NSW Department of Education

Review of Environmental Factors

Milton Public School Upgrade

Document version: 02

Date: 10/04/2025

NSW GOVERNMENT

Acknowledgement of Country

The NSW Department of Education acknowledges the Yuin people as the traditional custodians of the land on which Milton Public School is located.

We pay our respects to Elders past and present and celebrate the diversity of Aboriginal people and their ongoing cultures and connections to the lands and waters of Australia.

The NSW Department of Education is committed to honouring Aboriginal peoples' cultural and spiritual connections to the land, waters and seas and their rich contribution to society.

The NSW Department of Education recognises that by acknowledging our past, we are laying the groundwork for a future that embraces all Australians; a future based on mutual respect and shared responsibility

Declaration

This Review of Environmental Factors (REF) has been prepared by Urbis Ltd on behalf of the NSW Department of Education (department) and assesses the potential environmental impacts which could arise from the upgrade works at Milton Public School.

This REF has been prepared in accordance with the *Guidelines for Division 5.1 Assessments* and any relevant addendum (the Guidelines), and the relevant provisions of the *Environmental Planning and Assessment Act 1979* (EP&A Act), the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) and *State Environmental Planning Policy (Transport and Infrastructure) 2021* (TI SEPP).

This REF provides a true and fair review of the activity in relation to its likely impact on the environment and the information it contains is neither false nor misleading. It addresses to the fullest extent possible all the factors listed in Section 3 of the Guidelines, the EP&A Regulation and the Commonwealth *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act).

In preparing the REF I have declared any possible conflict of interests (real, potential or perceived) and I do not consider I have any personal interests that would affect my professional judgement.

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Abbreviations

Abbreviation	Description
AEP	Annual Exceedance Probability
AHD	Australian Height Datum
AHIP	Aboriginal Heritage Impact Permit
AHIMS	Aboriginal Heritage Information Management System
APZ	Asset Protection Zone
BC Act 2016	*Biodiversity Conservation Act 2016*
BC Regulation	*Biodiversity Conservation Regulation 2017*
BAM	Biodiversity Assessment Method
BCA	Building Code of Australia
BDAR	Biodiversity Development Assessment Report
BPFL	Bushfire Prone Land
CA	Certifying Authority
CM Act	*Coastal Management Act 2016*
CEMP	Construction Environmental Management Plan
CNVMP	Construction Noise and Vibration Management Plan
CTMP	Construction Traffic Management Plan
CWC	Connecting with Country
The department	NSW Department of Education
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DP	Deposited Plan
DPC	Department of Premier and Cabinet
DPHI	Department of Planning, Housing and Infrastructure
Design Guide	*Design Guide for Schools* published by the Government Architect in May 2018
EIS	Environmental Impact Statement
EMP	Environmental Management Plan
EPA	Environment Protection Authority
EP&A Act	*Environmental Planning and Assessment Act 1979*
EP&A Regulation	*Environmental Planning and Assessment Regulation 2021*
EPBC Act	*Environment Protection and Biodiversity Conservation Act 1999*
EPI	Environmental Planning Instrument
EPL	Environment Protection License
ESD	Ecologically Sustainable Development
FM Act	*Fisheries Management Act 1994*
FIRA	Flood Impact Risk Assessment
FERP	Flood Emergency Response Plan

Abbreviation	Description
GBCA	Green Building Council of Australia
Ha	Hectares
LEP	Local Environmental Plan
LGA	Local Government Area
MNES	Matters of National Environmental Significance
NCC	National Construction Code
NPW Act	*National Parks and Wildlife Act 1974*
NPW Regulation	*National Parks and Wildlife Regulation 2009*
NPWS	National Parks and Wildlife Service (part of EES)
NSW RFS	NSW Rural Fire Service
NT Act (Cth)	*Commonwealth Native Title Act 1993*
OEH	(Former) Office of Environment and Heritage
Planning Systems SEPP	*State Environmental Planning Policy (Planning Systems) 2021*
PMF	Probable Maximum Flood
PTS	Permanent teaching spaces
PoEO Act	*Protection of the Environment Operations Act 1997*
PBP	Planning for Bushfire Protection
Proponent	NSW Department of Education
REF	Review of Environmental Factors
RF Act	*Rural Fires Act 1997*
Resilience and Hazards SEPP	*State Environmental Planning Policy (Resilience and Hazards) 2021*
Roads Act	*Roads Act 1993*
SCPP DoE	*Stakeholder and community participation plan,* published by the NSW Department of Education October 2024
SCPP DPHI	*Stakeholder and community participation for new health services facilities and schools* published by the Department of Planning, Housing and Infrastructure October 2024
SDRP	School Design Review Panel
SEPP	State Environmental Planning Policy
SIS	Species Impact Statement
STS	Support teaching space
TI SEPP	*State Environmental Planning Policy (Transport and Infrastructure) 2021*
WM Act	*Water Management Act 2000*

Executive Summary

The Proposal

The proposal relates to the upgrade of Milton Public School (**Milton PS**) to provide new permanent teaching spaces including a new homebase building (Building Y) and associated infrastructure.

The proposed activity is the Milton PS Upgrade at 9 Thomas Street, Milton New South Wales 2358 (the **site**). Specifically, the proposed activity comprises the following:

- Demolition of paving, external stairs and excavation.
- Construction of a new two-storey home base building.
- Installation of additional solar panels.
- Relocation of existing cricket nets to the eastern boundary of site.
- Construction of new stairs and covered walkways linking the new building to the existing school.
- Construction of new fencing.
- Construction of new hardstand area.
- Minor alterations to the existing staff car park.
- Disconnection and relocation of existing LPG tank.
- Tree removal.
- External landscape works including tree planting.
- Associated water and electrical infrastructure upgrades.

Any works relating to the existing demountables or associated with substations will be undertaken via a separate planning pathway.

Milton PS has an approximate area of 4ha and is legally referred to as Lot 1 in Deposited Plan (**DP**) 861814 within the Shoalhaven Local Government Area (**LGA**).

The site is zoned SP2 Educational Establishment and existing development comprises various buildings, a car park, landscaping, sports fields and play space.

The site is an irregularly shaped lot with a narrow frontage to Thomas Street. Pedestrian and vehicular access is provided from Thomas Street and Wason Street. Milton PS is adjoined by low density residential properties to the south, west and east and Milton Rainforest Reserve to the north.

Parts of the site are mapped as bushfire prone land (**BFPL**) but it is not flood affected.

Planning Pathway

The proposal involves works by the Department of Education (the **department**) (a **public authority**) within the boundaries of the existing Milton PS. Accordingly, pursuant to Sections 3.37 of the *State Environmental Planning Policy (Transport and Infrastructure) 2021* (TI SEPP), the proposed works are classified as development which may be carried out without consent.

Therefore, the proposal is considered an ‘activity’ for the purposes of Part 5 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and is subject to an environmental assessment.

For the purposes of this proposal, the department is the proponent and the determining authority and the required environmental assessment is in the form of a Review of Environmental Factors (REF).

The REF has been prepared in the accordance with the *Guidelines for Division 5.1 Assessments* (DPE, June 2022) and the *Guidelines for Division 5.1 assessments - consideration of environmental factors for hospital and school activities Addendum* (DPHI, October 2024).

Consultation

Consultation will be undertaken with in accordance with statutory requirements under the TI SEPP and having regard to the *Stakeholder and community participation plan for new health services facilities and schools* (Department of Planning Housing and Infrastructure (**DPHI**), October 2024) (**SCPP DPHI**) and the *Stakeholder and Community participation plan For new schools and major school upgrade projects undertaken under Division 5.1 of the EP&A Act 1979* (Department of Education, October 2024) (**SCPP DoE**).

Comments received will be carefully considered and responded to.

In addition, as outlined in **Section 5.1** of this REF, non-statutory consultation has already been undertaken with a range of community and government stakeholders throughout the design process.

Environmental Impacts

This REF is supported by a series of technical reports that evaluate and propose measures to mitigate any environmental impacts arising from the proposed activity. These reports have identified potential impacts, all of which can be effectively managed through adoption of the required mitigation measures. The key issue assessed is as follows:

- **Bushfire:** The site is identified as containing Vegetation buffer, Category 3 and Category 2 BFPL. The building footprint is partially within the Vegetation buffer zone. Building Y has been designed with consideration to the impacts of bush fire and will be constructed to BAL-19 under AS 3959-2018. It will also become the designed shelter-in-place location for the school.

Other impacts have been considered as detailed in this REF.

Justification and Conclusion

Based on the environmental assessment undertaken as part of this REF, it has been determined that the proposal will not result in any significant or long-term detrimental impacts. The potential impacts identified can be reasonably mitigated and where necessary managed through the adoption of suitable site practices and adherence to accepted industry standards.

The environmental impacts of the proposal are not likely to be significant. Therefore, it is not necessary for an Environmental Impact Statement (EIS) to be prepared and approval to be sought for the proposal from the Minister for Planning and Public Spaces under Part 5.1 of the EP&A Act. The proposed activity will not have any effect on Matters of National Environmental Significance and approval of the Activity under the Commonwealth EPBC Act is not required.

On this basis, it is recommended that the department determine the proposed activity in accordance with Part 5 of the EP&A Act and subject to the adoption and implementation of mitigation measures identified within this report.

1. Introduction

The NSW Department of Education (the **department**) proposes to undertake upgrade works (the **activity**) at Milton Public School (**Milton PS**) located at 9 Thomas Street, Milton NSW 2538 (the **site**).

This Review of Environmental Factors (**REF**) has been prepared by Urbis Ltd on behalf of the department to determine the environmental impacts of the proposed activity at Milton PS. For the purposes of these works, the department is the proponent and the determining authority under Division 5.1 of the *Environmental Planning and Assessment Act 1979* (**EP&A Act**).

The purpose of this REF is to describe the proposal, examine and take into account all matters affecting or likely to affect the environment and to detail mitigation measures to be implemented to manage impacts.

The potential environmental impacts have been assessed in the accordance with the *Guidelines for Division 5.1 Assessments* (DPE, June 2022), *Guidelines for Division 5.1 assessments - consideration of environmental factors for hospital and school activities Addendum* (DPHI, October 2024), EP&A Act, the *Environmental Planning and Assessment Regulation 2021*, and the *Commonwealth Environment Protection and Biodiversity Conservation Act 1999* (**EPBC Act**).

The assessment contained within the REF has been prepared having regard to:

- Whether the proposed activity is likely to have a significant impact on the environment and therefore the necessity for an Environmental Impact Statement (**EIS**) to be prepared and approval to be sought from the Minister for Planning and Public Spaces under Division 5.2 of the EP&A Act; and
- The potential for the proposal to significantly impact Matters of National Environmental Significance (**MNES**) on Commonwealth land and the need to make a referral to the Australian Government Department of Environment and Energy for a decision by the Commonwealth Minister for the Environment on whether assessment and approval is required under the EPBC Act.

This REF is supported by a series of technical reports that evaluate and propose measures to mitigate any environmental impacts arising from the proposed activity. These are appended to the REF. **Appendix 1** – Mitigation Measures includes the department's standard Mitigation Measures, as well as any additional mitigation measures identified within the specialist reports.

2. Proposed Activity

2.1 The Site

2.1.1 Site Locality

Milton PS is located at 9 Thomas Street, Milton, NSW, 2538 and has an approximate site area of 4 hectares (ha). The site is legally referred to as Lot 1 DP861814 and is located within the Shoalhaven Local Government Area (**LGA**). Further site details are included in **Table 1**.

The site is owned by the Minister for Education and Early Learning. The site is zoned SP2 Educational Establishment and existing development comprises various buildings, a car park, landscaping, a sports field and sports courts. Milton PS currently comprises 24 permanent teaching spaces (**PTS**) and 12 demountable teaching spaces (**DTS**).

The site is an irregularly shaped lot with a narrow frontage along Thomas Street. Vehicular access is provided to the street from Thomas Street along the southern boundary of the site. Wason Street intersects the school's southern boundary along Thomas Street, providing access to the school's gated off-street staff car park. The street also serves several driveways for residential developments fronting the school.

The site is listed as local heritage item I304, identified as 'Victorian Rendered Masonry School and Schoolmasters Cottage.' The site contains two local heritage listed buildings (Building A and Q) which are located on Thomas Street. The proposed classroom building is located approximately 90m to the east of the heritage buildings.

There are significant trees present along the northern and western boundary of the site. There is a gradual slope downwards from the south-east to the north-east of the site.

The site is located within the township of Milton on the northern side of the Princes Highway. Milton is approximately 220 km south of Sydney. The site is bound by a combination of residential and commercial development to the south, east and southwest, as well as the Milton Rainforest Reserve to the north. Milton Memorial Park is located directly opposite the site to the south.

The location and configuration of the site is shown in **Figure 1** and **Figure 2.** Site photos are included at **Figure 3**.

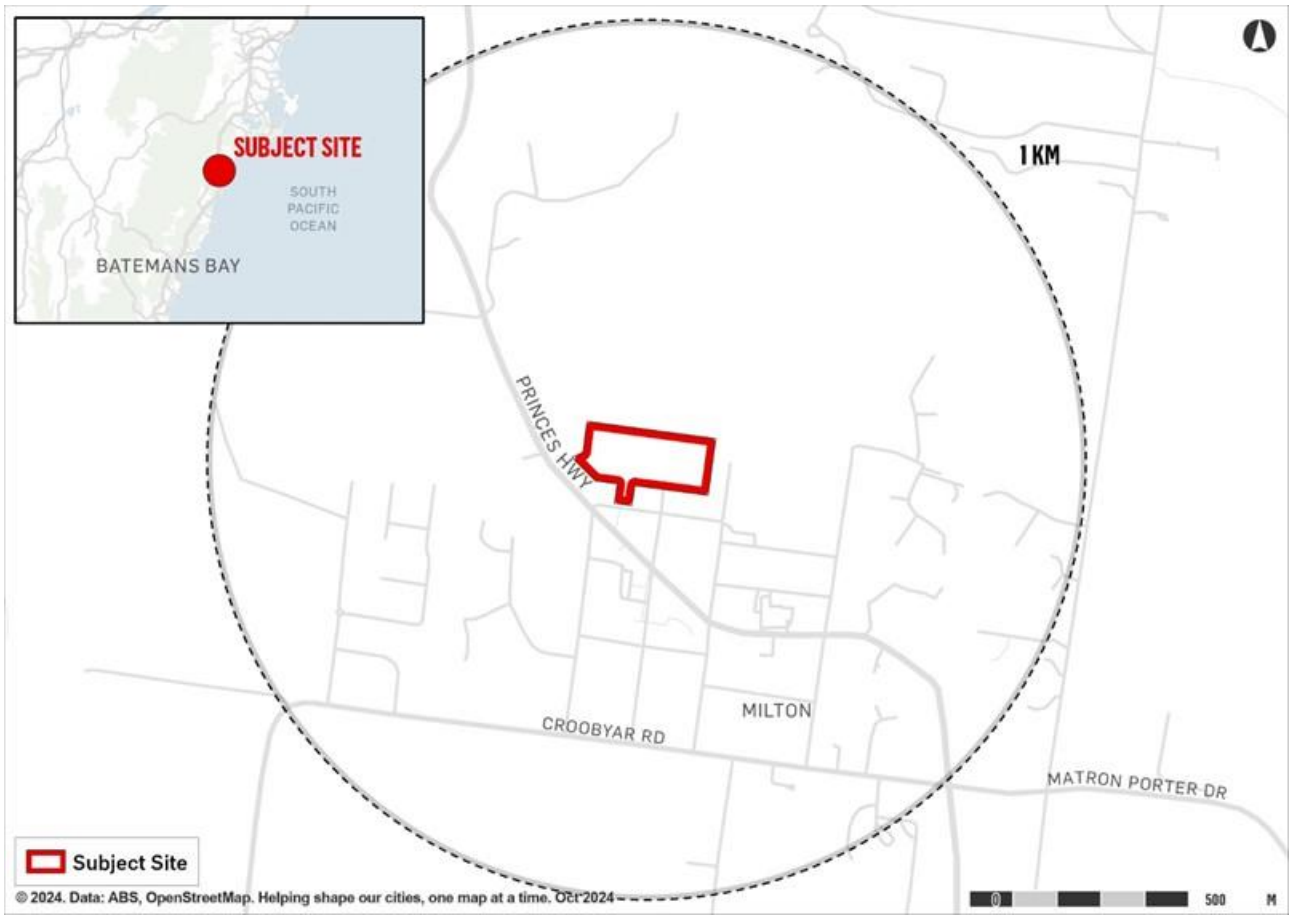
Table 1: Site Details

Site characteristics	Description
Site address	9 Thomas Street, Milton 2538
Legal description	Lot 1 in Deposited Plan 861814
Site area	4,028m2 (4 ha)
Local government area	Shoalhaven City Council
Site ownership	Minister for Education and Early Learning
Existing use / structures	Milton Public School, including various structures relating to the existing school on the site. The built form components of the school are concentrated in the western part of the site. The

Site characteristics	Description
	school currently comprises 24 PTS and 12 DTS.
Topography	The site has a gradual slope downwards from the south-east to the north-east of the site.
Vegetation	The site includes trees and vegetation between buildings on the western side of the site as well as significant trees along the northern and western boundary of the site.
Hydrology	There are no creek or drainage lines within the site. An unnamed drainage channel is located approximately 80 metres north of the site, which flows in an easterly direction and ultimately the catchment discharges to Narrawallee Creek, located approximately 2km northeast. It is inferred that surface water originating at the site, and potentially groundwater, would flow in a north-to-north easterly direction.
Acid Sulfate Soils	The site is mapped as Acid Sulfate Soils Class 5. It is not within 500m of the Class 1,2,3,4 and no Acid Sulfate Soils Management Plan is required.
Coastal Use and Environmental Area	The site is not mapped as being within a coastal use and/or environmental area.
Vehicle / site access	The site has a narrow frontage to Thomas Street (a local road). The main entry is at the southern end of the school along Thomas Street, with additional access provided on Wason Street adjacent to the staff carpark. Car parking is located at the southern boundary of the site accessed from Wason Street.

Source: Urbis, 2024

Figure 1: Site Aerial



Source: Urbis, 2024

Figure 2: Locality Plan

Photo 1 View facing south showing proposed activity site with existing demountable classrooms and trees to be removed.

Source: Department of Education, 2024.

Photo 2 View north down Wason Street at the intersection with Thomas Street.

Source: Department of Education, 2024.

Photo 3 View along Thomas Street at the intersection with Watson Street.

Source: Department of Education, 2024

Figure 3 Site Photos

2.1.2 Site Constraints and Opportunities

Consideration of site constraints has been undertaken through a review of the Section 10.7 (2 & 5) Planning Certificates dated 17 October 2024, mapping under relevant Environmental Planning Instruments (**EPIs**), and a review of specialist consultant reports and other desktop assessments. Key site constraints include:

- **Bushfire**: The site is identified as Bushfire prone land containing Vegetation Buffer, Category 2 and Category 3 bushfire prone land (**BFPL**). The Category 2 and Category 3 BFPL are located within the centre and on the northern edge of the site. The proposed activity area is located within the Vegetation Buffer. A Bushfire Assessment Report (**BAR**) prepared by Eco Logical Australia (**Appendix 14**) assessed the proposed activity against the relevant bushfire protection measures from Planning for Bush Fire Protection 2019.

  The BAR found that the proposed activity meets the acceptable solutions for Asset Protection Zone (45 – 81 m), construction (BAL-19 and as modified by Section 7.5 of PBP), utilities, vehicular access and emergency and evacuation planning. The additional bushfire protection measures that form part of the proposed activity achieve an improved bushfire outcome for the school.

- **Heritage**: The entire site is listed as local heritage item I304, identified as 'Victorian Rendered Masonry School and Schoolmasters Cottage.' The site contains two local heritage listed buildings (Building A and Q) which are located on Thomas Street adjacent to the site entry. The Statement of Heritage Impact (**SOHI**) concludes that the proposed activity will not impact these items or heritage significance of the site.

