used.

Figure 3-13 Fencing strategy
Source: Group GSA

3.6 Access, parking and circulation

Vehicular access to the new school will be via the existing entry from Croobyar Road. A new roundabout will link the driveway to the new car park. The car park will accommodate 30 parking spaces, including two accessible spaces.

A drop-off/pick-up area will be located on the south side of the carpark, immediately in front of the main building entry. Additionally, an indented bus bay is proposed along the Croobyar Road frontage to cater for the students who arrive by minibus.

A pedestrian path will lead from the street (adjacent the bus bay) and past the hydrotherapy building into the school campus.

A circulation diagram is shown below.

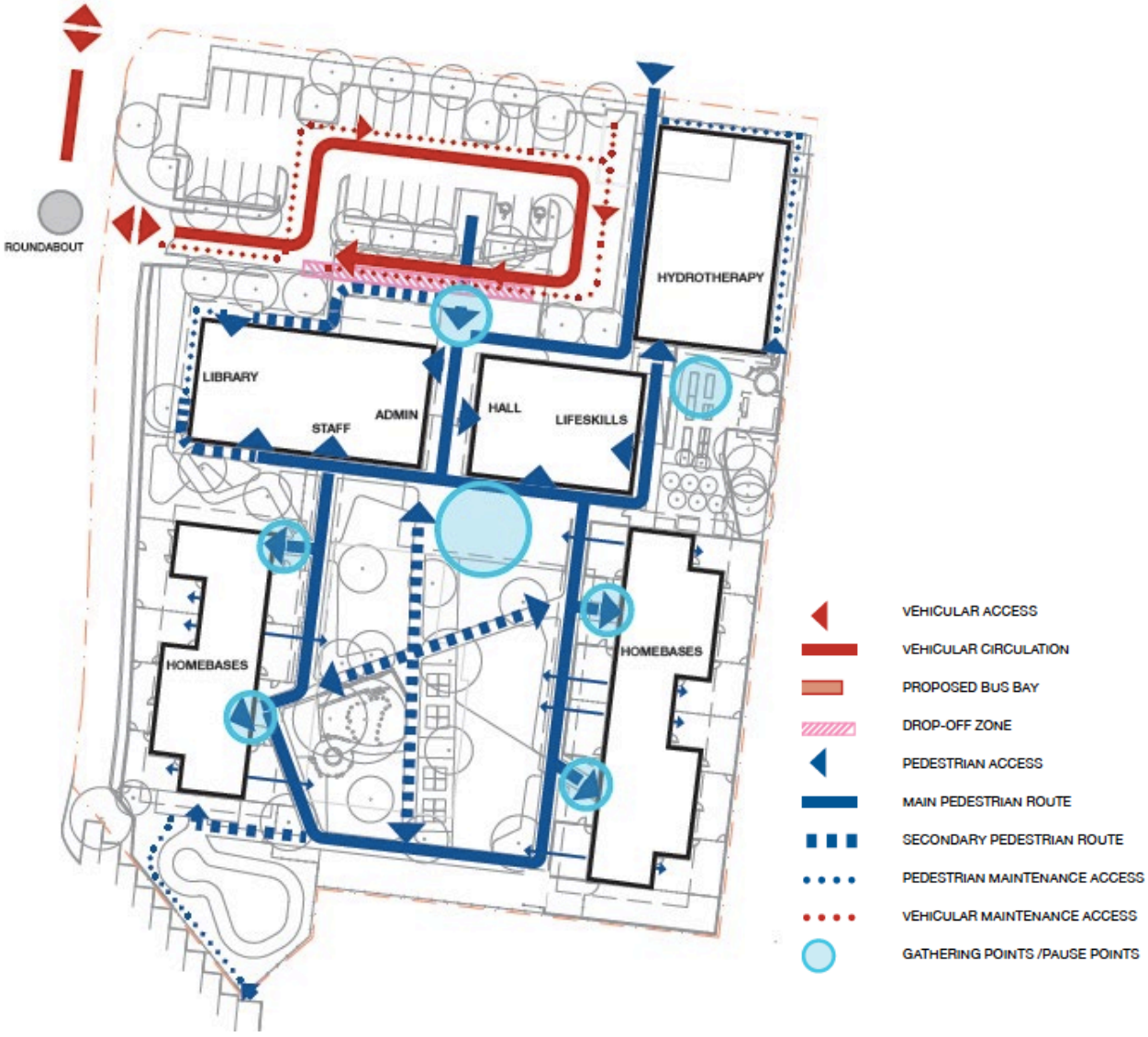


Figure 3-14 Pedestrian and vehicle circulation diagram
Source: Group GSA

3.7 Staging

The proposal does not include any staged construction. Further school development on the remainder of the lot may occur in the future, but this would be subject to a separate approval.

3.8 Construction

Construction is anticipated to commence late 2021 and be completed in early 2023. Construction of the proposal will be undertaken during standard hours, namely:

- Monday to Friday: 7:00am to 5:00pm;
- Saturdays: 8:00am to 1:00pm; and
- No work on Sunday and public holidays.

Approximately 64 construction jobs will be created during construction.

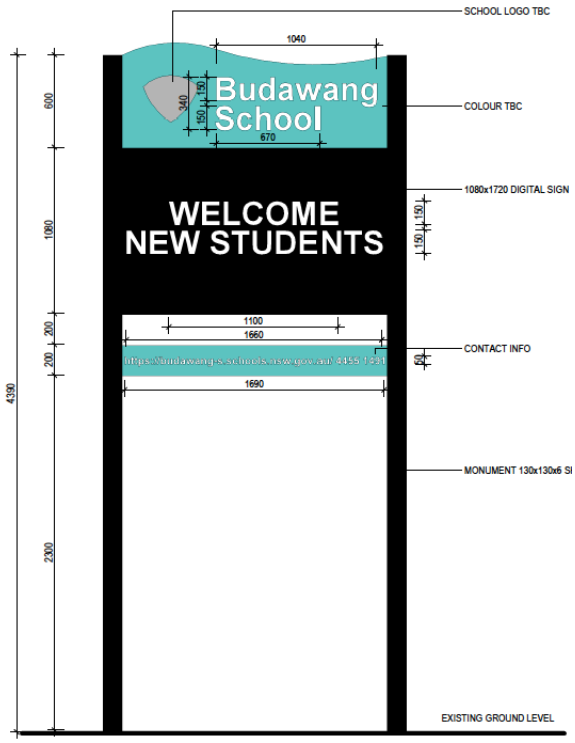
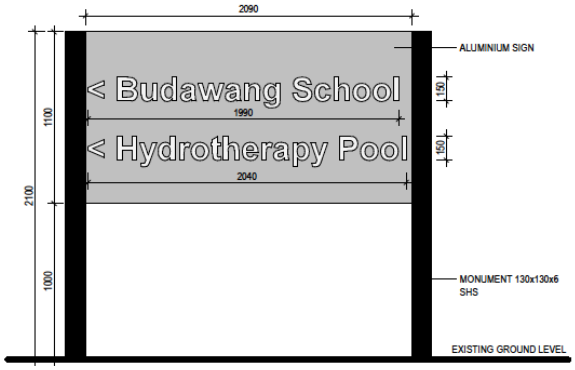
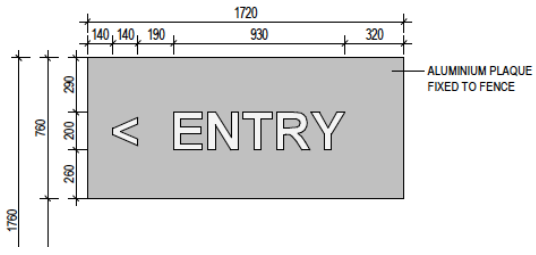
3.9 Operational details

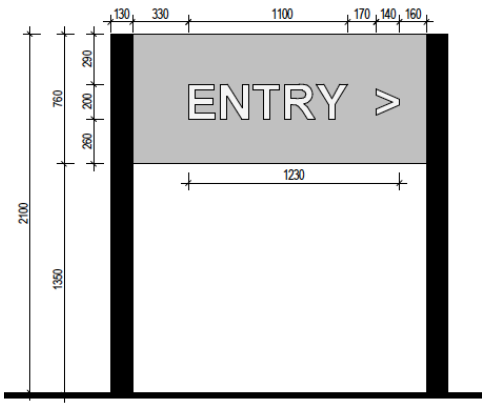
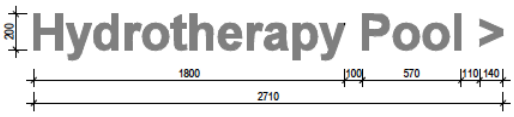
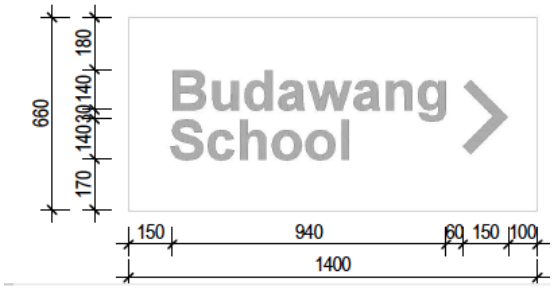
The school will accommodate up to 56 students and employ approximately 24 operational staff. The operational hours will be between 8:55am and 3:00pm as per the current Budawang School.

3.10 Signage

Five signs are proposed as part of this application, as described in Table 3-2. The location of the signs is shown at Figure 3-15.

Table 3-2 Proposed signage

Signage type	Size and location	Image
Digital pylon sign (Sign A)	Located at pedestrian entry 4.3m height at top of sign Digital display area approximately 1.08m x 1.72m Colour and exact school logo yet to be determined	
Aluminium pylon sign (Sign B)	Located at car park entry 2.1m height at top of sign 1.1m x 2.09m display area	
Plaque (Sign C)	Fixed to fence at driveway entry 1.76m height at top of sign 0.76m x 1.72m display area	

Signage type	Size and location	Image
Plaque (Sign D)	Located in car park 2.1m height at top of sign 0.76m x 1.9m display area	
Wall sign Sign (E)	Attached to hydrotherapy building west elevation 1.85m height at top of sign 0.2m x 2.71m display area	
Wall sign (Sign F)	Attached to Block A north elevation 2.36 height at top of sign 0.66m x 1.4m display area	

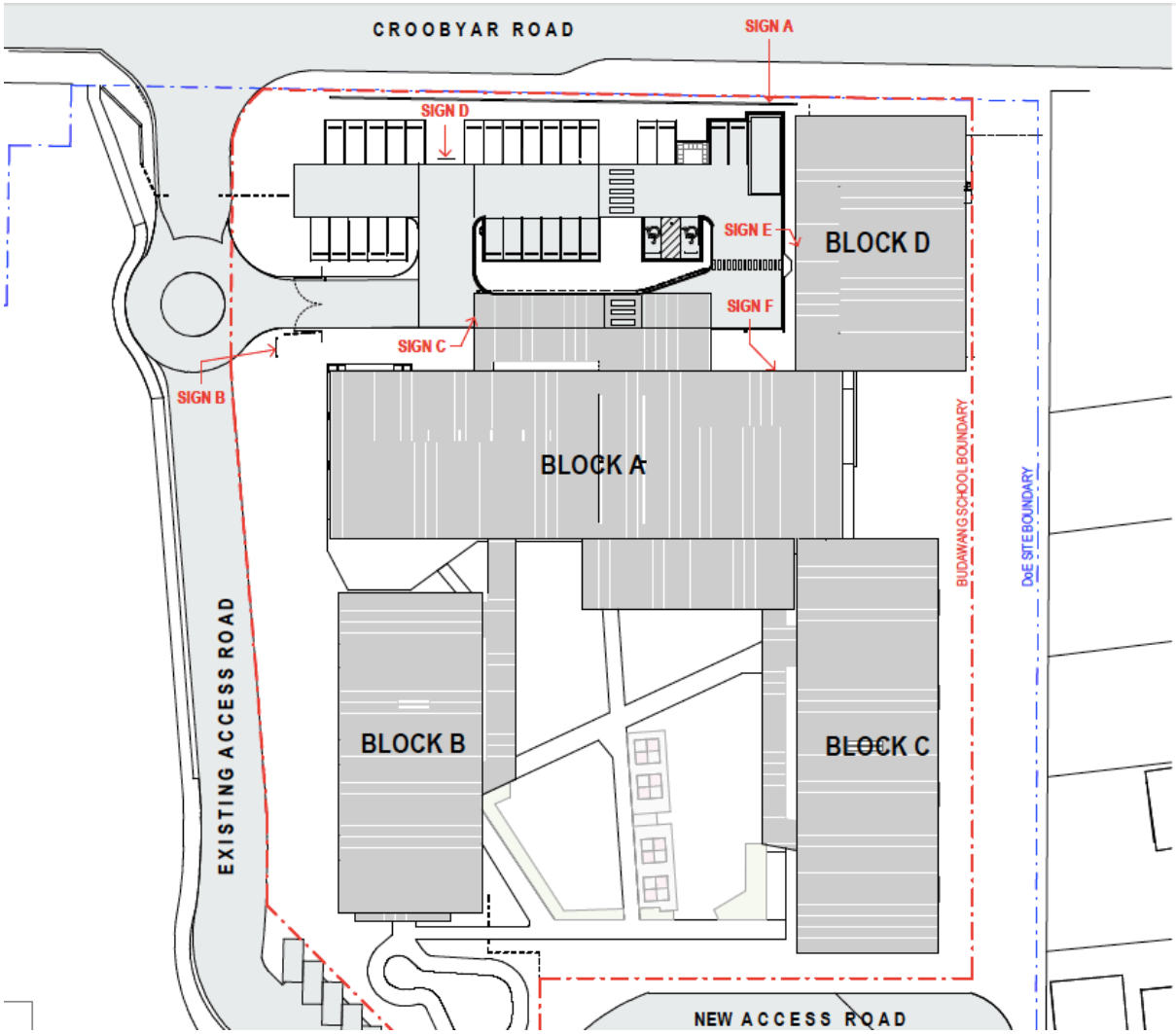


Figure 3-15 Signage location plan
Source: Group GSA

4 Strategic context

The proposal is consistent with the relevant planning provisions, goals and strategic planning objectives in relevant planning policies, as outlined in the table below.

Table 4-1 Assessment against strategic plans

Strategic plan	Purpose
NSW State Priorities	The 14 NSW State Priorities were unveiled in 2019 to provide a framework for economic growth, infrastructure delivery, service provision, and community wellbeing and safety across NSW. The proposal seeks to construct a new school to enable increased enrolment capacity for the Budawang SSP. Through its provision of important educational services, the proposal supports the priority of "improving education results". The other priorities are generally not relevant given the proposal's nature and location.
State Infrastructure Strategy 2018 – 2038 Building the Momentum	The State Infrastructure Strategy is a 20-year infrastructure investment plan for the NSW Government that places strategic fit and economic merit at the centre of investment decisions. The Strategy's strategic objective for education infrastructure is to "Deliver infrastructure to keep pace with student numbers and provide modern, digitally-enabled learning environments for all students". The Strategy primarily relates to addressing enrolments in schools, which are expected in to increase by 25% over the next 20 years. The proposal is consistent with the Strategy's relevant objective in that it provides for the upgrading and expansion of an educational establishment incorporating best-practice approaches to education. The proposal also meets growing demand for schools for specific purposes in the region.
Future Transport Strategy 2056	The Future Transport Strategy 2056 is an update of the NSW Long Term Transport Masterplan. It sets the 40-year vision, directions and outcomes framework for transport customer mobility in NSW. The Strategy will be delivered through a suite of accompanying plans, including Services and Infrastructure Plans and issue-based or placed-based Supporting Plans. The Strategy identifies the Milton-Ulladulla Bypass as a new/improved regional road corridor. This future bypass will likely reduce traffic along Pacific Highway near the site, which will improve the commute for students and staff of the Budawang School. There are no other specific objectives or actions in the strategy directly relevant to the proposal.

Strategic plan	Purpose
Illawarra-Shoalhaven Regional Plan 2036	The draft Illawarra Shoalhaven Regional Plan sets a 20-year vision for the future of the Illawarra-Shoalhaven region. The Plan provides a strategic policy, planning and decision-making framework to guide the region to sustainable growth over the next 20 years. While the Plan does not provide any specific objectives or actions directly relevant to the proposal, education is identified as a priority growth sector for the region. In line with this priority, the proposal seeks to grow the capacity of the Budawang School to enable greater access for students in the catchment, helping to build a more socially inclusive and safe community.
Draft Illawarra-Shoalhaven Regional Plan 2041	The draft Regional Plan provides an update to the 2036 Plan. The draft Plan contains a number of objectives that are generally relevant to the proposal including: • Objective 12: Build resilient places and communities; • Objective 13: Increase urban tree canopy cover; and • Objective 22: Embrace and respect the region's local character. The proposal is consistent with these objectives in that it will provide for a school that meets community demand, respects the local character of the area in terms of design and provides for increased tree canopy cover.
Crime Prevention Through Environmental Design (CPTED) Principles	The proposal has been assessed against the four key principles of CPTED including surveillance, access control, territorial reinforcement and space management. Refer to the CPTED Report at **Appendix 29** for further discussion.
Better Placed: An integrated design policy for the built environment of New South Wales (GANSW, 2017)	This policy sets out the NSW Government's position on design in the urban environment. It provides clarity on what the NSW Government means by good design and functions to assist in the design and assessment of projects. The policy includes seven applicable objectives: • Better fit – contextual, local and of its place; • Better performance – sustainable, adaptable and durable; • Better for community – inclusive, connected and divers; • Better for people – safe, comfortable and liveable; • Better working – functional, efficient and fit for purpose; • Better value – creating and adding value; and • Better look and feel – engaging, inviting and attractive. In accordance with these objectives, the proposal is sustainable, functional, sensitive to its context and visually

Strategic plan	Purpose
	distinctive. Notably, the design has been reviewed by the State Design Review Panel as discussed at section 6.2, **Appendix 4** and **Appendix 24** of the EIS.
Healthy Urban Development Checklist	The purpose of the Healthy Urban Development Checklist is to assist health professionals in providing advice on urban development proposals. The proposal is consistent with the Checklist as it will provide for a new development characterised by well-designed open spaces, quality environment, opportunity for social cohesion, healthy food and high quality learning facilities.
Draft Greener Places Design Guide	The Draft Greener Places Policy aims to guide the planning, design and delivery of Green Infrastructure in urban areas across NSW. The Policy is centred around the following four guiding principles: • Principle 1 – Integration; • Principle 2 – Connectivity; • Principle 3 – Multifunctionality; and • Principle 4 – Participation. In accordance with these principles, the proposal successfully integrates building form and green open space; provides for a series of accessible connected open space; features multifunctional green space that simultaneously provides environmental performance and enhances facility amenity; and incorporates the needs of various stakeholders including students, staff, community and local Aboriginal stakeholders.

5 Statutory context

5.1 Planning approval pathway

The SRD SEPP nominates certain types of development as either State significant development (SSD), State significant infrastructure or regionally significant development.

Under clause 15(1) of Schedule 1 of the SRD SEPP, development for the purpose of a new school, regardless of the capital investment value, is categorised as SSD.

Although the proposal involves relocation of an existing school, it must be characterised as a new school for the purposes of the SRD SEPP because the site is not technically an existing school site. Therefore, the proposal must be classified as SSD. The consent authority under section 4.5 of the EP&A Act is the Minister for Planning and Public Spaces or their delegate.

The EP&A Act establishes the assessment framework for the proposal. Section 4.12(8) requires that a development application for an SSD be accompanied by an EIS prepared by or on behalf of the applicant in the form prescribed by Schedule 2 of the Environmental Planning and Assessment Regulation 2000.

5.2 Permissibility

The site is zoned RU1 Primary Production under the LEP. Educational establishments, which includes schools, are permitted with consent in the zone.

5.3 Additional approvals required

No requirements for other approvals have been identified at this stage.

Section 4.41 of the EP&A Act identifies a number of approvals that do not apply to SSD applications, including a bushfire safety authority.

5.4 EPBC Act

The *Environment Protection and Biodiversity Conservation Act 1999* is federal legislation which provides a legal framework to protect and manage nationally important flora, fauna, ecological communities and heritage places defined as "matters of national environmental significance" (MNES). A referral must be made to the Australian Government Minister for the Environment for actions that are likely to have a significant impact on MNES.

The proposal is not likely to have a significant impact on MNES and therefore no referral is required.

5.5 EP&A Act

The table below provides consideration of the proposal in the context of the objects of the EP&A Act.

Table 5-1 Objects of the EP&A Act

Objects of the EP&A Act	Comments
(a) to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources	The proposal conserves and manages resources by locating the development on a developed, generally cleared area of land that was formerly used as a school. The proposal has minimised tree removal insofar as possible.
(b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,	The proposal incorporates a number of ESD measures outlined in section 7.4 of the EIS. The proposal is targeting a 4 Star Green Star rating.
(c) to promote the orderly and economic use and development of land	The proposal promotes the orderly and economic use of land by placing a new school on relatively unconstrained land while allowing flexibility for future school development on the remainder of the lot.
(d) to promote the delivery and maintenance of affordable housing	This objective is not applicable to the proposal.
(e) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats	The proposal has been designed to avoid impacts on the environment. The design minimises tree removal and avoids impacts on the nearby watercourse. The accompanying Biodiversity Development Assessment Report (BDAR) at **Appendix 9** has concluded that the development will result in minor and acceptable impacts on the site's biodiversity.
(f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage)	The built and cultural heritage of the site and adjoining properties has been considered as part of this EIS. As discussed in sections 7.5 and 7.6, the proposal would have no unacceptable heritage impacts.
(g) to promote good design and amenity of the built environment	The proposal features a high quality, purpose-built design that provides high amenity for users.
(h) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants	The proposal has been designed in compliance with relevant BCA and DDA standards for building construction.

Objects of the EP&A Act	Comments
(i) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State	Prior to lodgement, consultation was carried out with a range of State government agencies and the Shoalhaven City Council as detailed in section 6 of this EIS. Also refer to the consultation report at **Appendix 24**.
(j) to provide increased opportunity for community participation in environmental planning and assessment.	The local community and other stakeholders were consulted prior to lodgement as discussed in section 6 of this EIS, and the community will be able to provide further input during the formal exhibition process.

5.6 Biodiversity Conservation Act 2016

The *Biodiversity Conservation Act 2016* (BC Act) is the key piece of legislation that identifies and protects threatened species, populations and ecological communities within NSW.

Cl. 7.9 of the BC Act requires any application for SSD to include a biodiversity development assessment report (BDAR). Accordingly, a BDAR has been prepared for the proposal and is attached at Appendix 9. The results of the BDAR are discussed at section 7.9 of the EIS.

In summary, the BDAR has found that the proposal will have minor direct impacts including removal of 0.15ha of planted native vegetation and minor potential indirect impacts. A test of significance was carried out for the Grey-headed Flying-fox on the basis that the planted native vegetation could provide habitat for this threatened species. The test determined that the proposal is unlikely to result in a significant impact.

5.7 State Environmental Planning Policies

The relevant State Environmental Planning Policies (SEPPs) are addressed in the table below.

Table 5-2 SEPP assessment

SEPP	Comment
State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP)	Clause. 15 of Schedule 1 oof the SRD SEPP identifies that development for the purpose of a new school (regardless of capital investment value) is SSD. The proposal is for the purposes of a new school and is therefore classified as SSD.
State Environmental Planning Policy (Infrastructure) 2007 (ISEPP)	No clauses of the ISEPP are directly relevant to the proposal. The development is not traffic generating

SEPP	Comment
	development under Schedule 3 of the ISEPP and does not adjoin a classified road.
State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 (ESEPP)	Part 4 of the ESEPP contains specific development controls for schools. However, given that the proposal does not rely upon the ESEPP for permissibility, the controls under this part are generally not relevant. It is noted that the requirement under clause 35 to consider the Schedule 4 design quality principles is not applicable because the development is not of a type referred to in subclause (1), (3) or (5). Nonetheless, the entirety of the school has been assessed against the principles in section 7.1.11 of this EIS given it is a requirement of the project SEARs. Cl. 42 allows for a school SSD to contravene a development standard in the LEP, but the proposal does not seek to utilise this clause given it involves no contravention of an LEP standard. Cl. 57 of the ESEPP requires that new school development resulting in an additional 50 or more students be referred to TfNSW for comment. This clause also requires consideration of accessibility of the site and potential traffic safety, road congestion and parking implications. These matters are addressed at section 7.3 of the EIS. An Explanation of Intended Effect has been exhibited for proposed changes to the ESEPP. The proposed changes focus on resolving operational issues, clarifying provisions and other housekeeping issues. The changes are not directly relevant to this SSD application.
State Environmental Planning Policy No 64—Advertising and Signage (SEPP 64)	Four signs are proposed as part of the application. The signs are consistent with the aims of SEPP 64 in that they are compatible with the desired amenity and character of the area, provide effective communication in suitable locations and are of high quality design and finish. SEPP 64 contains no detailed controls directly applicable to the proposed signage, and consultation with TfNSW is not required given the size and location of the signage. An assessment against the general criteria in Schedule 1 of the SEPP is provided at **Appendix 32** of the EIS. In summary, the signage will have no adverse impacts in relation to character of the area; special areas; views and vistas; streetscape, setting or landscaping; site and building; associated devices and logos; illumination; or safety.