- **Vegetation**: There are a number of existing trees on the site which have been determined by the project arborist to be of high value. The proposed activity does not results in the removal of any trees of high retention value. It will result in the removal of 8 medium retention value trees and 6 low retention value trees.

- **Traffic and Access Management**: The existing road infrastructure and access points will be shared between construction vehicles movements and operation of the school.

Mitigation measures must be implemented which will minimise conflicts between construction and operation.

- **Topography**: The site is sloping, with a fall from the existing car park to the oval. This requires careful design to manage grading and contain sediment and erosion impacts.

A summary of key site considerations and constraints as per the Planning Certificate is provided in **Table 2**.

Table 2: Review of Section 10.7 Planning Certificate

Affectation	Yes	No
Critical habitat	☐	☒
Conservation area	☐	☒
Item of environmental heritage	☒	☐
Affected by coastal hazards	☐	☒
Proclaimed to be in a mine subsidence district	☐	☒
Affected by a road widening or road realignment	☐	☒
Affected by a planning agreement	☐	☒
Affected by a policy that restricts development of land due to the likelihood of landslip	☐	☒
Affected by bushfire, tidal inundation, subsidence, acid sulfate or any other risk	☒	☐
Affected by any acquisition of land provision	☐	☒
Biodiversity certified land or subject to any biobanking agreement or property vegetation plan.	☐	☒
Significantly contaminated	☐	☒
Subject to flood related development controls	☐	☒

Consideration has also been given to opportunities identified in project development, including:

- **Strategic location:** The site is located within an existing school close to Milton town centre and will continue to serve the educational needs of the community of Milton.
- **Sustainability**: The site orientation provides the opportunity for the delivery of a building with natural light and sustainability initiatives including a roof mounted photovoltaic (**PV**) system.
- **Natural Features**: Milton Rainforest Reserve is located directly to the north of the site. The proximity of the school to this area provides opportunities to enhance connections to natural landscapes through outdoor learning areas, recreational spaces, and visual corridors.

- **Spacious Site Area**: The site is approximately 4 ha and has been designed to accommodate functional layouts of school buildings, sports facilities, and open play spaces. This allows for optimised use while maintaining significant green and landscaped areas.
- **Futureproofing**: The pattern book template for the building considers the future adaptability of the learning spaces.
- **Adjoining uses:** Adjoining land uses are compatible with the site's use as an educational establishment.

2.2 Proposed Activity

The proposed activity relates to upgrades to Milton Public School. **Figure 4** provides an extract of the proposed site plan.

Table 3 provides a summary of key aspects of the activity.

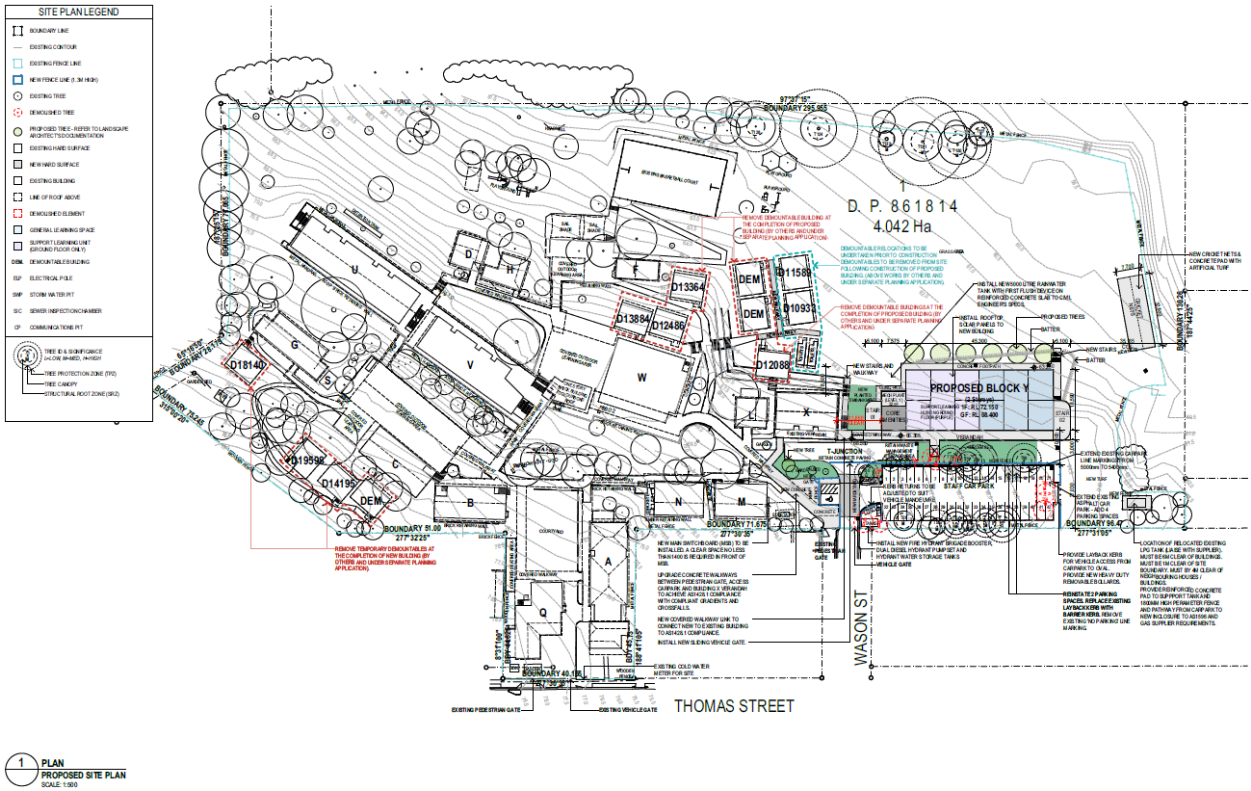
Any works relating to the existing demountables, demolition of the existing substation and construction of a new substation do not form part of this activity and will be undertaken through a separate planning pathway.

Table 3: Summary of the activity

Project Element	Description
Site Area	Approximately 4 ha.
Project Name	Milton Public School Upgrade
Project Summary	The proposed activity is an upgrade project, and comprises the following: • Construction of a new two-storey home base building (Building Y), featuring a Support Learning Unit (SLU) and a standard General Learning Space (GLS) hub on the ground floor, and two standard GLS hubs on the first floor. The building will also include a lift and student amenities. • Installation of additional solar panels. • Relocation of existing cricket nets to eastern boundary of site. • Construction of new stairs and covered walkways linking new building to the existing school. • Construction of new fencing. • Construction of new hardstand area. • Minor alterations to the existing staff car park. • Disconnection and relocation of existing LPG tank. • Tree removal. • External landscape works including tree planting. • Associated water and electrical infrastructure upgrades.
Use	Educational establishment
Student and Staff Numbers	No change to student capacity or staff numbers.
Car Parking and Bicycle Spaces	The site has 41 off street parking spaces, comprising: • Wason St carpark - 38 parking spaces including two (2) accessible spaces. • Thomas St - 3 parking spaces. As a result of the proposed activity, there will be 46 total off street parking spaces comprising: • Wason St carpark - 43 parking spaces including one (1) accessible space. • Thomas St - 3 parking spaces. <u>Kiss and drop</u> There is a kiss and drop zone on Thomas Street which provides 5 spaces. The proposed activity includes changing parking signage to

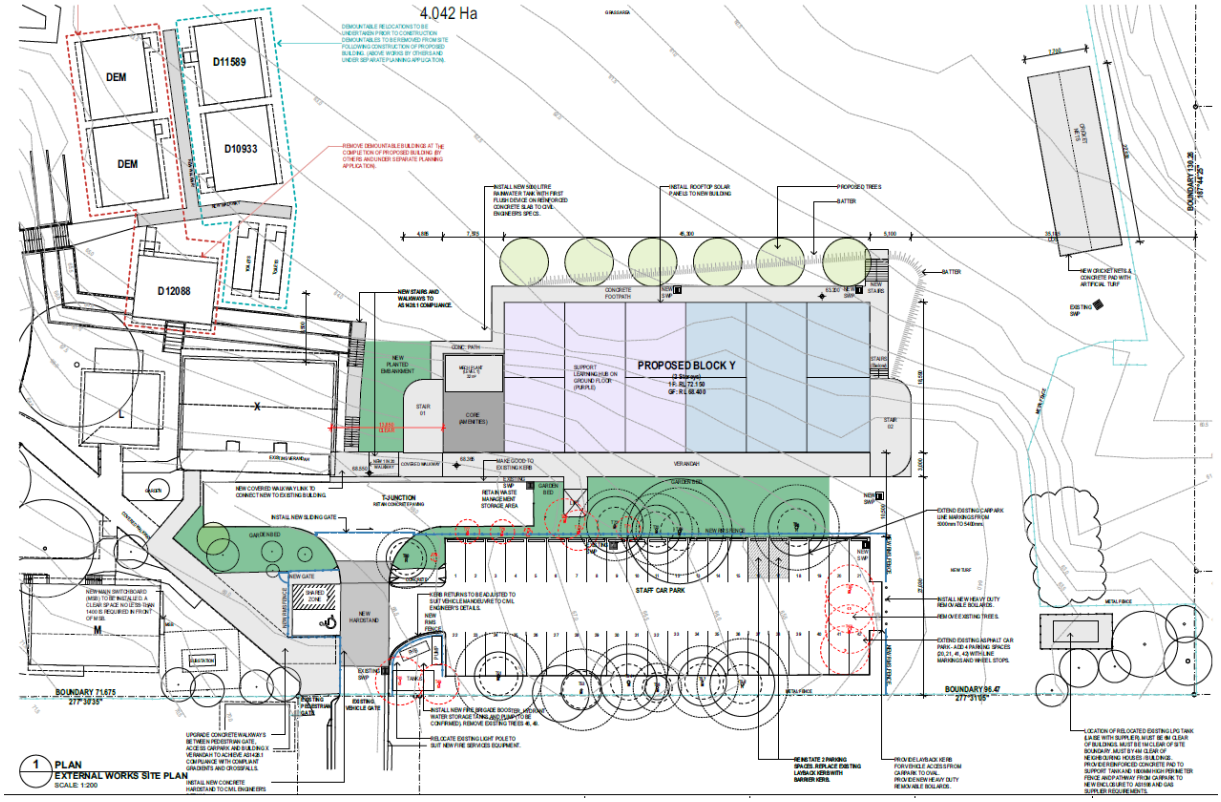
Project Element	Description
	provide an additional three kiss and drop spaces.
Height	The proposed Building Y will be two storeys and approximately 14m high.
Tree Removal	The proposed activity requires the removal of 16 trees.
Off Site Works	The proposed activity includes the following off site works: • A new wombat crossing on Thomas Street and • Change in parking signage to provide three additional kiss and drop spaces on Thomas Street. • Implement no stopping signage during school peaks at Wason Street between Thomas Street and school entrance gate.

The key features of the proposed activity are shown in **Figure 4** to **Figure 11.**



Source: Fulton Trotter Architects, 2025

Figure 4: Proposed Indicative Site Layout



Source: Fulton Trotter Architects, 2025

Figure 5: Proposed External Works Plan

2.2.1 Design Development

The proposed built form comprises a new two storey homebase building (**Building Y**) situated towards to the southern boundary of the site adjoining the carpark. It is designed to be sympathetic to the existing school environment and residential context. The proposed design uses the *SINSW Pattern Book* and the *Educational Facilities Standards and Guidelines (EFSG)* as a basis for the design. The pattern book design template for the building has considered future adaptability of these learning spaces.

Colours and textures are to be applied to the metal balustrades, stair metal screening, wall facade panels, framing elements and sunshades to present the unique identity of the school. The colour selection is inspired by colours found in school's existing built environment, respecting the existing context and the natural landscape.

The walkway facade is oriented towards the staff carpark to the south, while the facade with colourful sun hoods and framing elements is oriented towards the sports oval to the north. The long elevation is to the north which maximises natural light and climate control. Energy efficiency provisions for the building include a roof mounted photovoltaic (PV) system.

The proposed Building Y has been positioned to accommodate the required bushfire Asset Protection Zones (**APZ**).

The project addresses Connecting with Country by including Indigenous artwork opportunities to internal and external areas of the building and landscape that continue existing Indigenous programs at the school.

Source: Fulton Trotter Architects, 2025

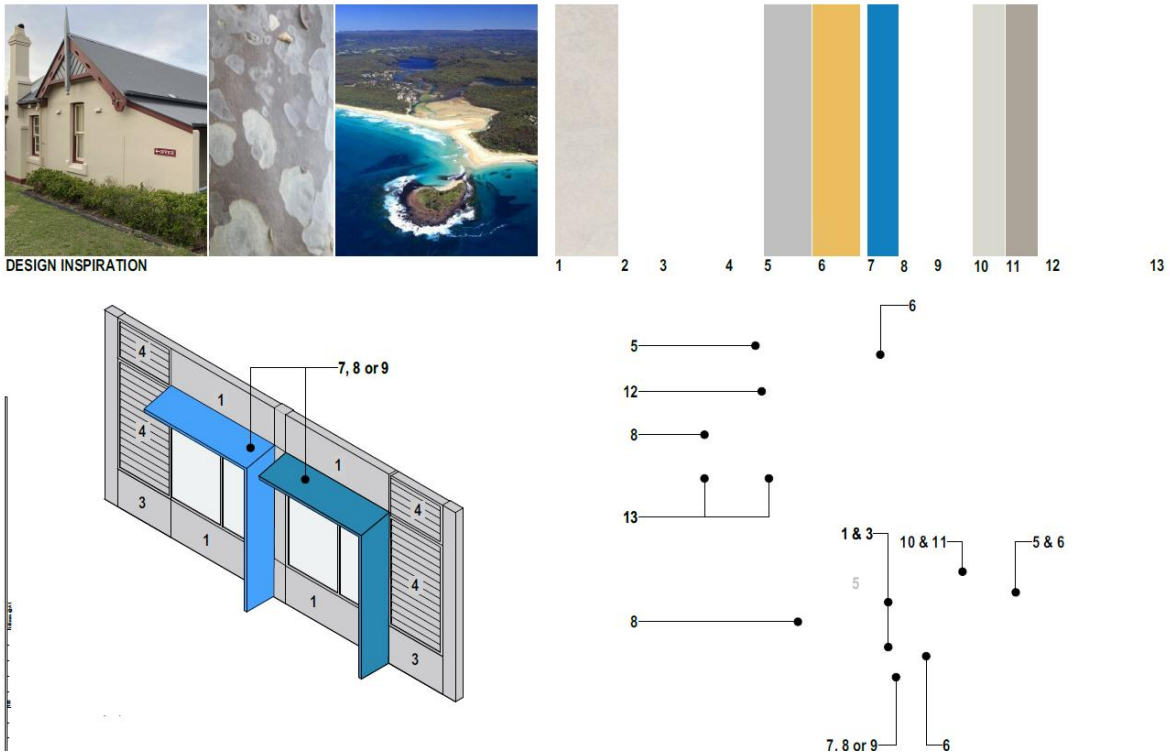
Figure 6: Render of New Homebase Building from the carpark

Source: Fulton Trotter Architects, 2025

Figure 7: Render of New Homebase Building from the oval

Source: Fulton Trotter Architects, 2025

Figure 8: New Homebase Building Materials and Finishes



Source: Fulton Trotter Architects, 2025

Figure 9: New Homebase Building Façade Strategy

Source: Fulton Trotter Architects, 2025

Figure 10: North and South Elevations

Landscaping

The approach to the landscape architectural design draws inspiration from the endemic flora and fauna, its context within a bushfire prone site and existing landscape features.

Sixteen (16) trees are required to be removed as part of the proposed activity as they are located within the footprint of the new building, carpark or pathways. Garden beds have been utilised where appropriate to soften the building interface and facilitate drainage.

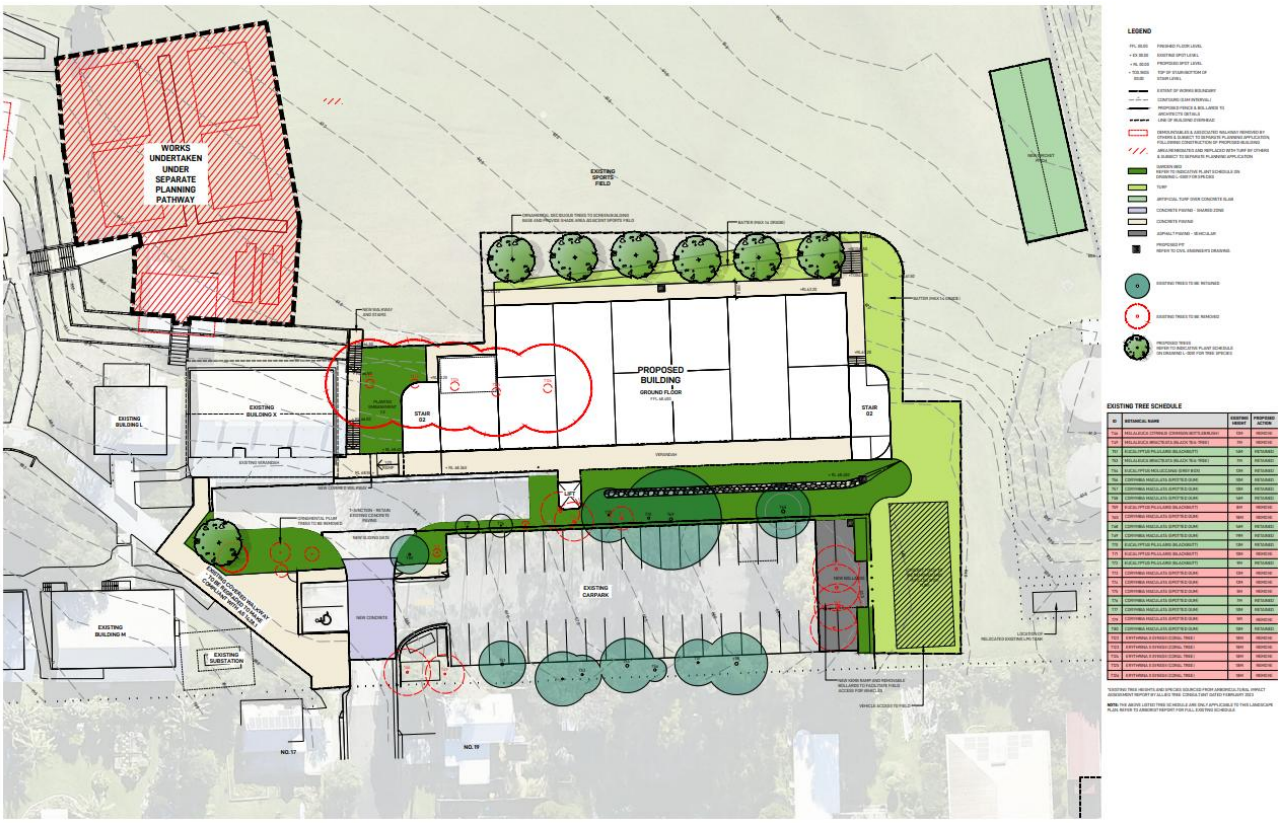
Immediately adjoining the new building turfed areas will be installed, including on the eastern side where the existing cricket will be removed and replaced with turf.

On the northern side of the new building 6 new ornamental deciduous trees (flowering plum trees) will be planted to replace trees that are required to be removed to accommodate the new building. These trees will grow to 7-9m in height and also provide shade to the sports field.

Areas of natural turf will also be used to rehabilitate areas of the site previously occupied by demountables.

Species selection has considered the existing character of the school grounds, as well as the need for safe and low maintenance planting in the learning environment. Native planting has been prioritised where appropriate to tie in to the endemic plant communities and provide an opportunity for learning about the local ecosystems.

The landscape plan is provided at **Figure 11** below.