SEPP	Comment
State Environmental Planning Policy No. 55 Remediation of Land (SEPP 55)	Cl. 7 of SEPP 55 requires that the consent authority consider whether the land is contaminated and whether it is or can be made suitable for the proposed use. Contamination is discussed in section 7.16 of the EIS. The contamination assessment has concluded that the site is suitable for the use subject to appropriate mitigation measures including implementation of an unexpected finds protocol. No additional investigation is required.
State Environmental Planning Policy (Koala Habitat Protection) 2019	*State Environmental Planning Policy (Koala Habitat Protection 2020* (Koala SEPP) is now the relevant version (commenced on 20 November 2020). The provisions of the Koala SEPP apply to determinations made by councils and therefore do not apply to this SSD application. Nonetheless, it is noted that the submitted BDAR at **Appendix 9** concludes that the proposal would have no impacts on threatened species or their habitat (other than a less than significant impact on the potential foraging habitat of the Grey-headed Flying-fox).
Draft State Environmental Planning Policy (Remediation of Land)	The Explanation of Intended Effect (EIE) for the draft SEPP was on exhibition from 31 January 2018 until 13 April 2018. The draft SEPP will retain the key operational framework of SEPP 55 and add new provisions relating to remediation works. The proposed new conditions are not relevant to the proposal given that no remediation works are proposed.
Draft State Environmental Planning Policy (Environment)	The draft Environment SEPP consolidates and simplifies seven existing SEPPs. The Explanation of Intended Effect (EIE) for the draft Environment SEPP was on exhibition from 31 October 2017 until 31 January 2018. None of the SEPPs to be consolidated are applicable to the proposal.

5.8 Shoalhaven Local Environmental Plan 2014

The table below addresses key sections of the LEP.

Table 5-3 Shoalhaven LEP assessment

Clause	Comment
Land use table	The site is zoned RU1 Primary Production. Educational establishments, which includes schools, are permitted with consent in the zone.

Clause	Comment
Zone objectives	The RU1 zone objectives are: • To encourage sustainable primary industry production by maintaining and enhancing the natural resource base. • To encourage diversity in primary industry enterprises and systems appropriate for the area. • To minimise the fragmentation and alienation of resource lands. • To minimise conflict between land uses within this zone and land uses within adjoining zones. • To conserve and maintain productive prime crop and pasture land. • To conserve and maintain the economic potential of the land within this zone for extractive industries. Consistent with these objectives, the proposal provides for a permitted land use that does not conflict with adjoining rural uses. The proposal will not displace any current primary production, as the site previously operated as a school.
4.1 Minimum subdivision lot size	LEP mapping identifies the site as subject to a 40ha minimum lot size control. The proposal includes no subdivision and therefore this clause is not relevant.
4.3 Height of buildings	No height of buildings control applies to the site.
4.4 Floor space ratio	No FSR control applies to the site.
5.1 Relevant acquisition authority	LEP mapping does not identify any part of the site as land reserved for public purposes.
5.10 Heritage conservation	The subject lot adjoins local heritage item no. 296 "Two storey Victorian Rendered Masonry Store" to the east, and local heritage item no. 264 "Milton Church of England Cemetery" is located directly across the street. Heritage impacts are addressed at section 7.6 of the EIS. In summary, the assessment has found the proposal will not diminish the heritage values of the nearby heritage items. Aboriginal cultural heritage is addressed at section 7.5 of the EIS. In summary, the assessment has found that the proposal will result in minor but acceptable impacts on Aboriginal cultural heritage.

Clause	Comment
7.1 Acid sulfate soils	LEP mapping identifies the entirety of the site as Class 5 acid sulfate soils. The proposed works are not within 500m of Class 1, 2, 3 or 4 land that is below 5m AHD and are not likely lower the watertable given no major excavation is proposed. Accordingly, no acid sulfate soils management plan is required.
7.3 Flood planning	LEP mapping does not identify the site as flood planning land. A flood assessment has shown that the proposal will remain generally unaffected by flooding. Refer to section 7.13 and **Appendix 15** of the EIS for further discussion.
7.5 Terrestrial biodiversity	LEP mapping does not identify any part of the site as terrestrial biodiversity.
7.6 Riparian land and watercourses	LEP mapping identifies a Category 3 watercourse running across the northwest portion of the lot, though no portion of the lot or site is identified as riparian land. The proposal will result in no impacts on the watercourse provided appropriate sediment and erosion control measures are in place (see further discussion at section 7.14 of the EIS).
7.8 Scenic Protection	LEP mapping does not identify the site as scenic protection land.
7.11 Essential services	The site is serviced by all essential infrastructure including water, electricity and sewage. Refer to the utilities advice at **Appendix 12** or details.

5.9 Shoalhaven Development Control Plan 2014

Clause 11 of the SRD SEPP states that development control plans do not apply to SSD applications. However, the project SEARs require the application to address the Shoalhaven Development Control Plan 2014 (the DCP) as a relevant policy.

The DCP contains general controls for all development in the LGA, which are addressed in the table below. The DCP, however, contains no site-, area- or school-specific controls.

Table 5-4 Shoalhaven DCP assessment

Provision	Comment
Chapter 2: General and Environmental Considerations	
2. Potentially contaminated land	Contamination is addressed at section 7.16 of the EIS. In summary the assessment has found that the proposal is suitable for the proposed use subject to appropriate mitigation measures. No additional investigation is required.

Provision	Comment
3. European heritage	The site adjoins local heritage item no. 296 "Two storey Victorian Rendered Masonry Store" to the east, and local heritage item no. 264 "Milton Church of England Cemetery" is located directly across the street. Heritage impacts are addressed at section 7.6 and **Appendix 7**. In summary, the assessment has found the proposal will not diminish the heritage values of the nearby heritage items.
4. Aboriginal cultural heritage	Aboriginal cultural heritage is addressed at section 7.5 of the EIS and **Appendix 7** of the EIS. In summary, the assessment has found that the proposal will result in minor but acceptable impacts on Aboriginal cultural heritage.
5. Crime Prevention Through Environmental Design	The proposal has been designed to incorporate the four key principles of CTPTED. This is further discussed at **Appendix 29** of the EIS.
Generic Chapters	
G1 Site Analysis, Site Design and Building Materials	The schematic design report at **Appendix 4** of this EIS adequately address the DCP's general criteria for site analysis, building design and materials.
G2 Sustainable Stormwater Management and Erosion/Sediment Control	The proposal includes a stormwater management plan (addressed at section 7.10 and **Appendix 14**) and a sediment erosion control plan (addressed at section 7.14 and **Appendix 14**), which are generally consistent with the controls of this section.
G3 Landscaping Design Guidelines	The proposed landscape plan, which is discussed at section 3.4 and attached at **Appendix 5** of this EIS, generally accords with the DCP's requirements.
G4 Tree and Vegetation Management	The proposal's tree and vegetation management, which is addressed section 3.2 and **Appendix 10** of this EIS, is being carried out generally in accordance with the DCP's requirements.
G5 Biodiversity Impact Assessment	The proposal's biodiversity impacts are addressed at section 7.9 and in the BDAR at **Appendix 9** of the EIS. The assessment has concluded that the proposal will result in minor but acceptable impacts.
G7 Waste Minimisation and Management Controls	The proposal's waste management measures, which are addressed at section 7.15 and **Appendices 20 and 21** of this EIS, generally accord with the DCP's requirements.

Provision	Comment
G18 Car Parking and Traffic	The proposal's car parking and access, which are addressed in section 7.3 and **Appendices 6a, 6b and 6c** of this EIS, generally accord with the DCP requirements.

5.10 Development contribution plans

The proposal provides for social infrastructure on behalf of the Crown and therefore is not subject to development contributions. This is consistent with the advice from DPIE in Circular D6 "Crown Development Applications and Conditions of Consent". This circular notes that Crown activities provide facilities which lead to significant benefits for the public in terms of essential community services and employment opportunities, and the activities are not likely to require the provision of public services and amenities in the same way as development undertaken with a commercial objective.

The circular recommends that, where the applicant is a Crown authority and the development is for educational services, no contributions should be collected for open space, community facilities, parking, and general local and main road upgrades.

Furthermore, the Shoalhaven Contributions Plan 2019 explicitly notes that the plan does not apply to development provided by or on behalf of the State government or Council. The proposed school is on behalf of the State government, and therefore Council's contribution plan does not apply.

Additionally, given that there was a school previously on the site, the proposed Budawang School is unlikely to generate notable additional demand on local infrastructure.

6 Consultation

Consultation have been undertaken in accordance with DoE's consultation policy (Planning and Delivery School Infrastructure NSW Public Consultation Policy), which provides a framework to actively engage the community and other stakeholders in relation to the planning of major projects.

A comprehensive Consultation Report is attached at **Appendix 24** of the EIS. Key consultation activities and outcomes are outlined in the subsections below.

6.1 Community engagement

DoE conducted the following community engagement activities prior to lodgement:

- An advertisement with survey was placed in the Milton Ulladulla times on 23 December 2020, 13 January 2021, 20 January 2021 and 27 January 2021;
- A letterbox drop with project updates was conducted on 13 January 2021 and 23 February 2021; and
- Creation of a dedicated website with regular updates to project status.

The main findings from the survey show that:

- Locals feel good about the development;
- Easy accessibility is the most important aspect of the school;
- Effective use of space and timeframe were most important aspects of construction
- Future proofing is most important in terms of design.
- Accessible playground is most important in the outside school spaces;
- Aboriginal and cultural acknowledgements are welcome; and
- Flexible learning spaces are the preferred style of classroom design.

6.2 Public authority engagement

6.2.1 Government Architect NSW

The proposal was presented to the Government Architect NSW (GANSW) twice, first on 02 December 2020 and then on 17 February 2021.

GANSW provided formal minutes from both sessions, which are included in the consultation report at **Appendix 24** of the EIS. At the second session GANSW noted the design's responsiveness to the recommendations from the first meeting and provided further recommendations to inform the design. The key recommendations

from the second meeting are addressed in the table below. GANSW's comments are also addressed in detail in the design report at **Appendix 4**. Of the EIS.

Table 6-1 GANSW engagement outcomes from 2nd meeting

Issue raised	Response
Masterplan and Landscape	
The design should be better integrated with the existing topography of the site. Demonstrate how the changes to the levels will allow for tree retention.	Site levels respond to the function of the development as an SSP, which will be attended by students with special needs, many of whom are wheelchair users. Consequently, the design has minimised falls across the play area, with a gradient of 1:40 to the courtyard playground. This functional requirement has impacted the extent to which the existing site levels can be maintained. Adjustments following the first review with GANSW include: • Number of new trees increased; and • More existing trees retained around the productive garden by introduction of low height retaining wall structures. Also, presentation of the buildings and boundary treatment to the existing roads has been considered. Planting has been used to screen fences and soften level changes. Refer to landscape sections at **Appendix 5** of the EIS for further detail.
The edge condition to the east of the site and visibility into the homebases from the elevated pedestrian path requires further resolution.	The pathway to the eastern side of the site lies outside the site boundary and does not form part of this application. Fencing has been selected to provide adequate privacy to and from the outdoor learning spaces located behind the homebases. Planting is also being use for screening to this fencing. Refer to the landscape fencing strategy at **Appendix 5** of the EIS for further information.
Community access to the hydrotherapy pool is supported. Provide a management plan indicating which facilities are accessible by the broader community and how these are accessed. More detailed resolution is required on	The hydrotherapy building will potentially be used by the local community outside school hours. This specialised facility caters for the wide ranging needs of the disabled community, who will benefit from the health aspects of hydrotherapy. Community members expected to use this facility are local people with disabilities, people

Issue raised	Response
pedestrian access as well as drop-off arrangement for the pool.	requiring hydrotherapy as part of injury rehabilitation, school students and their families, and residents from the nearby aged care facilities. Due to the disabilities of people attending the pool, it is expected that most will arrive by either car or taxi. From the car park, access to the hydrotherapy building is via a footpath to a signposted entry.
While we acknowledge tree coverage has increased to 23% of the site and the concerns of the Project Reference Group (PRG), we encourage an increase in planting in this rural setting to deliver on state targets. Consider tree species that respond to the concerns of the PRG.	The proposal will increase tree canopy cover on the site from 9% to 23%, which is an exceptional outcome in a rural area. We are unaware of any State target relating to tree cover in rural zones. The chosen species are hardy Australian natives that will provide good canopy but avoid excessive water consumption. Refer to the planting schedules within the landcape plans at **Appendix 5** of the EIS.
The hydrotherapy pool is encouraged to have a more open and generous relationship to the street, consider perforations in the blank façade or other solutions.	The hydrotherapy northern façade has been refined. See the architectural drawings at **Appendix 3** of the EIS for further detail. It should noted that privacy for people attending the pool is a key requirement for the design. The northern façade provides a buffer zone for the pool, maintaining privacy from the street. The swimming pool faces towards green spaces to create a calming therapeutic environment. Also, functional adjacency of the plant room with the car park means that the plant room is located adjacent to Croobyar Road.
The proposed scale of the car park and its proximity to the street do not deliver good urban design outcomes. Consider alternative options for carparking and access that allow the school and the hydrotherapy pool to have a public address to the street.	Buildings that create a public facade for the school also require adjacency with the car park for ease of access both during and outside school hours. Site constraints have resulted in the need to locate these core facilities, and consequently the car park, to the front of the site. To diminish the adverse visual impact of the car park on Croobyar Road, the following changes to the plans were implemented: • Eight parking spaces removed from the car park and relocated to the access road to

Issue raised	Response
	the west and will be constructed if required in the future; • 27 new trees planted within the car park to replace those removed; • Planting to the street boundary fencing to obscure views of the car park; • Street frontage of the hydrotherapy building used as the site boundary; • Suggestion for hydrotherapy street frontage to include a mural depicting local or indigenous themes; • Location of the car park is based on the functional relationship of pick up and drop off area, combined with achieving a connection to other educational facilities within the Budawang site; and • Best use of available land, achieving Government value for money objectives.
Explore opportunities to incorporate views out to the landscape and open space.	Maximisation of passive surveillance has informed the design, leading to the arrangement of linear blocks around a courtyard. The hydrotherapy pool has been designed and orientated to benefit from views southwards over the productive garden so that building occupants can enjoy views of nature whilst swimming or undertaking therapy. Homebases also have wide windows to maximise views over the attached outdoor learning spaces and central courtyard. Learning spaces, including the library, life skills room and multipurpose hall, all benefit from strong physical and visual connections to adjacent outdoor learning spaces. The sensory playground benefits from views out towards the creek and surrounding existing vegetation.
The proposed pedestrian access to the future school is still not supported as there is no surveillance and lacks amenity. Consider other design solutions that allow for the separation for pedestrian and vehicular movement.	The eastern pathway does not form part of this application; if required, it will form part of a future application. Street frontage to the site is limited. Consequently, the ability to separate traffic from pedestrians is limited.

Issue raised	Response
	Pedestrians accessing the site will typically be from the Princes Highway to the east. Consequently, all pedestrian access has been located to this side of the site to avoid conflicts between vehicles and pedestrians. A combination of factors including easements, existing site road, riparian corridor and flood levels associated with the creek mean that it is not possible to move the site boundary further west.
Architectural Expression	
More details are required on the architectural expression to the school including materiality. The awning elements to the pathways as well as to the COLA need further detail and illustration.	Long and simple rural forms have been adopted. The architecture is meant to be domestic in order to be familiar to the special needs student. Natural materials are calming, and timber-effect soffits are proposed for the overhangs, COLA and porte cochere. The use of timber effect panels is reflective of the forest and timber getting early European history of the area. Masonry walls are precast concrete with a colour additive and texture reflecting the sandstone of Budawang Ranges and Clyde River. The surface coloration is to resemble a rammed earth wall and the colours of the sandstone to the nearby heritage bakery. Further detail on materiality is provided in the design report at **Appendix 4** of the EIS.
Provide more detail on the thresholds of inside to outside and 'pause spaces'.	Each function has an entry space. The size of these spaces reflect the primacy of the entry. The various spaces are indicated on diagrams with sections 6.6 and 6.7 of the design report at **Appendix 4** of the EIS. The homebase outdoor learning spaces and pause spaces associated with the homebase block entries are illustrated in section 7.11 of the design report.
Provide more details on the section through the homebases to the courtyard to illustrate how views/edges are to be maximised.	Refer to the architectural drawings and landscape drawings at **Appendix 3** and **Appendix 5**, respectively. The homebases all look out over their own outdoor learning spaces into the central courtyard play area. Each home base also looks out to a more private outdoor learning space, also accessed by a withdrawal room. This space overlooks a

Issue raised	Response
	quiet landscaped zone. As such, there are two main outlooks for every home base, active or passive. Fencing materials have been selected to maximise views from the homebases to the courtyard. To increase visibility, these will be a dark coloured mesh within frames. Fences are coordinated to respond to either the architecture or the landscape to ensure they do not dominate.
The plenums to the homebase rooms appear to be significantly oversized for the room volume. We understand the desire to create a feeling of differentiation in the space however this can be achieved in other ways which will not affect solar access and daylighting to these deep floor plates. The reduced ceiling heights to the withdrawal rooms will make tight enclosed spaces.	The ceiling to the back of the homebases and withdrawal rooms is 2.7m high. Ceiling heights to the front of the homebases is around 4.3m. This is to create a variety scales of spaces. Withdrawal rooms are used within SSPs to decompress and calm; these are not intended to be large spaces. Rooflights have been included within the homebases to allow daylight into the centre of the homebases. Refer to the roof plans at Appendix 3 for further information.
The fencing requirement to the outdoor learning spaces require resolution to prevent the effect of 'fences within fences'. Consider other ways to separate these outdoor spaces through planting, programming of student groups, or moveable fences.	The outdoor learning spaces attached to the homebases are a key design feature dating from the earliest masterplan stage and serve a pedagogical function. The design of these spaces results from a review of other SSP designs. The spaces allow students a calm space that provides a more gradual transition between indoors and outdoors to enable them to control aggressive behaviours and enter the homebaes at their own pace. Additionally, these spaces allow students to undertake lessons or play outdoors if preferred. These spaces are used as a means of separating students for safety reasons. Fencing to these spaces is a safety function associated with separation of students The selection of fencing material has considered maximisation of the views from homebases out to the courtyard. Planting of a height sufficient to create a barrier would obstruct views over the central courtyard.
Aboriginal Cultural Heritage	

Issue raised	Response
As 20% of the students are anticipated to be Indigenous, the response to Aboriginal Cultural Heritage is considered critical. The current proposed 'yarning circle' has become a one-size fits all approach to school design. Consider a site-specific response through local consultation and the specific needs of this school;	Aboriginal cultural heritage has been considered as part of the design; however, discussions are still underway with the relevant community members to determine the most appropriate approach to integrate indigenous heritage into the design. The "yarning circle" will serve a pedagogical function as a gathering space within nature, and indigenous and endemic planting is used throughout the site. Further consultation will be undertaken as the project progresses.
The Indigenous landscaping components should be considered as an integrated whole rather than a discrete element of the landscape design.	Agreed. See point above.
The important of water to the local Aboriginal culture and the presence of watercourses on the site could inform the design.	Agreed. See point above.
Sustainability and environmental aspects	
Adopt a more rigorous approach to addressing solar access and daylighting into the classrooms.	A rigorous approach to solar access and daylighting has been adopted . Roof lights have been included to homebases located within the centre of blocks. The roof shape opens to the courtyards to emphasise the connection with place. The roof overhangs are calculated to allow solar access in winter and exclude it in summer during school hours. External vertical louvres allow individual homebae control over daylighting and solar access. For further information, refer to diagrams in section 8.2 of the design report at **Appendix 4** and the roof plans at **Appendix 3**.
Explore opportunities for each classroom to have a mixed mode system advising occupants on the optimal method of passive climate control.	A mixed mode system is being applied. For further information, refer to the ESD report at **Appendix 30** and to sections 8.1 and 8.2 of the design report at **Appendix 4**.
Clarify the quantum of how the ESD goals are to be achieved. Show where	Integration of ESD elements, such as solar panels and rainwater tanks, has been considered as part of the design. Photovoltaic

Issue raised	Response
water tanks, PVC, etc. are located and how many there are.	panels are to be located on the roof of Block A, facing north towards Croobyar Road. In addition to being the optimal position, this also expresses the school's environmental credentials to the community. Rainwater tanks will harvest water to irrigate the landscape; these are located to the backs of the homebases. An additional tank is located within the productive garden, which will be used as part of the pedagogical processes of growing and learning about food. For further information, refer to the ESD at section 8.1 and 8.2 of the design report at **Appendix 4** and to the ESD report at **Appendix 30**.

6.2.2 Shoalhaven Council

DoE and key members of the project team met with Council officers on 21 May 2020 and again on 14 August 2020.

At the first meeting the project team provided Council with an overview of the project and the potential planning approval pathways, and at the second meeting, the project team provided Council with a project update and confirmed the application would be lodged as an SSD.

Additionally, Councill provided comments as part of the SEARs. These are addressed in the table below.

Table 6-2 Response to Council comments

Comment	Response
Environmental services input	
1. Cut and fill map for the site detailing volumes and RLs pre and post development	A cut and fill plan is provided in the civil drawings at **Appendix 14** of the EIS.
2. Volumes of excavated material/fill anticipated for the demolition/construction phases of the project and the anticipated heavy vehicle haulage movements and haulage route in and out of the site. Expected duration of haulage activities.	The proposal requires earthworks in the order of 1,970m^3 of cut and 4,100m^3 of fill. The soil from areas of cut will be reused on site, and therefore approximately 2,310m^3 of imported fill is required overall. Heavy vehicle haulage movements are discussed in section 7.3 and **Appendix 6a** of the EIS.

Comment	Response
3. Queuing impacts to Croobyar Road intersection left turn with the Princes Highway. Note that Croobyar Road left turning lane is currently limited to 50m in length and may require extending further west to accommodate an increase in traffic movements.	Refer to section 7.3 and **Appendix 6a** of the EIS for further information. Traffic modelling has found that the proposal will have no significant impacts on intersection performance.
4. Recent developments approved in the vicinity include: a. DA20/1358 industrial storage units Lot 1 DP 1082590 Croobyar Road b. DA17/2021 industrial shed lot 1 DP 1071300 Wilfords Lane c. RA10/1005 Seniors Housing Development – lot 2 DP 1097329 & Lot 3 DP 702859 Croobyar Road	Noted. These developments will not notably affect the proposal, and the proposal will not notably affect these developments. An assessment of the potential increased traffic resulting from these developments is provided in the Traffic Impact Assessment prepared by .ptc at **Appendix 6a**.
5. Relevant Chapters of the Shoalhaven DCP 2014 include: a. Town Milton b. Site Analysis, Site Design and Building Materials c. Sustainable Stormwater Management and Erosion/Sediment Control d. Landscaping Design Guidelines e. Tree and Vegetation Management f. Biodiversity Impact Assessment g. Waste Minimisation and Management Controls h. Development on Flood Prone Land i. Car Parking and Traffic j. Advertising Signs and Structures	Noted. These sections of the DCP are generally addressed at section 5.9 of the EIS.
Shoalhaven Water input	
For the proposed development the following is required: 1. The applicant is to apply under Section 305 of Division 5 of Part 2 of Chapter 6 of the Water Management Act 2000 for a Certificate of Compliance from Shoalhaven Water.	Noted.

Comment	Response
2. Shoalhaven Water (Council) as the Water Utility will undertake an assessment and prepare a Notice of requirements for the development.	Noted.
3. Where a Construction Certificate is required all conditions listed on the Shoalhaven Water Development Application Notice under the heading "PRIOR TO THE ISSUE OF A CONSTRUCTION CERTIFICATE" must be complied with and accepted by Shoalhaven Water. The authority issuing the Construction Certificate for the development shall obtain written approval from Shoalhaven Water allowing a Construction Certificate to be issued.	Noted.
4. A Certificate of Compliance (CC) must be obtained to verify that all necessary requirements for matters relating to water supply and sewerage (where applicable) for the development have been made with Shoalhaven Water. A Certificate of Compliance shall be obtained from Shoalhaven Water after satisfactory compliance with all conditions as listed on the Development Application Notice and prior to the issue of an Occupation Certificate, Subdivision Certificate or Caravan Park Approval, as the case may be.	Noted.
General information	
Water Supply: 1. The applicant shall undertake hydraulic calculations to confirm that the existing metered service is adequate for the overall development on the property. 2. The applicant is made aware that Section 64 (Water Supply) Contribution may apply. 3. The applicant is to undertake a survey for backflow to ensure protection of the town water supply. Where necessary an appropriately sized backflow device is to be installed to ensure site containment.	The project services engineer has confirmed with Shoalhaven Water that there is sufficient pressure and flow to accommodate the required hydraulic systems. Noted that a section 64 (water supply) contribution may apply. A survey for backflow can be undertaken. The proposal's pumps for fire systems will not draw directly from Council's water supply system.

Comment	Response
4. Council does NOT permit the use of pumps for fire systems to directly draw from Council's water supply system. The applicant will need to install an appropriately sized water tank on the property from which the pumps will draw water from. The tank will be filled by gravity means from the town water supply system.	
Sewerage Services: 1. The applicant is made aware that there is an existing DN225 AC/C Sewer Rising (Pressure) Main located within an Easement to Pump Sewage that diagonally traverses the property. No building or part thereof shall be constructed within this easement. Proposed Block A1 has a corner located on the easement boundary line. It is preferred for the applicant to move the building clear of the zone of influence. 2. Detailed survey by registered surveyor showing the location and depth of the existing DN225 AC/C Sewer Rising (Pressure) Main is to be undertaken to ensure any infrastructure located over/near the sewer asset (eg, road works/ parking areas, structures (eg, gates), buildings, hard stand areas, landscaping, etc) comply with all of Shoalhaven Water's Specifications and Council's policies (eg Building Over Sewer policy). The applicant is advised that consideration needs to be given to the relocation of the sewerage rising main clear of the proposed development (including the sewer easement) may need to be undertaken. 3. 24/7 access to the sewer rising main shall continue to remain. Where such access is affected for maintenance, repair, upgrade, augmentation, emergency repair, etc, then the applicant shall provide a solution to protect the asset (subject to approval by Shoalhaven Water) before implementing. 4. The applicant is made aware that Section 64 (Sewerage Services) Contribution may apply. 5. The applicant will need to lodge an application for the discharge of liquid trade	No building is located over the easement. The proposed block A1 is near, but does not touch, the easement boundary line. A sewer survey is provided at **Appendix 2b** of the EIS. Noted that 24/7 access shall remain and that a section 64 (sewerage services) contribution may apply. An application for discharge of liquid trade waste will be lodged with Council as required.

Comment	Response
waste and enter into agreement with Council for such discharge/s.	

6.2.3 Other public authorities

Details regarding consultation with other public authorities is provided in Table 6-3.

Table 6-3 Government stakeholder engagement outcomes

Agency	Issues discussed	Response
Shoalhaven Water	The project services engineer has been in regular consultation with Shoalhaven Water throughout the project. Key items discussed included: • The design of the services and the impact these have on the existing water, fire and sewer connections to site; • The need to make an application for a Certificate of Compliance in relation to water supply; • Sewerage matters; and • If the new special school is to be on its own separate parcel of land (i.e., a Torrens subdivision takes place) then it must have separate services (water supply, fire support and sewer connection).	The services design of the project has taken into consideration the existing water, fire and sewer connections. As discussed in the utilities advice at **Appendix 12**, the existing water and sewer services to the site are adequate for the proposed systems and will not require upgrading. No Torrens title subdivision is proposed as part of the application.
Transport for NSW/RMS	The project traffic engineer sought advice from TfNSW regarding design of the proposal. Items discussed included: • Existing travel behaviour along the existing Princes Highway; • The impact of additional traffic upon completion of the development; and • The potential additional impact of traffic in the	The key issues raised are addressed in the Traffic Impact Assessment prepared by .ptc at **Appendix 6a** of the EIS.

Agency	Issues discussed	Response
	Milton/Ulladulla area upon completion of the Milton-Ulladulla bypass.	
Endeavour Energy	The project services engineer has been in ongoing consultation with endeavour energy regarding location of the substation.	The design and location of the substation has been sited in accordance with the relevant guidelines, further to discussions with Endeavour Energy.

7 Assessment of key issues

This section contains an assessment of the key issues identified in the project SEARs. It is informed by, and should be read in conjunction with, the specialist reports and drawings appended to the EIS.

7.1 Built form and urban design

7.1.1 Methodology

A schematic design report is attached at **Appendix 4**. The report addresses the height, density, bulk and scale, setbacks and interface of the proposal in relation to the site and surrounding area. Key items from the report are discussed below.

7.1.2 Existing environment

The site contains two buildings, namely Building L of the former high school and a preschool (plus associated small shed and gatehouse). The remainder of the site is mostly open landscaped area.

The two buildings are dated and have no notable aesthetic significance. The preschool addresses Croobyar Road and is setback approximately 18m from the street, while Building L is set back a significant distance from the street, forming part of the former high school buildings.

Photos of existing development are provided at section 2.4 of the EIS.

7.1.3 Height

The proposed buildings are all single storey. The maximum height (at the roofline of the hydrotherapy building is) of 58m AHD or approximately 6.8m above ground level, which is roughly the same height as the existing preschool. While the LEP does not apply a maximum height to the site, the proposal's height is below the LEP's 8.5m maximum control for the surrounding residential land.

It is also noted that the height is well below the height of the adjoining heritage store, whose height is 62.91m AHD. The relationship with the heritage store is illustrated in Figure 7-1.

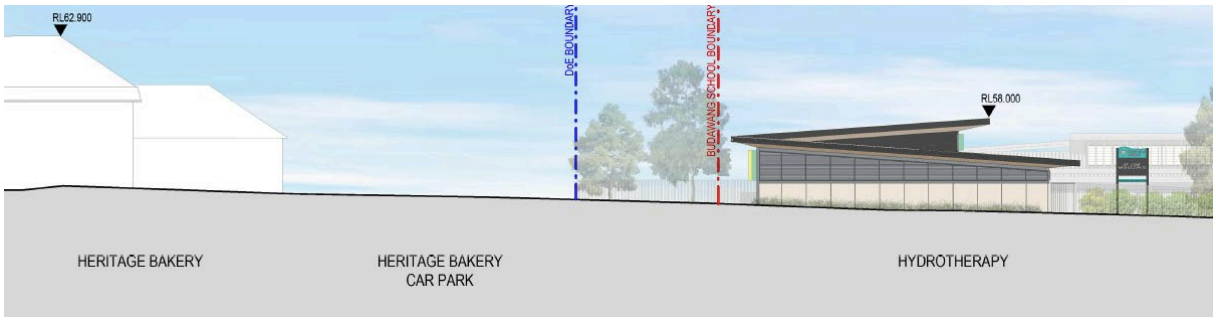


Figure 7-1 North elevation showing relationship to heritage item
Source: Group GSA

Given the low height and consistency with the existing development, the proposal's height is not expected to have any adverse impacts related to height. Potential overshadowing, streetscape and view impacts are discussed in further detail below.

7.1.4 Density

There is no FSR or other density control applicable to the site. The proposal's density is a direct result of the required student capacity as well as consideration of the site's ability to accommodate additional built form. The proposed buildings are sized for purpose and feature appropriate intra-building separation and separation from neighbouring development.

The proposed gross floor area is approximately 2,325m^2. Based on the site area of 10,206m^2, the proposed FSR is approximately 0.24:1, and the site coverage (excluding outdoor covered areas) is approximately 22.8%. This FSR and site coverage are considered appropriate to the rural context.

7.1.5 Bulk and scale

The proposed development's bulk and scale are appropriate to the rural/urban edge context, appropriate to the proposed use and generally consistent with the existing school development on the site.

The built form reads as a group of low buildings under sweeping, interconnected roofs, as illustrated in the elevation extracts below.

Organising the campus around a central courtyard creates linear blocks with dual aspect facades. The longest of these blocks (Block A) measures 60m long but is split by an 6m wide external corridor, which provides covered access from the drop-off to the covered outdoor learning area (COLA). Blocks B and C, the homebase blocks, measure 48m and 39m long, respectively.

Figure 7-2 South elevation
Source: Group GSA

Figure 7-3 West elevation
Source: Group GSA

7.1.6 Setbacks

Front setbacks

The façade of Block D (hydrotherapy building) is set back 3m from Croobyar Road, while the remainder of the proposed buildings are set back approximately 37m. The smaller setback for the hydrotherapy building reflects the building's function as a public front for the school. The smaller setback is also similar to the approximately 4m front setback of the heritage store to the east.

The large 37m setback for the remainder of the buildings is appropriate to the rural streetscape and complies with the DCP's minimum setback of 30m for low density development in the RU1 zone on lots greater than 1ha in area.

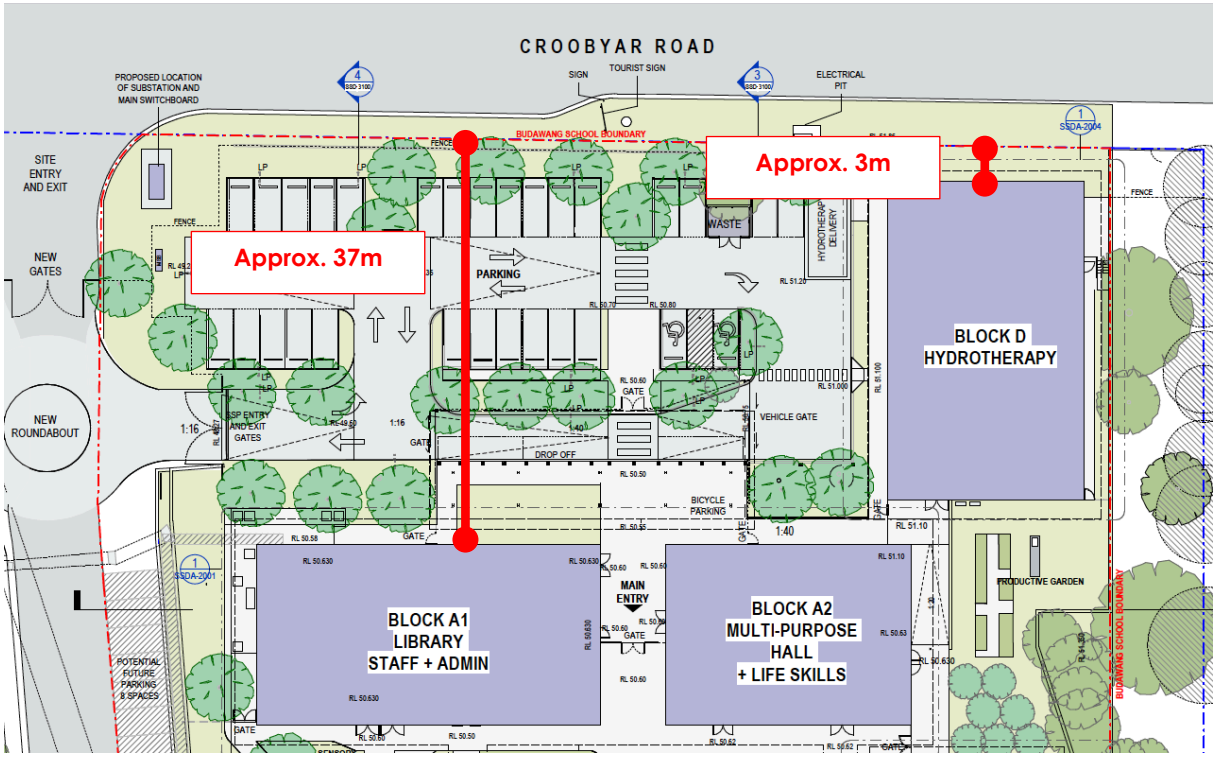


Figure 7-4 Front setbacks diagram
Source: Group GSA

Rear setbacks

Rear setbacks are not relevant for the proposal given that the land to the rear of the site forms part of the existing school lot and contains former school buildings. The proposed layout allows for appropriate separate between existing and future school development.

Side setbacks

The proposed buildings are set back more than 9m from the western side boundary of the site, and on the other side of this boundary is the existing driveway and further land within the existing school lot. The buildings are more than 40m from the lot

boundary, which is more than sufficient for providing adequate separation from the adjoining land to the west.

As shown in Figure 7-5, Block D is set back approximately 11m from the heritage store boundary, and Block C is set back approximately 13.3m from the neighbouring residential land. These setbacks are consistent with the DCP's setback control for dwellings in the RU1 zone, which requires a minimum 10m side setback for lots greater than 1ha. (This control does not technically apply to the development but provides a useful guideline.)

The setback allows for adequate separation of built form and sufficient space for screening landscaping. The setback will also accommodate a future potential pedestrian pathway leading to the remainder of the lot.

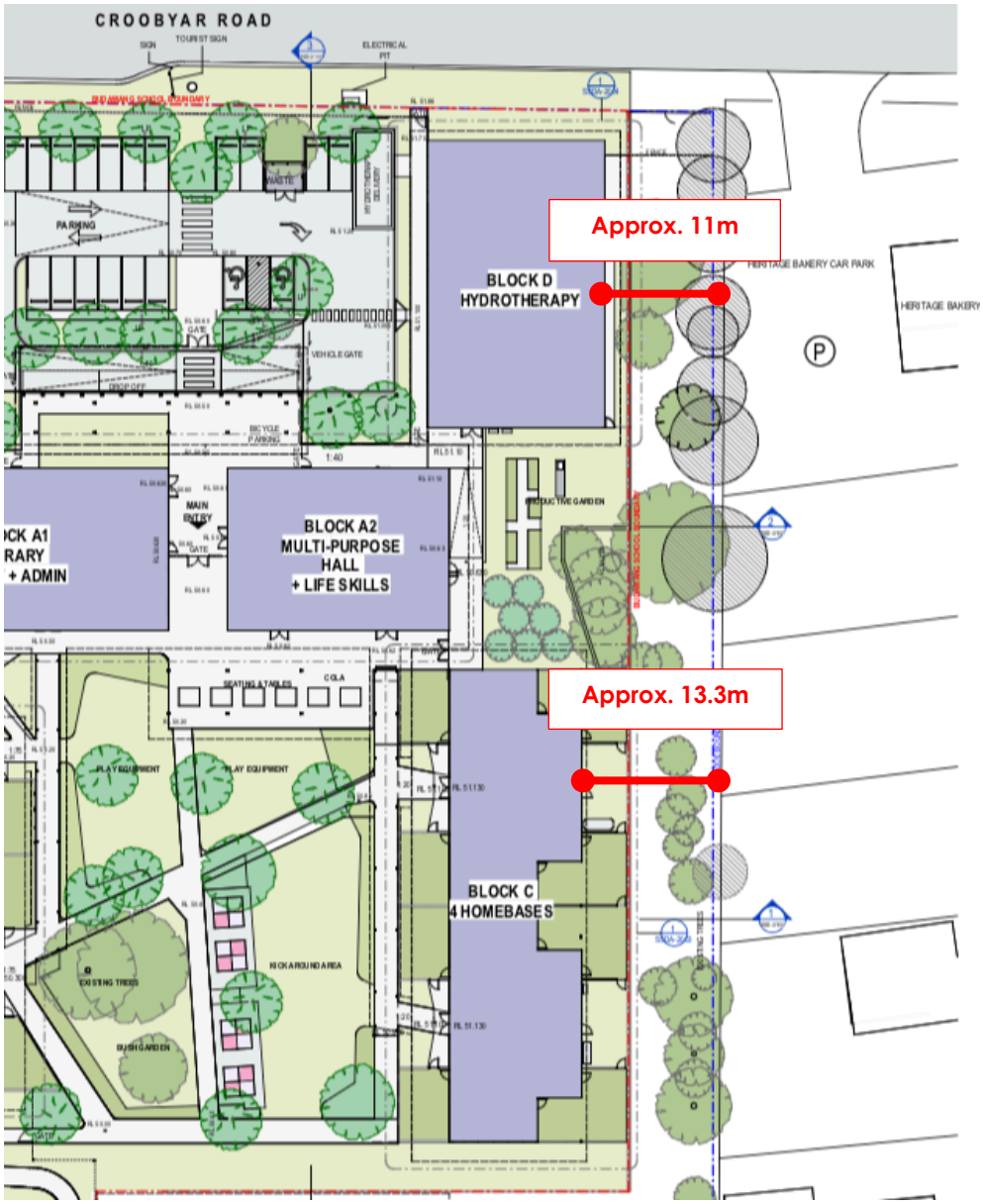


Figure 7-5 Eastern setback diagram
Source: Group GSA

7.1.7 Interface with surrounding development, topography and streetscape

Surrounding development

The single storey nature of the proposal is consistent with surrounding development, which is also generally single storey.

Importantly, the low scale of the proposal allows the adjoining two-storey heritage store to maintain its prominence. Furthermore, the sloping nature of the land and the requirement for bulk cut near the eastern boundary mean that the proposal will sit below the level of the heritage store, as illustrated in the elevation extract below.

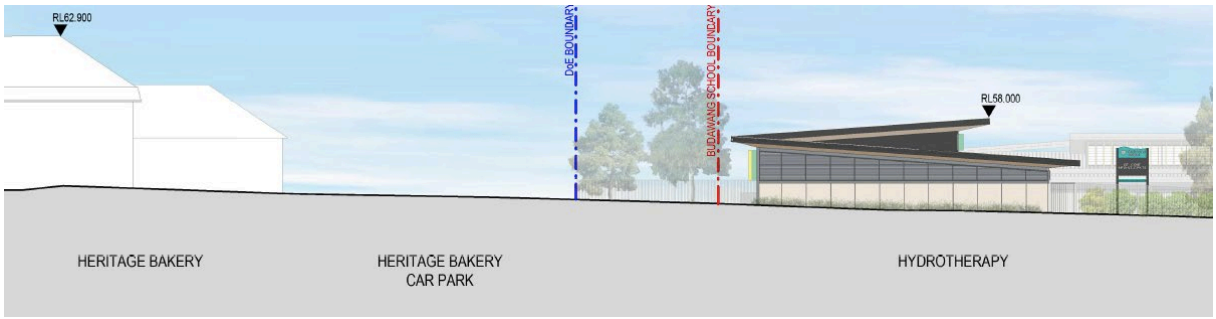


Figure 7-6 North elevation showing relationship to heritage item
Source: Group GSA

Also, as discussed in section 7.6 of the EIS, the existing line of trees along the heritage store property boundary will not be affected, which will ensure the existing interface between the site and the heritage store is preserved.

Topography

The site has an east-to-west fall of approximately 4m across 85m. To achieve a typical gradient of 1:40 across the site for wheelchair use, the topography must be manipulated.

On the western side of the school, near the existing driveway, fill will be used to create terraced retaining walls with planting, as illustrated in the section detail at Figure 7-7. The eastern boundary will be manipulated with a combination of berms and retaining walls, as illustrated at Figure 7-8. The heights of retaining walls will be minimised by the use of terracing and berms, and planting will be used to disguise the walls.

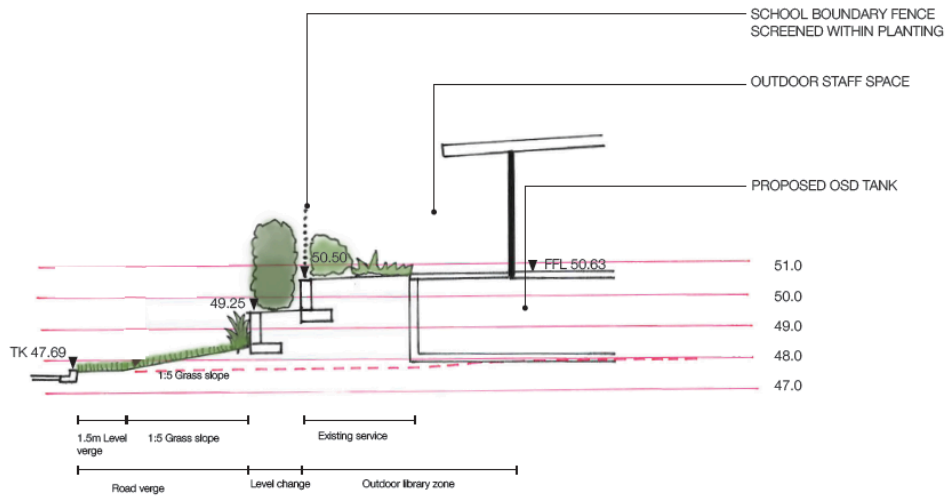


Figure 7-7 Section detail showing retaining walls on western boundary
Source: Group GSA

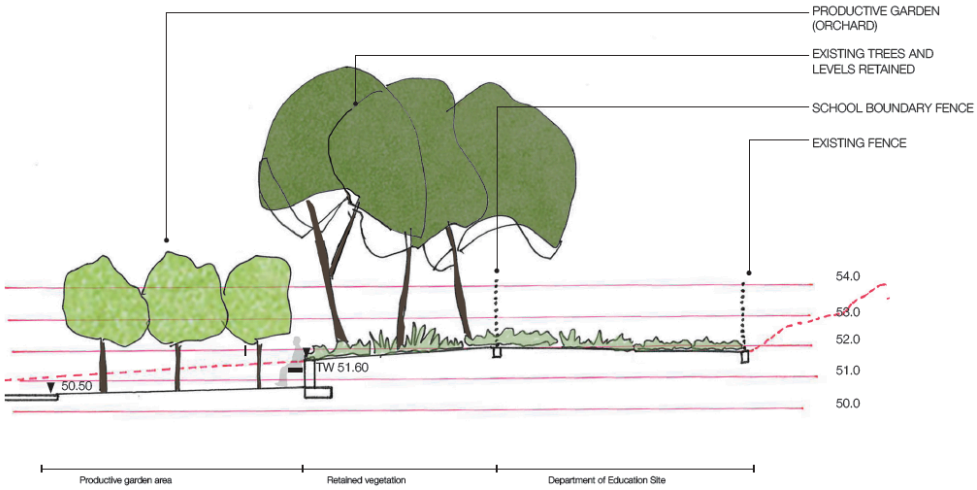


Figure 7-8 Section detail showing retaining walls on eastern boundary
Source: Group GSA

Streetscape

The existing streetscape along Croobyar Road in the vicinity of the site generally reflects the land use zoning. Development on the southern side of the road features large setbacks in the order of 30m+, consistent with the rural zoning, while development on the northern side features smaller setbacks in the range of 4m to 5m, consistent with the urban residential zoning. The commercial development to the east of the site on the southern side of the road (i.e., heritage store) also features a smaller setback of approximately 4m, which reflects its tourist zoning and prominent position along Princes Highway.

As noted in the setbacks discussion above, the proposed buildings are set back a significant distance from the street (approximately 37m), with the exception of the hydrotherapy building, which is set back approximately 3m. The large 37m setback is

appropriate to the rural streetscape and complies with the DCP's minimum setback of 30m for low density development in the RU1 zone on lots greater than 1ha in area.

The streetscape impacts of the smaller setback for the hydrotherapy building would be minimal. The building is oriented such that its shorter end faces the street, thereby minimising the bulk along the street. Also, the north elevation of the hydrotherapy building has intentionally been designed as a public façade for the school with identification signage and pedestrian entry. Furthermore, the setback of the hydrotherapy building will reflect the setbacks of the residential development in the R1 zone directly opposite Croobyar Road and that of the commercial development (heritage store) immediately to the east.

The proposed car park in the setback zone features landscaping along the northern edge, as illustrated in the section detail below. This will soften the appearance of the hardstand area and contribute to visual amenity along the street.

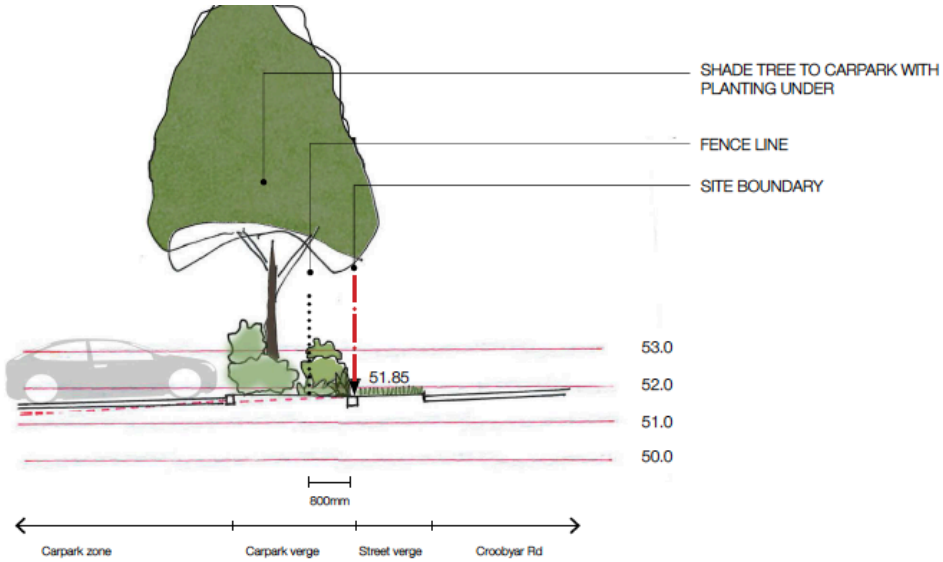


Figure 7-9 Section detail showing carpark buffer landscaping
Source: Group GSA

7.1.8 Services

Waste and other services have been considered in the design of the proposal, with specialist consultants engaged from an early stage of the project. A loading zone has been provided at the east end of the carpark in front of the hydrotherapy building.

In regards to mechanical plant, the architectural plans at **Appendix 3** include the locations of communication rooms, utility rooms and other necessary rooms for services, and the section drawings clearly indicate sufficient space for service bulkheads.

7.1.9 Access to daylight, ventilation, acoustic separation

The design utilises a combination of passive and mechanical measures to ensure the amenity and comfort of students and staff.

Learning spaces and common spaces are oriented to achieve high levels of natural daylight and feature extensive glazing to allow visual connection to the outdoors. Appropriately angled roofs will allow for winter sun but block hot summer sun, as illustrated in the diagrams below.

Learning spaces have two aspects where possible, providing excellent natural cross ventilation. Fan-forced ventilation will also be utilised when outdoor temperature is favourable but there is a high pollen count or other unfavourable outdoor condition.