Source: Fulton Trotter and Ground Ink, 2025

Figure 11: Landscape Concept Drawing

Access and Parking

Vehicle Access

Vehicle access to Milton PS is provided from Thomas Street and Wason Street. There will be no alteration to the existing vehicular access points.

The existing driveway and car park are internal to the school boundary and accessed from Wason Street. The existing car park provides 38 spaces.

The proposed activity includes the following traffic and parking changes:

- The proposed activity comprises 5 additional car parking spaces within the existing carpark.
- A new wombat crossing on Thomas Street north across Wason Street
- An expanded Kiss and Drop zone to increase capacity from 5 spaces to 8 spaces.
- Implement no stopping during morning drop off and afternoons at Wason Street between Thomas Street and the school entrance gate

These works are shown on **Figure 12** below**.**

Source: Fulton Trotter / SCT 2025

Figure 12: Transport upgrades

Pedestrian Access

The main entry to Milton PS school is from Thomas Street, with additional access provided on Wason Street adjacent to the staff carpark. No changes to the existing access locations are proposed.

Design Guide and Design Quality Principles

The architecture of the proposed building is based on the SI Pattern Book. The façade design is based on a standard modular system which presents both internally to the school and to the surrounding context. The modular system contains typical components such as cladding, windows, doors, natural ventilation louvres, mechanical louvres, framing elements and sunshades. The composition of the façade components is designed by the project team based on specific project requirements.

The walkway facade is oriented towards the staff carpark to the south, while the facade with colourful sun hoods and framing elements is oriented towards the sports oval to the north. Colours and textures are to be applied to the metal balustrades, stair metal screening, wall facade panels, framing elements and sunshades to present the unique identity of the school. The colour selection is inspired by colours found in school's existing built environment and natural landscape.

The built form of the proposed activity responds effectively to the design quality principles in Schedule 8 of the TI SEPP and the Design Guide, as outlined in **Table 4**.

Table 4: Response to Design Quality Principles in Schedule 8 of TI SEPP

Design quality principle	Response
1. Responsive to context	The proposed activity has been thoughtfully designed to respond to and enhance the positive qualities of its surroundings, adhering

Design quality principle	Response
	to a Country-centred approach and considering site-specific conditions. Key aspects of the design are as follows: **Scale and Integration:** Keeping to the maximum two-storey scale of existing buildings on the site, at a scale that does not overpower the surrounding single and two storey residential area. Being set back from the site boundary behind the existing car park and mature trees, the building is only slightly visible from Wason Street. **Accessibility:** The building sits comfortably to meet existing ground levels for accessibility, while minimising the extent to which the ground floor level is above existing ground. The building bridges the existing topography to connect the car park level to the oval level. **Ecology and Orientation:** Positioning and orienting the building to maximise solar access, with a north facing long elevation for maximum climate control. The building is also sited to suit bushfire asset protection zone requirements and building separation, while minimising removal of existing trees. **Connectivity:** Maximising the logical connection between the new building and existing Building X as well as the sports oval. **Landscaping and Streetscape:** Additional landscape treatment complements the existing landscaping on the site.
2. Sustainable, efficient and resilient	The proposed activity has been meticulously designed to achieve sustainable, efficient, and resilient outcomes, aligning with the principles of caring for Country. Key elements of the design include: **Orientation:** The proposed Building Y is orientated to face the main long elevation to the north-west and features a high level of façade sun shading to minimise heat gain. **Passive Cooling:** Passive cooling using a high window area for natural ventilation, with adjacent proposed vegetation. **Flexible and Durable Design:** The building comprises a regular column grid and open floor plate design which maximises flexibility for future layout changes. The “long life, loose fit” approach ensure the building can adapt to evolving needs over time, remaining durable and resilient. **Materials:** Robust, low maintenance materials. The external materials are designed to be the final finish, eliminating the need for painting and further reducing maintenance requirements. **Solar:** A roof mounted PV solar panel system contributes to the energy efficiency and sustainability of the school. Overall, the design demonstrates a strong commitment to

Design quality principle	Response
	sustainability, efficiency and resilience and ensures that the school is well-equipped to thrive in an evolving climate while minimising its environmental footprint.
3. Accessible and inclusive	The proposed activity has been carefully designed to be accessible and inclusive, ensuring that the buildings and grounds are welcoming and easy to navigate for people with differing needs and abilities. Key aspects of the design include: **Safe and Equitable Access:** The design prioritises safe and equitable access to the new building and adjacent buildings and outdoor spaces for people of all abilities to move freely and comfortably throughout the school. **Comprehensive Accessibility Features:** The proposed activity includes ramp, stair and lift access allowing for people with mobility challenges to move freely and comfortably throughout the building. **Community Integration:** The design maintains the ability of the school to hold activities outside of school hours and share its facilities with the community. This approach fosters a sense of belonging and strengthens the role of the school as a community hub. Overall, the design demonstrates a strong commitment to accessibility and inclusivity, caters to the diverse needs of the student body and community and fosters a welcoming and supportive community for all.
4. Healthy and safe	The proposed activity has been thoughtfully designed to prioritise health and safety, ensuring that the environment supports the wellbeing of all users. Key elements of the design include: **Safe and Equitable Access:** The design enables safe and equitable access to the new building and adjacent buildings and outdoor spaces on the site and promotes a secure and inclusive environment for all. **Supervision and Visibility:** The layout of the school is designed to allow for effective supervision with internal spaces that facilitate visual connections. This ensures that staff can easily monitor student activities which promotes safety and security within the school. **Building Visibility:** The building features public visibility internally and externally providing a good sense of security and oversight of the school grounds. **Welcoming and Accessible Environment:** The design maintains a welcoming address and accessible environment and ensures that the school remains inviting and open to the

Design quality principle	Response
	community, while allowing for the emphasis on safety and security. Overall, the design demonstrates a strong commitment to health and safety, creating a secure and supportive environment that promotes the wellbeing of all members of the school community.
5. Functional and comfortable	The proposed activity has been designed to create functional and comfortable spaces that cater to a wide range of educational and community activities. Key aspects of the design include: **Flexible Learning Spaces:** The layout features consistent learning spaces and learning commons, and opportunities for different levels of openness or insularity by allowing for flexible furniture arrangements. Sliding doors between spaces further enhance flexibility and allow for various uses and configurations. **Designated Storage Areas:** Adequate storage areas are provided to minimise clutter and maintain the organisation and functionality of the learning and activity spaces. **Clear Circulation Paths:** The design includes clear circulation paths enabling the efficient and comfortable navigation of the school. **Natural Light and Ventilation:** The building is designed to maximise natural light. The design includes natural and mechanical ventilation methods which ensures a comfortable indoor environment. Overall, the design demonstrates a strong commitment to creating functional and comfortable spaces that support a wide range of activities and is considerate of the amenity of the adjacent built and natural environments.
6. Flexible and adaptable	The proposed activity has been thoughtfully designed to be flexible and adaptable, ensuring that the spaces can evolve to meet changing educational and community needs. Key aspects of the design include: **Flexible Learning Spaces:** The layout features consistent learning spaces and commons that can be easily reconfigured. The use of sliding doors allows for varying levels of openness or insularity which accommodates for different teaching styles and group sizes. **Adaptable Furniture:** The design incorporates furniture that can be rearranged to support a wide range of activities, from formal instruction to informal group work, enhancing the adaptability of the learning environment. **Designated Storage Areas:** Adequate storage is provided to keep spaces organised and clutter-free, allowing for quick and

Design quality principle	Response
	easy reconfiguration of rooms as needed. **Clear Circulation Paths:** The design includes clear and rational circulation paths, facilitating smooth transitions between different areas and activities, and supporting the dynamic use of space. **Natural Light and Ventilation:** Abundant natural light and opportunities for both natural and mechanical ventilation create a comfortable and adaptable indoor environment that can respond to varying conditions and uses. **Materials:** Robust, low maintenance materials. The external materials are designed to be the final finish, eliminating the need for painting and further reducing maintenance requirements. **Flexible and Durable Design:** The building comprises a regular column grid and open floor plate design which maximises flexibility for future layout changes. Overall, the design demonstrates a strong commitment to flexibility and adaptability, ensuring that the school can effectively support a diverse range of educational and community activities now and in the future.
7. Visual appeal	The proposed activity has been designed with a strong emphasis on visual appeal, ensuring that the buildings and their landscape settings are aesthetically pleasing and contribute positively to the streetscape and neighbourhood character. Key aspects of the design include: **Scale and Proportion:** The building is designed to be in keeping with the scale of neighbouring buildings on the school site, ensuring a harmonious integration with the existing built environment. The articulation of the structure, glazing, and cladding in both internal and external areas provides variety within a consistent grid approach, achieving good proportions and a balanced composition. **Façade Design:** The long elevations feature a depth of façade and a variety of materials, which help to break down the scale of the building. This thoughtful design approach ensures that the building does not appear monolithic and instead presents a visually interesting and engaging appearance. **Contemporary Aesthetic:** The proposed building will have well-articulated elevations with a simple, unobtrusive contemporary aesthetic. The colours and materials chosen relate to the existing buildings, allowing the new structure to sit comfortably within its setting while maintaining a cohesive visual identity. **Streetscape Amenity:** The design responds to and enhances the streetscape amenity, contributing to the quality and character of the neighbourhood. The building's identity and orientation improve

Design quality principle	Response
	the school's street presence and entry. **Civic Role and Community Significance:** The design reflects the school's civic role and community significance, creating a welcoming and visually appealing environment that underscores the importance of the school within the community. Overall, the design demonstrates a strong commitment to visual appeal, ensuring that the school buildings and their landscape settings are not only functional but also enhance the aesthetic quality and character of the neighbourhood.

This comprehensive response ensures the built form meets the design principles in the TI SEPP and the Design Guide's requirements, creating a public-quality, functional, and sustainable educational facility.

Sustainability and Climate Change

A Sustainable Development Plan Report was prepared by NDY and is attached at **Appendix 11**.

The project has been designed in accordance with the Green Building Council of Australia (**GBCA**)'s Green Star Buildings v1 certification at a 4-Star rating.

The building design includes several initiatives aimed at reducing energy consumption. These initiatives feature a greater than 10% improvement in energy efficiency over the minimum National Construction Code (**NCC**) compliance. The design incorporates passive strategies such as optimal orientation, thermal mass, shading, and public-performance insulation and glazing. Energy-efficient lighting, heating, ventilation, air conditioning, and appliances are utilised, alongside energy monitoring and whole-building demand management. Renewable energy sources, particularly solar photovoltaic panels, are integrated, and the building is designed to be 100% electric to minimise gas use and greenhouse gas emissions. Additionally, commissioning and tuning strategies are implemented to ensure optimal performance.

To address water consumption, the building incorporates water-efficient fixtures, equipment, and appliances, along with water use monitoring systems. Rainwater collection and reuse are facilitated, and bubblers and taps are provided to encourage water drinking and reduce waste. The design also includes water-sensitive urban design, stormwater management, and protection of groundwater and drinking water catchments. Commissioning and tuning strategies are applied to ensure efficient water use.

The new homebase building was oriented with the main long elevation to the north and a public level of façade sun shading to minimise heat gain. Further it incorporates passive cooling using a public window area for natural ventilation. Proposed adjacent planting and landscaping to external areas will further mitigate the proposal's exposure to extreme climate events.

The building's material consumption strategy focuses on sustainability, aiming for at least a 10% reduction in upfront carbon through the selection of sustainable materials. This includes the use of low embodied carbon materials and those with public recycled content, particularly in major construction materials such as concrete, steel, timber, and aluminium.

The School Transport Plan (**STP**) prepared and attached at **Appendix 17** aligns with ESD principles by promoting sustainable transport options to reduce the carbon footprint of the school community. Measures include:

- Appointment of a School Travel Coordinator (**STC**) to promote sustainable travel behaviour change for all school stakeholders (students, parents/carers and staff).
- The provision of a Travel Access Guide (**TAG**) to staff, parents and students that provides information about how to access the school safely and efficiently, in alignment with this STP.
- Encouraging carpooling to reduce vehicle congestion and emissions during peak school hours.

These measures reflect a commitment to sustainable transport options and align with the broader ESD goals for the activity.

2.2.2 Construction

The Principal Contractor will be responsible for establishing and managing the site in accordance with planning approvals and relevant legislation and regulations.

The proposed construction hours will be as follows:

- 7:00am to 6:00pm, Monday to Friday.
- 8:00am to 1:00pm, Saturday.
- No work without prior approval on Sundays and Public Holidays.

The site will be secured and made safe from the public throughout the proposed activity via the erection of a temporary 1.8m to 2.4m public perimeter fence, including shade cloth hoarding attached where appropriate in locations where a solid hoarding is not provided, along the entire work site boundary to prevent unauthorised entry to the construction site.

The safety of staff and students during construction is of utmost importance, and safety measures are to be adopted by the Principal Contractor at all times. Safety measures include secure hoarding of the construction site, appropriate signage to help staff manage children’s movements, limiting heavy vehicle movements to school off-peak times, forward entry and exit of all construction vehicles to and from the site and licensed traffic controllers.

The types of vehicles that will be used for this project are listed below:

- Utes and trucks up to 3T, on a daily basis
- Excavators will be use during foundation and services trenching
- Concrete trucks and concrete pumps will be used for pouring foundations.

Demolition

Any works relating to the removal and/or demolition of the demountables will be undertaken through a separate planning pathway. Once the demountables are removed the proposed activity includes the demolition of the following:

- Entrance hardstand areas.
- Retaining wall, stairs and walkway.

- Existing cricket net.
- Disconnection and relocation of LPG tank.
- Decommissioning of existing fire hydrant water tanks and fire hydrant booster; and
- Kerbs.

There are no demolition works are proposed to the two heritage buildings (Building A and Building Q). The proposed demolition works are shown in **Figure 13** below.

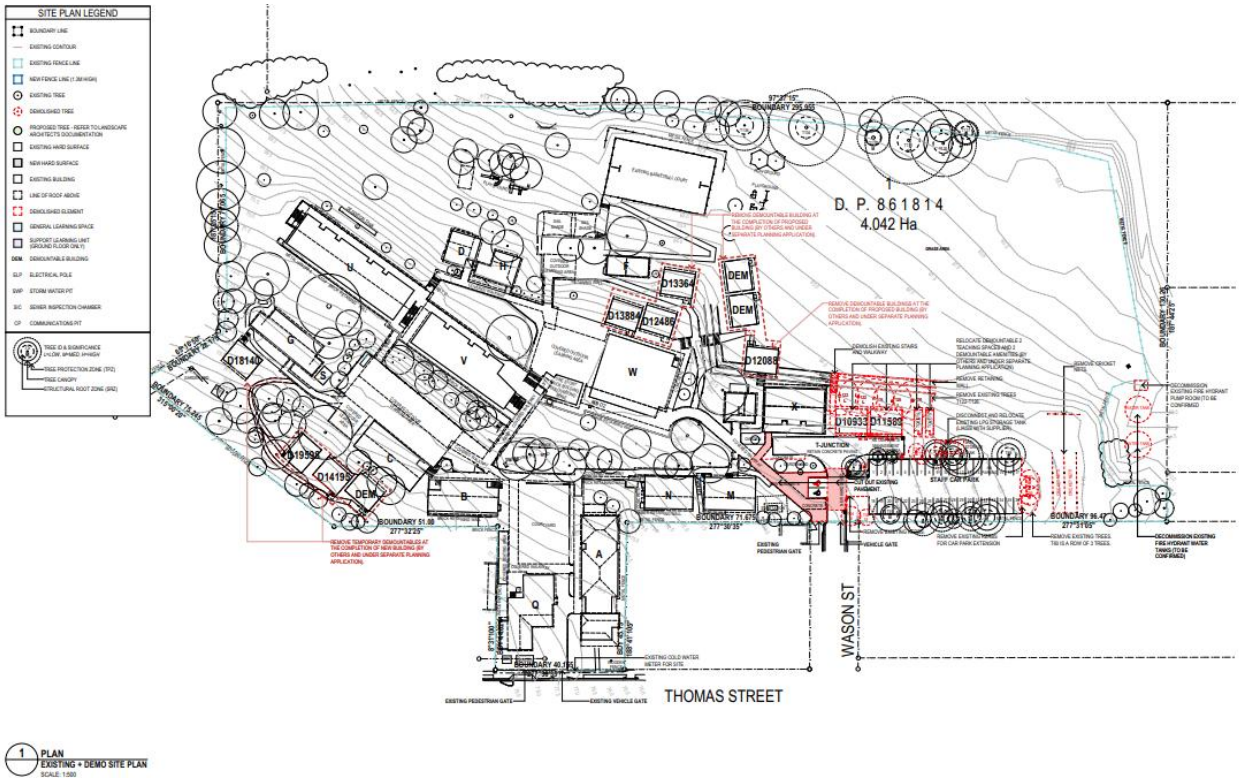


Figure 13: Existing and Demolition site plan

Earthworks

Bulk earthworks will comprise 150mm topsoil removal, fill to creation to create a level surface for the proposed building and carpark alterations, as well as excavation for stormwater pipes and pits. Approximately 864.32 cu.m fill required which are based on 15.59 cu.m cut and 879.91 cu.m fill respectively.

Erosion and sediment controls measures will be applied to manage earthworks.

Tree and Vegetation Removal

The Arboricultural Impact Assessment prepared by Allied Trees (**Appendix 22**) identified the removal of 16 trees based on conflict with the proposed new Building Y or the supporting paths and car park upgrade.

Of the trees required to be removed, the assessment identified the following tree retention values:

- 8 Medium Retention Value trees.
- 8 Low Retention Value trees.

Nineteen (19) trees in the vicinity of the proposed activity are to be retained and are to be managed and protected for the duration of the works. Exclusion zones around trees to be retained will be demarcated by protection fencing, boarding and wraps, as per the Arboricultural Impact Assessment. The Principal Contractor will prepare an approved site-specific Construction Environmental Management Plan that demonstrates protection of trees and other identified vegetation in accordance with the Mitigation Measures at **Appendix 1**.

Utilities and Services

The following new utility connection works are proposed, and will be subject to the necessary approvals:

- New in ground sewer and water connections to the new building.
- Proposed new battery to new building as required under NCC Specification 43.

No off-site utility works or connections are proposed under this REF.

Waste Management

The Principal Contractor will adhere to the Construction Waste Management Plan (**CWMP**) prepared by EcCell Environmental at **Appendix 15**. The CWMP ensures compliance with all applicable regulatory requirements during the construction phase of the proposed activity and details measures to promote responsible waste separation, including recycling provisions and procedures. Waste will be confined to minimise dust and pollution and disposed of in compliance with the *Environmental Planning and Assessment Act 1979*.

Designated areas on site will be allocated for the separated storage of building materials and works waste, as well as for sorting and removing waste for recycling, reuse, or landfill. Waste that cannot be reused or recycled will be taken to an EPA-approved facility after proper classification. Hazardous waste will be labelled, kept separate from non-hazardous waste, securely contained, and disposed of by a certified hazardous waste carrier. Before transporting waste offsite, it will be verified that the transporter and facility are licensed to handle the specific materials.

For more details, refer to the attached CWMP (**Appendix 15**).

2.2.3 Operation

The activity does not propose any changes to the existing operation arrangements of the school, including any alterations to student or staff numbers, community use or operating hours.

Waste Management

The nominated WCP is within the boundary of the school site west of the proposed activity site. The WCP will not change because of the proposed activity.

The proposed operational waste management procedures involve the private collection of waste and recycling bins in accordance with the department's contracts with a private waste collection service. The appointed waste contractors wheel the Mobile Garbage Bins (**MGB**) for each waste stream from their resting position to the back of the truck for collection and then wheel the MGBs back at nominated times in accordance with the relevant waste contract.

2.3 Related activities

There is no other nearby development activity to the site.

Any works relating to the existing demountables, demolition of the existing substation and construction of a new substation do not form part of this activity and will be undertaken through a separate planning pathway.