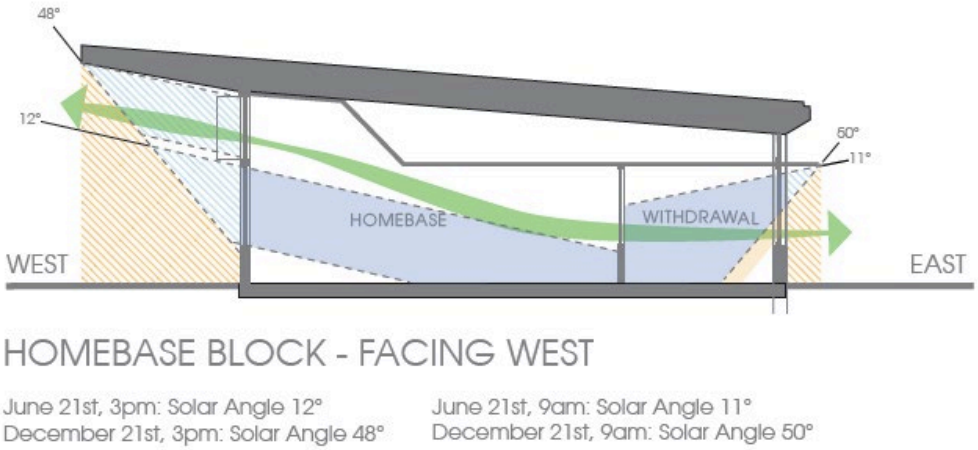


Figure 7-10 Thermal and ventilation diagram – homebase block facing west
Source: Group GSA

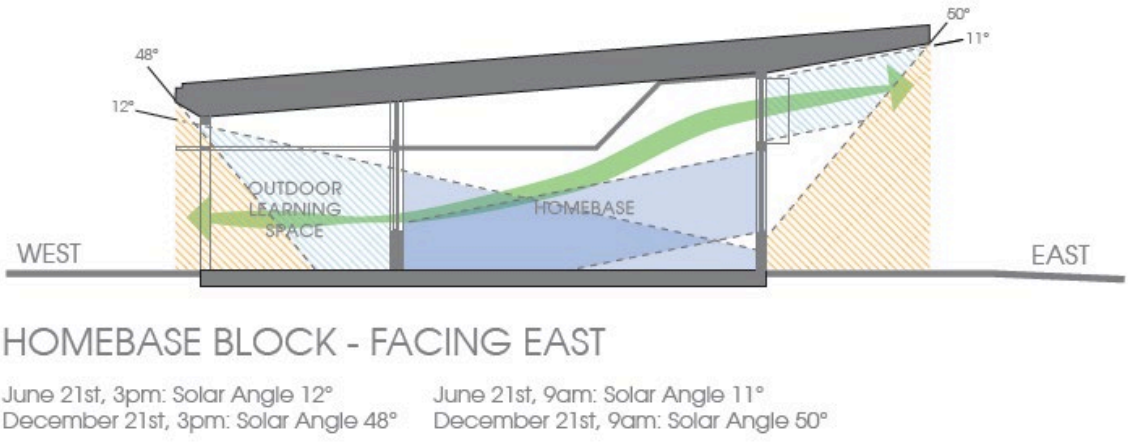


Figure 7-11 Thermal and ventilation diagram – homebase block facing east
Source: Group GSA

In regards to acoustic separation, the site is located in a rural setting and is not notably affected by noise intrusion from surrounding uses, traffic or aircraft.

Adequate separation from adjoining uses as well as appropriate acoustic separation within the new buildings will be utilised to achieve adequate levels of acoustic comfort. Section 7.8 of the EIS provides further discussion on acoustic impacts.

7.1.10 Access to landscape and outdoor spaces

The proposal features an integrated landscaping scheme with central courtyard, providing excellent access to the outdoors. The courtyard is at the heart of the school both physically and visually, with most learning spaces benefitting from views over the courtyard.

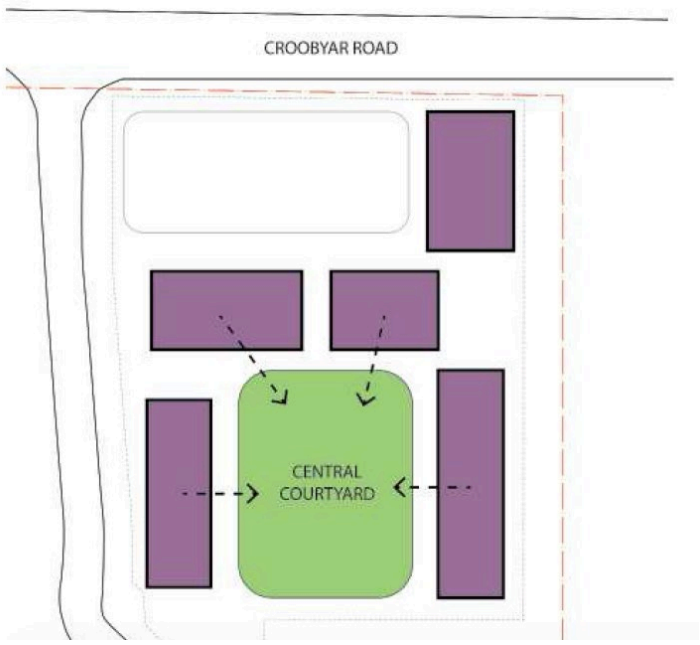


Figure 7-12 Landscape at heart of school diagram
Source: Group GSA

The proposal also features a productive garden, outdoor library and reading space, outdoor breakout spaces directly accessible from the homebases and a large COLA at the northern end of the central courtyard.

Refer to the landscape plans at **Appendix 5** for further detail.

7.1.11 Education SEPP design quality principles

Principle 1: Context, built form and landscape

The proposal's scale and materiality respond to the local context. The roof form is sympathetic to the adjacent buildings and surroundings, and the materials and colour palette are in keeping with nearby buildings, including the neighbouring sandstone heritage bakery, which is referenced in the selection of sandstone-coloured concrete.

Principle 2: Sustainable, efficient and durable

The proposal features robust, durable and easy-to-maintain materials.

ESD principles are addressed at section 7.4. Key ESD features of the proposal include:

- Protection from excess solar gain provided by deep overhangs and louvres;
- Photovoltaic panels;
- Rainwater tanks to be used for irrigation;
- Waste management considers recycling; and
- Ease of maintenance in term of the building form and the selection of materials.

Principle 3: Accessible and inclusive

Accessibility and inclusivity have been factored in from the earliest stage of the design to ensure that the building is suitable for students with differing needs and capabilities.

All homebases have been designed to cater for the full range of student needs, from the highly active with behavioural issues through to the severely physically disabled. This approach maximises flexibility when allocating students to homebases and thereby is a means of future-proofing the school.

Principle 4: Health and safety

Safety-in-design reviews have been undertaken as part of the schematic design process.

Glazing below 900mm has been avoided due to the risks associated with students breaking windows.

To ensure safety for staff, the design has considered escape routes, both from a BCA perspective and from the perspective of escaping challenging student behaviours.

Principle 5: Amenity

The existing Budawang School in Ulladulla is dated and undersized. The proposed new facility provides a purpose-built facility with high amenity that caters to the unique needs of students and staff.

Principle 6: Whole of life flexible and adaptive

The design of the school affords a variety of different spaces, including homebases that facilitate team teaching. As noted above, each homebase caters to the full spectrum of student need, allowing flexibility in how students are allocated.

The proposal also allows for redevelopment of the remainder of the site for other future educational purposes.

Principle 7: Aesthetics

The design of the school responds to the local context in terms of scale and materiality.

A series of over-sailing roofs gather the accommodation below and tie together the myriad of requirements for the individual blocks. The roofs provide a dominant aesthetic form, overlapping and stretching over the buildings while maintaining simple, clean lines. The roofs allow diffuse overhead natural light into the learning spaces and provide shading to the outdoor learning areas. The roof pitches are raised four degrees towards the central courtyard, thereby expanding the view of this central space.

Elevations overlooking the courtyard are glazed from 900mm above finished floor level to maximise opportunities for surveillance over the central courtyard from the homebases. This glazing aids the impression of the roof as a floating element.

End elevations are concrete up to 2700mm above finished floor level, creating the appearance of bookends. The gap between the concrete and the soffit is bridged by either glazing or horizontal louvres, which serve the mechanical system.

7.2 Environmental amenity

7.2.1 Overshadowing

The buildings are single storey and located at least 10m from the eastern lot boundary. As demonstrated in the mid-winter (worst-case) shadow diagrams below, the shadow cast by the proposal is contained within the lot until just before 3pm at mid-winter, which means neighbouring development to the east will be affected only marginally. The proposal will cause only marginal overshadowing to the remainder of the lot to the south, ensuring adequate solar access for any potential future school development on the lot.

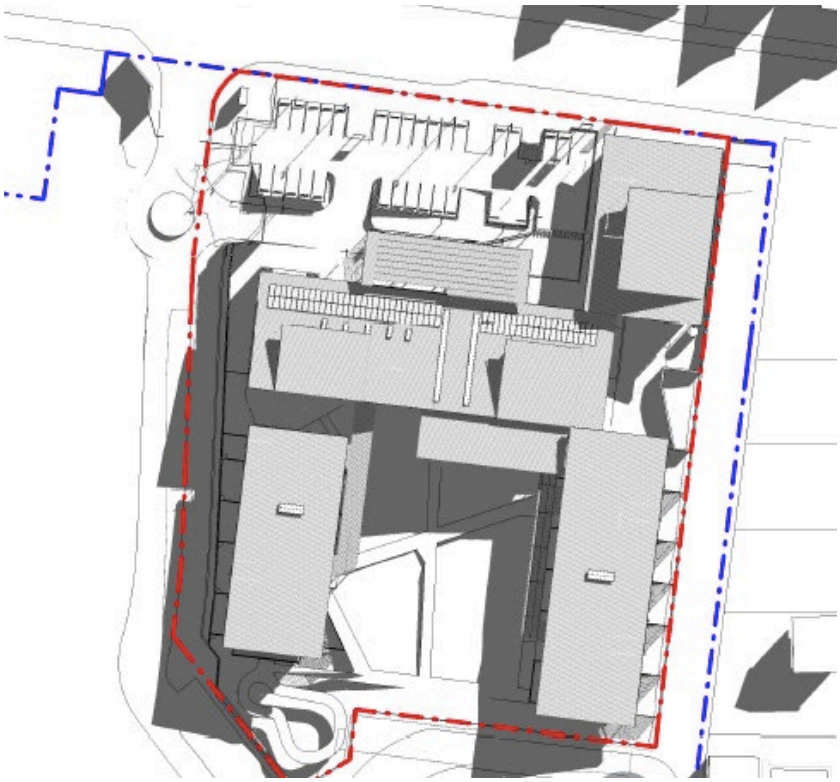


Figure 7-13 Shadow diagram – Mid-winter 9am
Source: Group GSA

Figure 7-14 Shadow diagram – Mid-winter 12pm
Source: Group GSA

Figure 7-15 Shadow diagram – Mid-winter 3pm
Source: Group GSA

7.2.2 Visual privacy

The lot adjoins a heritage store and low-density residential properties to the east. There are no known current privacy issues. The existing preschool is set back from the boundary by approximately 12m. and is shielded from the heritage store by dense screen planting. The heritage store is set back from the side boundary by approximately 17m, providing an additional buffer.

The adjoining residential properties are situated with their rear yards adjoining the school site, and their rear boundaries generally feature screen planting. The dwellings themselves are set back approximately 37m to 40m from the boundary, providing adequate privacy.

The proposal includes two new buildings near the eastern boundary with windows facing the neighbouring development, namely Block C (homebase) and Block D (hydrotherapy building). These buildings will sit approximately 13.3m and 11m, respectively, from the lot boundary, with Block C facing the residential land and Block D facing the heritage store.

The setbacks of Block C and D are generally consistent with the approximately 12m setback of the existing preschool building. Also, the setbacks are consistent with DCP's setback control for dwelling houses, which requires a 10m side setback on rural lots greater than 1ha in area. (The DCP control does not technically apply to the site but provides a useful conservative guideline.)

Given consistency with the conservative DCP control, the proposal is not likely to cause any privacy impacts on the adjoining heritage store or residential properties to the east.

Also, the majority of the trees along the eastern boundary will be retained, including all trees along the heritage store boundary, providing further privacy. The removal of trees in the area of the proposed productive garden area is not likely to have any adverse privacy impacts given the area of the trees will be replaced by a garden area, not tall structures.

No mitigation measures regarding privacy impacts have been identified.

7.2.3 View impacts

Methodology

View analysis has taken the form of a review by the planner supported by site photographs and renders of the proposal prepared by the architect. The proposal is low in scale (one storey), and there are no significant views that cross the site. Specialist analysis is therefore considered unnecessary.

Existing environment

The site is situated on rural-zoned land just outside of the Milton urban area. The surrounding area is generally characterised by low density residential uses and rural land. The site can be seen easily from Croobyar Road but is not readily visible from the broader locality. The site is not located on a ridge, knoll or other local high point, and there are no significant views identified in Council's DCP or other planning document that cross the site.

Looking south over the site from Croobyar Road, the primary visible features are the existing school grounds and the buildings on the remainder of the lot, as shown in Figure 7-17 to Figure 7-20.

The heritage and residential development to the east do not benefit from any significant views over the site to the west. As shown in Figure 7-19 and Figure 7-20, there is a thick stand of trees along the heritage store boundary that obscures views between the two sites.

During consultation conducted as part of the ACHAR (see further discussion at section 7.5 of the EIS), it was identified that views to Dithol (also known as Pigeon House Mountain) and Bhewerre Beach are of significance. The mountain is located approximately 16km to the southwest of the site, while the beach is approximately 22km to the northeast. These features, however, are not readily visible from the site or adjacent public domain. Looking southwest from the site's street frontage, Dithol is hidden by intervening land mass, vegetation and existing development, as evident in Figure 7-18. The beach to the northeast is also not visible due to intervening land mass, development and vegetation.

Figure 7-16 View locations
Source: Group GSA

Figure 7-17 View 1 – looking S from high school entry
Source: Group GSA

Figure 7-18 View 2 – looking SW from street
Source: Group GSA

Figure 7-19 View 3 – looking SE from street towards heritage store
Source: Group GSA

Figure 7-20 View 4 – looking SW along heritage store boundary
Source: Group GSA

Impacts

The proposal will introduce new built form visible from the street, but the impact will be less than significant. The built form will be single storey, consistent with surrounding development, and will not block any important view or dominate the surrounding area visually.

Any potential views from higher land to the east of the site towards Dithol and other mountains to the southwest will not be affected by the introduction of single storey built form at the site.

The proposed removal of trees and shrubs along the northern boundary may amplify the visual impact of the new built form and carpark in the short term, but the proposed landscaping will in time soften the visual appearance of the development. The tree to be retained along the northern boundary will also soften the visual appearance while the new plantings grow.

As shown in the visualisations below, the development will appear relatively unobtrusive in the visual context with its low scale with low-pitched roofs.

Figure 7-21 View of school looking towards heritage bakery
Source: Group GSA

Figure 7-22 Aerial view of school
Source: Group GSA

Figure 7-23 View of school looking across Croobyar Road from heritage cemetery
Source: Group GSA

In regards to heritage views, the proposal will not significantly affect views to or from the neighbouring heritage store or the cemetery across the street.

The proposal will not be readily visible from the heritage store given that the existing stand of trees along the heritage store boundary (i.e., tree no. 65-72 as identified in the arborist report, which are located within the heritage store property) will be retained. Also notably, the veranda of the heritage store does not face the site, and therefore views from the veranda will not be affected. Views to the heritage store from the public domain will also not be affected, as illustrated in the view at Figure 7-21.

The development will be visible when looking south from the heritage cemetery across Croobyar Road as illustrated in the view at Figure 7-23, but this view is not significant from a heritage, topographical or cultural perspective and is already affected by surrounding commercial and residential development. Views to the heritage cemetery from the public domain will not be affected.

Mitigation measures

No mitigation measures regarding view impacts have been identified.

7.2.4 Lighting

External lighting will be designed to comply with the following standards:

- AS/NZS 4282 – Control of the obtrusive effects of outdoor lighting; and
- AS/NZS 1158.3.1 – Pedestrian area (Category P) lighting – Performance and design requirements.

The lighting will give due consideration to CPTED principles and minimisation of light spillage to surrounding sensitive receivers. The following approaches will be incorporated into the external lighting design to minimise obtrusive lighting:

- Luminaire mounting heights selected to minimise spill and cater for better lighting control;
- Where possible, light fittings adequately set back from property boundary to reduce light spill;
- Light fillings with narrow beam or sharp cut of angles; and
- Light fittings with low vertical aiming angles.

7.2.5 Wind

The site is located in a rural context and is not known to suffer from any acute or unusual adverse wind impacts.

Given the low height of the proposal and lack of known current wind issues, it is considered that the proposal will not result in any unacceptable adverse wind impacts. Specialist input is considered unnecessary.

No mitigation measures have been identified.

7.3 Transport and accessibility

7.3.1 Methodology

A Traffic Impact Assessment prepared by .ptc is attached at **Appendix 6a**. The report analyses the existing transport network; assesses the potential traffic impacts associated with the proposed development during the construction and operation phases; assesses the suitability of the development's access, internal circulation and servicing arrangements; and recommends measures to ameliorate any adverse impacts.

The report utilises SIDRA analysis to determine potential traffic impacts. Traffic count surveys were undertaken on 29 October 2020.

7.3.2 Existing environment

Existing access and surrounding road network

The site access is provided via a driveway off Croobyar Road, a local road with one lane in each direction. Croobyar Road connects to Princes Highway approximately 50m to the east of the site. Princes Highway is a State road that forms the main north-south arterial connection through Milton and along the South Coast region. The surrounding road network is illustrated at Figure 7-24.

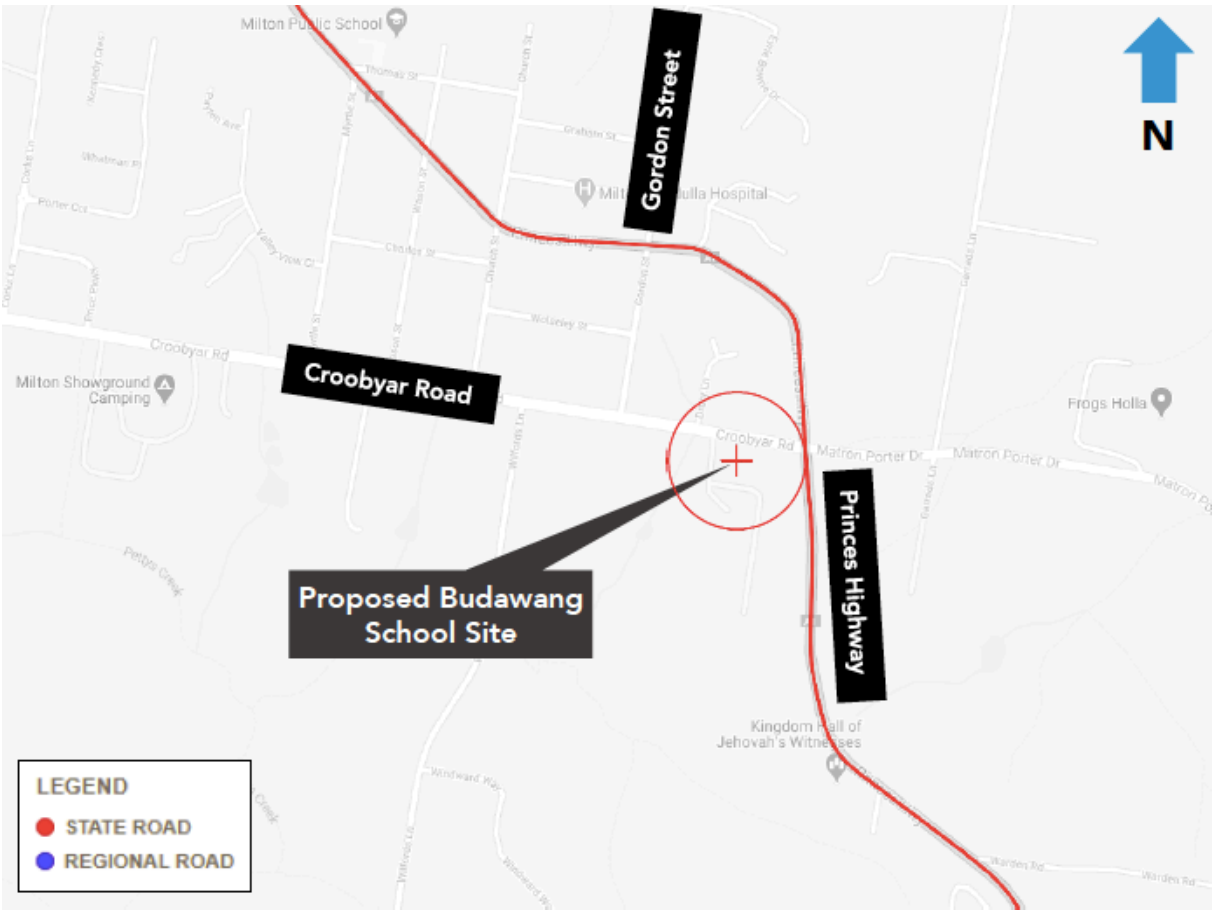


Figure 7-24 Surrounding road network
Source: .ptc

Existing traffic conditions

Traffic count surveys were undertaken on 29 October 2020 (outside school holiday period) from 7am to 10am and from 2pm to 6pm at the following intersections (illustrated in Figure 7-25):

1. Princes Highway/Croobyar Road/Matron Porter Drive;
2. Croobyar Road/Gordon Street; and
3. Princes Highway/Gordon Street.

SIDRA analysis has shown that the existing level of service (LoS) at these intersections is level B (good with acceptable delays and spare capacity) or better.

Figure 7-25 Surveyed intersections
Source: .ptc

Existing public transport

The site is currently poorly serviced by public transport, which is typical of regional areas. Only three bus services operate within 400m, 800m and 1,200m walking catchments, as shown in Figure 7-26.

The closest existing bus stop, located adjacent to the Princes Highway/Church Street intersection within the 800m walking catchment, is serviced by the 700-1 bus, which runs twice per day between Bomaderry and Eden. The other two stops are located approximately 1,200m from the site and provide limited services between Bomaderry and Burrill Lake and between Milton and Ulladulla.

Public transport is not a viable travel mode option for staff given the location of the bus stops and low level of service. It is also not a viable option for students given the school caters to students with disabilities.

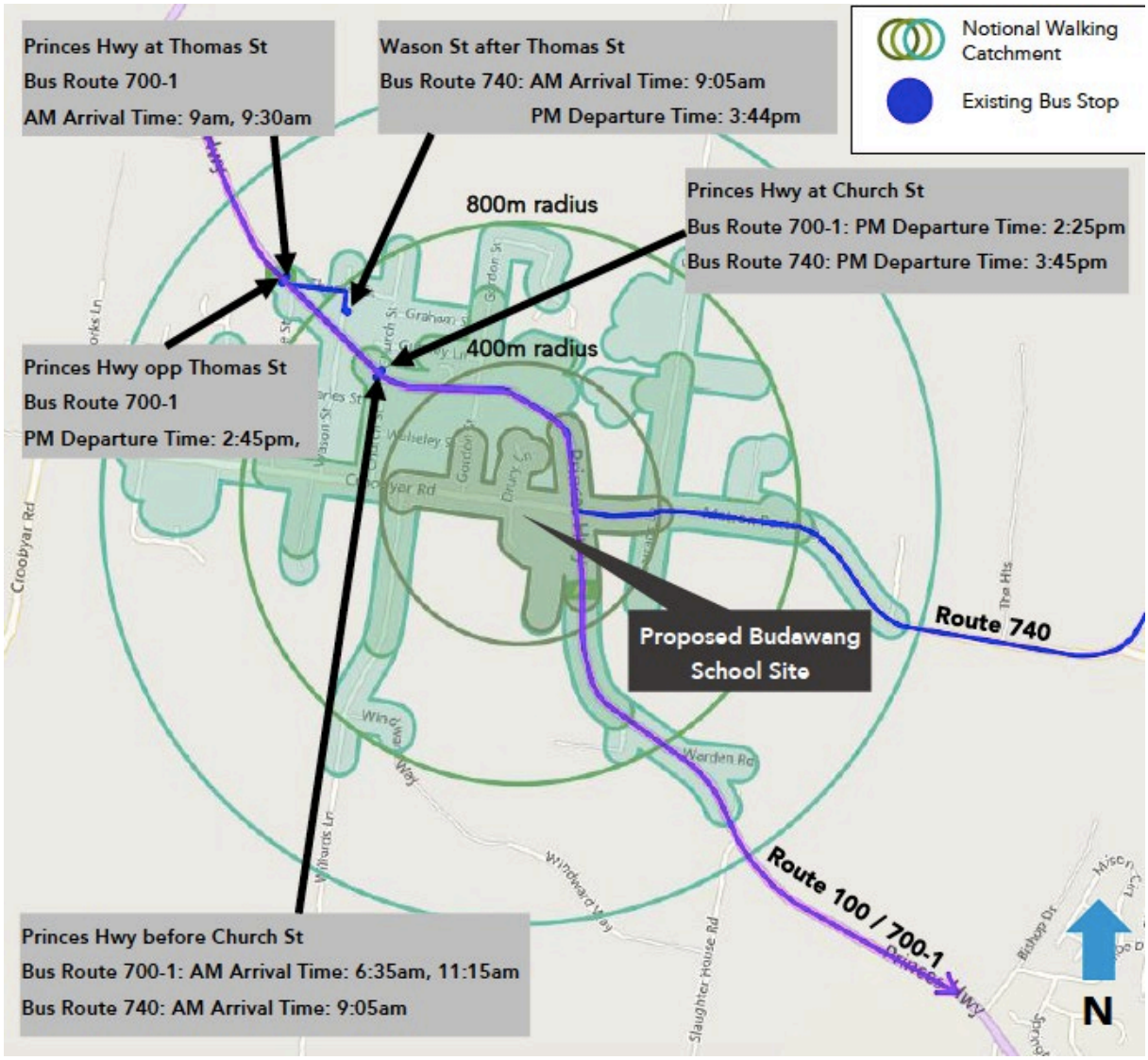


Figure 7-26 Existing public transport (bus) infrastructure
Source: .ptc

Existing pedestrian infrastructure

The pedestrian infrastructure in the local area is not well developed, which is typical of regional areas. Footpaths are provided along the Princes Highway within Milton Town Centre, but pedestrian connecting through the surrounding local roads is generally poor, with footpaths either provide on one side of the carriageway or missing. Refer to the diagram at Figure 7-27 for further detail. As shown in the diagram, there is a footpath on the northern side of Croobyar Road across from the site but no other nearby footpaths.