3. Proposal Need and Alternatives

3.1 Proposal Need

The proposed activity is part of the NSW Government's plan to rebuild public education. This targeted investment ensures regional communities receive access to world class public education.

The proposed activity will provide much needed upgrades to Milton PS through improvements to the quality of facilities and permanent teaching spaces offered at the school. Additionally, the proposed activity will provide additional car parking on the site.

3.2 Alternatives

The proposed activity has been developed following a consideration of options and alternatives to address the need identified above. A summary of the options considered is provided in **Table 5**.

Table 5: Assessment of Options and Alternatives

Option	Discussion	Preferred Option
Option 1: The Proposed Activity	The proposed activity orients the building to be parallel with the existing car park and sports oval and east of Building X. An access compliant covered walkway connects the new building to Building X. The location provides for the integration of the new building with the existing school.	The proposed activity is the **preferred option** as it provides an optimal outcome for students and staff whilst ensuring minimal environmental impacts. It has a shorter overall building length. It best aligns with the strategic goals of the State. The proposed activity will ensure that the Milton local area benefits from improvements to the quality of essential services for residents in the region.
Option 2: Alternative Design	The alternative design was generally based on the Masterplan Feasibility Report prepared by NBRS. Note that in Option 2 the building was in the same position as Option 1. This part of the site was deemed to be the least constrained and therefore other locations were not considered. The difference between Option 1 and Option 2 relates to the configuration of rooms. In Option 2 the core was located centrally, which resulted in a longer building.	The alternative design is **not preferred** as it resulted in a longer building length.
Option 3: Do Nothing	The do nothing option would retain the existing arrangements on site.	Doing nothing is **not preferred** as it does not effectively utilise available NSW Government funding and the proposed new teaching spaces and additional upgrades would not be made available to students and staff.

4. Statutory and Strategic Framework

4.1 Permissibility and Planning Approval Pathway

State Environmental Planning Policy (Transport and Infrastructure) 2021 (**TI SEPP**) aims to facilitate the effective delivery of infrastructure and educational establishments across the state and provides that various developments for the purposes of a government school are permitted without consent. The proposed activity is development permitted without consent as outlined at **Table 6**.

Table 6: Description of Proposed Activities under the TI SEPP

Division and Section within TI SEPP	Description of proposed activity
Section 2.109	The proposed activity includes wombat crossing on Thomas Street which is permitted without consent under • Section 2.109 (1) Development for the purpose of a road or road infrastructure facilities. Road infrastructure facilities includes traffic control facilities including pedestrian crossings. T
Section 3.37 (1)	The proposed activity comprises construction, operation or maintenance on behalf of a public authority within the boundaries of an existing or approved government school, including: • Section 3.37(1)(a)(iii) a permanent classroom, • Section 3.37(1)(a)(iv) a car park, • Section 3.37(1)(b) minor alternations or additions such as— (i) internal fitouts, or (ii) alterations or additions to address work health and safety requirements or to provide access for people with a disability, or (iii) alterations or additions to the external façade of a building that do not increase the building envelope (for example, porticos, balcony enclosures or covered walkways), • Section 3.37(1)(e): demolition of structures or buildings (unless a State heritage item or local heritage item), The site is a local heritage item, however the demolition works do not impact the two items specifically identified in the listing, the Victorian Rendered Masonry School and Schoolmasters Cottage. The demolition works are therefore eligible to be undertaken as development without consent. • Section 3.37(1)(f) construction, operation or maintenance of a building associated with the operation of the school on land within a prescribed zone.
Section 3.37(2)	Under Section 3.37(2)(a) a building resulting from development carried out under subsection (1)(a) or (f) must not have a height of more than the greater of— (a) the maximum height permitted for a building under an environmental planning instrument applying to the land on which the development is proposed to be carried out, or (b) 4 storeys. The proposed activity involves the construction of building with a maximum height of two storeys which is less than the maximum of four storeys outlined in the policy. It is noted that there is no maximum height of building control for the site under the *Shoalhaven Local Environmental Plan 2014*.

Division and Section within TI SEPP	Description of proposed activity
Section 3.37(5)	Section 3.37(5) provides that development for a purpose referred to in subsection (1)(a), (b) or (c) includes a reference to development for the purpose of construction works in connection with that purpose. Construction works for Chapter 3 are defined in Section 3.3 as follows: (3) If this Chapter provides that development for a particular purpose that may be carried out without development consent includes construction works, the following works or activities are (subject to and without limiting that provision) taken to be construction works if they are carried out for that purpose— (a) accessways, (b) temporary construction yards, (c) temporary lay-down areas for materials or equipment, (d) temporary structures, (e) conduct of investigations, (f) clearing of vegetation (including any necessary cutting, pruning or removal of trees) and associated rectification and landscaping, (g) demolition, (h) relocation or removal of infrastructure, (i) extraction of extractive materials at the construction site solely for the purpose of the construction. The installation of infrastructure services, the tree removal and the excavation for construction of the proposed activity are all identified as construction works and therefore can be undertaken as development without consent in conjunction with the proposed activity.
Section 3.37(4)	In accordance with Section 3.37(4) the proposed activity would not result in the contravention of any existing condition of the development consent currently operating (other than a complying development certificate) that applies to any part of the school, relating to hours of operation, noise, vehicular movement, traffic generation, loading, waste management or landscaping. Refer to **Table 7** below for further discussion.
Section 3.37(5A)	In accordance with Section 3.37(5A) the Design Quality Principles set out in Schedule 8 of the TI SEPP and the Design Principles set out in the Design Guide for Schools have been considered as set out in **Section 2.2.1** of this REF.
Section 3.39	The proposed activity includes landscaping within an existing school. The proposed landscaping can be undertaken as exempt development in accordance with: • Section 3.39(1)(c)(iii) landscaping, including irrigation schemes (whether using recycled or other water).

Activities permissible without consent require environmental impact assessment in accordance with Division 5.1 of the EP&A Act and are assessed and determined by a public authority, referred to as the determining authority. The department is the proponent and determining authority for the proposed activity.

Additionally, section 5.7 of the EP&A Act states that an activity that is likely to significantly affect the environment must be subject of an Environmental Impact Statement rather than an REF. The effects of the activity on the environment are considered in **Section 6** of this REF and have been assessed as a less than significant impact and can therefore proceed under an REF assessment.

Section 171(1) of the EP&A Regulation notes that when considering the likely impact of an activity on the environment, the determining authority must take into account the environmental factors specified in the guidelines that apply to the activity.

The *Guidelines for Division 5.1 Assessments* (DPE June 2022) and the *Guidelines for Division 5.1 assessments Consideration of environmental factors for health services facilities and schools Addendum* (DPHI, October 2024) provide a list of environmental factors that must be taken into account for an environmental assessment of the activity under Division 5.1 of the EP&A Act. These factors are considered in detail in **Section 6** of this REF.

Existing Development Consents

A request for all development consents applying to the site was submitted to Shoalhaven City Council (**Council**) under the *Government Information (Public Access) Act 2009* (**GIPA Act**). The GIPA request was responded to on 16 December 2024 and the development consent(s) listed in **Table 7** were identified.

Table 7: Development consents applying to the site

Development Application #	Description	Date Determined
DA97/0239	Covered Outdoor Learning Area (COLA). The COLA is not impacted by the proposed activity and there are no applicable conditions of consent. The	09/07/1997
DA00/2300	COLA. The COLA is not impacted by the proposed activity and there are no applicable conditions of consent.	26/06/2000
DA02/1475	Stabilisation and regrading of existing fill. The proposed activity does not impact this area and there are no applicable conditions of consent.	03/06/2002
DA03/3261 **Redevelopment of Milton Public School in two stages**	The stamped plans for this DA show trees in the vicinity of the new homebase building. The trees on the stamped plans are proposed to be removed under the proposed activity but will be replaced. The outcome will therefore remain consistent with the stamped plans. Condition 12 requires a landscaping plan, approved by Council, to establish a privacy screen along the eastern boundary of the site adjoining Lot 1, DP 348564, Thomas Street, and near the school administration building. The works proposed under the REF are located in a different part of the site. The proposed homebase building was redesigned to avoid the approved waste collection area to the west of the proposed building.	18/05/2004

The proposed activity would not contravene any existing condition of the consent(s) currently operating (other than a complying development certificate) that applies to any part of the school, relating to hours of operation, noise, vehicular movement, traffic generation, loading, waste management or landscaping.

4.2 Environmental Protection and Biodiversity Conservation Act 1999

The provisions of the EPBC Act do not affect the proposal as it is not development that takes place on or affects Commonwealth land or waters. Further, it is not development carried out by a Commonwealth agency or development on Commonwealth land, nor does the proposed

development affect any matters of national significance. An assessment against the EPBC Act checklist is provided at **Table 8**.

Table 8: EPBC Act Checklist

Consideration	Yes/No
Will the activity have, or likely to have, a significant impact on a declared World Heritage Property?	No
Will the activity have, or likely to have, a significant impact on a National Heritage place?	No
Will the activity have, or likely to have, a significant impact on a declared Ramsar wetland?	No
Will the activity have, or likely to have, a significant impact on Commonwealth listed threatened species or endangered community?	No
Will the activity have, or likely to have, a significant impact on listed migratory species?	No
Will the activity involve any nuclear actions?	No
Will the activity have, or likely to have, a significant impact on Commonwealth marine areas?	No
Will the activity have any significant impact on Commonwealth land?	No
Would the activity affect a water resource, with respect to a coal seam gas development or large coal mining development?	No

4.3 Other Approvals and Legislation

Table 9 identifies any additional approvals that may be required for the proposed activity.

Table 9: Consideration of other approvals and legislation

Legislation	Relevant?	Approval Required?	Applicability
State Legislation			
National Parks and Wildlife Act 1974	Yes	No	The aim of the NPW Act is to ensure the conservation of the natural environment including any objects, places or features identified as having public cultural value or significance. Section 90 of the NPW Act facilitates the issuance of Aboriginal Heritage Impact Permits (**AHIP**) in the instance there are any potential aboriginal heritage impacts. An Aboriginal Heritage Due Diligence (**AHDD**) report was prepared by Apex Archaeology in accordance with the Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales 2010 (**DECCW**)- **Appendix 19**. The report found that there are no Aboriginal sites within 200m, nor is the site assessed as likely to contain Aboriginal cultural heritage values. The NPW Act is not relevant as the proposed activity does not require a Section 90 approval.
Rural Fires Act 1997	Yes	No	The site is mapped as BFPL. School buildings are classified as special fire protection purpose (**SFPP**) under the *Rural Fires Act 1997* and are assessed against the Bushfire Protection Measures (BPM) of the Planning for Bushfire Protection (PBP). Building Y has been designed in accordance with PBP and will be constructed to BAL-19 under AS 3959-2018.
Biodiversity	Yes	No	Part 7 of the *Biodiversity Conservation Act 2016* (the **BC**

Legislation	Relevant?	Approval Required ?	Applicability
Conservation Act 2016			**Act**) outlines biodiversity assessment and approval requirements and states that an activity under Part 5 of the EP&A Act is to be regarded as an activity likely to significantly affect the environment if it is likely to significantly affect threatened species as defined by the test of significance criteria in Section 7.3 of the BC Act, which may then lead to a Species Impact Statement (**SIS**) or Biodiversity Assessment Report (**BDAR**). The Flora and Fauna Assessment report (**FFA**) prepared by Water Technology the proposed activity (**Appendix 21**) includes the test of significance and concludes that the proposed activity does not significantly affect any threatened species or ecological communities as per the BC Act. As a result, an EIS (and therefore a SIS or a BDAR) is not required.
Contaminated Lands Management Act 1997	Yes	No	This REF is supported by a PSI prepared by Stantec (**Appendix 24**) which confirms that the site is suitable for its intended use. Additionally, no approval is required under the CLM Act. Furthermore, the Section 10.7 Planning Certificate does not indicate that the site is significantly contaminated or that any approvals under the CLM Act are required.
Roads Act 1993	Yes	Yes	The proposed activity includes the construction of a wombat pedestrian crossing on Thomas Street north across Wason Street. An approval under the Roads Act 1993 is required from Council.
State Legislation – State Environmental Planning Policies			
State Environmental Planning Policy (Planning Systems) 2021	Yes	No	The Planning Systems SEPP allows development for a building for an existing educational establishment to be classified as State Significant Development (**SSD**) if the EDC exceeds $50 million. The proposed activity does not reach these thresholds and is not classified as State Significant Development. The proposed activity is being carried out under Section 3.37 of the TI SEPP as development without consent.
State Environmental Planning Policy (Sustainable Buildings) 2022	Yes	Yes	The provisions of Chapter 3 of the SB SEPP apply to the proposed activity as it involves the erection of a new building with an estimated development cost (**EDC**) greater than $5 million. This REF is accompanied by a Net Zero Statement and ESD Report which outline the strategies to resolve operational and construction emissions as well as committing to Net Zero operational emissions by 2050.
State Environmental Planning Policy (Resilience and Hazards) 2021	Yes	No	*State Environmental Planning Policy (Resilience and Hazards) 2021* (Resilience and Hazards SEPP) contains planning provisions relating to: • Chapter 2- Land use planning within a coastal zone • Chapter 3- Management of hazardous and offensive development • Chapter 4- Remediation of contaminated land and to minimise risk of harm The site is not identified as a coastal use or within a coastal environment area. Therefore, the provisions of Chapter 2

<table>
<tr><th>Legislation</th><th>Relevant?</th><th>Approval Required ?</th><th>Applicability</th></tr>
<tr><td></td><td></td><td></td><td>are not required to be assessed.
Chapter 4 of the Resilience and Hazards SEPP provides a statewide planning approach for the remediation of land to reduce the risk of harm to human health or the environment. Under Chapter 4, a consent authority must consider whether the land is suitable for a proposed activity from a contamination perspective. The preliminary site investigation (PSI, Appendix 24) completed for the proposed activity concludes that the site is not contaminated and is suitable for the proposed activity.</td></tr>
<tr><td>State Environmental Planning Policy (Industry and Employment) 2021</td><td>Yes</td><td>No</td><td>The proposed activity does not include signage works. Therefore, the signage provisions of the IE SEPP are not required to be assessed.</td></tr>
<tr><td>Shoalhaven Local Environmental Plan 2014</td><td>Yes</td><td>No</td><td>The site is zoned SP2 Educational Establishment. While the TI SEPP removes the requirement to seek consent under the provisions of the Shoalhaven LEP 2014 (SLPE 2014) the proposal is consistent with the relevant objectives of the SP2 zone which are to:
To provide for infrastructure and related uses.
To prevent development that is not compatible with or that may detract from the provision of infrastructure.
<table><tr><td>Height of Buildings</td><td>Not subject to a height of building control.

Under Clause 4.3(2A) if land is not mapped with a height control, the site is subject to a blanket 11m height of building control.

The proposed building height of approximately 14m is however permissible under the provisions of the T & I SEPP.</td></tr><tr><td>Floor Space Ratio</td><td>Not subject to a floor space ratio control.</td></tr><tr><td>Heritage</td><td>The entire school site is a heritage item ‘Victorian Rendered Masonry School and Schoolmasters Cottage’, item number I304 listed under Part 1 of Schedule 5 of the SLEP 2014. Refer Section 6.6.</td></tr></table>Shoalhaven LEP mapping is included in Figure 14 below.</td></tr>
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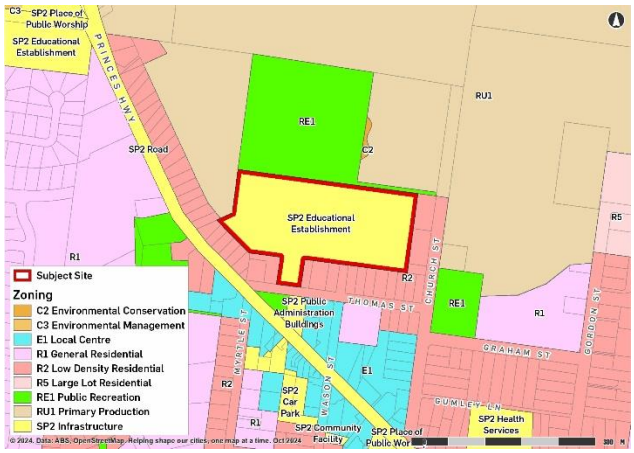
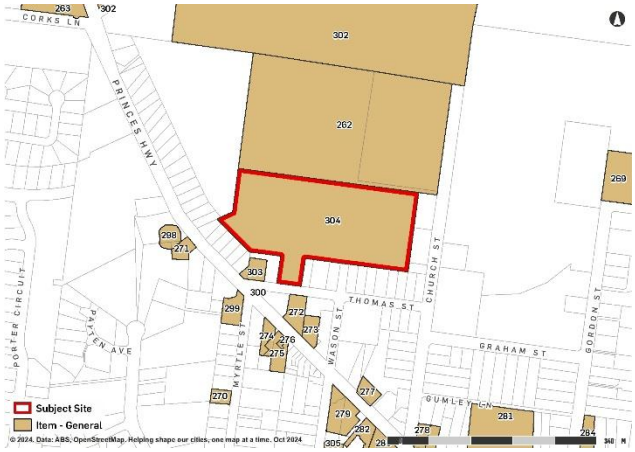
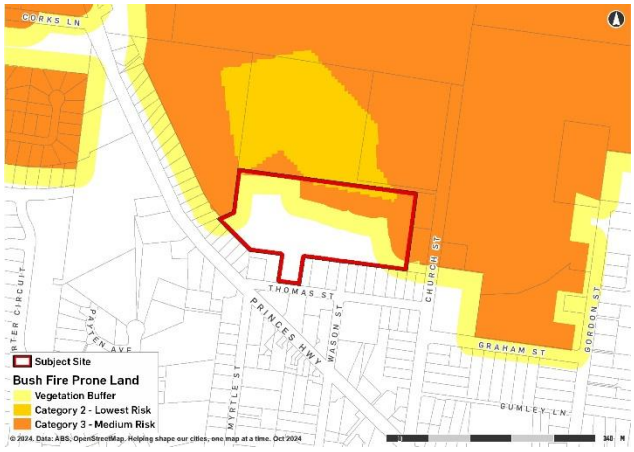


Picture 4 Land Zoning Map

Picture 5 Height of Buildings Map



Picture 6 Heritage Map



Picture 7 Bushfire Prone Land Map

Source: Urbis, 2024

Figure 14: Shoalhaven LEP Maps

4.4 Strategic Plans

Table 10 considers strategic plans that are relevant to the proposed activity.

Table 10: Consideration of applicable Strategic Plans

Strategic Plan	Assessment
Illawarra Shoalhaven Regional Plan 2041	The Illawarra Shoalhaven Regional Plan (**Regional Plan**) provides the overarching strategic plan for growth and change in Wollongong, Shellharbour, Kiama and Shoalhaven. It is a 20-year plan to inform land use planning and inform the work of agencies to plan for growth and change and create an innovated, connected, diverse and resilient Shoalhaven. It identifies key challenges facing the Shoalhaven including increasing the population to eight million by 2056, 817,000 new jobs and a requirement of 725,000 new homes by 2036. The Illawarra Shoalhaven Region Plan includes the following objectives of relevance to the proposed activity: • Objective 11 of the Plan aims to protect important environmental assets. The proposed activity contributes to the improvement of educational facilities within its existing

Strategic Plan	Assessment
	site and does not impact the adjacent environmental assets. • Objective 15 of the Plan targets a Net Zero region by 2050. The proposed activity achieves a 4-Star Green Star rating demonstrating its contribution to achieving Net Zero in accordance with this objective.
Future Transport Strategy 2061	Future Transport Strategy is a strategic document providing future investment, planning, delivery, and operational direction focussed on improving New South Wales's transport system. The strategy adopts a customer-first approach based on Transport for New South Wales's (TfNSW) desired outcomes of improving customer connectivity, creating successful places for the community, and supporting economic activity. The strategy also supports the Government's vision of Six Cities. These six cities will be seamlessly connected and within each of the six cities, customers will be within 30 minutes by public transport to jobs, homes, essential services, and social connections. Relevant to the project, the strategy aims to facilitate students' independent mobility by improving safe walking and bike riding options for travel between home and school and integrating active and public transport. Actions targeted at meeting this aim are: • Provide safer streets that will allow more students to walk or cycle to school. • Improve safe walking, cycling, and public transport access to schools. • Develop future transport plans to support sustainable travel for students of all abilities to and from school. The proposed activity supports these actions as the provision of the wombat crossing will improving pedestrian safety and supporting walking to school and other forms of active transport.
Shoalhaven Local Strategic Planning Statement	The Shoalhaven Local Strategic Planning Statement 2020 (**LSPS**) identifies a long term direction for future land-use planning work and to plan for and deliver homes, jobs, services, and infrastructure. The LSPS sets out two key directions, Direction 1 Managing Economic Growth includes delivering infrastructure (including schools). The proposed activity supports Direction 1 by delivering adequate and appropriate education infrastructure. The proposed activity will upgrade Milton PS which directly addresses Collaboration Activity CA2.5 of Planning Priority 2: *Work with the NSW Department of Education to identify and deliver new and upgraded schools and identify opportunities for community use of facilities.*

5. Consultation

5.1 Early Stakeholder Engagement

Table 11 provides a summary of early stakeholder (non-statutory) consultation undertaken to inform project development and preparation of the REF.

Table 11: Summary of Early Stakeholder Engagement

Stakeholder	Engagement
Transport Working Group (TWG)	A transport working group (**TWG**) was formed of representatives from Shoalhaven City Council (**Council**), Transport for New South Wales (**TfNSW**), School Infrastructure (**SI**), RP Infrastructure (**RPI**), Fulton Trotter Architects (**FT**) and SCT Consulting (**SCT**). **19 August 2024 (TWG 01):** An introductory meeting was held to discuss the activity's transport context. The project team met with Shoalhaven City Council and TfNSW stakeholders to provide a project overview, rapid transport assessment and list of proposed transport initiatives. **18 November 2024 (TWG 02):** A follow-up transport meeting was held with stakeholders from Shoalhaven City Council and TfNSW. The project team provided project and design updates. The project team was represented by SI, RPI, FT and SCT. Proposed transport initiatives were discussed and agreed.
Shoalhaven City Council (**Council**)	**9 December 2024:** An advisory meeting was held with Council to provide site context, planning consideration and architectural plans. The project team was represented by SI, the department's Statutory Planning team, RPI, FT and Urbis. Council representatives provided high level feedback for the project team to consider as part of finalising the planning application. This included guidance on design considerations, landscaping area and recommendations for further consultation. **6 February 2025** Further to TWG 02, a separate meeting with Shoalhaven City Council was held to provide further feedback specific to council's previous queries and advise project's final position on public domain and transport initiatives. Four transport initiatives were endorsed to be implement by the project • Implement no stopping during school peaks at Wason Street between Thomas Street and school entrance gate, pending local Council/Traffic committee feedback • A new wombat crossing on Thomas St north across Wason St • Additional time limited no parking zone to extend kiss 'n drop spaces and reduce overspill, pending local Council/Traffic committee approval. • NSW Department of Education consultants to develop easy to use bus maps (TAG). Council raised no concerns regarding the final position presented.

Stakeholder	Engagement
Endeavour Energy	**25 July 2024 – preliminary enquiry:** A preliminary enquiry was submitted in the Connections Portal to request information regarding capacity of existing substation supply. Response confirmed supply available. **11 November 2024 – load application:** A load application was lodged to establish a new substation. Note any works relating to the substation will be undertaken through a separate planning pathway, and do not form part of the activity under assessment in this REF.
Community	**23 November 2023:** A flyer on the project website notified the commencement of planning and geotechnical investigations to occur on 27 and 28 November 2023. **March 2024:** A flyer on the project website announced the proposed upgrades at Milton Public School were in the early planning stage. **April 2024**: A flyer on project website providing update on project commencement and next steps and links for consultation surveys. **September 2024:** A flyer on the project website provided an update on project progress and notified the community of an information session to be held on 10 March 2025. **10 March 2025:** A community information session was held at the school for the public community to provide an opportunity to view the master plan and concept design and provide feedback to the project team. Information boards and packs were made available.

5.2 Statutory Consultation

Consultation will be undertaken in accordance with statutory requirements under the TI SEPP and having regard to the SCPP DPHI and the SCPP DoE. This includes:

- Sending notices to adjoining neighbours, owners and occupiers inviting comments within 21 days.
- Sending notices to the local council and relevant state and commonwealth government agencies and service providers inviting comments within 21 days (being a major upgrade).
- Making the REF publicly available on the Planning Portal throughout the consultation period.

6. Environmental Impact Assessment

6.1 Traffic, Access and Parking

A Traffic and Transport Impact Assessment (**TTIA**) has been prepared by SCT Consulting and is included at **Appendix 17**. The TTIA addresses the traffic and transport impacts during the construction and operational stages of the proposed activity. The report also outlines the proposed mitigation measures for the activity to minimise any adverse impacts, where required.

Methodology

The TTIA provides a comprehensive analysis of both existing and predicted traffic conditions resulting from the proposed activity. The following methodology was undertaken to provide a comprehensive assessment of the existing traffic conditions:

- A review of the existing transport conditions including drop-off / pick-up arrangements, pedestrian and cycling facilities, public transport facilities and connectivity surrounding the subject site.
- A summary of previous consultation with relevant council and agencies – through a TWG.
- A review of the existing transport planning documents.
- A transport assessment of the school student enrolment catchment and travel modes.
- A review of historical crash data.
- Assessment of the existing and proposed access arrangements for vehicles, servicing and refuse collection.
- Assessment of the school's car and bicycle parking provision.
- Assessment of the on-site parking layout, access, servicing and refuse collection requirements.

Existing Environment

Milton PS has frontage to Thomas Street, a one-way local street which permits vehicles to travel in an east bound direction. The main entry to the school is from Thomas Street, with additional access provided on Wason Street adjacent to the staff carpark. Wason Street intersects the school's southern boundary along Thomas Street, providing access to the school's gated off-street staff car park. The street also serves several driveways for residential developments fronting the school.

A bus stop on Thomas Street serves as the primary pick-up and drop-off point for Milton Public School students, with additional stops at the intersection of Princes Highway and Thomas Street, as well as on Wason Street south of Thomas Street.

The current kiss and drop off facility located on the southern leg of Thomas Street has capacity for five vehicles.

School buses to and from Milton Public School are primarily run by Ulladulla Buslines with some additional services provided by Shoal Bus. Ulladulla Buslines operates eight AM and seven PM services (denoted by animals). Shoalbus operates the S505 route.

A student travel mode share survey conducted in October 2023 (refer **Figure 15**) showed that mode share is evenly split between bus and private vehicles for trips to school. For students leaving school, most students are using the bus and active transport (combined mode share of approximately 57 per cent). Buses account for 51% of student travel.

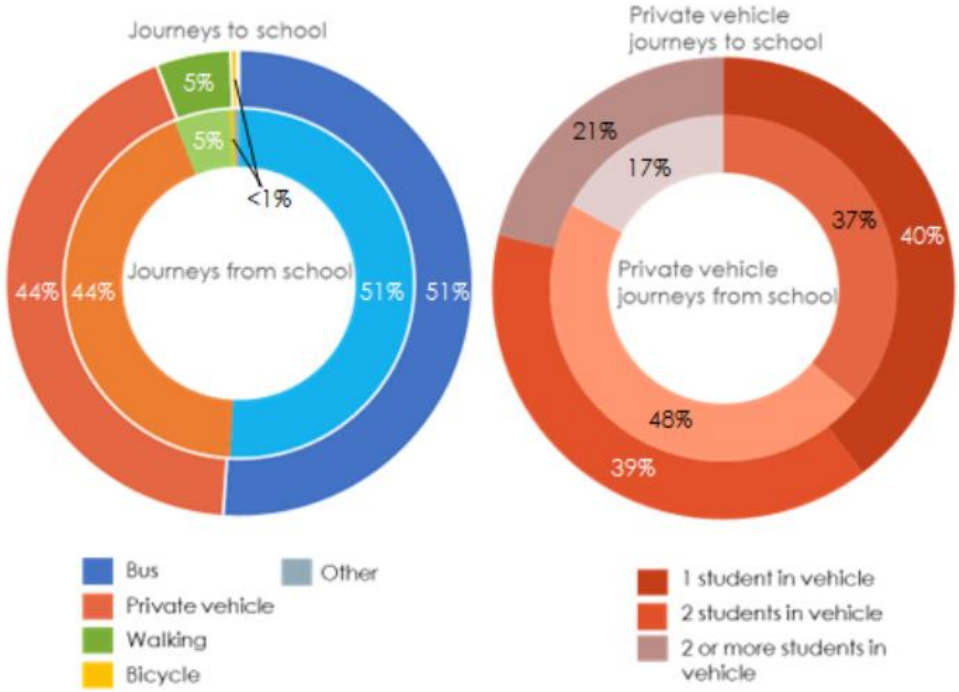


Figure 15 Travel Mode Share

Assessment

The proposed activity does not increase the school population, thus it does not generate any additional traffic. The key findings of the TTIA in respect of operational traffic and parking are as follows:

The assessment finds:

- The 5 proposed additional parking spaces within school property will accommodate for visitor and student parking, in addition to the 38 existing spaces, making for a total of 43 car parking spaces on site. The 43 spaces are a practical maximum on-site parking supply based on the need to provide play space and space and other school facilities. The increase in spaces will better service staff parking and reduce reliance on on-street parking.
- The addition of three extra kiss and drop spaces on Thomas Street to improve operational efficiency and safety for drop-off activities, which currently occur at various locations around the school. This is not anticipated to increase car mode share, with existing kiss and drop behaviours maintained but now operating more safely.
- Wason Street serves the staff car park and several residential driveways yet lacks formal crossing infrastructure. The new wombat crossing on Thomas Street north will enhance pedestrian facilities around the school,
- The new crossing will enhance pedestrian connectivity, improving safety and overall walkability in the area. The new crossing will better accommodate walking as the preferred mode of transport.

- To manage demands and the operational efficiency of the Kiss and Drop, the infrastructure provisions will be supported by the School Travel Plan, Travel Access Guide and supporting operational guidance on the correct and appropriate use of the Kiss and Drop zone.
- The on-site car parking facilities are considered to be compliant with the relevant requirements of Council's DCP and Australian Standards AS2890.1, AS2890.2 and AS2890.6.

Construction

The key findings of the TTIA in respect of construction traffic and parking are as follows:

- The estimated peak workforce is approximately up to 100 full-time equivalent (FTE) workers. Due to the limited public transport to the site, it is estimated that 100% will take private transport to the site, with a vehicle occupancy of 2 passengers assumed, this generates a parking demand for 50 construction worker cars.
- It is assumed that the 50 light vehicles generated can park on site (outside of school operating hours), or on-street on the surrounding road networks. A mitigation measure has been included to ensure workers do not to park within the Milton Village pool car park or at nearby business premises.
- Workers would generally start earlier and end earlier than the commuter peak periods and would likely not coincide with the school or road network periods.
- For construction access, potential haulage routes to the site are via the Princes Highway travelling from either north or south and then onto Thomas Street. Vehicles exiting the site with travel via Wason Street back to the Princes Highway. The Princes Highway is an approved B-double route under both the General Mass Limit (**GML**) and Concessional Mass Limit (**CML**) regulations.
- Final construction vehicle numbers are still being confirmed. At the submission of this draft, a preliminary estimate of 10 heavy vehicle truck movements is anticipated on a typical day.
- As oversized vehicles may be used for transporting building parts and modules, deliveries will be scheduled outside of peak travel hours. This will minimise disruptions to the broader traffic network and reduce the risk of damage to the components.
- The construction of the Building Y will generate temporary traffic impacts on the local road network due to the movement of heavy vehicles, material deliveries and workforce commuting. The combined light vehicle trips and heavy vehicle movements are a relatively small demand in the context of the typical road demands, and this level of traffic increase during the peak construction periods is expected to have negligible impacts on the surrounding street network.
- Construction site access will be provided through Wason Street at the existing driveway entry.
- During the construction work, the loading and unloading of all materials will only occur within the site.

- To mitigate potential conflicts with other construction vehicles and general traffic, traffic controllers will be used to stop traffic on the public street(s) to allow trucks to enter or leave the site. Where possible, vehicles must enter and exit the site in a forward direction.
- There are to be no construction vehicle movements in or out of the access gate during school PM peak/finish time to minimise conflicts with parents/students.

Mitigation Measures

Subject to the implementation of the mitigation measures outlined below, the proposed activity will have a negligible impact on the traffic conditions of the area.

#	Reason for mitigation measure	Mitigation Measure	Timing	Significance after mitigation
CTMM1	To minimise traffic disruptions and manage construction-related movement safely.	Prepare a Construction Traffic Management Plan (**CTMP**) to inform construction workers and heavy vehicle movements on safe traffic flow and minimise disruption to the school and surrounding areas. The CTMP must include a Construction Worker Access Management Plan (**CWAMP**) to outline strategies and measures to manage how construction workers access a construction site including carpooling initiatives.	Prior to Construction	Not significant
CTMM3	To prevent disruption to residential streets and maintain safety and amenity.	Construction worker parking can impact the safety and amenity of surrounding areas. Workers will be required to park on the adjoining residential streets and not within the pool car park or in business premises. This provision will be included as a clause in the CTMP following consultation with the construction team.	Construction	Not significant
CTMM4	To better service staff parking and reduce reliance on on street parking.	Increase in staff parking spaces by 5 spaces which comply with AS2890.1-2004.	Construction	Not significant
CTMM5	To reduce congestion and prevent kiss and drop activities from occurring on Wason Street.	Subject to Traffic Committee approval, implement no stopping during No Stopping 8.00 – 9.30 am and 2.30 – 4.00 pm SCHOOL DAYS at Wason Street between Thomas Street and school entrance gate, to manage traffic flow	Construction	Not significant

#	Reason for mitigation measure	Mitigation Measure	Timing	Significance after mitigation
		during peak drop off and pick up times.		
CTMM6	To provide better segregate pedestrians from the road users to create a safer crossing environment for students and teachers.	New wombat crossing on Thomas Street north across Wason Street.	Construction	Not significant
CTMM7	To manage traffic flow and ensure availability of parking spaces for kiss and drop during peak periods.	Subject to Traffic Committee approval, change parking signage for three existing unrestricted parking spaces on Thomas Street (southern side) to No Parking 8.00 – 9.30 am and 2.30 – 4.00 pm SCHOOL DAYS to manage traffic flow during peak drop off and pick up times.	Construction	Not significant.
OPTMM1	To support infrastructure provisions and provide supporting operational guidance on the correct and appropriate use of the transport facilities surrounding the site.	Prepare and implement a School Transport Plan and Travel Access Guide for use by students, parents and staff.	Operation.	Not significant.
OPTMM2	To reduce congestion caused by private vehicle use and improve overall traffic management.	Appoint a School Travel Coordinator and establish a School Transport Committee	Operation	Not significant
OPTMM3	To ensure the plan's ongoing effectiveness and responsiveness to changing conditions.	Update the School Transport Plan annually for the first two years.	Operation	Not significant

6.2 Noise and Vibration

A Noise and Vibration Impact Assessment (**NVIA**) has been prepared by NDY in accordance with relevant NSW EPA guidelines and is attached in **Appendix 18**. The report evaluates the potential

noise and vibration impacts associated with the proposed activity, covering both the construction and operational phases of the educational establishment.

Methodology

The noise and vibration assessment methodology includes the following key steps:

- Identification of Noise Sensitive Receivers: Key residential, recreational, and educational receivers surrounding the site were identified, with their proximity to construction and operational activities noted.
- Establishing Noise and Vibration Criteria: Criteria were developed based on relevant guidelines, including the *NSW Noise Policy for Industry* (**NPI**), *Interim Construction Noise Guideline* (**ICNG**), and *Assessing Vibration: A Technical Guideline*.
- The ICNG identifies that the relevant noise level for classrooms is 45 dBA which has been adopted to assess the impacts of the proposed activity on the existing school.
- Short term noise measurements, to derive the project noise level trigger (**PNTL**).
- Noise Prediction and Assessment:
    - Noise level predictions were made using typical construction equipment and activity sound power levels, accounting for distance attenuation, shielding, and reflections.
    - Scenarios for operational noise, including building services and traffic, were modelled to ensure compliance with criteria.
- Vibration Assessment: Potential vibration impacts were evaluated for construction equipment, with recommendations for detailed site-specific assessments during project execution.

Existing Environment

The existing noise environment around the public school site is relatively quiet, reflecting the low density residential environment. Existing noise levels were monitored during an attended recording near Wason Street as identified in **Table 12** below.

Table 12: Short term monitoring location

Short-term monitoring location	Date and Time	Short term attended measurement	
		Overall LA_{eq}	L90
Cnr. Thomas and Wason St.	24.07.24 / Daytime	50	39

As shown in **Figure 16**, two residential properties are identified as the most affected receivers. The closest of these sensitive receivers, on which the NVIA is based, are identified in **Table 13** below.

Table 13: Sensitive Receivers

Receiver	Address	Approximate distance (metres)	Type
A	21 Church Street, Milton	50	Residential

Receiver	Address	Approximate distance (metres)	Type
B	19 Thomas Street, Milton	30	

The PNTL are the most stringent noise levels of the NSW NPfI project intrusiveness and project amenity noise levels for day, evening and night-time periods and are project-specific, as shown in **Table 14** below. The PNTL for the existing school is 45 dBa (internal)/ 55dBa (external).

Table 14: Project Noise Trigger Levels

Location	Time	Descriptor	External PNTL
A and B	0700 to 1800	LAeq, Day	53dBA (Day)
	1800 to 2200	LAeq, Evening	43 dBA (Evening)
	2200 to 0700	LAeq, Night	38 dBA (Night)

Source: NDY, 2024

Figure 16 Sensitive Receivers

Assessment

Construction Noise and Vibration

Construction noise is predicted to be below 75 dBA at all locations. Construction noise for excavation and piling will require a perimeter hoarding as indicated in **Figure 17** to meet recommended noise levels inside the nearest school building. Time-managed machinery will be required for the tracked excavator and dumper truck. The vibration levels from percussive piling works are expected to meet the construction vibration criteria for sensitive structures to vibration as per DIN 4150 – 3.