Given this low level of pedestrian infrastructure, walking is not likely to be a viable travel mode option for staff. Walking is also not a viable option for students given the school caters to students with a disability.

Figure 7-27 Existing pedestrian infrastructure diagram
Source: .ptc

7.3.3 Milton-Ulladulla bypass

The Milton-Ulladulla bypass is planned to be completed as part of the Princes Highway Upgrade project and is currently under investigation. The intersection of Princes Highway/Matron Porter Drive/Croobyar Road is a potential location to be investigated as part of the project. The investigation corridor is identified in the LEP as illustrated in Figure 7-28.

It is expected that the bypass will result in the reduction of traffic along the Princes Highway, as through-traffic would be diverted away from the town.

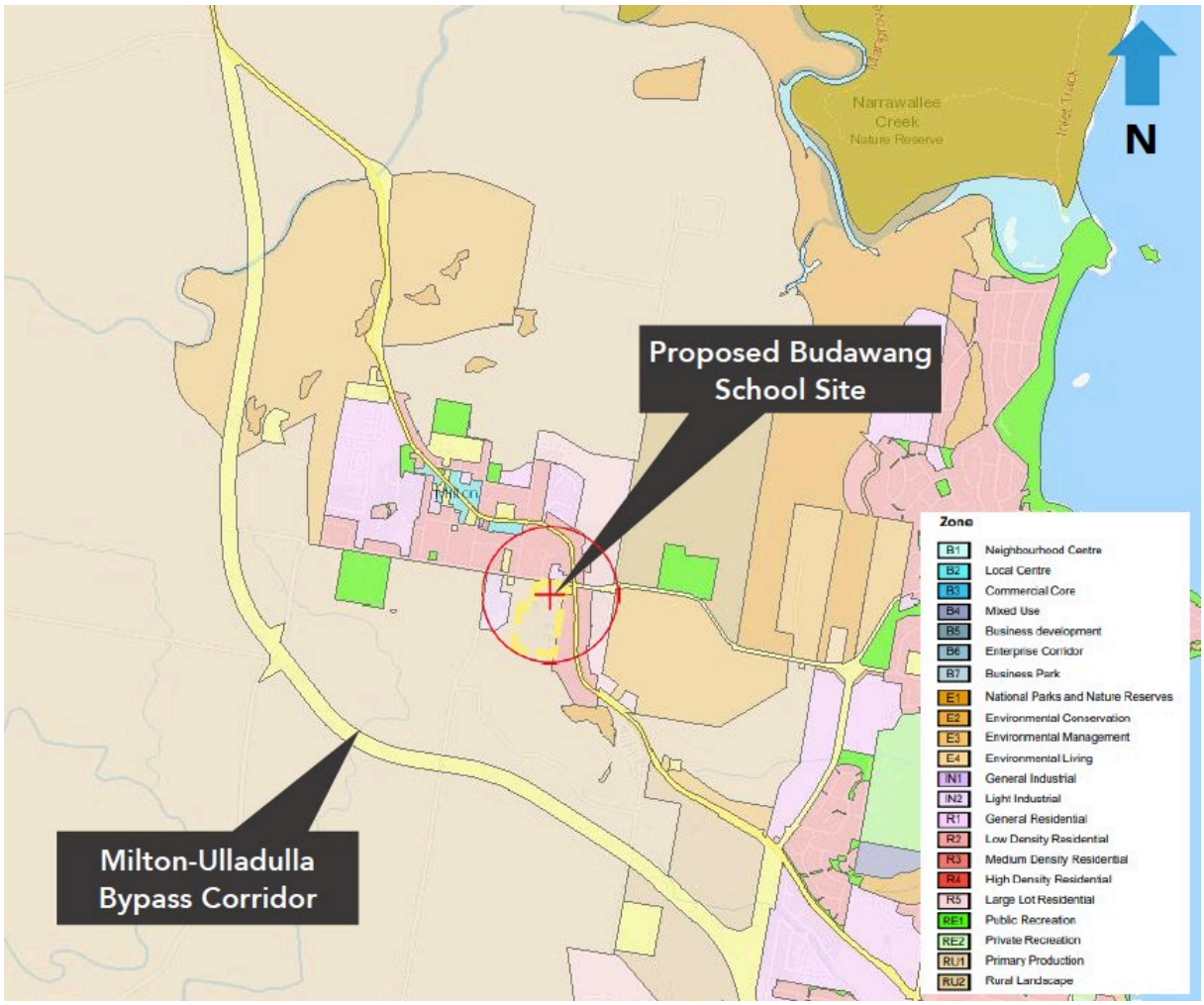


Figure 7-28 Land use map showing Milton-Ulladulla bypass corridor
Source: .ptc

7.3.4 Traffic impacts

Traffic impacts have been modelled using SIDRA to determine the proposal's potential impacts on the surrounding intersections. The modelling considers the scenario of a completed school in 2023 as well as a future 2030 scenario. The modelling results are provided in table 18 of the traffic report, and the key findings are discussed below.

In order to provide a robust assessment, the traffic modelling has not incorporated the future bypass.

Princes Highway/Croobyar Road/Matron Porter Drive

The overall LoS at this intersection is currently B (good with acceptable delays and spare capacity) in the AM and PM peak hours and is expected to remain at this level in the future.

It is noted that for the 10-year scenario, the lane utilisation of the southern Princess Highway approach was adjusted to represent a more realistic driver behaviour (i.e.,

drivers wanting to continue their journey northbound along the highway will change from the right into the left late to drive around vehicles wanting to turn right into Matron Porter Drive).
The results show that the development will have only minor impact on the overall delay and saturation of this intersection.

Croobyar Road/Gordon Street

The LoS of all turn movements of this intersection is currently A (good operation) in the AM and PM peak hours. The future scenario does not predict significant changes. The LoS for all turn movements will remain the same, and the intersection will still have a minimum 80% spare capacity in the peak hours. Therefore, the traffic impacts at this intersection resulting from the development and future background growth will be minor.

Princes Highway/Gordon Street

The through and right turn movements from Gordon Street North currently have a LoS B and C (satisfactory) for the AM and PM peak hours, respectively. The development will not change the LoS of any turn movements and no significant changes to other performance measures. There will still be a minimum of 55% spare capacity in the peak hours, and therefore the traffic impact at this intersection as a result of the development will be minor.

Taking into account the 2030 background growth, the through and right turn movements from Gordon Street North will operate at LoS D (operating near capacity) and C, respectively. However, the intersection will still operate with 55% spare capacity in the PM peak hour and 50% spare capacity in the AM peak hour. Therefore, the future growth will not significantly change the performance of this intersection.

Croobyar Road/site driveway

The LoS of all turn movements of this intersection is currently A in the AM and PM peak hours, and the LoS is not anticipated to be affected by the development or future background growth. Taking into account the future background growth, there will be approximately 80% spare capacity in the peak hours. Therefore, the traffic impact at this intersection as a result of the development and future background growth will be minor.

7.3.5 Access and circulation

The proposal will utilise the existing site access off Croobyar Road. The existing crossovers at the preschool entrance will be removed.

In order to facilitate vehicular access and egress to and from the school, an internal roundabout is proposed, which will prioritise traffic movements for vehicles exiting the new car park and help to streamline vehicular traffic between the school and any future development on the remainder of the lot.

The roundabout will lead to a car park directly in front of the proposed school. Two-way circulation will be provided within the car park, with one-way flow through the drop-off zone.

Swept path assessments have been prepared to demonstrate that B99 and B85 vehicles are able to circulate through the car park with appropriate clearances. Swept paths for heavy vehicles have also been prepared to show entry and egress by an 11.3m vehicle (the largest anticipated vehicle).

Waste collection is proposed to occur from within the shared delivery and waste collection area on the eastern end of the staff car park.

Hydrotherapy deliveries are proposed to occur from within the shared delivery and waste collection area on the eastern end of the staff car park. As some deliveries may contain chemical goods, a raised bund is required to prevent contamination of the surrounding road surfaces should any spill occur. The bund will be constructed in a form similar to a mountable median island.

7.3.6 Parking

Car parking

The proposed school provides capacity for 56 students; however, future potential expansion (under a separate approval) may allow for up to 80 students. Accordingly, the carpark has been designed to allow for a school with up to 80 students.

Total capacity of 80 students results in a minimum DCP parking requirement of 15 parking spaces (including one accessible space), three pick-up and drop-off spaces and one bus bay. The proposal provides 30 car spaces for staff (including two accessible spaces), three spaces for pick-up and drop-off, plus allocation for one bus bay (located within the Croobyar Road front), which is double the DCP's minimum requirements.

Given that the school caters to students with a disability, no students will drive and park at the school. Students will be dropped off by a private vehicle or bus, and the proposed drop-off spaces and bus bay adequately caters for these students. Accordingly, the proposed 30 parking spaces cater only to staff and potentially to community users for the pool outside of school hours. The proposed provision of 30 spaces is more than sufficient for staff given it far exceeds DCP minimum requirements as noted above. The proposed 30 spaces would also be sufficient for potential community users given they would be parking outside of school hours and as such would not be sharing the car park with staff.

The parking spaces have been assessed and found to be generally compliant with or capable of complying with the minimum requirements of AS2890.1.

Bicycle parking

Council's DCP refers to the Austroads Guidelines for recommended bicycle parking rates. Given future students will have varying levels of disability, it is not anticipated

that cycling will be a suitable method of transport for students, but it may be an option for staff and visitors. The Austroads Guidelines does not specify bicycle parking for visitors, and therefore reference is made to the NSW Planning Guidelines for Walking & Cycling. In accordance with these guidelines, the proposed school development requires one to two bicycle spaces for staff and two to four bicycle spaces for visitors. In accordance with this requirement, the proposal provides two bicycle spaces for staff and four bicycle spaces for visitors in an area adjacent to the school's main entry.

Bus stop

At the existing Budawang School approximately 40% of students arrive by minibus. To facilitate the bus service at the proposed school, an indented bus bay is proposed along the Croobyar Road frontage. A pedestrian path will provide direct access between the bus stop and the school.

7.3.7 Green travel plan

A Green Travel Plan (GTP) is attached at **Appendix 6b**. The purpose of the GTP is to outline how the development intends to make travel to and from the site safer and more sustainable. Key strategies and targets are outlined in the table below.

Table 7-1 Green Travel Plan outline

Mode	Current share	Target share	Strategies
Active transport (walking and cycling	5.3%	15%	• Pedometer-based walking programs • Green Travel Day • End of trip facilities (for staff)
Public transport	<1%	5%	• Travel access guide • Seek discussion with Council, TfNSW and local bus operators regarding additional bus services.
Car share	2.2%	5%	• Carpooling scheme
Private vehicle	91.6%	75%	NA

In addition to the above mode-specific strategies, the GTP recommends a number of general strategies for promoting and educating staff about sustainable travel, including:

- Distribute a transport access guide to all staff;
- Newsletter items and social campaigns;
- Consistent reminders through staff meetings;

- Annual review meetings to announce progress;
- Form and advisory committee involving staff;
- Annual survey;
- Regular meetings to discuss effectiveness of initiatives ;
- Update all noticeboards;
- Review and update GTP regularly; and
- Present annual monitoring review results to Council.

7.3.8 Construction traffic management

A Preliminary Construction Traffic Management Plan (PCTMP) has been prepared by .ptc and is attached at **Appendix 6c**. The report addresses the location of the work zone, site boundary, site offices, crane locations, material and waste storage area, haulage routes, construction vehicle access arrangements, heavy vehicle swept path assessment, construction hours, construction vehicle movements, construction program. Key items from the plan are outlined below.

Construction vehicle routes and access

Two options for construction vehicle access are proposed:

- Direct site access: This option involves construction vehicles entering and exiting the site via the existing driveway off Croobyar Road and the internal road. The remainder of the school lot is unoccupied, and there are no plans to occupy or develop the remainder of the lot during construction of the proposed school; therefore, this option is viable and would not conflict with any other operations on the school lot. Vehicles travelling from the north will travel southbound along the Pacific Highway, turn right into Croobyar Road and then turn left into the site. Vehicles travelling from the south will travel northbound along the Pacific Highway, turn left into Croobyar Road and then turn left into the site.

- Access through work zone: This option involves a work zone on Croobyar Road. Construction vehicles will park within the work zone while arriving or leaving the site. Vehicles travelling from the north will travel southbound along the Pacific Highway, turn right into Croobyar Road and then arrive at the work zone. Vehicles travelling from the south will travel northbound along the Pacific Highway, turn left into Croobyar Road and then park within the work zone. The work zones could be located at two different locations on Croobyar Road.

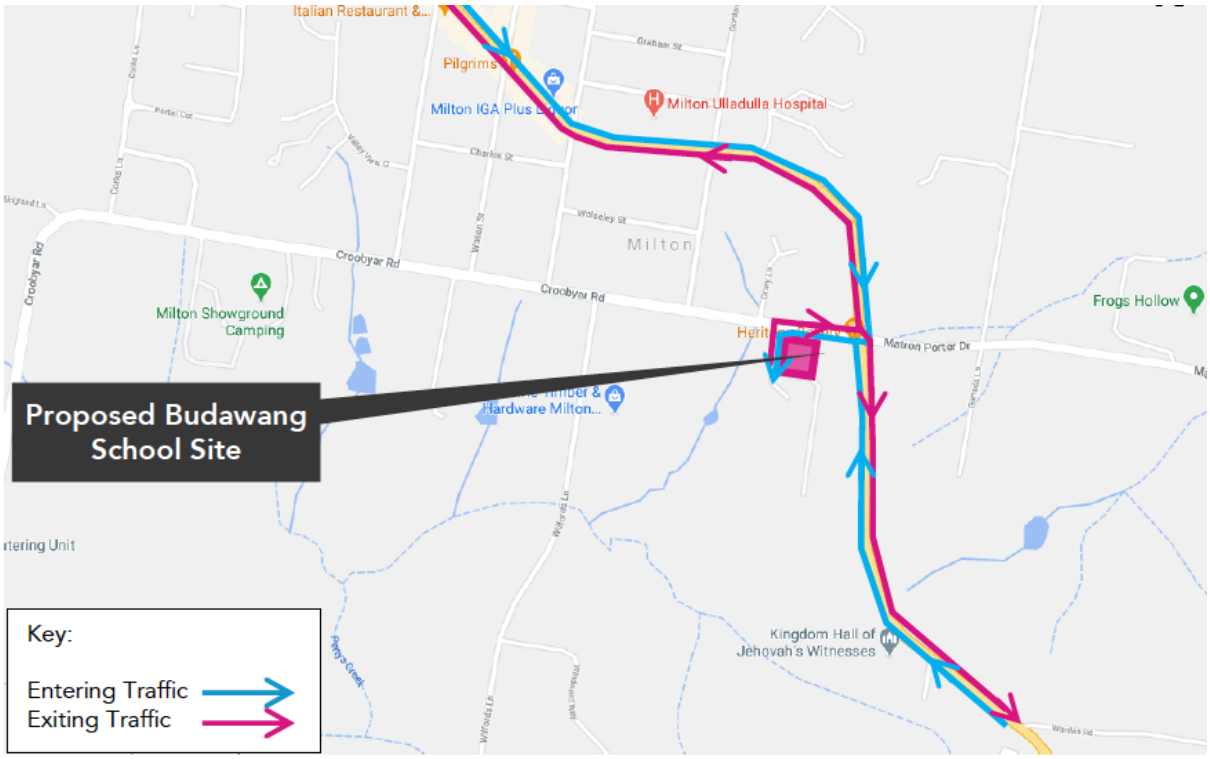


Figure 7-29 Construction vehicle route option 1
Source: ptc.

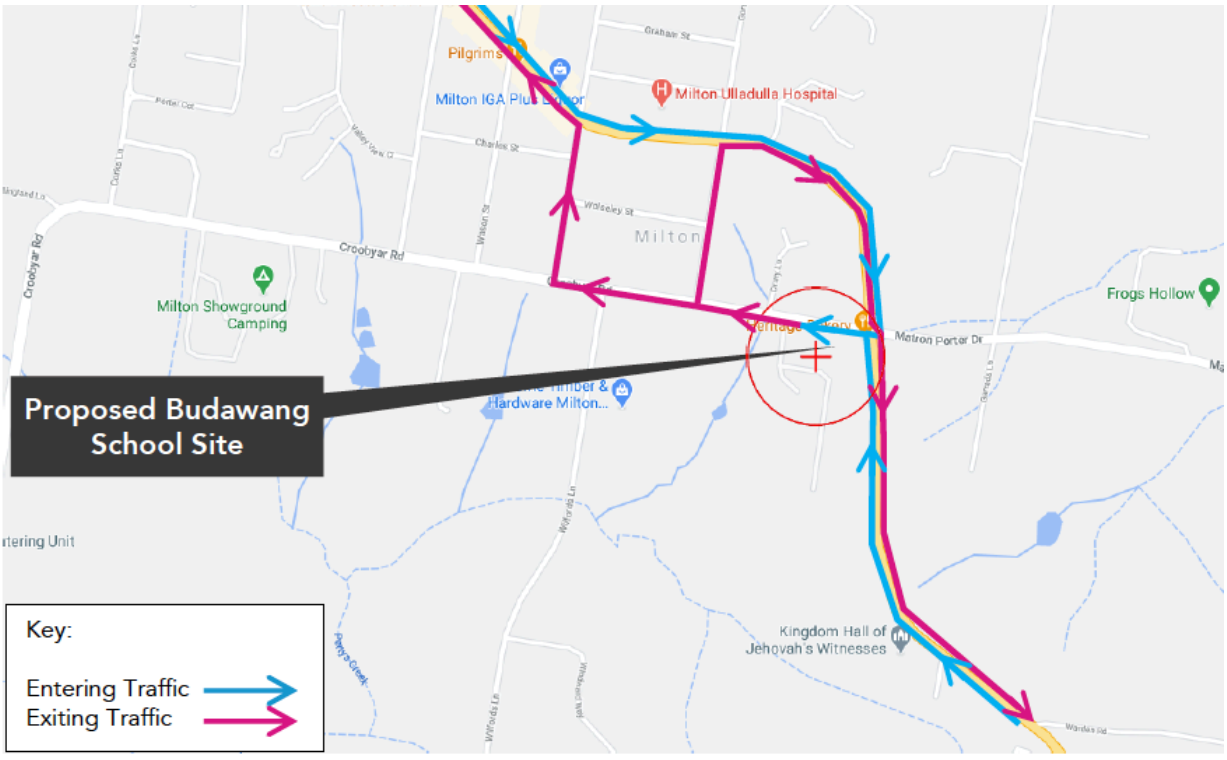


Figure 7-30 Construction vehicle route option 2
Source: ptc.

Work zones

The Option 1 vehicle access involves no work zone.

Option 2 requires a work zone along Croobyar Road, and two such zones are possible:

- A work zone at the left turn lane along Croobyar Road (near the site entry), which currently has a "no stopping" parking restriction; or
- A work zone along the kerbside parking lane of Croobyar Road, which would require the temporarily removal of eight parking spaces.

The former option is suitable if there are limited vehicles turning left into the site during construction periods. This option also has the benefit of a wider work zone that is less likely to affect through-traffic along Croobyar Road.

Traffic control measures

If the Option 1 route is used, a traffic control plan in accordance with the RMS Traffic Control at Works Site will be required to inform road users of turning vehicles into and out of the site. No traffic control plan is required for Option 2.

Pedestrian management

The general public will not be allowed into the construction area. The entire site (and any remote work areas when applicable) will be physically separated via A class fencing.

7.3.9 Mitigation measures

It is recommended that the measures in the GTP and PTCMP be implemented. No other mitigation measures have been identified.

7.4 Ecologically sustainable design (ESD)

7.4.1 Principles of ESD

There are four ESD principles defined by cl. 7(4) of Schedule 2 of the EP&A Regulation that must be considered in the assessment of the proposal. These are addressed in the table below.

Table 7-2 ESD principles assessment

Principle	Description	Comment
Precautionary principle	The precautionary principle says that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for	There are no threats of serious or irreversible environmental damage associated with the proposal. The proposal provides for a development that avoids environmental impacts where

Principle	Description	Comment
	postponing measures to prevent environmental degradation.	possible and locates new buildings generally in the location of current buildings.
Intergenerational equity	The principle of intergenerational equity says that the present generation should ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations.	The proposal seeks to maintain the environmental assets of the site by maintaining existing trees where possible and providing for appropriate management of stormwater. The proposal also seeks to improve the environmental character of the site through new and improved landscaping, and to minimise the consumption of resources where possible.
Conservation of biological diversity and ecological integrity	This principle says that conservation of biological diversity and ecological integrity should be a fundamental concern.	The proposal is generally located on cleared/developed land, thereby conserving the biological and ecological integrity of the riparian area to the west. The proposal will implement appropriate stormwater management systems and have no detrimental impact on the nearby creek or other waterways.
Improved valuation, pricing and incentive mechanisms	This principle says that environmental factors should be included in the valuation of assets and services.	The project will integrate several initiatives which aim to minimise pollution and other undesirable environmental outcomes. Contractors will be required to provide and abide by an environmental management plan which is in accordance with NSW Environmental Management Systems Guidelines or a similar standard.

7.4.2 ESD measures

The table below summarises the ESD strategies recommended for the project. The ESD report prepared by Intelle at **Appendix 30** provides detail on these strategies.

Note: The ESD report also identifies strategies "for future investigation" that may be considered as the design progresses, but these strategies do not form recommended mitigation measures under this EIS.

Table 7-3 ESD measures

Theme	Recommendation for incorporation at detailed design stage
Leadership and governance	• Set building specific environmental targets (energy, water and waste) and measure and report results • Certification of 4 Star rating under Green Star Design and As Built v1.3 • Final decisions taken during detailed design stages on major building systems such as envelope, plant equipment to be guided based on life-cycle costing and life cycle impacts • Construction contractor to implement a site specific responsible construction practices including ISO14001 Environmental Management Plan and staff Wellness program • Implementation of comprehensive • Commissioning plan in accordance with best practice standards
Energy and carbon minimisation	• Passive design • Energy efficiency • Sourcing of energy from low or zero carbon sources
Water	• Rainwater harvesting • Water efficient appliances and fittings • Water sensitive urban design • Select drought tolerant native species for vegetation and landscape
Indoor environmental quality	• Building layout and orientation • supports use of natural ventilation to maintain indoor air quality and thermal comfort • Use of low formaldehyde and low VOC products • Design of the façade that support views, daylighting
Operational waste	As per Green Star requirement
Land use, ecology and biodiversity	As per Green Star requirement.
Emissions and discharges	• Water sensitive urban design • Meet or exceed Green Star requirements
Climate resilience	Project to complete a formal climate change risks assessment and incorporate mitigation measures.

7.4.3 Assessment against accredited rating scheme

The project is seeking a formal certification under the 4 Star Green Star rating using the Design and As Built Tool v1.3. In addition to the rating tool, the project will seek to implement best practice ESD features that will support the outcomes intended by Green Star.

7.4.4 CSIRO projected impacts

Climate change projections published by NSW Office of Environment and Heritage for the Shoalhaven/Illawarra region indicate:

- By 2030 maximum temperature are projected to rise by 0.7°C and continue to rise by 1.9°C by 2070;
- Rainfall is projected to decrease in the south western region during spring and winter, and rainfall is projected to increase across the region during autumn;
- Severe fire weather is projected to increase slightly across the Illawarra during spring and summer by 2070;
- By 2030 the Illawarra is projected to experience an average of two more days per year above 35ºC and continue to rise to five more days per year by 2070; and
- By 2030 the Illawarra is projected to experience an average of 4 fewer nights below 2ºC per year and continue to decrease by 11 nights per year by 2070.

CSIRO research projected Australia's climate will experience:

- Hot days will become more frequent and hotter (very high confidence);
- Sea levels will rise (very high confidence);
- Oceans will become more acidic (very high confidence);
- Snow depths will decline (very high confidence);
- Extreme rainfall events will become more intense (high confidence);
- Southern and eastern Australia are projected to experience harsher fire weather (high confidence);
- Increasing potential evapotranspiration (atmospheric moisture demand) (high confidence);
- Tropical cyclones may occur less often but become more intense (medium confidence).

The following strategies are proposed in response to the projected impacts of climate change:

Hot days will become more frequent and hotter:

- Solar passive design /shading features such as minimising heat gains through shading and glazing selection;
- Quality of thermal construction, air leakage and building sealing to prevent hot air infiltration through the façade;
- Maintain indoor comfort conditions by the appropriate use of active and / or passive cooling;
- Landscaping, water bodies and shading provided by trees;
- Use of heat reflective paints on roof or hard surfaces to reduce heat island effect:
    - For roof pitched <15° - a three-year SRI of minimum 64 or initial SRI of minimum 82; and
    - For roof pitched >15° - a three-year SRI of minimum 34 or initial SRI of minimum 39.