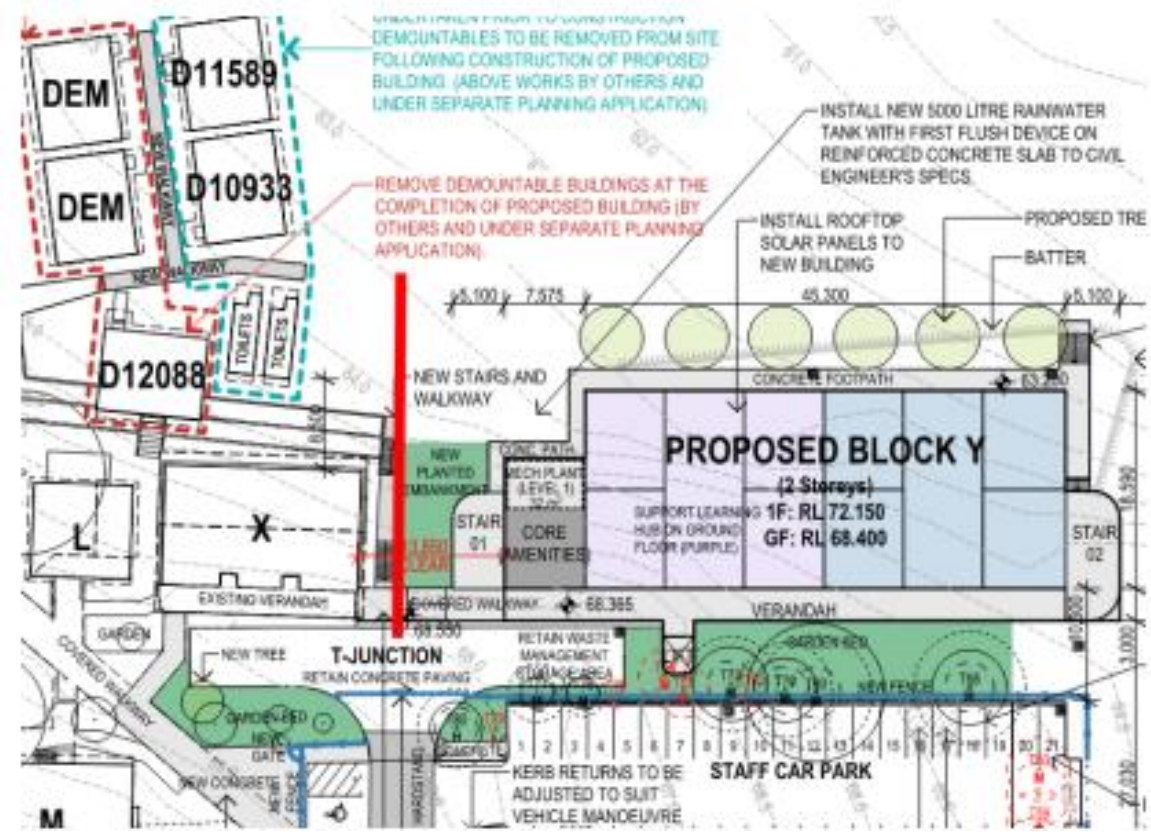


Figure 17 Indicative location of hoarding during construction phase

Operational Noise and Vibration

There are no expected changes to noise emissions from waste collection, the school public address (PA) system and school bells, outdoor areas, operational traffic or fire pump rooms on site, as the activity does not increase student or staff numbers.

The new mechanical plant will be fitted with acoustic louvers for condenser units and internally lined ducts with 50 mm insulation for both ends on fans. It is assumed that the condenser units will operate in a limited way during the evening and not operate during nighttime periods.

The potential noise and vibration impacts resulting from the proposed activity are considered acceptable according to the state and local regulations. The extent and nature of potential impacts are low and will not have a significant impact on the locality, community and/or the environment.

Mitigation Measures

Subject to the mitigation measures outlined below, potential impacts can be appropriately managed to ensure that there is minimal impact on the locality, community and/or the environment.

#	Reason for mitigation measure	Mitigation Measure	Timing	Significance after mitigation
CMM17	To protect the existing school buildings from construction noise.	Construction noise for excavation and piling will require a perimeter hoarding as indicated in Section 7.2 of the NDY Acoustic Report (dated 7 April 2025) to meet recommended noise levels inside the nearest school building to the works. Time managed machinery will be required for the tracked excavator (70 per cent) and dumper truck (40 per cent).	Construction	Not significant.
OPMM9	To avoid impacts resulting from the plant room operation.	Acoustic louvres are to be installed surrounding mechanical plant and fans are to have internally lined ducts with acoustic insulation.	Construction	Not significant
OPMM10	To meet the Project Specific Noise Trigger Level (**PNTL**) levels during nighttime.	Mechanical plant room not to operate during night time periods (after 10 pm).	Operation	Not significant.
OPMM11	To avoid impacts from the pump operation.	The proposed fire pump will need to be designed with a complete acoustic enclosure to meet project boundary noise levels.	Design/Operation	Not significant.

6.3 Contamination and Hazardous Materials

A Preliminary Site Investigation (**PSI**) Report has been prepared by Stantec and is included at **Appendix 24**. The results of the PSI did not necessitate the completion of a Detailed Site Investigation (**DSI**). The PSI assesses and quantifies any soil and groundwater contamination at the site and confirms that the site can be made suitable to accommodate the proposed upgrade works.

Methodology

The methodology to undertake the PSI involved:

- A desktop study of information for the site and surrounds. This desktop study included a review of:
    - A collection of historical data.
    - Relevant mapping including geology, hydrogeology, topography and acid sulfate soils risk maps.

    - NSW EPA contaminated land records and Protection of the Environment Operations (**PoEO**) Licenses.
    - Information and documentation provided to Stantec by the client, including publicly available asbestos registers for the site.
- An onsite inspection primarily focused on the portions of the site that are proposed for upgrade and alteration.
- Interviews with relevant site operators, where possible.
- Development of a Preliminary Conceptual Site Model based on the information gathered during the desktop study and site inspection.

Existing Environment

The PSI report identified the site was used for agricultural purposes since 1944. The 1959 aerial imagery shows buildings and structures with the site established as a school in 1948.

The site was not subject to regulation by the NSW EPA and appeared to be free of statutory notices and licencing agreements under both the *Contaminated Land Management Act 1997* and *Protection of the Environment Operations Act 1997* and was not included on the List of NSW Contaminated Sites.

During the inspection, it was noted that filling appears to have occurred at locations where a level ground surface has been achieved, with the most filling evident in the central and northern portions of the site. However, localised filling was also noted in the southern portion and toward the eastern boundary. The quality and origin of the fill cannot be determined without further assessment, and latent demolition rubble and other wastes were observed on exposed surface soils at some locations.

Assessment

Latent demolition rubble / fragments were observed on visible ground surfaces at some locations where filling is suspected to have occurred. The asbestos register for the site notes that asbestos debris and sheeting are assumed to be present beneath several demountable buildings, which is supported by the observations of waste and anthropogenic materials being present beneath buildings during the inspection.

Soils assessed as part of the contamination investigation did not contain concentrations of chemical contaminants above the adopted human health criteria that would preclude the ongoing land use as a primary school.

Exceedances of generic ecological criterion were identified for copper and zinc. However, due to the absence of significant ecological receptors under both the current and proposed site configuration the generic exceedances were not considered to prohibit the proposed upgrades.

Surficial waste beneath buildings and surrounding buildings was considered unsuitable should site occupants, such as students, interact with the materials.

Preliminary and indicative classification of soils encountered at the site, for the purpose of informing future off-site disposal, were preliminarily classified as General Solid Waste (non-putrescible).

Overall, the PSI concluded that the site is suitable for the proposed activity. Several mitigation measures have been proposed to manage the risk of unidentified contamination, as well as the classification and disposal of waste.

Mitigation Measures

Subject to the implementation of the following mitigation measures proposed by Stantec, it is considered that the activity will have a negligible environmental risk due to contamination and complies with all relevant NSW EPA requirements.

#	Reason for mitigation measure	Mitigation Measure	Timing	Significance after mitigation
CMM2	To ensure that the proposed activity will not have a significant impact on human health and ecological receptors.	All future activities should be conducted as per a suitable Construction and Environmental Management Plan (**CEMP**) to minimise potential risks to human health and the environment.	Construction	Not significant.
CMM2 LCMM1	Due to the potential occurrence of unexpected finds during construction phase.	To manage unidentified contamination risks, develop an unexpected finds protocol for unidentified asbestos or other contamination.	Pre- Construction	Not significant
CMW20	To avoid the health risks associated with improperly disposed soils and legal liabilities associated with non-compliance of waste disposal.	Any material being removed form site must be classified for off-site disposal in accordance with the EPA (2014) *Waste Classification Guidelines* and/or an applicable NSW EPA Resource Recovery Order.	Construction	Not significant.
SWMM2	To ensure imported and/or blended material (if required) is suitable for the proposed land use.	Imported fill must be compatible with the existing soil characteristics of the site and limited to the following: Virgin excavated natural material (VENM); and/or Excavated natural material (ENM) certified as such in accordance with Protection of the Environment Operations (Waste) Regulation 2014; and/or Material subject to a Waste Exemption under Clause 91 and Clause 92 of the Protection of the Environment Operations (Waste) Regulation 2014 and recognised by the NSW Environment Protection Authority as being “fit for purpose” with respect to the works under the REF. Certificates from a suitably qualified person/contractor	Construction.	Not significant.

#	Reason for mitigation measure	Mitigation Measure	Timing	Significance after mitigation
		proving that the imported fill material complies with these requirements must be provided to the relevant DoE Project Lead prior to filling works.		

6.4 Hydrology and Water Quality

A Stormwater Management Report was prepared by Meinhardt (**Appendix 14**).

Existing Environment

The site is located approximately 60m south of an unnamed drainage line which drains into Narrawallee Creek approximately 2.5km north east of the site. The site is not flood affected.

Assessment

Stormwater

The proposed stormwater design is summarised below:

- The proposed activity includes stormwater works. A pit and pipe system within the site area conveys minor flows.
- The roof drainage system has been designed and documented by the hydraulic engineer and is directly discharged to the proposed pit behind the proposed building.
- The proposed activity does not generate a requirement to provide onsite detention under Shoalhaven Development Control Plan 2014.
- Overland flow paths are provided to cater for upstream catchments to bypass the activity site and to convey major storm flows along the proposed swale at the frontage of the proposed building towards Narrawallee Creek to the north east.
- As the proposed activity constitutes less than 10% of the existing development footprint at the site, there are no significant environmental impacts and pollutant issues to be anticipated in comparison to existing conditions. Therefore, it is not necessary to implement additional water quality protection measures.
- Water quality and sediment and erosion control measures, including water quality devices, sediment fences, and sediment basins, will be implemented across the site during the construction phase.

The Stormwater report (**Appendix 14**) confirms -

- Adequate stormwater management systems will be implemented adjacent to neighbouring properties to ensure the proposed activity does not have significant adverse effects on the locality and community.
- The nature and extent of potential impacts are minor. Potential impacts can be appropriately mitigated or managed to ensure that there is minimal effect on the locality, community.

Mitigation Measures

The following mitigation measures are to be implemented to manage flooding, stormwater, run off and sediment control.

#	Reason for mitigation measure	Mitigation Measure	Timing	Significance after mitigation
SWMM7	To mitigate sediment and erosion during construction and early work stage.	Sediment and erosion control – Sediment control measures, including the provision of sediment basins, straw bales, inlet traps and filters will be implemented.	Construction	Not significant.
CMM13	To minimise the impact of construction activities on the subject site.	All works will be scheduled taking into account approved works hours, any restrictions relevant to specific tolls / activities and respite periods etc.	Construction	Not significant

6.5 Aboriginal Heritage

An AHDD report was prepared by Apex Archaeology (**Appendix 19**) in accordance with the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales 2010* and examines the potential Aboriginal archaeological values of the site.

The purpose of the report is to identify, assess, and manage potential impacts on the site, ensuring compliance with cultural heritage protection laws.

Existing Environment

The desktop assessment identified that the site is considered disturbed with no previously registered Aboriginal sites within 200m, nor any previously identified landforms in close proximity that may result in sub-surface Aboriginal archaeological deposits.

The site inspection identified that ground disturbance is prevalent across the majority of the study area, as existing buildings and play areas have been benched into the original ground surface to create level areas. There are some areas of open space, however this area has seen ground surface modification activities over the last 100 years. Evidence of vegetation clearance, landscaping, building, landscape modification and ongoing land use practices are evident within the site.

Assessment

It is considered highly unlikely that archaeological material will be present within the site due to the level of disturbance within the site, as well as topographical features of the area being unlikely to have been a focus of occupation by Aboriginal people in the past.

A site visit identified no surface Aboriginal artefacts, and no areas of potential archaeological deposit were noted.

The site is not considered likely to have Aboriginal cultural heritage values. No further Aboriginal archaeological assessment is required for the site. No AHIP or Aboriginal Cultural Heritage Assessment are required.

Mitigation Measures

Subject to the mitigation measures in the table below, aimed to address the discovery of unanticipated archaeological material, the proposed activity will have a negligible impact on the Aboriginal cultural values of the area.

#	Reason for mitigation measure	Mitigation Measure	Timing	Significance after mitigation
HMM2	To ensure that the proposed activity will not have a significant impact on Aboriginal Heritage.	If any unexpected Aboriginal objects, sites or places (or potential Aboriginal objects, site or places) are discovered during any construction work, all works in the vicinity must cease and the area must be appropriately protected. The DoE Heritage Team is to be notified and an archaeologist engaged to undertake a site inspection to assess the find in consultation with the Registered Aboriginal Parties (RAPs). Following the on-site assessment, the archaeologist and RAPs (if they attended the site) are to advise on whether further management, mitigation or approvals are required in consultation with the DoE Heritage Team. Should Aboriginal objects be identified, these are to be registered in the Aboriginal Heritage Information Management System (AHIMS). An Aboriginal Heritage Impact Permit (AHIP) would also need to be obtained to impact the site.	Pre-construction and construction	Not significant.
HMM4	To ensure that factual information can be presented in the event of a legal dispute.	The Aboriginal Due Diligence Assessment must be kept by the department so that it can be presented, if needed, as a defence from prosecution under Section 86(2) of the *Nationals Parks and Wildlife Act 1974*.	Construction and operation	Not significant.

6.6 Environmental Heritage

A Statement of Heritage Impact (**SOHI**) was prepared by City Plan and attached in **Appendix 20**. The purpose of the report is to assess the potential heritage impacts of the proposed activity on the site's heritage values.

Existing Environment

The site is listed as a heritage item ‘Victorian rendered masonry school and schoolmaster’s cottage’1 (item no. 304) under Part 1 of Schedule 5 of the SLEP 2014 as having local heritage significance. The subject site is also listed on the Department of Education Section 170 Heritage Conservation Register as ‘Milton Public School – Building B00A and B00Q.’ Building A and

Building Q have heritage significance. The proposed activity is within proximity to several other heritage items including ‘Remnant Rainforest ‘ Church Street, item number 262 which is directly north of the site, ‘’Federation rendered masonry courthouse and police station ‘64 Princes Highway and ‘Two storey Victorian former manse and graveyard’, 1 Thomas Street and Princes Highway, item 303, both south of the site.

Assessment

The SOHI found that the aesthetic, architectural, historical and social significance of the heritage item and heritage items in proximity to the site will not be impacted by the proposed activity. The significant school buildings A and Q that front Thomas Street will not be physically or visually impacted by the proposed activity. This is due to the physical distance between the heritage buildings and the proposed activity area within the schoolgrounds. The historical and aesthetic significance of the heritage items will not be compromised with the proposed activity, thus there is no environmental impact from a heritage perspective.

The proposed homebase building may be partially visible from the adjacent Milton Rainforest Reserve. However, the new building will be located approximately 90 metres from the shared boundary. This distance along with mature plantings planted at school grounds along shared boundary creates a sufficient buffer to visually separate the new structure from the heritage listed reserve.

The new two storey building has no other visual relationship with any of the heritage items in proximity to Milton PS. The majority of these heritage items are situated to the south-east of Milton PS, which is away from the proposed new building. As such, there are no visual impacts on any of the other heritage items in the vicinity

The trees proposed to be removed are not of heritage significance and do not contribute to the established heritage values of the subject site or the heritage items in vicinity.

City Plan concludes:

- The extent and nature of potential heritage impacts from the proposed activity is low and will not have a significant impact on the heritage locality, community and environment.
- There are no mitigation measures applicable to the proposal that need to be implemented as the proposed works have no identified heritage impacts

6.7 Ecology

A Flora and Fauna Assessment (**FFA**) report was prepared by a Water Technology (**Appendix 21**). The report documents the findings of the biodiversity assessment, identifying potential biodiversity constraints relevant to the proposed activity.

Existing Environment

Vegetation communities

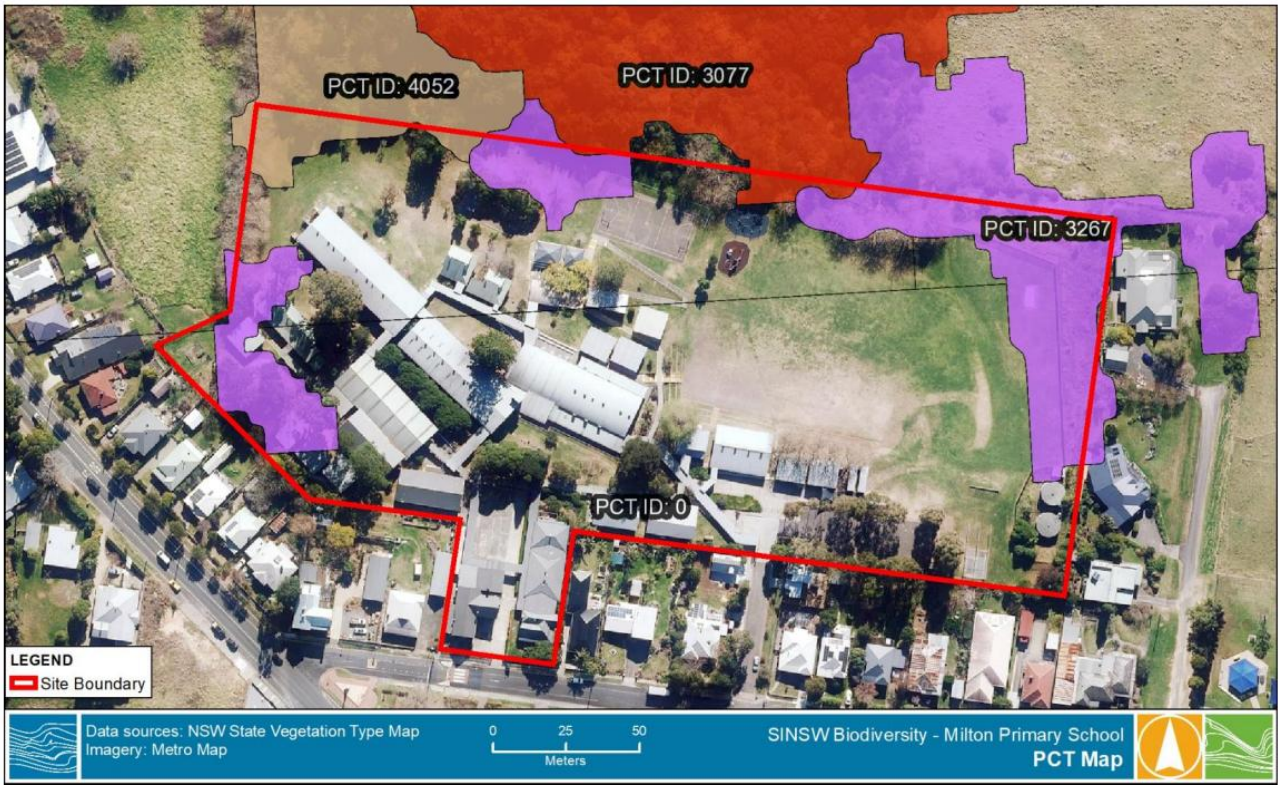
The assessment identifies that there are significant areas of biodiversity within the site that could constrain future development. A review of the vegetation mapping databases was undertaken to identify Plant Community Types (**PCTs**) present within the area, refer **Figure 18**. Three PCTs were modelled in the mapping database as being present within the school site, being:

- PCT 3267 – Shoalhaven Foothills Turpentine Forest.

- PCT 3077 – Illawarra Complex Dry Rainforest.
- PCT 4052 – South Coast Low Hills Red Gum Grassy Forest.

Threatened species

Species with a moderate likelihood of occurrence include the Grey-headed Flying-fox (*Pteropus poliocephalus*), Powerful Owl (*Ninox strenua*), and Masked Owl (*Tyto novaehollandiae*).



Source: Water Technology 2025

Figure 18 Plant Community Types

Assessment

The site was primarily dominated by scattered, canopy species such as Brush Box (*Lophostemon confertus*). There was limited midstorey and understorey presence, the ground surface was mainly artificial turf or concrete.

Native plantings were observed behind and adjacent to school buildings D15442 and Block E, and the walkways were predominantly planted with native species, though not specifically related to the nearby PCT.