Extended drought periods:

- Site wide water efficiency and water sensitive urban design;
- Selection of high WELS rating appliances;
- Use of drip irrigation and low water use species; and
- Rainwater capture and reuse on site

More extreme rainfall events:

- Consideration of increased drainage capacities to reduce flooding of roofs and hard surfaces; and
- Assessment of stormwater peak discharge for the site post development and risk of flooding.

Gustier wind conditions:

- Site orientation and layout for wind protection; and
- Assessment of façade wind loading and its impact.

Additionally, the ESD report recommends consideration of climate change projects during the detailed design phase, with an assessment of climate change scenarios and impacts on the project to be undertaken using at least two timescales relevant to the project lifespan.

7.5 Aboriginal cultural heritage

7.5.1 Methodology

An Aboriginal Cultural Heritage Assessment Report (ACHAR) has been prepared by Tocomwall and is attached at **Appendix 8**. The ACHAR has been prepared in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW 2010b) (the Code), Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW (OEH 2011) (the Guide) and Applying for an Aboriginal Heritage Impact Permit: Guide for Applicants 2011.

Note: The "study area" for the purposes of the ACHAR is the entire lot.

7.5.2 Existing environment

The study area is located on gently sloping ground to the west on the side of a low ridgeline. A non-perennial first order stream passes along the western margin of Lot 200. The nearest higher order stream is Pettys Creek, approximately 660m from the study area and 900m from the proposed development footprint.

A review of the spatial data, geology, soils and vegetation for the study area suggests that the area would have been an area of high biodiversity, and is likely to have been an important economic zone. There is potential for scarred trees to be present within the locality; however, by 1959 the study area had been completely cleared of all trees and vegetation, which would have removed any scarred trees if they were present.

There are no rock shelters, grinding grooves or known raw material sources or quarries within the study area.

During the consultation process, a registered Aboriginal stakeholder (RAP) (see further discussion below) indicated there was a campsite to the south of the study area that was subject to repeated visitation. The RAP also indicated that views from the local area to the surrounding areas is of significance.

Based on the above information, it is predicted that the site could include isolated or low density artefact concentrations. The presence of Aboriginal objects is likely to have been associated with people moving through the landscape and with procurement of resources in the area.

A pedestrian survey and visual inspection of the ground surface identified two locations within the study area likely to retain some intact natural soil profiles, as they retain some of the natural profile of the original slope. As shown in Figure 7-31, one location is at the south of the study area (outside of the development footprint) and the other is within the development footprint in the area to the south of the former preschool. Other than these two areas, the study area is classified as Category 8 (highly disturbed) land based on the soil disturbance categories used by the National Committee on Soil and Terrain. The two areas with potential extant soil profiles are classified as Category 5 (completed clearing; pasture, native or improved, cultivated at some stage).

Figure 7-31 Extant soil profile locations
Source: Tocomwall

7.5.3 Archaeological investigations

Test excavation was undertaken on 3 December 2020 in accordance with the Code. Test pits were dug in the location of the potentially extant soil profile I near the preschool, as identified in Figure 7-32.

Two lithic artefacts were identified during the test excavation. One artefact was identified as a broken flake consisting of a medial piece of silcrete. Two negative flake scars are present on the dorsal surface. A second artefact was identified as a flake derived from a quartz pebble using the bipolar reduction technique.

The results of the test excavation suggest a dispersed, low density distribution of artefacts across area. The low number of artefacts aligns with the present understanding of the archaeology of the South Coast, lowlands and hinterland, namely that artefact distributions and sites may be found anywhere within the landscape but will generally be small and consist of low numbers of artefacts if they are not associated with significant landscape features (e.g., broad open ridges with adjacent water sources and flat areas closely associated with woodlands and major river valleys).

Figure 7-32 Test pit locations
Source: Tocomwall

7.5.4 Consultation

Consultation was carried in four stages:

1. **Notification of project proposal and registration of interest:**

   In accordance with consultation guidelines, relevant bodies and known Aboriginal stakeholders were notified of the development, requesting registration of interest in the project. Additionally, a public notice was placed in the Milton Ulladulla Times on 30 September 2020. A total of 10 Aboriginal stakeholders registered their interest.

2. **Presentation of information about the project:**

   I project information pack was sent to the 10 registered Aboriginal parties (RAPs).

3. **Gathering information about cultural significance:**

   A project methodology pack was provided to each RAP On 3 November 2020. Two RAPs responded. One RAP expressed support of the methodology, and the other identified that the site is near an old campsite their family would visit and expressed interest in participating in the test pitting.

4. **Review of draft ACHA report:**

   The draft ACHAR was sent to the RAPs on 16 December 2020, and the review period ended on the 13th of January 2021. Only one acknowledgement of the report was received. After the review close date, attempts were made to contact the other RAPs by phone to see if they had any comment. Two RAPs confirmed they were satisfied with the final ACHAR.

7.5.5 Statement of significance

The two Aboriginal artefacts identified during test excavation are likely part of disperse, low density scatter that commonly occur in the locality. The artefact materials and types are a common occurrence.

From the scientific, educational, representational and rarity assessment, the site is of low significance. Due to the small amount of information that can be gained from the site, it contributes very little additional information to the understanding of the site, locality and region.

The aesthetic values of the site are of low significance due to the early farming and later development of the study area.

The site has cultural and historical value due to a nearby former campsite, its views to important landscape features in the area and its association with cultural stories.

7.5.6 Direct harm

The proposed Block C is positioned in the location of potentially intact soils. The other buildings are located in positions where the soil is in a disturbed context, and there are no surviving soil profiles. The construction of Block C will involve earthworks that are expected to disturb the remaining extant soils in the area. The works will also destroy the test pit locations from which the two artefacts were identified. The artefacts will be directly harmed and any objects that may be present in the surrounding soils will also be directly harmed.

7.5.7 Mitigation measures

The ACHAR includes the following recommendations:

- If any unanticipated Aboriginal archaeological objects, sites or potential archaeological deposits are identified during the construction program within impact footprints, works should cease immediately, and Heritage NSW is to be notified; and

- If any human remains are identified during the earthworks within the impact footprints, works should cease immediately, and the police and NSW Heritage should be contacted.

It is noted that the ACHAR also contains a recommendation to obtain an Aboriginal Heritage Impact Permit (AHIP). AHIPs, however, are not required for SSD projects, and therefore the recommendation is not relevant.

7.6 Heritage

7.6.1 Methodology

A Heritage and Historical Archaeological Report prepared by Tocomwall is attached at **Appendix 7**. The report assesses the proposal's impacts on any archaeological potential at the site and impacts on the nearby heritage items. The report is informed by desktop investigation and site inspection. Key points from the report are outlined below.

7.6.2 Existing environment

A search of the NSW State Heritage Register, Australian Heritage Database and the Shoalhaven LEP has revealed that there are no heritage items listed within the site. There are two local heritage items in the near vicinity:

- Heritage item no. 296 "Two Storey Victorian rendered masonry store", which adjoins the subject lot the east and is currently occupied by a bakery; and
- Heritage item no. 264 "Milton Church of England Cemetery", which is located to the north of the site directly opposite Croobyar Road.

The heritage store is one of the oldest buildings in the region and has considerable historical significance as a rare example of an early store. The building retains its essential character and commercial prominence in the streetscape.

The heritage cemetery was used as a burial ground between approximately 1864 and 1904 with 174 recorded burials. In the 1980s the Anglican Church sold the cemetery site, and it is claimed that the new owner destroyed all evidence of the headstones. A memorial was constructed in 1996 as memory of the early pioneers of the area that were buried at the site.

Figure 7-33 Neighbouring heritage store
Source: Tocomwall

Figure 7-34 Cemetery memorial across Croobyar Road
Source: Tocomwall

7.6.3 Archaeological impacts

The archaeological survey was carried out on the 27th of October 2020. No historical items or areas with potential archaeological deposits were identified during the survey.

The research into the history of the area together with the archaeological survey has determined that the site is unlikely to include archaeological features and deposits.

The study area has been subject to significant soil disturbance resulting from the construction of the former Anglican College.

7.6.4 Impacts on neighbouring heritage store

The proposed development sits easily within the context, and its single storey form helps to minimise any potential visual impacts upon the heritage store.

The proposed roof height of a maximum of 58m AHD is approximately the same height as the existing preschool building, meaning the proposal will cause no additional visual impact due to height.

As evident in Figure 7-35 and Figure 7-36, there is an existing row of trees along the edge of the heritage store property that block views from the store to the site. These trees, which are identified as tree nos. 65-72 in the arborist report at **Appendix 10**, are contained within the heritage store property and will not be adversely affected by the proposal as confirmed in the arborist report. Additionally, the veranda on the heritage store does not face the school grounds, meaning there will be no impact to the views from the veranda.

Figure 7-35 Looking south
Source: Group GSA

Figure 7-36 View towards site from heritage store parking lot
Source: Group GSA

7.6.5 Impacts on heritage cemetery

The proposal will not affect views to the cemetery. The proposal will be visible from the cemetery when looking south, but this view does not form any important visual link or any feature associated with the history of the cemetery. Also, the view has already been affected by surrounding residential and commercial development.

The proposal is not anticipated to have any other impacts on the significance of the cemetery.

7.6.6 Mitigation measures

The tree line along the boundary of the site and the adjoining heritage store should be maintained to help minimise visual impacts to and from the store.

7.7 Social impact assessment

7.7.1 Methodology

A social impact assessment has been undertaken using the following methodology:

- Place context analysis including neighbouring uses, access to transport and services;
- Identification and analysis of potential social impacts of the development, from the points of view of the affected community and other relevant stakeholders, i.e. how they expect to experience the project;
- Analysis of social impacts in accordance with the specific SEARs requirements and draft Social Impact Assessment Guideline 2020 for State significant projects; and
- Recommendation of mitigation measures to address identified impacts.

7.7.2 The proposal

The proposal is for the construction of a new Budawang School at the former Shoalhaven Anglican School in Milton to replace the existing Budawang School in Ulladulla.

The existing Budawang School is the only SSP serving students with acute disabilities in the southern region of the Shoalhaven LGA, with the nearest SSP, Havenlee School, situated 70km north in Nowra.

The proposal is required as the current site has insufficient capacity and inadequate facilities to fully meet student needs.

7.7.3 Locality

The proposed school is located in Milton, a small village town located in the South Coast Region of New South Wales in the City of Shoalhaven. The area of the proposed works is within the boundary of the former Shoalhaven Anglican School on Croobyar Road.

The predominate surrounding land use to the north and east is low density residential development with some commercial uses, rural lands to the south and industrial land to the west.

Based on 2016 Australian Bureau of Statistics data, the suburb of Milton has a population of approximately 1,663 people, of which 115 and 86 people attended primary and secondary school respectively. Milton has a lower proportion of people aged 0-19 years of age (20.8%) compared to the NSW average (24.5%) while the area has a significantly higher aged population with 44.5% of the population compared to 21.8% aged 60 years and over. The median weekly income for people aged 15 years and over in Milton is $542 compared to $664 in NSW.

7.7.4 Wider context

Unlike mainstream schools, SSPs are not assigned live-in catchment boundaries, meaning that students with learning and support needs are not restricted from attending SSPs outside their live-in catchments. Havenlee School, the only other SSP within the Shoalhaven LGA, is currently located 70km from the Budawang School. As such, it is necessary to consider the wider context in relation to the proposed school. Figure 7-37 shows the Ulladulla-Milton and Jervis Bay Study area, which is based on two consolidated school community groups (SCGs), with the pink dots indicating the location of students attending Budawang SSP.

Within the study area, there are eight primary schools, two secondary schools, three non-government schools and one SSP. Students with disabilities are distributed in a mix of settings across four primary schools, two high schools and the Budawang School.

The Ulladulla-Milton and Jervis Bay study area is characterised by higher disability prevalence. Disability prevalence is relatively high in the Shoalhaven LGA, with 6% of the LGA student population requiring learning support. Within the study area, this figure increases to 6.6%. Support classes across both school environments have collectively expanded by 45% from 2014 to 2019, while the number of students enrolled in support classes has increased from 243 students to 352 students during the same period.

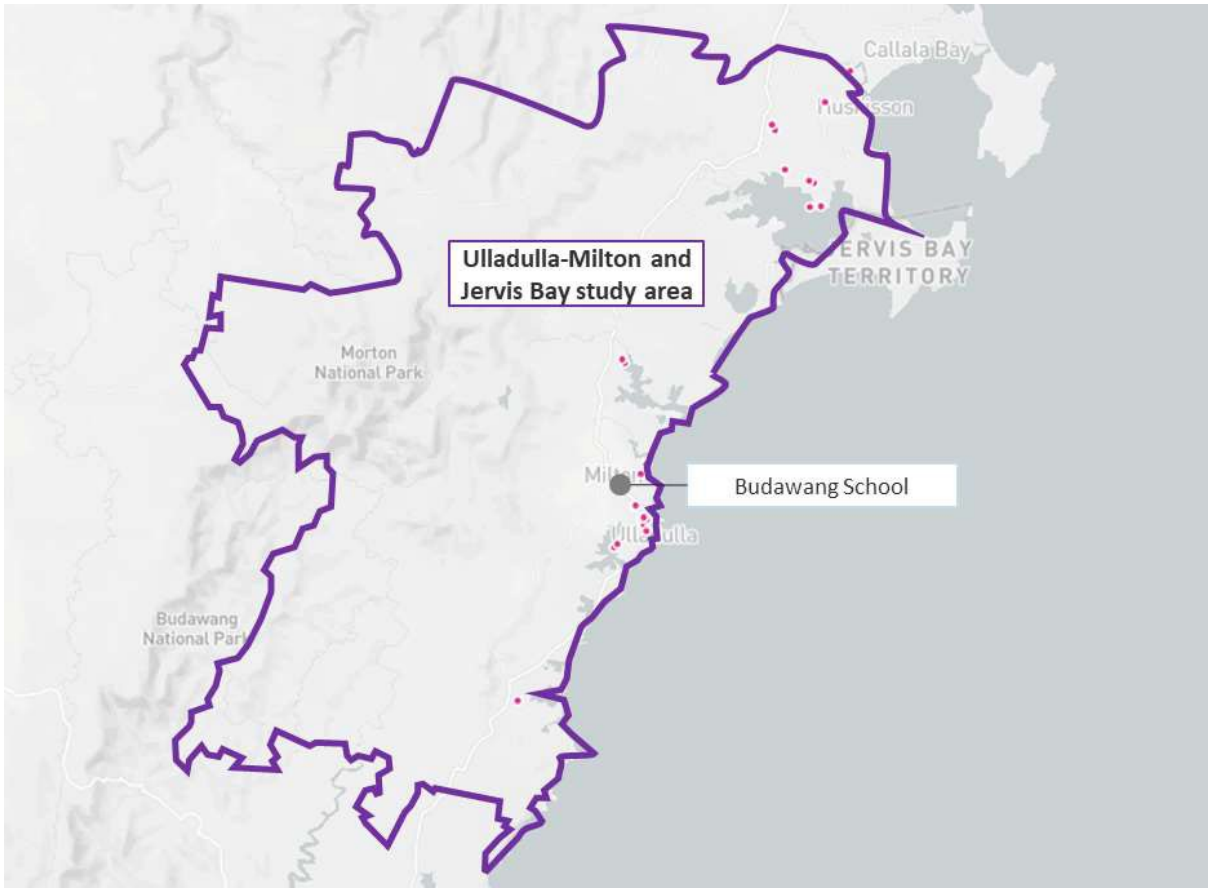


Figure 7-37 Ulladulla-Milton and Jervis Bay study area
Source: Mecone

7.7.5 Social impact assessment

The table below provides an assessment of the social impacts of the proposal.

Table 7-4 Social impact assessment

Potential Social Impact	Impact Type	Impact Level	Assessment	Mitigation measure
Way of life				
The proposed SSD will take approximately 18 months to construct	Negative	Medium	The proposal will result in temporary construction impacts including noise, vibration and transport impacts.	Ensure nearby residents and property owners are notified of construction works ahead of time in accordance with relevant legislation and construction works are conducted in accordance with the Australian standards and conditions of consent.
Increased traffic along Croobyar Road during school hours	Negative	Low	The submitted traffic assessment has concluded that the proposal will not have a significant effect on surrounding intersections.	None
Community				
The site is located at the former Shoalhaven Anglican School	Positive	Low	The school will utilise a former school site for school purposes; however, the proposal will result in new built facilities.	Future school operations should consider the use of existing buildings on site to enable greater utilisation of the site for community purposes.
The new hydrotherapy building will potentially be open outside	Positive	High	The hydrotherapy building will function as a high quality recreation and health asset for the	None.

school hours for the benefit of the community			surrounding community.	
Accessibility				
Limited public transport services to and from town	Negative	Low	Currently, 17 students at Budawang School arrive with parents or carers, and 14 utilise community transport. While none of the students currently catch a bus or walk to school, limited public transport options make students and teachers more reliant on personal vehicle transportation.	Community transport should continue as a key transport method for the school to reduce student and teacher's reliance on personal vehicle transportation.
The new site location is located in the outskirts of Milton	Negative	Low	The new Budawang School is located 5km from the existing school in Ulladulla. While the location of the school may benefit from being more centrally located within Milton, no students or teaching staff catch a bus or walk to school currently. The relocation of the school would have mixed impacts on the travel times for all students and staff, which is considered to be of minor significance given the close proximity of the two locations.	None
New hydrotherapy facility	Positive	High	A new hydrotherapy facility will significantly reduce travel time for students and staff enabling greater accessibility to the	Provide opportunities for community use outside of school hours.

			facility. It will also enable.	
Culture				
The site adjoins and is proximity to local heritage items	Neutral	Low	The proposal will result in new built form in close proximity to heritage items, but views to and from the item will remain generally unaffected as confirmed in the heritage report at **Appendix 7** of the EIS.	None
Impact on Aboriginal heritage artefacts in extant soils	Negative	Low	The proposal will result in minor impacts to extant soils and any artefacts located within those soils.	Follow the recommendations in the submitted ACHAR.
Health and well-being				
Hydrotherapy aquatic facility	Positive	High	Provision of an onsite hydrotherapy aquatic facility can generate positive health outcomes for the student cohort	None
The proposal has been designed to cater for students with acute disabilities	Positive	High	The proposal will provide a fit for purpose school which will provide improved resources to achieve optimal learning outcomes and mitigate safety and wellbeing risks.	None
Surroundings				
Ecology	Negative	Low	The proposal will result in minor tree removal but no significant ecological impacts.	None
Safety and security	Positive	Low	The proposal will increase activity in	None

			the area and allow for surveillance of the public domain.	
Adjoining residential properties	Negative	Low	Theoretically there is potential for noise and privacy impacts on the adjoining residential properties. However, the assessments undertaken as part of the EIS have confirmed the impacts would be minimal.	External noise control should be in accordance with the recommendations in the noise report.
Nearby industrial uses	Negative	Negligible	Theoretically this is potential for adverse noise and air quality impacts from the nearby industrial uses to the west. However, the acoustic and air assessments in the EIS have confirmed the impacts would be negligible.	None
Livelihoods				
Future employment	Positive	Medium	The proposed construction of the site and future employment for staff will result in 64 jobs during construction and 24 during operation.	None
Increased enrolment capacity for the Budawang SSP	Positive	High	The proposal will address capacity constraints and functional inadequacies with the existing Budawang School.	None
Decision-making systems				
Potential for community input prior to lodgement	Positive	Medium	Community consultation was carried out prior to lodgement (see	Community consultation during construction

and during assessment			section 6 of the EIS), and the community will have the opportunity to comment during the exhibition period.	

7.8 Noise and vibration

7.8.1 Methodology

An Acoustic Assessment prepared by Marshall Day Acoustics is attached at **Appendix 11**. The report assesses the impacts associated with noise emissions from the site during the operational and construction phases and noise intrusion to the site from surrounding noise sources.

A survey of background noise levels was conducted from 19 July 2020 to 25 July 2020, using a 01 dB noise logger. The selected location for the survey near the existing driveway entry has provided a suitable representation of noise levels in the local environment and nearby noise sensitive receivers.

7.8.2 Existing conditions

The school site is surrounded by Croobyar Road and low-density residential properties to the north, low-density residential properties along the Princes Highway to the east, a residential property to the west and existing school buildings to the south.

As shown in Figure 7-38, the nearest noise sensitive residential receivers are located to the east of the site, with further residential receivers to the north across Croobyar Road.

Figure 7-38 Surrounding noise receivers
Source: Marshall Day

Milton Heliport is located less than 200m to the west of the site. The heliport is used by the nearby Milton Ulladulla Hospital for emergency evacuations.

A general industrial area is also located to the west. The industrial facilities include the Ulladulla Diesel Services & Mobile Repairs Pty Ltd, Boral Concrete and McConnel Steel & Fabrication. The existing residence at 21 Croobyar Road is located between the proposed school and these industrial buildings.

7.8.3 Noise emission from school

Operational noise

Key sources of noise emissions from operation of the future school include the public address (PA) system, school bell, mechanical services, outdoor activities and additional traffic noise.

Regarding the PA system, school bell and mechanical services, detailed information is not available at this early stage of the project design. However, noise from any internal speakers will be well controlled by the building façade, and any noise emissions related from external speakers, bells and mechanical services items must

be designed and selected such that the applicable Noise Policy for Industry (NPfI) noise criteria are achieved at the residential receivers when assessed cumulatively with all other noise emissions from the school as a whole.

Regarding outdoor activities, it is assumed that noise levels from play activities will be in the order of 50 dBA at the nearest eastern residential receiver, and 44 dBA at the nearest northern and western residential receivers. Based on a subjective assessment under the Noise Guideline for Local Government, NSW Environment Protection Authority 2013 (NGLG), this noise is unlikely to be considered offensive.

Construction noise

Predicted noise levels from construction activities have been calculated, and a detailed assessment is provided in Appendix E of the acoustic report.

For all surrounding receivers, predicted noise levels from the proposed construction equipment indicate that noise from all phases of construction will be below the "highly noise affected" management levels for both "worst-case" and "average" scenarios.

For the closest receivers surrounding the site, noise from typical site preparation, bulk excavation and construction activities may exceed "noise affected" goals from the EPA criteria for both "worst case" and "average" scenarios by up to 23 dB and 13 dB respectively, while staying below the "highly noised affected" management levels.

Exceedances of "noise affected" goals are typical of construction sites in suburban areas, as background noise levels tend to be relatively low. Further, since all construction works are restricted to take place only during the daytime, noise impacts will not be experienced during the most sensitive time period (i.e., night-time).

As construction noise levels are predicted to exceed the "noise affected" goals, the site operator will need to consult and negotiate with the community. Notification should be provided of the proposed construction activities to nearby residents and non-residential receivers. The Interim Construction Noise Guideline (ICNG) recommends that, for situations in which the "noise affected" management levels are exceeded, all feasible and reasonable work practises should be adopted. Additionally, all potentially impacted residents should be informed of the nature of the works, expected noise levels and duration, as well as contact details for site representatives.

Construction vibration

The distances between the proposed school site and the residential receivers are such that even the most significant vibration generating equipment to be used are unlikely to give rise to vibration levels exceeding the criteria for the daytime period in "Assessing Vibration: A Technical Guideline". On this basis, vibration impacts are not expected to require any specific control beyond standard work practises.

7.8.4 Noise intrusion into school spaces

Traffic noise

Analysis of the measurement results indicates that the school outdoor areas are expected to achieve targets for traffic noise ingress with no mitigation required.

The analysis shows that traffic noise levels within internal spaces of Block A2 and Block B are predicted to be marginally above the recommended target levels during the busiest traffic hours with windows open, which means alternative ventilation will be required to achieve both the target noise levels and adequate ventilation.

Traffic noise levels are expected to be below the recommended noise levels at all the remaining building façades (including the façades of building blocks A1 and C).

Helicopter noise

Helicopter noise is not expected to have any significant adverse impacts on the amenity of the school.

During the long-term measurements, only one helicopter event (19 June at 00:15 am) was recorded. The maximum noise was found to be 79 dBA at the noise logger location. Based on this measured maximum noise, helicopter events can be readily controlled with closed windows and the external glazing, wall and roof acoustic performance requirements.

Industrial noise

Nearby industrial activity is not expected to have any significant adverse impacts on the amenity of the school. The environment protection licences and council conditions applicable to the industrial sites set out noise and vibration emission criteria and require that the facilities manage their operation such that the applicable criteria are achieved at the most affected nearby receiver locations. In this case, the most affected receiver is the residence at 21 Croobyar Road, located between the industrial facilities and the subject site. Compliance with the 21 Croobyar Road residence, therefore, will also mean compliance with the proposed school.

7.8.5 Mitigation measures

The following mitigation measures are recommended:

- At the detailed design stage, the PA and bell systems must be designed such that the applicable NPfI noise criteria are achieved when assessed cumulatively with all site-related operational noise emissions;
- At the detailed design stage, any noise emissions from external mechanical services items must be designed and selected such that the applicable NPfI noise criteria are achieved at the residential receivers when assessed cumulatively with all other noise emissions from the school as a whole; and

- The noise control measures detailed in Table 7 of the acoustic report should be implemented during the construction phase, and a full construction noise and vibration management plan must be prepared by the builder; and

- At Blocks A2 and B, where windows are required to be closed to control traffic noise, it may be necessary to provide alternative ventilation in the form of acoustically treated vents, mechanical driven fresh air systems, air-conditioning (incorporating fresh air) or some other design to provide fresh air to space; and

- Noise from helicopter events should be controlled with closed windows and the external glazing, wall and roof acoustic performance requirements detailed in Table 18 of the acoustic report (or an equivalent set of construction options developed during detailed design).