Potential habitat sites were identified, including two nests near Block E—one within an air conditioning unit and another large nest in trees on the northeastern side of the site. The site assessment did find potential habitat features within the site, which may be impacted by the proposed activity. This included vegetative debris at the base of a Phoenix Palm (*Phoenix sp.)* in the northwestern corner and beneath a large cut stump on the walkway, which has previously been used by an infant Tawny Frogmouth (*Podargus strigoides*). One Forest Oak (*Allocasuarina torulosa*) and one Black Sheoak (*A. littoralis*) were recorded on site which are both important food trees for South-Eastern Glossy Black-cockatoo (*Calyptorhynchus lathami lathami*). The Grey-headed Flying-fox (*Pteropus poliocephalus*) may forage on-site, but it is unlikely to roost here due to the absence of preferred waterways.

No large hollows were observed, limiting the site's potential to support breading habitat for threatened species such as the Powerful Owl or Masked Owl.

One Magenta Lilly Pilly (Syzygium paniculatum), a threatened species, was recorded on site. This tree is not proposed for removal. Given its threatened status, appropriate mitigation measures will be implemented to ensure its protection throughout the proposed activity.

A Test of Significance was not required. No referral to the Australian Minister for the Environment under the EPBC Act is required. The proposal would be unlikely to cause a significant impact on the environment. Therefore, it is not necessary for an Environmental Impact Statement, a Species Impact Statement nor a Biodiversity Assessment Report to be prepared and approval to be sought from the Minister for Planning under the Environment Protection and Biodiversity Conservation Act 1999. The assessment determined that the proposal is not likely to have a significant impact on the environment, so a Species Impact Statement (**SIS**) nor approval from the Minister for Planning was required.

Overall, subject to implementing the mitigation measures contained in **Appendix 1**, the conclusion of the FFA is that the proposed activity will not significantly impact the environment in relation to ecological matters.

Mitigation Measures

The following mitigation measures are to be implemented to manage potential impacts to flora and fauna and biodiversity. Mitigation measures recommended to address tree removal in **Section 6.8** will also protect biodiversity.

ID	Reason for mitigation measure	Mitigation Measure	Timing	Significance after mitigation
BMM1	To protect wildlife and comply with ecological regulations.	Inspect all trees for hollows and nests. If fauna is discovered, an ecologist may be required to remove and relocate any fauna if the tree or vegetation is to be removed.	Pre-construction	Not significant.
BMM2	To prevent spread of weeds and optimise landscaping outcomes.	Use AS 4454 leaf mulch with 90% recycled content for tree protection fencing. Chip trees marked for removal and use mulch 100mm deep. Avoid soil, weeds, sticks, and stones. Comply with AS 4454 (1999) and AS 4419 (1998).	Construction	Not significant
BMM3	To avoid invasion by plant pathogens.	Basic hygiene protocols are to be implemented for construction personnel and machinery on site to reduce the potential for invasion by plant pathogens including Phytophthora	Construction	Not significant.

ID	Reason for mitigation measure	Mitigation Measure	Timing	Significance after mitigation
		cinnamomi, the fungus myrtle rust Uredo rangelli and amphibian chytrid fungus.		

6.8 Tree Removal

An Arboricultural Impact Assessment (**AIA**) has been prepared by Allied Trees and is included at **Appendix 22**. The AIA evaluate the proposed activity's impact on trees, assessing their condition and retention value. It outlines necessary tree protection measures and justifies tree removals, ensuring compliance with relevant environmental standards and minimising ecological disruption during construction.

Methodology

The AIA evaluated 35 trees within the area of the proposed activity, including any tree where the Tree Protection Zone (**TPZ**) or Structural Root Zone (**SRZ**) overlaps with the work area. Trees beyond the proposed activity were not assessed as they will not be impacted by the activity. The AIA provides a detailed tree assessment including tree identification, size, condition and ratings for Safe Useful Life Expectancy (**SULE**) and Significance of a Tree Assessment Rating System (**STARS**).

Assessment

The design of the proposed building protects and retains existing trees where possible. However, the AIA identified 16 trees (trees No. 46, 49, 59, 60, 71, 73, 74, 75, 79, and 122-126) for removal based on the design conflict. Tree number 60 represent three (3) trees.

Of the trees required to be removed, the assessment identified the following tree retention values:

- 8 Medium Retention Value trees.
- 8 Low Retention Value trees.

Nineteen (19) trees (trees No. 51, 53, 54, 56, 57, 58, 68, 69, 70, 72, 76, 77, 80, 127, 130, 131, 133, 134 and 136) can be retained based on conditions assigned to the work methodology.

The landscape adjacent to the new building will be remediated, and garden beds have been utilised where appropriate to soften the building interface and facilitate drainage.

The AIA considers the extent and nature of potential impacts to be moderate and that they do not have significant impact on the locality, community and/or the environment.

The proposed activity will not be carried out in a declared area of outstanding biodiversity value and is not likely to significantly affect threatened species, populations or ecological communities, or their habitats or impact biodiversity values, meaning a Species Impact Statement and/or Biodiversity Development Assessment Report is not required having regard to s7.8 of the BC Act.

Mitigation Measures

Mitigation measures have been recommended to ensure tree protection. The majority of these are addressed by the department standard mitigation measures. Where additional mitigation measures have been identified these are listed below.

#	Reason for mitigation measure	Mitigation Measure	Timing	Significance after mitigation
TMM1	To protect trees	Trees not approved to be pruned or removed are to be protected and maintained in accordance with *AS 4970-2009 Protection of Trees on Development Sites* and are to remain in place until the completion of all construction work in the vicinity of the protected trees.	Construction	Not significant
TMM2	To protect trees	A project arborist (conforms to the AS 4970) is required to be nominated before works start, and they are to be provided with all related site documents.	Pre construction	Not significant
TMM3	To protect trees for retention from unnecessary damage.	A Tree Management Plan (Arboricultural Method Statement) must be issued before works starts, detailing further tree protection measures.	Pre-Construction and Construction	Not significant.
TMM4	To safeguard trees from construction activities which can impact trees through physical injury, soil compaction, and root damage.	Tree protection must be approved by a Consulting Arborist AQF Level 5. No materials, mixing, parking, disposal, repairs, refuelling, fires, stockpiling, or backfilling is allowed near remaining trees. Removal or lopping of trees needs written permission from the Superintendent.	Pre-construction	Not significant.
TMM5	To avoid the incorrect removal of trees for retention.	Trees for removal are to be identified and marked for removal.	Pre-Construction	Not significant.
TMM6	To minimise ecological impact.	All construction workers must be briefed about the conditions outlined in the Tree Management Plan before the initiation of work All contractors and staff must undergo induction outlining the ecological sensitivity of the site, no-go areas, the need to minimise ecological impact and all other mitigation measures outlined in this section.	Pre-construction	Not significant.
TMM7	To protect trees for retention from unnecessary damage.	Soil must not be filled or compacted above tree roots enclosed by protection fencing during construction near trees. Guidelines must be followed to prevent soil compaction in these areas. Protection includes using elevated planks attached to scaffolding to prevent ground compression.	Construction	Not significant.
TMM8	Protection of trees	Trenching shall avoid the TPZ's. Proposed routes shall be re-routed outside of the TPZ. Underboring required if unable reroute. Any excavation in the area of a TPZ must	Construction	Not significant.

#	Reason for mitigation measure	Mitigation Measure	Timing	Significance after mitigation
		be authorised and conditioned by the project arborist.		
TMM9	Construction impacts to site may alter soil hydrology and in turn tree root access to water.	Contractors are to maintain plants are watered. Water should be applied at an appropriate rate suitable for the plant species during periods of little or no rainfall.	Construction	Not significant.
TMM10	To compensate for the loss of protected flora and related fauna habitats.	Advanced specimens of the same species that have been removed must be planted in groups.	Construction	Not significant.
TMM11	To compensate for the loss of amenity value.	Advanced specimens of the same species that have been removed in areas that offer visual and/or noise screening must be planted.	Construction	Not significant.
TMM12	To ensure tree health	Tree protection fencing will use AS 4454 leaf mulch with 90 per cent recycled content. Trees marked for removal with be chipped and mulched to a depth of 100mm, and free from soil, weeds, sticks and stones. The fencing will comply with AS 4454 (1999) and AS 4419 (1998).	Construction	Not significant.
TMM13	To protect trees from construction activities.	Trees No. 68, 69, 70, 72, 76, 77 and 80. As part of the design is a fence to extend across the SRZ for each tree, No. 68, 69, 70, 2, 76, 77 and 80. The nominated design is a Safe Direction Crash Barrier, which will require piers, assumed as 300mm in diameter. To limit any impact on a tree and limit future damage to the fence, these footings shall be located outside of the SRZ for each tree.	Construction	Not significant
TMM14	To protect trees from construction activities	Establish exclusion zones around Magenta Lilly Pilly to prevent damage during construction activities.	Construction	Not significant
LCMM3	To safeguard trees and avoid ground or water contamination.	Chemicals and contaminants must be stored properly in an enclosed area with a spill bund to prevent runoff in case of accidents.	Construction	Not significant.

6.9 Social Impact

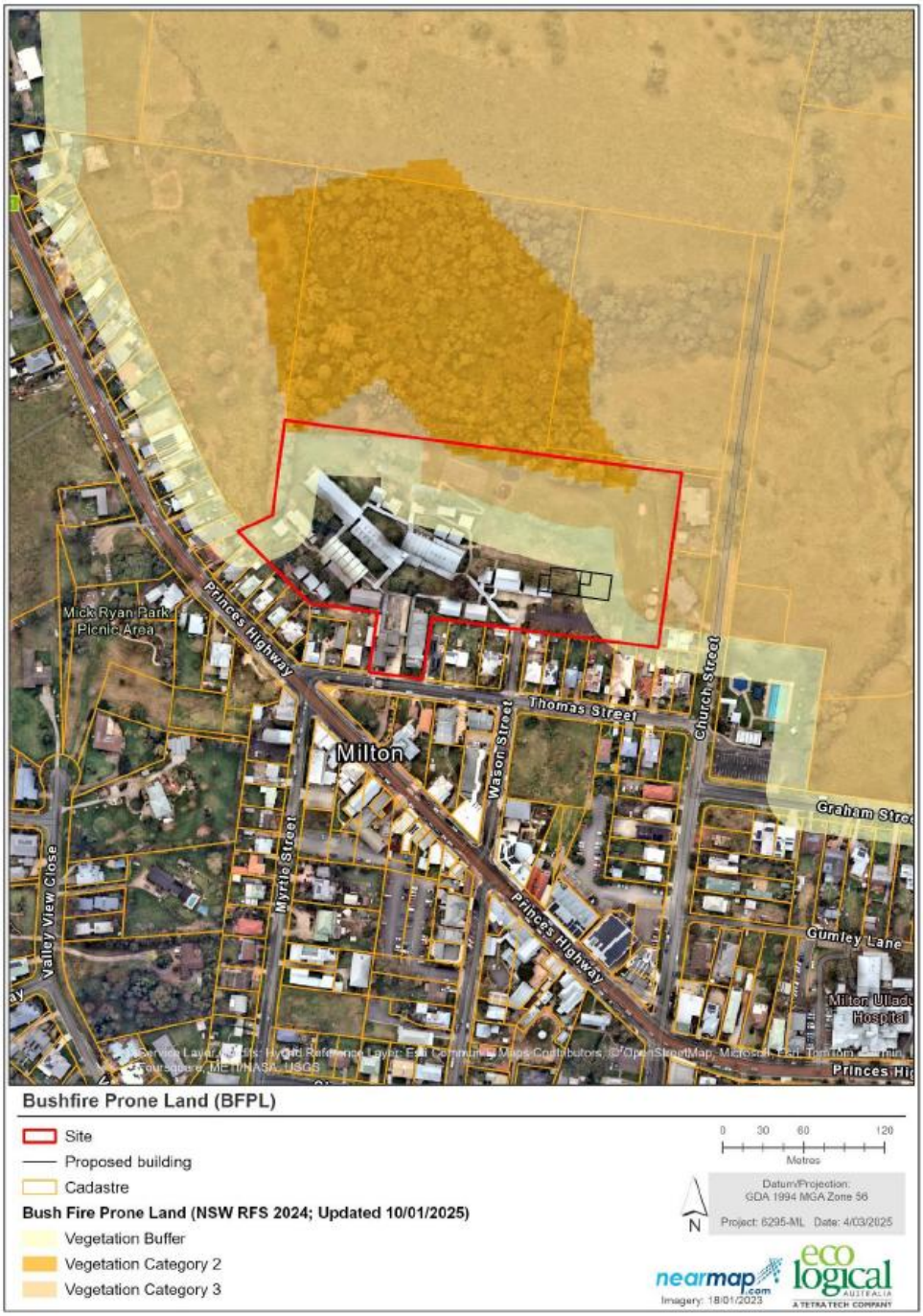
Social impacts relating to the proposed activity are addressed in **Table 15** below.

Table 15: Social Impact

Type of Impact	Describe the impacts on the community and how they might be experienced, either positively or negatively	Discussion
Impacts on access – will there be an improvement to the quality of provision and a response to emerging and changing needs?	There will be a strong positive impact due to the upgraded school environment.	The proposed activity will deliver a new building to replace the existing demountable arrangements which will enhance the delivery of education for future students and their families.
Impacts on privacy, overshadowing, peace and quiet, and visual amenity (views / vistas) - will there be significant change for neighbours and the local area during both construction and operation?	There will be short term medium negative impact associated with disruption to the locality during the construction period. There will be no negative visual amenity or overshadowing impacts.	The short term negative impacts may include construction traffic, noise, dust and vibration. These will be managed by an approved Construction Management Plan.
Impacts on sense of place - will there be effects on community cohesion or how people feel connected to the place and its character?	There will no impact on community cohesion. There may be positive impacts on community perception of the school and increased connection to the it and its character for students and staff.	The proposed activity does not change the existing use of the site as an educational facility, therefore the impacts will be low.
Impacts on the way people get around – will there be changes associated with traffic or parking in the area?	There may short term medium negative impact associated with disruption to the locality during the construction period. The proposed activity will deliver three additional Kiss and Drop spaces, no stopping signage, 5 additional staff parking spaces and a wombat crossing.	The short term negative impacts may include heavy vehicle construction traffic and the need for construction workers to park off site. There will be a medium positive impact due to provision of additional kiss and drop spaces and improved pedestrian conditions due to the installation of the wombat crossing on Thomas Street. The proposed activity will not generate any additional traffic as it does not increase student or staff numbers.
Impacts on wellbeing - will there be benefits for students and the community associated with better school facilities, sporting facilities and grounds, and active transport options?	There may be minor positive impacts on community perception of the school and increased connection to it and its character for students and staff.	The proposed activity will improve the quality of the existing school by providing a new, fit for purpose home base building, landscaping and improved car park.

6.10 Bushfire

A Bushfire Assessment Report (BAR) was prepared by Eco Logical Australia Pty Ltd in accordance with Planning For Bush Fire Protection 2019 (PBP). As shown in **Figure 19**, the site is BPL, mapped as containing Vegetation buffer, Category 3 and Category 2 bushfire prone land. The proposed activity is located in the part of the site mapped Vegetation buffer. Currently the Bushfire and Grassfire Response Plan for the school nominates existing Building W as the shelter-in-place if it is unsafe for offsite evacuation. This building cannot accommodate all students/staff and is not constructed to any specific BAL construction rating.



Source: Eco Logical, 2024

Figure 19: Bushfire Hazard Assessment

Assessment

The site of the proposed activity is identified as comprising Vegetation Buffer. The proposed activity is a Special Fire Protection Purpose (**SFPP**) facility, which includes schools and similar uses that have vulnerable occupants who may be at greater risk during a bushfire event.

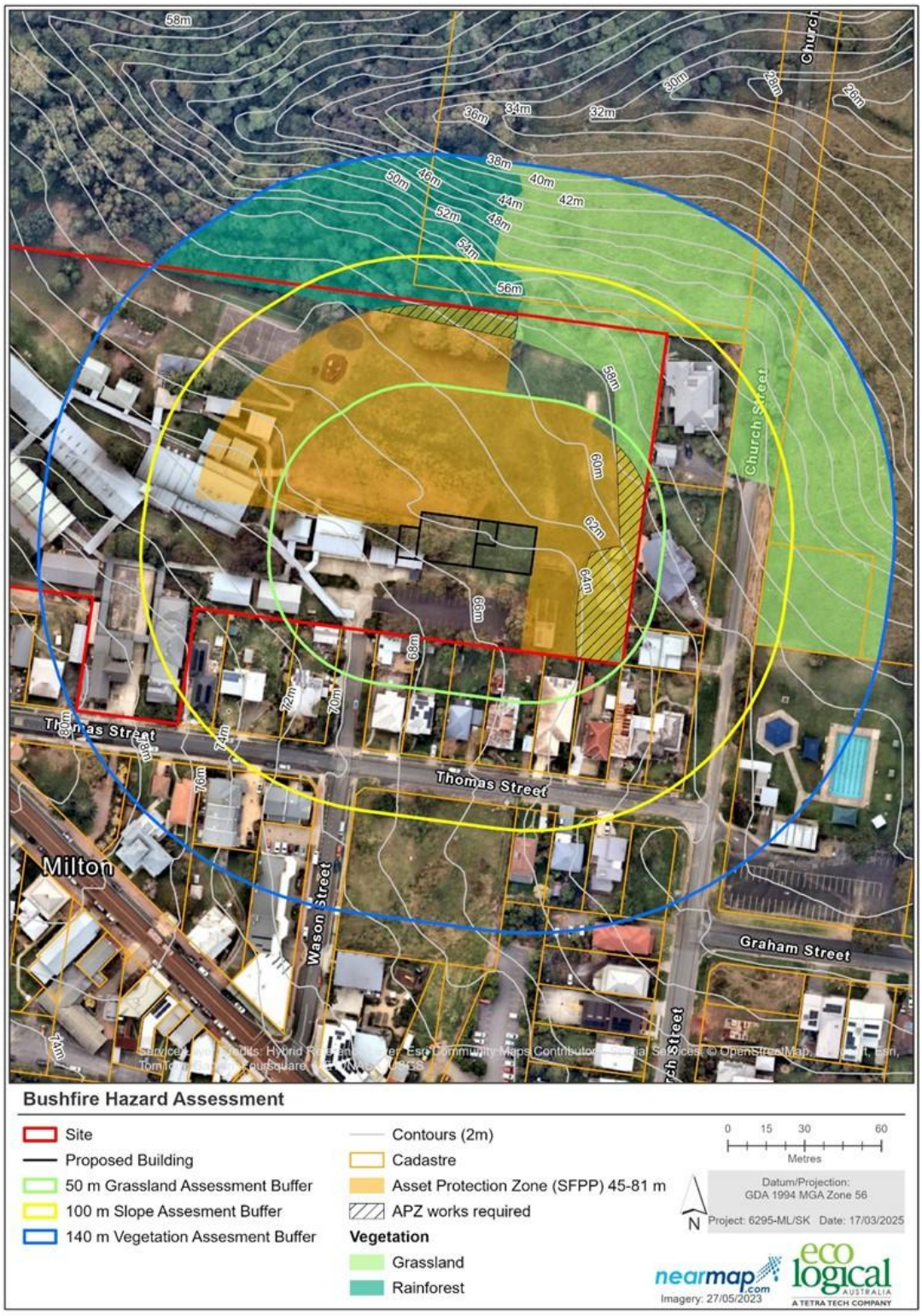
Bushfire prone vegetation within 140m of the site to the north is identified as 'Illawarra Complex Dry Rainforest' (DCCEEW 2022) which falls within Dry Rainforests vegetation class (Keith 2004) and classified as 'rainforest' under PBP. The effective slope under this vegetation falls within the PBP slope category of '>15-20 degrees downslope'.

There is unmanaged grassland to the north-east, within the subject land, that extends further to the north and east. Unmanaged grassland is considered a 'grassland' hazard under PBP, as such is classified accordingly. The effective slope under this hazard falls within the PBP slope categories of '>5-10 degrees downslope' and '10-15 degrees downslope'.