7.9 Biodiversity

7.9.1 Methodology

A Biodiversity Development Assessment Report (BDAR) prepared by Ecological is attached at **Appendix 9**. The BDAR includes information in the format detailed in the BC Act (s.6.7), Biodiversity Conservation Regulation 2017 (s6.8) and the Biodiversity Assessment Method (BAM). The author of the report is BAM-accredited.

The purpose of the report is to document the finds of an assessment undertaken for the project in accordance with Stage 1 (Biodiversity Assessment) and Stage 2 (Impact Assessment) of the BAM.

Key findings from the report are outlined below.

7.9.2 Existing environment

Being part of former school grounds, the site contains a mix of landscaping plants and lines of trees bordering driveways and car parks. The arrangement and structure of vegetation indicate the vegetation is not naturally occurring but rather has been planted for landscaping purposes.

While the species of trees and shrubs are predominantly Australian natives, many are not native to the region (e.g., Brush Box, whose natural distribution is coast and ranges north from the Hunter Valley). Additionally, there are exotic trees and shrubs interspersed among the natives.

The planted vegetation areas are shaded pink in Figure 7-39.

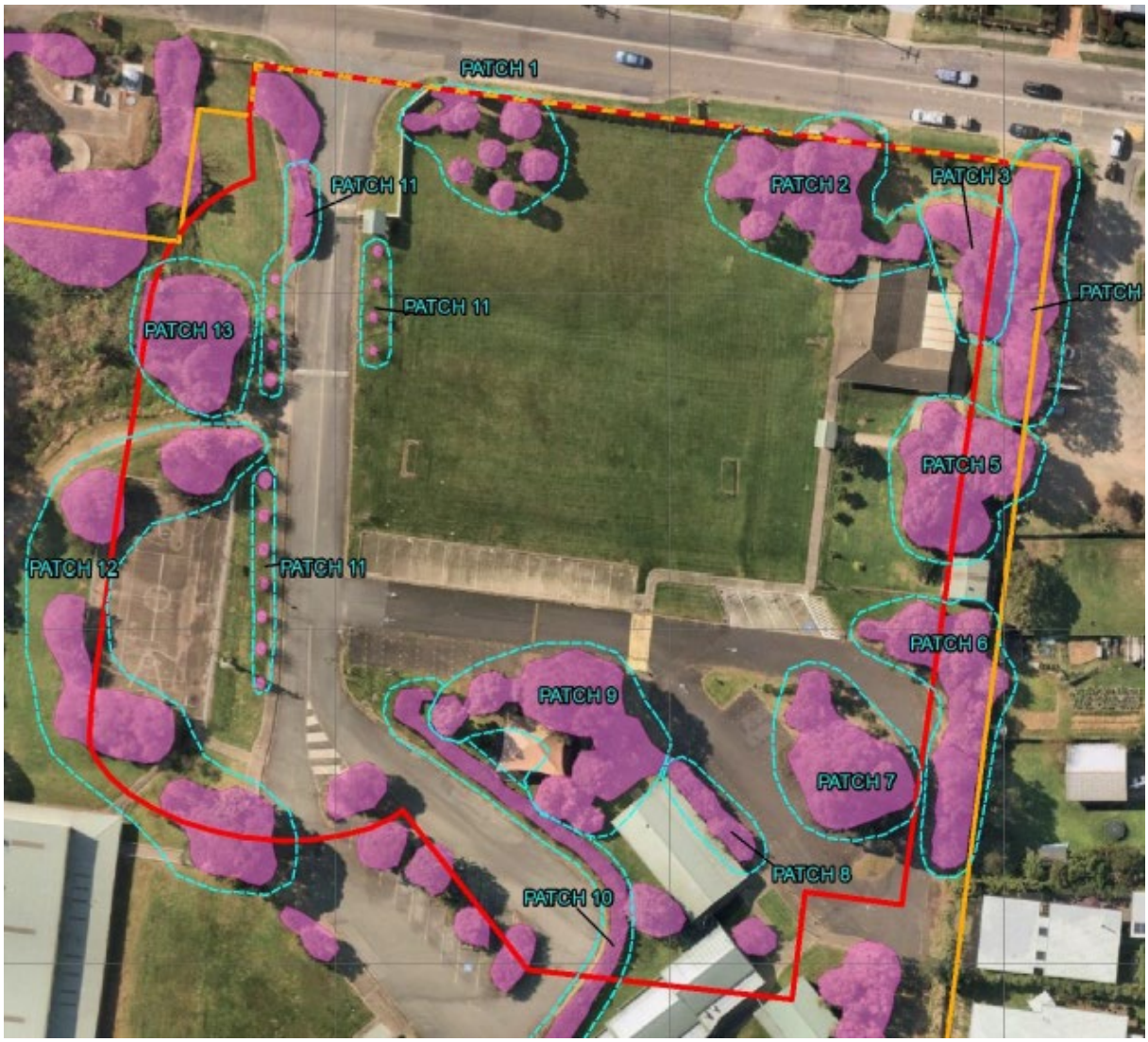


Figure 7-39 Planted vegetation diagram
Source: Eco Logical

Given the vegetation type, it was determined that the BAM streamlined assessment module for planted native vegetation is appropriate for the BDAR. Developments assessed under the streamlined module are not required to assess native vegetation, identify plant community types (PCTs) and threatened ecological communities (TECs), determine the vegetation integrity score for native vegetation on the site or assess the suitability of habitat for threatened species.

7.9.3 Impacts

Direct impacts

The proposal will result in the removal of 0.15 ha of planted native vegetation, which cannot be assigned to any PCT.

Impacts on threatened species and their habitat

The proposal's impacts on threatened species and threatened species habitat include:

- Removal of 0.15ha of planted native vegetation that may provide foraging habitat for the Grey-head Flying-fox; and
- Demolition of two abandoned buildings (preschool and shed) that may provide habitat for several species of microbat.

A test of significance was carried out for the Grey-headed Flying-fox, and it was determined that the proposal is unlikely to result in a significant impact to this species.

Upon investigation of the two buildings to be demolished, no evidence of microbat use was observed, suggesting no individuals are using the two buildings for roosting.

Serious and irreversible impacts

There are no candidate entities for serious and irreversible impacts within the site.

Impacts requiring offset

There are no impacts associated with the proposed development that require offsets as specified for planted native vegetation streamlined assessment module.

Indirect and prescribed impacts

The proposal will result in potential indirect impacts including inadvertent impacts on adjacent habitat or vegetation; reduced viability of adjacent habitat due to edge effects; reduced viability of habitat due to noise, dust or light spill; transport of weeds and pathogens from the site to adjacent vegetation; and loss of breeding habitats. Due to the highly modified nature of vegetation both within and adjacent to the site, these potential indirect impacts are not considered to be significant.

The proposal will not have any prescribed impacts (i.e., impacts unrelated to clearing of vegetation). As noted above, the two abandoned buildings do not contain any signs of habitation by microbat.

7.9.4 Mitigation measures

The BDAR recommends the following mitigation measures to manage potential impacts:

- Clearing protocols should be established to minimise damage to soil and retained vegetation (e.g., use of chainsaw in place of heavy machinery);
- Daily timing of construction activities is recommended to be accordance with Table 1 of Interim Noise Guidelines (2009);

- Construction should only occur during daylight hours, and night lights will not be used;
- Dust suppression measures should be implemented;
- The riparian area on western edge of the development site should be fenced to prevent entry;
- All machinery/equipment should be cleaned prior to entering/exiting the property;
- Future weed infestations should be managed/removed by a qualified Bush Regenerator; and
- All staff working on the development should undertake an environmental induction as part of their site familiarisation, and site briefings should be updated based on phase of the work.

Additionally, general recommendations regarding protection of existing trees are provided in the arborist report in Section 7.3 and 7.4 of the arborist report at **Appendix 10**.

7.10 Tree removal

7.10.1 Methodology

An Arboricultural Impact Assessment Report is attached at **Appendix 10** of the EIS. The report identifies the species, location dimension, condition and significance of the site's trees, and assesses the impacts of the proposed works on each tree. The report also includes tree protection zones (TPZs) and protections specifications for the trees to be retained.

7.10.2 Existing environment

The site contains a number of trees, all of which appear to be landscaped specimens rather than remnant vegetation. The arborist has assessed a total of 81 trees located in or near the site.

The assessed trees range in height from 6m to 27m. (Note: There are a number of lower trees or shrubs on the site, but approval is not required for removal of a tree less than 5m in height).

The majority of the trees on the site are Australian natives; however, as noted in section 7.9 of the EIS, the trees are generally not native to the local area.

7.10.3 Impacts

The proposal seeks approval for removal of 53 trees. The trees to be removed are either located within the building footprint or will be subject to major encroachment by the proposed works. The trees to be removed are identified in the tree

management plan at Figure 7-40. A full-size version of the plan is attached at **Appendix 5** of the EIS.

The report notes that trees 23-31 within the footprint of the proposed batter cut/ excavation are of sufficient significance for retention and require a design modification to remove the excavation within the structural root zone. As a consequence the design of the Productive Garden area, where these trees are located has been modified to include a retaining wall structure, reflecting the RL of the existing ground level, which will ensure there is no impact on the root zone of these trees.

Where trees are to be retained, their soil levels are to be maintained.

Figure 7-40 Tree removal plan
Source: Group GSA

7.10.4 Mitigation measures

Sections 7.3, 7.4 and 8.0 of the arborist report recommend a number of mitigation measures for ensuring the protection of the trees to be maintained, including:

- Site induction for all workers regarding tree protection and engagement of a project arborist are required prior to commencement of works;
- Tree protection measures must be implemented during demolition and construction, with the final design of the measures subject to work methodology and final design;
- The tree protection zones (TPZs) must conform to the following:
    - Soil levels within the TPZs must remain the same, with any excavation within a TPZ to be specified and allowed for by the project arborist;
    - Materials or structure are not to be stored in the TPZs;
    - No fires are permitted within TPZs;
    - All drainage runoff and sediment must be prevented from entering the TPZs;
    - No activity that will cause excessive soil compaction is permitted within the TPZ;
    - No site sheds or similar are permitted to be located in a TPZ unless approved by the project arborist;
    - No construction work or related activity is permitted within the TPZ;
    - No part of any tree to be retained may be used as an anchorage point;
    - Any excavation work within a TPZ must utilise methods to preserve root systems intact and undamaged, with any unearthed root greater than 50mm in diameter to be assessed and advised on by the project arborist;
- Assessment and documentation by the project arborist must be undertaken at three stages of the project, namely:
    - Pre-demolition: Installation of protection measures;
    - During construction: For any further works required in the TPZs; and
    - During construction: For any crown modification including pruning or root disturbance.

7.11 Stormwater drainage

7.11.1 Methodology

A Stormwater Management Report and concept stormwater plans prepared by Intelle are attached at **Appendix 13** and **Appendix 14**, respectively. The report utilises DRAINS software to determine pre- and post-development flows and MUSIC modelling to estimate pollutant removal.

7.11.2 Impacts

Stormwater will be captured by a series of pits and pipes draining into a stormwater treatment system followed by an on-site detention (OSD) tank located half under Block A before connecting to the existing 750mm diameter stormwater pipe that discharges under the existing access road and into the natural watercourse. The OSD tank has been designed to match the post-development peak flow with the pre-development peak flow in accordance with Council's DCP.

The proposed treatment train will protect against the risk of excessive pollutants entering downstream habitat. The first element along the train will be rainwater tanks for the two homebases. The captured rainwater will be used for toilet flushing and irrigation. These tanks were not modelled in MUSIC, giving a more conservative result in terms of pollutant removal.

Ocean Protect pit baskets will be installed in surface inlet pits around the site. These pit baskets will capture a large portion of gross pollutants, large sediment particles and organic matter.

Ocean Protect Stormfilter cartridges will be installed within the OSD tank. This secondary device will capture the majority of the nutrients (phosphorus and nitrogen) picked up from the site.

The MUSIC modelling results demonstrate that the proposed treatment train will meet Council and GreenStar targets for pollutant reduction.

7.11.3 Mitigation measures

Implementation of the proposed stormwater system will ensure adequate capture and treatment of stormwater. No additional mitigation measures are required.

7.12 Bushfire

7.12.1 Methodology

A Bushfire Protection Assessment is attached at **Appendix 22**. The author of the report is a Fire Protection Association Australia Bushfire Planning and Design Level 3 Certified Practitioner.

The report addresses bushfire hazard and the requirements for special fire protection purpose development as detailed in Planning for Bush Fire Protection 2019 (PBP).

Note: A school is a special fire protection purpose under section 100B of the *Rural Fires Act 1997*. Schools affected by bushfire hazard are generally required to obtain a bush fire safety authority (BFSA) from the Rural Fire Service and are also "integrated developments" under section 4.45 of the EP&A Act. However, SSD projects are exempt from requiring a BFSA and are not integrated development.

7.12.2 Existing environment

The predominant vegetation affecting the proposed development is within the riparian corridor to the west, as shown in Figure 7-41. This vegetation is not mapped as bush fire prone but is capable of supporting bushfire. The riparian corridor is approximately 15-50m-wide and contains a mix of exotic (water lily, common reeds) and native species (casuarinas, acacia and eucalyptus). The vegetation has been classified as "low hazard" vegetation in accordance with Section A1.11.1 of PBP.

Low hazard vegetation uses "rainforest" setbacks and construction levels as a surrogate for reduced fire behaviour expected from small/narrow areas of vegetation. The effective slope under this vegetation falls under the PBP slope category of ">0-5 degrees downslope".

Figure 7-41 Bushfire hazard assessment
Source: Eco Logical

7.12.3 Asset protection zone (APZ)

The development is required to provide a 47m-wide APZ as shown in Figure 7-41. It has been found that the proposal complies or is capable of complying with the required APZ, in particular:

- The proposed building layout allows for a suitably wide APZ (i.e., 47m) such that radiant heat levels of greater than 10kW/m2 (calculated at 1200K) will not be experience don any part of the building;
- The APZ is located on land with a slope less than 18 degrees;
- The APZ can be managed in accordance with PBG protection and is located wholly within the lot; and
- There are no structures within 6m of the proposed development.

7.12.4 Other considerations

The required building construction standard is based on the determination of the bushfire attack level (BAL). Based on the vegetation type, effective slope and managed separation distance, the proposal is exposed to BAL-12.5, and the development should be constructed accordingly.

PBP requires that landscaping is managed to minimise flame contact and radiant heat to buildings, and the potential for wind-driven embers. The proposed landscaping is capable of being managed in accordance with PBP.

The proposal complies with or is capable of complying with the requirements for access, water supplies and electricity services set out in PBP.

7.12.5 Mitigation measures

The following bushfire protection measures are recommended to ensure compliance with PBP:

- A 47m-wide APZ should be provided as detailed in Table 3 and Figure 2 of the bushfire report, and the APZ is to be maintained in perpetuity to the specifications detailed in Appendix A of the bushfire report;
- Any future landscaping must meet the requirements of PBP listed in Appendix A of the bushfire report;
- The proposal is to be constructed to BAL-12.5 based on the construction specifications detailed in either AS 3959-2018 or the NASH standard, including additional ember provisions detailed in section 7.5 of PBP as required;
- Access to the site must meet the standard summarised in Table 6 of the bushfire report;
- Reticulated supply must meet a PBP acceptable solution specifications for a subdivision;

- Electricity supply is to be located underground;
- Gas services are to be installed and maintained in accordance with AS/NZS 1596:2014;
- A bushfire emergency management and evacuation plan is to be completed prior to occupation of the building.

7.13 Flooding

7.13.1 Methodology

Flood Advice is attached at **Appendix 15**. The advice provides specialist advice regarding potential flood risk at the site.

A hydrological modelling tool (XPRAFTS) was utilised to estimate the peak flow in the unnamed creek on the site, and a hydraulic modelling tool (DRAINS) was utilised to provide an indicative estimate of the flood levels.

7.13.2 Existing environment

The site generally slopes from east to west with a high point of 52.5m AHD and a low point of 47.5m AHD. A shallow depression runs through the site from east to west, and there is an unnamed creek running through the eastern part of the lot, flowing from north to site. The creek has a catchment area extending approximately 10ha to the north of the site and discharges to Pettys Creek, approximately 1km to the south of the site.

Hydrological modelling has estimated the peak flow in the unnamed creek for the 1% annual expected probability (AEP) event to be 8.1m^3 per second.

Hydrological modelling has estimated the peak flood levels for the 1% AEP event at the upstream end of the creek (near Croobyar Road) to be approximately 47m AHD and have a depth of approximately 0.5-1m. The depth of flow here is expected to also be indicative of depths in the creek further downstream.

The flood planning level (1% AEP event plus 0.5m freeboard) is approximately 47m AHD at the site.

7.13.3 Impacts

The site is relatively high (minimum level of approximately 47.5m AHD) when compared to the flood levels (maximum approximately 47m AHD). The proposed development is therefore expected to remain largely unaffected by flooding.

Also, given the relatively small catchment (10ha) and general site topography, it is not expected that any significant issues related to flood evacuation would be experienced, even in larger events such as the probable maximum flood. Evacuation would be available to the Princes Highway from the north eastern corner of the site if necessary.

A preliminary assessment has been undertaken to assess the impacts of increases in rainfall intensities due to climate change. It has been found that the increased intensity would result in minor increases in flood levels of less than 0.1m. This increase is insignificant in relation to the proposed development. Furthermore, given the site's elevation, future sea level rise will have no effect on flooding for the site.

7.13.4 Mitigation measures

The flood advice letter specifies that the overland flows currently conveyed in the existing east/west depression will need to be accommodated in the proposed civil and stormwater design. The proposed stormwater system (see civil drawings at **Appendix 14**) has been designed to accommodate the overland flow, and therefore additional mitigation is not required.

The flood advice suggests that a flood impact assessment be prepared if any significant cut/fill is proposed along the western edge of the site. As shown on the bulk earthworks plan at **Appendix 14**, the western boundary be manipulated primarily by fill, except for the area of the roundabout, which will be cut by up to 0.4m. The extent of cut is not considered significant, and therefore a flood impact assessment is unnecessary.

7.14 Soils and water

7.14.1 Impacts on groundwater

A Report on Desktop Surface Water and Groundwater Assessment is attached at **Appendix 18**. Key findings from the report are outlined below.

Borehole drilling conducted as part of land contamination investigations (described at section 7.16 of the EIS) included consideration of groundwater levels. Groundwater seepage was observed at depths of 3.5m, 3.4m and 2.7m in Bores 101, 104 and 107 respectively. No free groundwater was observed in the remaining boreholes during excavation.

Based on the observed groundwater levels during the borehole drilling and the proposed design, groundwater interaction during the proposed works is not anticipated. It is noted that groundwater levels can fluctuate, though it is unlikely that such fluctuation would cause interaction with the proposed works. As such, the proposed excavations are considered to have a minimal, if any, impact on the local groundwater regime.

The proposed works would necessarily disturb the surface soils at the site and temporarily increase the likelihood of impacts to the adjacent tributary and associated riparian area. The potential impacts are associated with increased traffic during works; spoil generation and management; sewage and stormwater control; vehicle and plant emissions; erosion and sediment control; and waste management requirements.

However, these potential impacts are typical of development works of this nature and able to be readily minimised and controlled through standard construction management measures. No special mitigation measures are required.

7.14.2 Sediment and erosion control

A sediment and erosion control plan is attached at **Appendix 14**. An extract is provided at Figure 7-42.

The sediment and erosion control measures will be implemented during construction. The design of these measures will be in accordance with the Managing Urban Stormwater – Soil & Construction Volume 1 (Landcom, 2004).

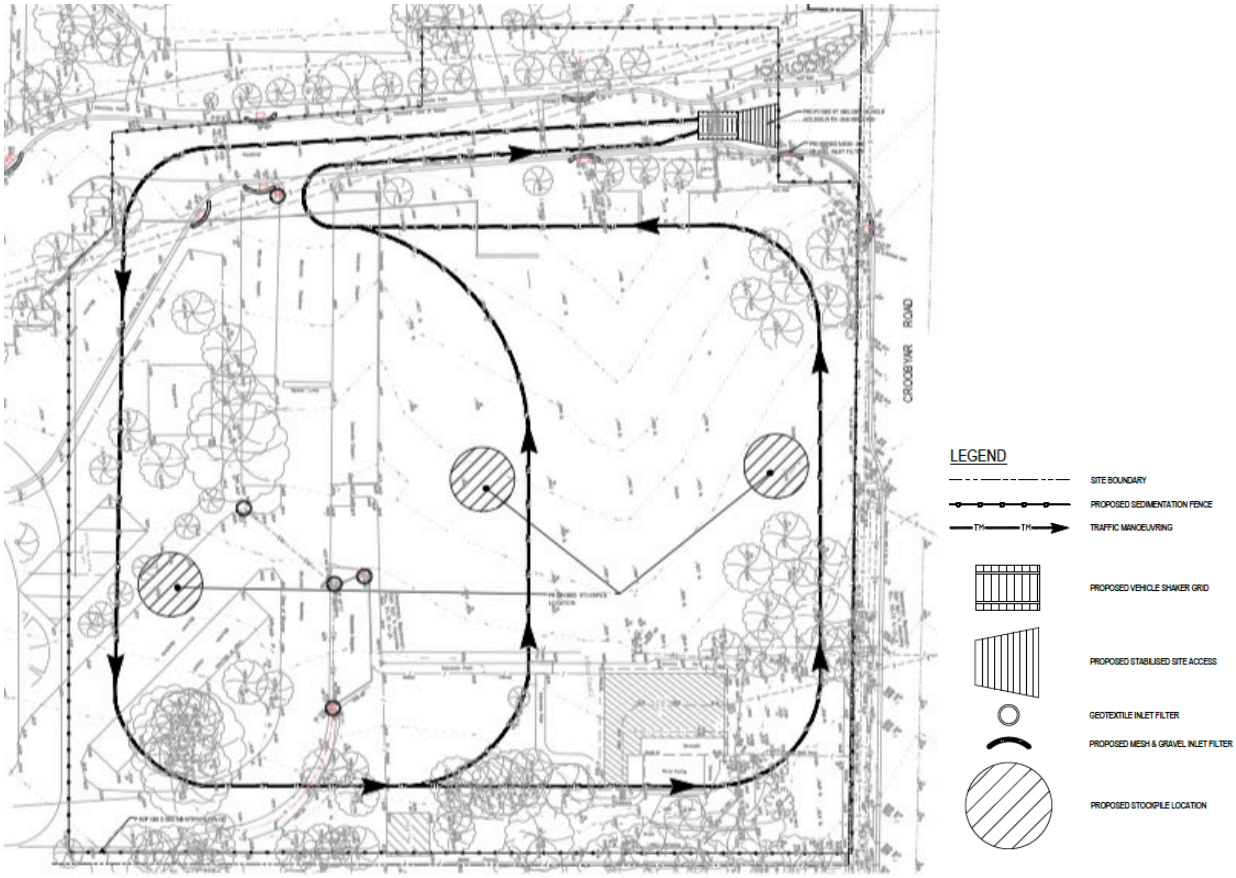


Figure 7-42 Sediment control plan extract
Source: Henry & Hymas

7.14.3 Salinity

A Salinity Investigation and Management Plan is attached at **Appendix 19**. The plan presents the results of borehole drilling and sampling followed by laboratory testing. Key findings from the investigation are outlined below:

- The site is classified as "mildly aggressive to concrete" foundations and piles and "non-aggressive to steel";
- The soils underlying the site are classified as "non-saline to slightly saline";
- Sodicity tests show non-sodic to highly sodic soils, indicating potential for erodibility if soils are left exposed.

In conclusion, the investigation notes that the mild aggressivity to concrete, presence of some slightly saline soils and the highly sodic soils are naturally occurring features of the local landscape and are not an impediment to development. Site-specific management of saline soils is not required. Compliance with the durability requirements of AS2159:2009 and AS36000:2018 will adequately manage any risk.

7.15 Waste

7.15.1 Demolition and construction waste

A Construction and Demolition Waste Management Plan is attached at **Appendix 20**. The expected waste volumes during the demolition and construction stages are identified in the table below.

As seen in the table, a large percentage of demolition and construction waste will be covered through reuse or recycling rather than sent to a landfill.

Table 7-5 Demolition and construction waste details

Material type	Demolition waste		Construction waste	
	Approx. volume (m^3)	Approx. % recovered	Approx. volume (m^3)	Approx. % recovered
Excavation material	84	99.8%	0	99.8%
Green waste	17	80%	0	80%
Bricks	16	100%	0	100%
Tiles	3	100%	0	0%
Concrete	4	100%	7.5	100%
Timber	3	33%	1.68	33%
Plasterboard	2	50%	0.8	0%
Metals	2	100%	4	100%
Asbestos	0	0%	NA	NA
Other	0	0%	0	0%

7.15.2 Operational waste

An Operational Waste Management Plan is attached at **Appendix 21**. The report considers the proposal's waste generation, bin requirements, waste rooms and collection arrangements.

The predicted waste generation of the proposal is outlined in the table below.

Table 7-6 Operational waste details

Waste type	Waste generation	Required bins	Collection frequency
General waste	1,440L/week	6 x 240L	1 per week
Recycling	730L/week	3 x 240L	1 per week
Sanitary waste	720L/week	3 x 240L	1 per week

The waste room is located in at the northeast portion of the carpark near the loading bay, as shown in Figure 7-43 and Figure 7-44. The room is sized to accommodate the required 12 bins.