In all other directions there are managed lands within the school grounds, existing residential development and public road infrastructure.

In summary the BAR concludes:

- APZs are required to the north, north east and east of the proposed activity site due to the proposed activity being classified as an SFPP. Proposed Building Y has been positioned and oriented to suit APZ requirements, while seeking to reduce the removal of existing trees. The APZs (shown in **Figure 20**) are contained wholly within the boundaries of the site.
- The BAR identifies performance criteria including BAL 19 construction that when complied with will ensure that the proposed activity meets the relevant specifications and requirements under PBFP.
- Specification 43 of the National Construction Code (NCC) 2022 which requires mandatory bushfire protection measures for designated Class 9 buildings including schools will apply to the proposed activity.
- The bushfire mitigation program recommendations provide an overall better bushfire outcome for the school by improving the landscape to minimise potential building ignitions during a bushfire and providing safer defendable areas around existing buildings.
- The proposed Building Y shall be designated as the new shelter-in-place. The existing Emergency Management Plan will be updated to reflect this.



Source: Eco Logical, 2025

Figure 20: Bushfire Prone Land (BPL)

The recommendations within the BAR have been included as mitigation measures in **Appendix 1**.

Mitigation Measures

The following mitigation measures are to be implemented to address potential bushfire impacts.

#	Reason for mitigation measure	Mitigation measure	Timing	Significance after mitigation
BFMM1	To ensure landscaping meets PBP requirements.	Prior to occupation, DoE must ensure new landscaping within the site is designed to meet the requirements of PBP.	Design Construction Operation	Not significant
BFMM2	The proposed building can withstand bushfire attack in the form of wind, embers, radiant heat and flame contact.	DoE are to ensure the proposed building designed and constructed to the relevant NCC requirements including BAL-19 based on the construction specifications detailed in AS 3959-2018 and additional ember provisions detailed in Section 7.5 of PBP as required. At commencement of construction and during operation, DoE to ensure fencing within 6 m of the building is to be constructed of non-combustible material only.	Design Construction Operation	Not significant
BFMM3	Afford buildings and their occupants protection from exposure to a bushfire. Provide appropriate separation between a hazard and buildings which, in combination with other measures, prevent the likely fire spread to buildings.	The identified APZs are to be established and maintained in perpetuity or until surrounding land is developed to specifications detailed in Appendix A of the BAR. Prior to construction, DoE must ensure the identified APZ (Table 3 and shown in Figure 3 of the Bushfire Assessment Report) is maintained to the specifications detailed in Appendix A of the Bushfire Assessment Report. During operation, DoE must ensure APZ are managed in perpetuity.	Throughout the life of the project	Not significant
BFMM4	To ensure that utility services are adequate to meet the needs of firefighters.	DoE to ensure fire hydrants are provided in accordance with AS2419:2021.	Design Construction Operation	Not significant

#	Reason for mitigation measure	Mitigation measure	Timing	Significance after mitigation
BFMM5	To ensure emergency evacuation procedures and management measures are in place.	Prior to operation, DoE to update Bushfire and Grassfire Response Plan including: 1. Designating the new building as the shelter-in-place; and 2. Clear signage is to be provided to the new building and identifying it is the designated 'shelter-in-place'. 3. Remove Building W as the current shelter-in-place option in the Bushfire and Grassfire Response Plan. 4. Updated Bushfire and Grassfire Response Plan to be provided to local brigade(s)	Prior to operation Operation	Not significant
BFMM6	Better Bushfire Outcome	Prior to operation, DoE to: 1. Install clear signage to the new building and identifying it is the designated 'shelter-in-place'; 2. Ensure external combustible items located away from windows/doors (landscaping, hard landscaping, bins, out buildings etc.); and 3. Additional fire extinguishers to be located internally near all entry/exit points for use against combustible .	Prior to operation Operation	Not significant

6.11 Soils and Geology

A Geotechnical Assessment has been prepared by Stantec (refer **Appendix 7**) to provide an assessment of the existing subsurface ground conditions and other geological conditions at the site and also assess the potential impacts on surface and groundwater resources as a result of the proposed activity.

Assessment

The key findings and recommendations of the Geotechnical Assessment is summarised below:

- Existing fill as uncontrolled fill was observed to be publicly localised and variable across the site with maximum depth of 0.2m.
- The subsurface conditions comprise topsoil overlying fill, residual clay/sand and extremely weathered Monzonite. Based on the geotechnical sub-surface logs and laboratory testing, it is expected the site classification of "Class S" be adopted (if applicable) for footings constructed in accordance with AS2870-2011.

- It is expected that mainly soil will be encountered during all earthworks. Very low to low strength rock can be expected to be present underlying the residual soils , however, it unlikely to be encountered during earthworks.
- Excavation of soil can be readily achieved using conventional earthmoving equipment. Ripping or hammering may not be required for the proposed earthwork.
- Groundwater standing level or seepage was not encountered in any of the boreholes at the time of investigation. It should be noted however, that variations in groundwater seepage flows may occur due to variations in rainfall duration and intensity. It is anticipated that earthworks required for the proposed activity will not intersect with the groundwater table.

Based on this assessment and the geotechnical conditions encountered during the site investigation, there are not considered to be any significant or unusual geotechnical concerns that would preclude the construction of the proposed activity.

Mitigation measures

The following mitigation measures are to be implemented, subject to detailed geotechnical design.

#	Reason for mitigation measure	Mitigation measure	Timing	Significance after mitigation
SMM1	To reduce the risks differential settlement and/or failures.	Prior to bulk earthworks, the site shall be cleared of any foreign matter or unsuitable material.	Construction	Not significant
SMM2	To reduce the risks differential settlement and/or failures.	Proof roll testing to be carried out using a minimum 12 tonne roller and compact the exposed subgrade to at least 98% Standard Maximum Dry Density (SMDD) at +/- 2% Optimum Moisture Content (OMC).	Construction	Not significant
SMM3	To reduce the risks differential settlement and/or failures.	Should isolated soft/loose areas be encountered during this process, this material should be removed and replaced with suitable granular structural fill. Structural fill could comprise a select well graded granular material such as processed sandstone and road-base (DGB20)	Construction	Not significant
SMM4	To reduce the risks differential settlement and/or failures.	Backfill excavation with approved structural fill in 150mm layers to a standard compaction of at least 98%.	Construction	Not significant

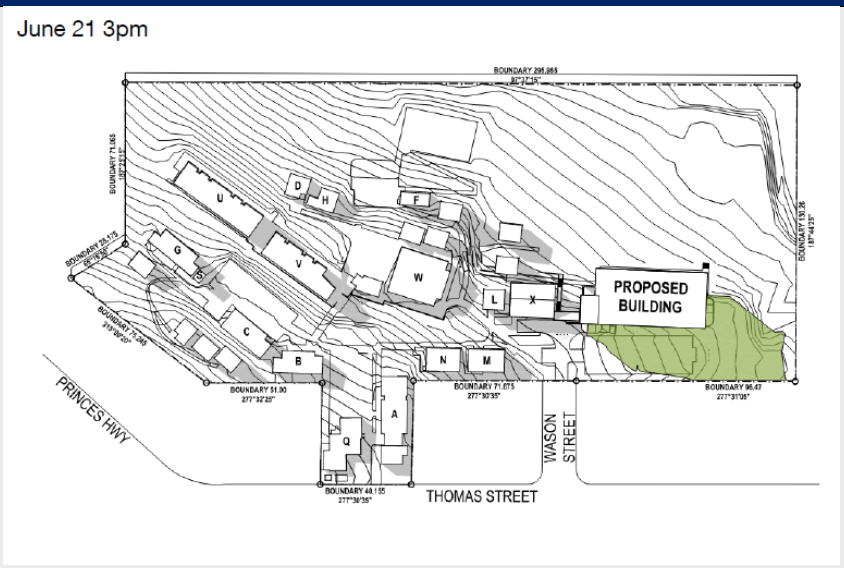
#	Reason for mitigation measure	Mitigation measure	Timing	Significance after mitigation
SMM5	To reduce the risks of differential settlement and/or failures.	Surface drainage must be maintained at all times by adopting appropriate cross-falls across the site. Surface drainage must be installed as soon as is practicable in order to capture and remove surface flows to prevent erosion and softening of the exposed surface	Construction	Not significant
SMM6	To prevent stability of the batter cuts.	Design and construction of temporary and batter cuts should follow recommendations presented in Table 9 of the Stantec Geotechnical Report.	Design Construction	Not significant

6.12 Other Issues

Other issues relevant to the proposed activity are considered in **Table 16** below.

Table 16: Other issues

Issue	Consideration
Visual Amenity and Privacy	The carpark provides a buffer to the new building and existing mature trees on the boundary screen views to the new building. The trees immediately adjacent to the street boundary will be retained. Therefore, there is minimal impact on the views to the school from the street as shown in the below figure.  **Figure 21: View of proposed activity site from Wason Street** Materials and finishes follow the SINSW Pattern Book Materials and Finishes principles to be contextual, durable, local and economical. The proposed colour combination will complement the existing site character and building forms.
Overshadowing	Shadow studies were conducted for both summer and winter as part of the Architectural Plans prepared by Fulton Trotter Architects, included at **Appendix 2**. The shadow diagram shown in **Figure 22** indicates minor overshadowing of the car park and adjacent landscaping, which falls within the site. The proposed activity will not impact neighbouring lots. No further assessment and no mitigation measures are required.

Issue	Consideration
	June 21 3pm  *Source: Fulton Trotter Architects, 2025* **Figure 22: Shadow Diagram**
Waste	An Operational Waste Management Plan (**OWMP**) and a Construction Waste Management Plan (**CWMP**) were prepared by EcCell Environmental Pty Ltd. The OWMP found that the proposed activity will not introduce additional long-term waste challenges. Waste minimisation and management practices will ensure that potential impacts are mitigated effectively. The proposed activity will not change the location and size of the existing waste storage area or collection vehicle access arrangements. The CWMP notes that the construction phase of the activity will generate additional waste but finds that the extent and nature of potential impacts are low and will not have significant impact on the locality, community and/or the environment. The potential impacts can be appropriately mitigated or managed to ensure that there is minimal impact on the locality, community and/or the environment.
BCA and Access	The proposed activity is supported by a BCA Design Compliance Report (**Appendix 9**) and Access Report (**Appendix 12**). These reports confirm the proposed activity will comply with all applicable regulatory requirements. The design of the proposed new homebase building integrates with existing buildings and structures to provide safe and equitable access and movement across the site.
Site Services	Hydraulic Services drawings have been prepared by Acor (refer **Appendix 8**) which identifies the existing utility mains that surround the site and proposed connections within the site to the proposed activity. An Electrical Services design has been prepared by NDY (refer **Appendix 8**) to identify the electrical infrastructure upgrades required to service the site, including a new main switchboard.

6.13 Construction Impacts

A preliminary Construction Management Plan (**CMP**) has been developed by the project managers (RPI Infrastructure).

Assessment

A summary of the potential impacts during the construction phase of the project is provided below:

- **Noise and Vibration**: Noise from machinery, vehicles, and construction activities may disturb nearby residents and sensitive areas, particularly during peak activity periods. Vibration caused by excavation and heavy equipment could impact adjacent properties if not carefully managed.
- **Air Quality and Dust**: Dust generated from excavation, material handling, and vehicular movement on unsealed surfaces could degrade air quality. Diesel emissions from machinery and vehicles may also contribute to temporary air pollution.
- **Traffic and Access**: Construction traffic, including heavy vehicles, could lead to congestion and disruptions on local roads. Construction vehicle movements may also pose safety concerns for pedestrians in the vicinity.
- **Waste Generation**: Construction activities will generate waste, including recyclable materials and potentially hazardous substances, requiring responsible management and disposal.
- **Erosion and Sedimentation**: Earthworks and excavation activities could result in sediment runoff, potentially contaminating local waterways and stormwater systems if not adequately controlled.

Mitigation Measures

It is noted that the Standard Mitigation Measures address construction impacts. Additional site specific mitigation measure are recommended below to address potential construction impacts.

#	Reason for mitigation measure	Mitigation measure	Timing	Significance after mitigation
CMM18	To ensure separation of construction vehicles from staff vehicles and reduce truck movements at busy school times.	All construction vehicles will travel along Wason Street to enter and exit at the south boundary of the site via the staff carpark	Construction	Not significant
CMM19	To ensure separation of construction vehicles from staff vehicles and reduce truck movements at busy school times.	Heavy vehicle movement is also required to avoid school drop off and pick up times	Construction	Not significant

6.14 Cumulative Impact

There have been no other developments approved in the last 2 years within 500m of the site.

The TTIA has assessed the traffic impacts of proposed activity and confirmed that the operational traffic impacts would be negligible as the proposed activity does not increase student capacity. Therefore, there are no cumulative operational traffic impacts.

6.15 Consideration of Environmental Factors

Section 171(1) of the EP&A Regulation notes that when considering the likely impact of an activity on the environment, the determining authority must take into account the environmental factors specified in the guidelines that apply to the activity.

The assessment provided in the sections above has been prepared to provide a detailed consideration of the factors that must be taken into account for an assessment under Division 5.1 of the EP&A Act. These factors are summarised at **Table 17** and where mitigation measures have been proposed in response to the factor, these have been identified.

Table 17: Environmental Factors considered

Environmental Factor	Consideration	Mitigation Measure Reference
Any environmental impact on a community?	The proposed activity involves an upgrade to an existing educational facility. The new building is situated close to existing buildings and integrates into the existing school infrastructure with minimal external impacts. The building is set back from the street and has been thoughtfully designed with a materials palette that is considerate of the existing environment. It is approximately 90m east of the heritage buildings on site and will not impact views to or from these buildings. The existing school activities will not change therefore there is not anticipated to be any impact or disruption to the surrounding community during the operation of the building. Existing trees have been protected and retained where possible, however the construction of the new building requires the removal of 14 trees identified as conflicting with the position of the building, car park and pathways. The AIA Report considers that the potential impacts can be appropriately mitigated and managed as per the Mitigation Measures attached to the REF to ensure that there is minimal impact on the environment. During the construction phase, temporary environmental effects may arise such as increased traffic, noise and dust. However, these impacts are anticipated to be minor and will be effectively managed and mitigated through the implementation of management strategies outlined in this REF. Overall, the proposed activity is designed to achieve positive long-term outcomes for the environment and community.	CTMM1. Prepare a Construction Traffic Management Plan CMM2. Prepare a Construction Environmental Management Plan. All tree protection measures.
Any transformation of a locality?	The proposed activity will have a positive impact on the locality. Once operational, the upgrades to the school will provide a positive benefit to the school community through providing the necessary quality educational facilities for students and staff.	N/A
Any environmental impact on the ecosystems of the locality?	The proposed activity does not involve environmental impacts on local ecosystems. The site does not contain Aboriginal cultural material. There are no threatened ecological species nor does it contain habitat for threatened species.	TMM1. Trees are identified and marked for retention. TMM6: Workers induction
Any reduction of the aesthetic, recreational, scientific or other environmental quality or value of a locality?	The proposed activity occurs within the existing school site and will not be prominent from outside the site. The design incorporates a considerate materials palette further reducing the visibility of the building and maintains compatibility with the surrounding built environment. By integrating these design elements, the proposed activity ensures that it does not detract from the aesthetic, recreational, scientific or other environmental qualities of the locality. The activity complements the existing character of the area, resulting in an outcome that is both contextually appropriate and environmentally considerate.	N/A
Any effect on locality, place or	The site is not identified as having aesthetic, anthropological, archaeological, architectural, cultural,	HMM1, HMM2

Environmental Factor	Consideration	Mitigation Measure Reference
building having aesthetic, anthropological, archaeological, architectural, cultural, historical, scientific or social significance or other special value for present or future generations?	historical, scientific, social significance or other special value. Accordingly, the proposed activity will not affect these values for present or future generations.	
Any impact on the habitat of protected animals, within the meaning of the *Biodiversity Conservation Act 2016*?	The proposed activity will not have a significant impact on the habitat of protected animals, within the meaning of the BC Act.	TMM1. Trees are identified and marked for retention. All works to comply with tree retention plans
Any endangering of any species of animal, plant or other form of life, whether living on land, in water or in the air?	The proposed activity will not endanger any species of animal, plant or other form of life on land, water or the air.	All ecology mitigation measures. TMM1. Trees are identified and marked for retention. All works to comply with tree retention plans.
Any long-term effects on the environment?	The proposed activity is not likely to have long-term effects on the environment.	All mitigation measures.
Any degradation of the quality of the environment?	No degradation of the quality of the environment will occur from this proposed activity. Construction activities will be managed in accordance with a Construction Management Plan and mitigation measures contained in this REF to ensure any potential impact on the environment is appropriately managed.	All mitigation measures.
Any risk to the safety of the environment?	The proposed activity has been designed with careful consideration of the site's existing risks, particularly bushfire. According to the Bushfire Protection Assessment, the proposed activity is consistent with the specifications and requirements within PBP, with the new building assigned as the designated shelter-in-place for the school. The construction of the new building reduces the risk of bushfire to the school by providing additional safe space from bushfire. This ensures that the project is resilient to potential bushfire events and does not exacerbate the risks of such occurring in the locality. As a consequence, the proposed activity is not expected to pose any significant risk to the safety of the environment or the surrounding community, with robust strategies in place to manage and mitigate the	BFMM1-BFMM6

Environmental Factor	Consideration	Mitigation Measure Reference
	identified risks effectively.	
Any reduction in the range of beneficial uses of the environment?	The proposed activity relates to upgrades to an existing school and will not limit or reduce the range of beneficial uses of the environment.	N/A
Any pollution of the environment?	The risk of noise and vibration and air, water, soil and light pollution arising from construction works will be mitigated by the implementation of the CMP.	CMM2: Prepare a Construction Management Plan
Any environmental problems associated with the disposal of waste?	Waste generated by the proposed activity will be managed in compliance with the provisions outlined in the OWMP and CDWMP. These plans ensure that all waste is handled, recycled and disposed of responsibly, preventing any environmental issues associated with waste disposal.	WMM1 – WMM12 OPMM1
Any increased demands on resources (natural or otherwise) that are, or are likely to become, in short supply?	The activity will not increase the demand for resources that are or are likely to become in short supply.	N/A
Any cumulative environmental effects with other existing or likely future activities?	As outlined in **Section 6.13** of this REF, there will be negligible cumulative environmental impacts. All construction works associated with the proposal will be undertaken in accordance with the CMP.	CMM2. Prepare a Construction Management Plan
Any impact on coastal processes and coastal hazards, including those under projected climate change conditions?	The site is not identified as being within a Coastal Management Area or as Flood Prone Land.	N/A
Applicable local strategic planning statement, regional strategic plan or district strategic plan made under Division 3.1 of the Act?	The activity is consistent with the strategic policies identified in **Section 0** of this REF.	N/A

7. Justification and Conclusion

The proposed upgrade works at Milton PS are subject to assessment under Division 5.1 of the EP&A Act. The REF has examined and taken into account to the fullest extent possible all matters affecting, or likely to affect, the environment by reason of the proposed activity.

As outlined in this REF, the proposed activity can be justified on the following grounds:

- It responds to an existing need within the community;
- It generally complies with, or is consistent with all relevant legislation, plans and policies;
- It has minimal environmental impacts; and
- Adequate mitigation measures have been proposed to address these impacts.

The activity is not likely to significantly affect threatened species, populations, ecological communities or their habitats, and therefore it is not necessary for a Species Impact Statement and/or a BDAR to be prepared. The proposed activity is not likely to significantly affect the environment. Therefore, it is not necessary for an EIS to be prepared and approval to be sought for the proposal from the Minister for Planning and Public Spaces under Division 5.2 of the EP&A Act. On this basis, it is recommended that the department determine the proposed activity in accordance with Division 5.1 of the EP&A Act subject to the implementation of mitigation measures identified within this report.