A private waste collection contractor (or Council's commercial collection service) will be engaged to service the waste, recycling and sanitary bins per an agreed schedule.

On the day of service, a private waste collection vehicle will enter the site from Croobyar Road and park in the loading bay. The waste collection staff will collect the bins directly from the bin room. The groundskeeper will provide the driver with access to the bin room. Once the bins are serviced, the collection vehicle will exit the site onto Croobyar Road in a forward direction.

It is recommended that the proposal comply with the waste management measures contained in the waste management plan. No other mitigation measures have been identified.

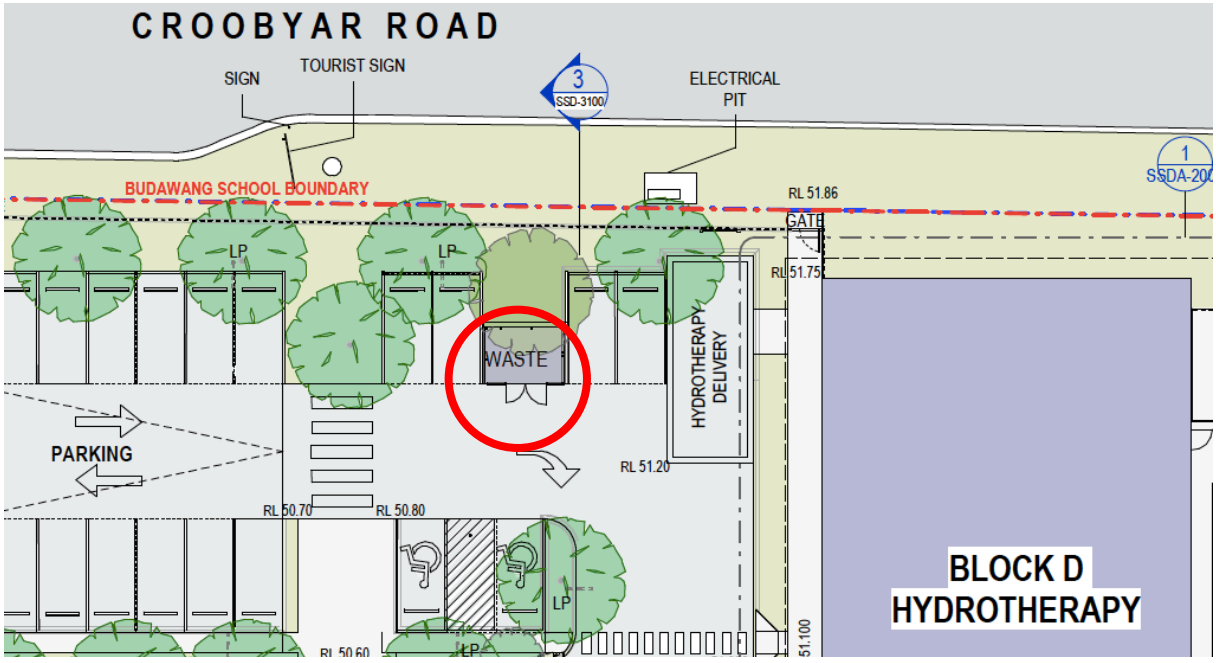


Figure 7-43 Waste room location
Source: Elephants Foot

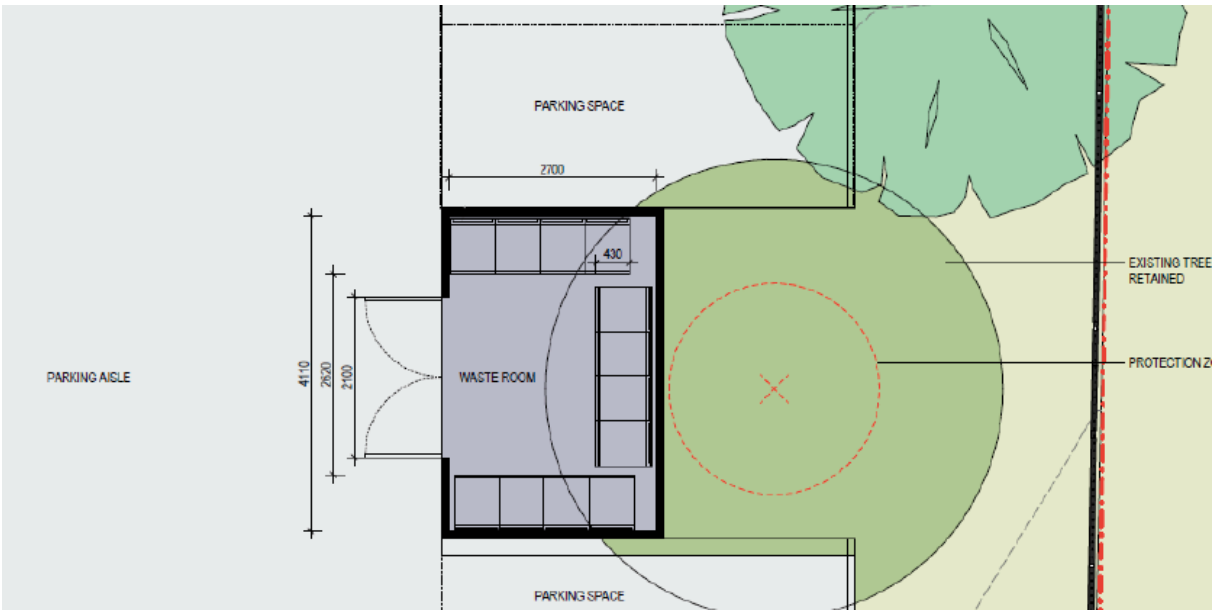


Figure 7-44 Waste room detail
Source: Elephants Foot

7.16 Contamination

7.16.1 Methodology

A Preliminary Site Investigation and Limited Soil Assessment prepared by Cardno is attached at **Appendix 17**. The objective of the report is to assess whether contamination has the potential to exist on the site and to determine whether further investigation is needed.

7.16.2 Existing environment

Cardno's site inspection identified the following existing site features relevant to contamination assessment:

- Asbestos containing materials were not observed on the visible ground surfaces nor in any buildings or structures (noting the inspection undertaken was general and did not constitute a full hazardous materials assessment);
- There is no evidence of manufacturing, industrial or chemical processes or infrastructure;
- There is no evidence of fuel storage tanks (underground or above ground) at the site.
- Dangerous goods such as fuels, oils and paints were not observed during the inspection;
- Oil staining and discoloration were not observed on concrete slabs or ground surfaces surrounding any buildings or sheds;

- Two small waste/rubbish stockpiles were identified, but these were located in the far southeastern portion of the lot, well outside of the Budawang School site; and

- Vegetation at the site appeared healthy and not under plant-stress.

7.16.3 Impacts

Assessment criteria

Soil assessment criteria were adopted from National Environment Protection (Assessment of Site Contamination) Measure 1999, as amended 2013), and their application are summarised below:

- Health investigation levels (HIL) A have been adopted to assess risk to site users. HIL A is appliable to children's day care centres, preschools and primary schools.

- Ecological investigation levels (EIL) and ecological screening levels (ESL) for urban residential and public open space have been adopted as ecological screening criteria.

    - The extensive history of human occupation and land disturbance on the site and neighbouring properties make the presence of sensitive ecological receptors reliant on-site soils low.

    - The application of the urban residential and public open space EIL and ESL are considered appropriate to capture risk to unidentified ecological receptors.

Analytical results

Hand excavations were undertaken in the northeast portion of the lot in the location of the proposed school. In summary, the results showed that:

- Exceedances of the human health criteria were not reported in shallow soil samples; and

- Copper was reported at concentrations above the ecological criteria of 80mg/kg, with one sample containing 82mg/kg and another containing 100g/kg.

Discussion

Based on the results of the investigation, Cardno considers the potential risks to human health and the environment to be low. Historical land uses at the site appear to have been limited to low-intensity agricultural grazing and educational purposes.

A limited number of commercial premises have historically adjoined the site to the east. These properties may contain potential contaminant sources associated with storage of petroleum products and construction waste; however, the likelihood of contaminants migrating onto the site is considered low.

Bulk filling within the lot appears limited to the lower-lying western portions including the sports field (outside of the proposed school lot).

The identified copper concentrations which marginally exceeded the ecological assessment criteria in two of the soils samples are considered representative of background concentrations and do not present an unacceptable risk to potential ecological receptors.

7.16.4 Mitigation measures

The contamination report recommends the following mitigation measures:

- During earthworks an unexpected finds protocol must be prepared and implemented;
- Due to the absence of identified contaminant sources, the inferred natural geology within the SSP redevelopment footprint and low contaminant contaminations in shallow soil, further assessment and remediation is not warranted unless suspected contaminated materials are discovered during earthworks;
- Buildings and structures proposed for demolition must first be subjected to hazardous materials (HAZMAT) assessment;
- If building containing hazardous materials are demolished, a clearance certificate is required for surface soils prior to construction commencing; and
- Any waste generated during the redevelopment, including demolition materials and excavated soil, must be assessed for potential offsite reuse / disposal opportunities in accordance with the NSW EPA Waste.

In accordance with third recommendation, Hazardous Materials Assessments for the buildings to be demolished are provided at **Appendix 28**.

7.17 Aviation

7.17.1 Methodology

An Aviation Impact Assessment is attached at **Appendix 27**. The report assesses the proposal's potential impacts on the operations of the nearby Milton Helipad in the context of the relevant regulatory requirements and guidelines.

7.17.2 Existing environment

The Milton Helipad is located approximately 140m from the site, as illustrated at Figure 7-45. There are no other helipads or airports in the near vicinity that would potentially be affected by the proposal.

Figure 7-45 Site relative to Milton Helipad
Source: Aviation Projects

7.17.3 Impacts

As shown in Figure 7-46, the proposed buildings will be below the required approach and take-off surface for helicopters utilising the helipad. The permissible height is 8.24m, while the proposed building height is approximately 6.8m.

No other impacts have been identified.

In summary, the assessment has found that the proposal:

- Will not penetrate the obstacle identification surfaces of helipad;
- Will not impact visual or instrument flight operations to/from the helipad or any certified airports within the vicinity of the project
- Will not impact any aviation facilities;
- Will not impact any aviation facilities or Bureau of Meteorology infrastructure; and
- Will not involve high-velocity vertical plume that would affect helicopter operations.

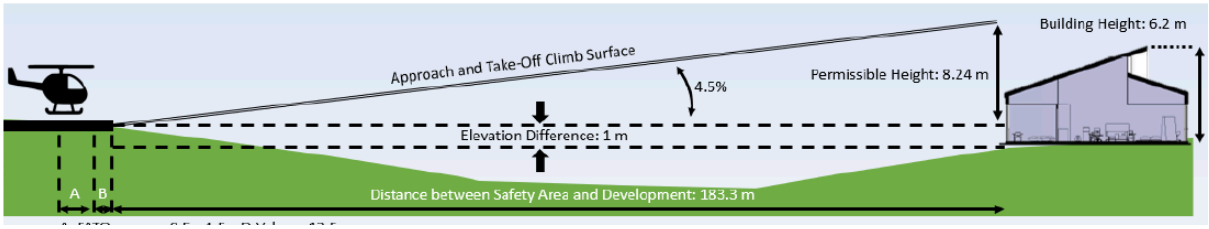


Figure 7-46 Approach and climb surface over site
Source: Aviation Projects

7.17.4 Mitigation measures

The following mitigation measures are recommended:

- Any crane used during construction should be appropriately marked, operated during daylight hours only and referred to NSW Health for consideration by users of the helipad; and
- If a crane is required to be operated at night, it should be lit with applicable obstacle lighting.

7.18 Utilities

Utilities advice prepared by the project services engineers is provided at **Appendix 12**. The existing site infrastructure and need for upgrades are summarised in the table below.

Table 7-7 Utilities details

Utility	Existing	Required upgrades
Sewer	There is an existing Shoalhaven Water sewer line on the site that bisects the western portion of the proposed school	The proposal will utilise the existing sewer infrastructure, with no upgrades required. It is noted that a sewer easement is registered on the site. The proposal avoids this constraint, with no buildings located over the easement.
Potable water	The site is serviced by incoming water mains.	Shoalhaven Water has confirmed that there is sufficient pressure and flow to accommodate the required systems. No upgrades are required.
Gas	Not presently available at the site.	NA

Utility	Existing	Required upgrades
Electricity	The site is serviced by a pole top substation to the west of the site boundary.	The substation will be relocated to the northwest corner of the site as a kiosk. Maximum demand calculations for the development are not yet finalised. This is required to provide Endeavour Energy with a concept design and application for the new kiosk substation. Once the application is made, Endeavour Energy will provide a design information package, which will outline any required upgrade works.
Telecommunications	Telecommunications infrastructure runs parallel to the northern boundary of the site	The proposal will connect to the existing infrastructure as required.

8 Assessment of other issues

8.1 Geotechnical

A Report on Geotechnical Investigation is attached at **Appendix 16**. The report provides the results of subsurface investigations to inform the structural design of the proposal. The report concludes that the site is geotechnically suitable for the proposed development and provides comments regarding site preparation, likely reactivity site classifications, retaining wall design parameters, foot design parameters and drainage.

8.2 BCA

A Preliminary BCA and Certification Assessment is attached at **Appendix 26**. The assessment confirms that the proposal is capable of complying with the relevant requirements of the BCA, subject to resolution of several minor items. These minor items do not require changes to the overall design and can be addressed at the construction certificate stage.

8.3 Accessibility

An Access Design Assessment Report is attached at **Appendix 25.** The report identifies the extent to which the design complies with the accessibility provisions of the BCA. The report concludes that the proposal is capable of complying with the accessibility provisions of the BCA, either by meeting the deemed-to-satisfy requirements or via a performance-based approach.

8.4 Air quality

An Air Quality Impact Assessment is attached at **Appendix 31**. The report assesses the potential air quality emissions of the proposed construction activities and the potential air quality impacts on the school due to surrounding sources of air pollution, namely the nearby concrete batching facility and helipad. Key points from the report are outlined below.

8.4.1 Dust from concrete batching facility

The concrete batching plant to the west has the potential to generate dust during delivery and loading activities.

Victorian government guidelines suggest a buffer distance between 100m and 300m is appropriate for a concrete batching plant (no such guidelines are published by the NSW government). The distance between the proposed school and the batching plant is approximately 300m, consistent with the guidelines.

Given the proposed school's significant distance from the batching facility, no adverse impacts are expected.

8.4.2 Dust from helipads

Dust from helipads is caused by engine emissions and the downdraft from the helicopter rotors disturbing dust on the ground during take-off and landing.

A visual inspection of the helipad has shown that the helipad itself is concrete, with the area surrounding the pad being well grassed with a single lane sealed road leading off Croobyar Road. Additionally, the helipad is situated a significant distance away from the school with a series of buildings and vegetative barriers between the helipad and school.

Given the lack of unsealed surfaces, the distance from the helipad to the proposed school and the low relative frequency of use expected for the helipad, dust generation and adverse impacts as a result of the generated dust are expected to be very low.

The effect of engine emissions is also expected to be low given the low frequency of use at the site and the expected short duration of helicopter visits to the helipad.

8.4.3 Dust from construction activities

Construction of the proposed school has potential to generate dust that may impact air quality.

Assessment of potential air quality impacts from the proposed construction activities has identified an unmitigated risk of low to negligible for all aspects of the works. With standard mitigation measures implemented, the risk of impacts is expected to fall to negligible for all activities.

8.4.4 Mitigation measures

No mitigation measures are required for addressing air quality impacts upon the school resulting from the concrete batching plant or helipad.

It is recommended that dust resulting from construction activities be managed through the development of a Construction Air Quality Management Plan (CAQMP). Potential measures for inclusion in the CAQMP are provided at Table 22 of the air quality report.

9 Environmental risk assessment

This chapter provides an environmental risk assessment of the proposed school. The assessment identifies all potential impacts, the significance and manageability of each impact, the proposed mitigation measures, and any potential residual impacts following mitigation.

The significance of impact is assigned a value between 1 and 5 based on the receiving environment, the level of understanding of the type and extent of impacts, and the likely community response to the environmental consequence of the project.

The manageability of environmental impact is assigned a value between 1 and 5 based on the complexity of mitigation measures, the known level of performance of the safeguards proposed and the opportunity for adaptive management.

The sum of the significance and manageability values provides an indicative ranking (between 1 and 10) of the residential impacts after the mitigation measures have been implemented.

Table 9-1 Risk assessment matrix

Significance of impact	Manageability of impact				
	5 Complex	4 Substantial	3 Elementary	2 Standard	1 Simple
1 – Low	6 Medium	5 Low/Medium	4 Low/Medium	3 Low	2 Low
2 – Minor	7 High/medium	6 Medium	5 Low/Medium	4 Low/Medium	3 Low
3 – Moderate	8 High/Medium	7 High/Medium	6 Medium	5 Low/Medium	4 Low/Medium
4 – High	9 High	8 High/Medium	7 High/Medium	6 Medium	5 Low/Medium
5 – Extreme	10 High	9 High	8 High/Medium	7 High/Medium	6 Medium

Table 9-2 Environmental risk assessment

Item	Potential Impact	Significance of impact	Manageability of impact	Mitigation measure	Residual impact
Environmental amenity	Minor overshadowing of surrounding properties	1	1	No mitigation measures identified	2 (Low)
	Minor potential changes to wind conditions at the site	1	1	No mitigation measures identified	2 (Low)
	Views to and from the site will change	2	1	No mitigation measures identified	3 (Low)
	Light spillage visible to surrounding properties	1	2	Implement standard measures to reduce light spill	3 Low
Transport and accessibility	Potential conflict between construction vehicles and other vehicles/pedestrians	2	2	Finalise and implement construction traffic management plan	4 (Low / medium)
	Increased vehicular traffic during operation	2	2	Implement the Green Travel Plan	4 (Low / medium)
ESD	Potential inefficient use of energy and resources	1	2	Green Star 4-star certification Assessment of climate change scenarios as recommended in the ESD report	3 (Low)
Heritage	Views from the heritage cemetery will change Views to and from the adjacent heritage store will remain generally unaffected	2	1	No mitigation measures identified	2 (Low)
Aboriginal heritage	Damage to archaeological artefacts	2	2	Implement an unexpected finds protocol	5 (Low / medium)
Noise and vibration	Increased noise during construction	2	2	Implement standard noise mitigation	4 (Low / medium)

Item	Potential Impact	Significance of impact	Manageability of impact	Mitigation measure	Residual impact
				measures during construction	
	Increased noise to surrounding residences during operations	2	2	Select and design bell, PA system and plant to achieve the relevant external noise levels identified in the acoustic report	4 (Low / medium)
Contamination	Potential impacts from unexpected contamination during demolition of existing buildings	1	2	Undertake a pre-demolition hazardous building materials survey and testing of the asphaltic concrete for the potential presence of coal tar prior to the demolition of the site structures	3 (Low)
	Potential impacts from unexpected contamination during construction	1	2	Develop and implement an unexpected finds protocol	3 (Low)
Drainage	Negative flow impacts on surrounding property	1	2	Implement stormwater management system including on-site detention	3 (Low)
	Reduced quality of water exiting the site	1	2	Implement water treatment train to ensure improved quality of water exiting the site	3 (Low)
Flooding	Potential changes to overland flow behaviour	1	2	Implement the proposed stormwater drainage system	3 (Low)
Bushfire hazard	Exposure to ember attack, radiant heat and direct flames	1	2	Construct buildings with appropriate bushfire-rated materials Provide and maintain a 47m-wide APZ as	3 (Low)

Item	Potential Impact	Significance of impact	Manageability of impact	Mitigation measure	Residual impact
				specified in the bushfire report	
Biodiversity	Minor direct impacts on native vegetation	1	2	No mitigation measures identified	3 (Low)
	Minor indirect and impacts on biodiversity due to construction activities	1	2	Implement construction management measures accordance with the recommendations in the BDAR	3 (Low)
Tree removal	Construction impacts on trees to be retained	1	2	Implement tree protection measures in arborist report for trees to be retained	3 (Low)
Sediment and erosion impacts	Erosion and sediment runoff during construction	1	2	Implement measures in the sediment and erosion control plan	3 (Low)
Aviation	Risk of conflict between construction cranes and helicopters	1	2	Any crane is to be lit during night time, and the crane details are to be referred to NSW Health	3 (Low)
Air quality	Minimal risk of dust impacts from nearby concrete batching plant and helipad	1	2	No mitigation measures identified	3 (Low)
	Dust impacts on surrounding properties resulting from construction activities	1	2	Prepare and implement an air quality management plan as recommended in the air quality report	3 (Low)
Waste	Odour and visual impacts of waste during demolition, construction and operation phases	1	2	Follow procedures and recommendations in waste management plan	3 (Low)
Geotechnical	Risk that building structure and methodology may not	1	2	Follow recommendations in geotechnical report	3 (Low)

Item	Potential Impact	Significance of impact	Manageability of impact	Mitigation measure	Residual impact
	be appropriate for subsurface conditions				
Salinity	Low risk of saline soils affecting the proposal	1	2	Compliance with the durability requirements of AS2159:2009 and AS36000:2018	3 (Low)

10 Mitigation measures

The table below provides a consolidated list of recommended mitigation measures.

Table 10-1 Mitigation measures

Item	Potential Impact	Mitigation Measures
Environmental amenity	Minor overshadowing of surrounding properties	No mitigation measures identified
	No mitigation measures have been identified	No mitigation measures identified
	Views to and from the site will change but no acute adverse impacts have been identified	No mitigation measures have been identified
	Light spillage visible to surrounding properties	Implement standard measures to reduce light spill
Transport and accessibility	Potential conflict between construction vehicles and other vehicles/pedestrians	Finalise and implement the construction traffic management plan
	Increased vehicular traffic during operations	Implement the Green Travel Plan
ESD	Poor, inefficient use of energy and resources	Green Star 4-star certification Assessment of climate changes scenarios as recommended in the ESD report
Heritage	Views from the nearby heritage cemetery may change slightly Views to and from the adjacent heritage store will remain generally unaffected	No mitigation measures identified
Aboriginal heritage	Damage to archaeological artefacts	Implement an unexpected finds protocol
Noise and vibration	Increased noise during construction	Implement standard noise mitigation measures during construction
	Increased noise to surrounding residences during operations	Select and design bell, PA system and plant to achieve the relevant external noise levels identified in the acoustic report

Item	Potential Impact	Mitigation Measures
Contamination	Potential impacts from unexpected contamination	Develop and implement an unexpected finds protocol
		Undertake a pre-demolition hazardous building materials survey and testing of the asphaltic concrete for the potential presence of coal tar prior to the demolition of the site structures.
Drainage	Negative flow impacts on surrounding property	Implement stormwater management system including on-site detention
	Reduced quality of water exiting the site	Implement water treatment train to ensure improved quality of water exiting the site
Flooding	Potential changes to overland flow behaviour	Implement the proposed stormwater drainage system
Bushfire hazard	Exposure to ember attack, radiant heat and direct flames	Construct buildings with appropriate bushfire-rated materials Provide and maintain a 47m-wide APZ as specified in the bushfire report
Biodiversity	Minor direct impacts on native vegetation	No mitigation measures identified
	Minor indirect and impacts on biodiversity due to construction activities	Implement construction management measures accordance with the recommendations in the BDAR
Tree removal	Construction impacts on trees to be retained	Implement tree protection measures in arborist report for trees to be retained
Sediment and erosion impacts	Erosion and sediment runoff during construction	Implement measures in the sediment and erosion control plan
Aviation	Minor risk of conflict between construction cranes and helicopter operations	Any crane is to be lit during night time, and the crane details are to be referred to NSW Health

Item	Potential Impact	Mitigation Measures
Air quality	Minimal risk of dust impacts from nearby concrete batching plant and helipad	No mitigation measures identified
	Dust impacts on surrounding properties resulting from construction activities	Prepare and implement an air quality management plan as recommended in the air quality report
Waste	Odour and visual impacts of waste during demolition, construction and operation phases	Follow procedures and recommendations in waste management plan
Geotechnical	Risk that building structure and methodology may not be appropriate for subsurface conditions	Follow recommendations in geotechnical report
Salinity	Low risk of saline soils affecting the proposal	Compliance with the durability requirements of AS2159:2009 and AS36000:2018

11 Conclusion and justification

This EIS is submitted to the Minister for Planning to accompany an SSD application for establishment of a new Budawang School at 17 Croobyar Road, Milton, to replace the existing Budawang School in Ulladulla.

This EIS has considered the relevant statutory instruments and strategic documents and provided an assessment of the potential impacts of the proposal on the built and natural environments as well as an assessment of social impacts.

This EIS fulfils the requirements of the EP&A Act and Regulation, addresses all relevant matters prescribed by the SEARs and demonstrates that the potential impacts of the proposal can be satisfactorily managed or mitigated.

In summary, the development should be approved for the following reasons:

- The proposal will increase the capacity of public schools for specific purposes in the area to meet identified demand;
- The proposal will provide for a contemporary, purpose-built facility to replace the existing Budawang School, which is outdated, overcrowded and ill-suited for providing optimal educational outcomes;
- The proposal will provide for a new hydrotherapy facility for the benefit of students and local community;
- The proposal will generate jobs, both short-term and ongoing;
- The proposal's design is the result of detailed analysis of the site and consultation with the community, DoE and GANSW;
- The potential environmental impacts of the proposal can be satisfactorily mitigated subject to the recommendations of the technical supporting documentation accompanying this EIS;
- The site is suitable for the proposal; and
- The proposal is in the public interest.

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