NSW Department of Education

Review of Environmental Factors

Dundas Public School upgrade

Document version: V4

Date: 20/05/2025

NSW GOVERNMENT

Acknowledgement of Country

The NSW Department of Education acknowledges the traditional custodians of the land on which the Dundas Public School upgrade is proposed.

We pay our respects to their 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 Gyde Consulting Pty Ltd on behalf of the NSW Department of Education (the department) and assesses the potential environmental impacts which could arise from the upgrade to Dundas Public School at 85 Kissing Point Road, Dundas.

This REF has been prepared in accordance with the *Guidelines for Division 5.1 Assessments* (the Guidelines) and any relevant addendum, 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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Version	Date	Description	Prepared by	Approved by
1	06/03/25	Draft V1 – draft for SP review	Lauren Daly, Assistant Planner Belinda Barrie, Senior Associate	Georgia Sedgmen, Director
2	14/03/25	Draft V2	Lauren Daly, Assistant Planner Belinda Barrie, Senior Associate	Georgia Sedgmen, Director
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4	20/05/2025	Final – Updated post assessment for determination	Lauren Daly, Assistant Planner Belinda Barrie, Senior Associate	Georgia Sedgmen, Director

Tables

Figures

Appendices

Appendix	Name	Prepared by
1	Mitigation Measures prepared by Gyde Consulting	Gyde Consulting
2	Survey Plan	SDG Pty Ltd
3	Section 10.7(2 & 5) Planning Certificate	City of Paramatta Council
4	Architectural Plans	Fulton Trotter Architects
5	Landscape Drawings	Ground Ink
6	Architectural Design Report	Fulton Trotter Architects
7	Arboricultural Impact Assessment	Laurence and Co
8	Hydraulic Integrated Water Management	ACOR
9	Electrical and Mechanical Services Report	NDY
10	Preliminary Construction Management Plan	RP Infrastructure
11	Transport and Access Impact Assessment, Construction Traffic and Pedestrian Management Plan and Travel Access Guide	Crossley Transport Planning
12	Construction Waste Management Plan	EcCell
13	Operational Waste Management Plan	EcCell
14	GIPA Analysis	Gyde Consulting
15	Flora and Fauna Assessment	Ecological
16	Supplementary Detailed Site Investigation	ADE Consulting

Appendix	Name	Prepared by
17	Supplementary Geotechnical Investigation Report	ADE Consulting
18	Stakeholder Engagement Report	RP Infrastructure
19	Aboriginal Cultural Heritage Assessment Report and associated Aboriginal Archaeological Technical Report	AMAC Archaeological
20	Structural and Civil Report and Structural and Civil Drawings	Meinhardt
21	Stormwater Management Plan	Meinhardt
22	Acoustic Report	NDY
23	Building Code of Australia Report	MBC Group
24	Access for People with Disabilities Report	MBC Group
25	Sustainable Development Plan	NDY
26	Net Zero Statement	NDY
27	Preliminary Energy Modelling Assessment Letter	NDY
28	Preliminary Upfront Carbon Assessment Letter	NDY

Abbreviations

Abbreviation	Description
AATR	Aboriginal Archaeological Technical Report
ACHAR	Aboriginal Cultural Heritage Assessment Report
ACM	Asbestos containing material
AEP	Annual exceedance probability
AHD	Australian Height Datum
AHIMS	Aboriginal Heritage Information Management System
AS	Australian Standard
BCA	Building Code of Australia
BC Act	*Biodiversity Conservation Act 2016*
BC Regulation	*Biodiversity Conservation Regulation 2017*
BDAR	Biodiversity Development Assessment Report
CMP	Construction Environmental Management Plan
CWC	Connecting with Country
CWMP	Construction Waste Management Plan
dBA	Decibels A
the Department	NSW Department of Education
Design Guide	*Design Guide for Schools* published by the Government Architect in May 2018
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DDA	Disability Discrimination Act
DPE	Department of Planning and Environment
DPHI	Department of Planning, Housing and Infrastructure
DPS	Dundas Public School

Abbreviation	Description
DPWC	Development permitted without consent
DSI	Detailed Site Investigation
EFSG	Educational Facilities Standards and Guidelines
EIS	Environmental Impact Statement
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
ESD	Ecologically Sustainable Development
FTE	Full time equivalent
GIPA Act	*Government Information (Public Access) Act 2009*
GLS	General learning space
Ha	Hectares
HVAC	Heating, Ventilation and Air Conditioning
LED	Light emitting diode
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*
OLS	Obstacle Limitation Surface
OSD	On-site detention
OWMP	Operational Waste Management Plan
PCMP	Preliminary Construction Management Plan
PFAS	Perfluoroalkyl and polyfluoroalkyl substances
PLEP	*Paramatta Local Environmental Plan 2023*
PLR	Parramatta Light Rail
PMF	PMF
PRG	Project Reference Group
Planning Systems SEPP	State Environmental Planning Policy (Planning Systems) 2021
PSI	Preliminary site investigation
PTS	Permanent teaching space
Proponent	Department of Education
RAP	Registered Aboriginal Parties
RBL	Rating background noise level
REF	Review of Environmental Factors
RFS	Rural Fire Services

Abbreviation	Description
Resilience and Hazards SEPP	*State Environmental Planning Policy (Resilience and Hazards) 2021*
Roads Act	*Roads Act 1993*
School	Dundas Public School
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
TAIA	Transport and Access Impact Assessment
TI SEPP	State Environmental Planning Policy (Transport and Infrastructure) 2021
TPZ	Tree protection zone
TWG	Transport Working Group
WSUD	Water sensitive urban design

1. Introduction

This Review of Environmental Factors (REF) has been prepared on behalf of the NSW Department of Education (the department) to determine the environmental impacts of the proposed activity described in Section 2. For the purposes of these works, the department is the proponent and the determining authority under Part 5 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 protective measures to be implemented to mitigate impacts.

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

The activity relates to Dundas Public School (DPS) and involves upgrades to the existing school to provide permanent teaching spaces (PTS). The activity includes the construction of a single-storey building in the south-western corner of the site, external covered walkways connecting the new building to the existing school network, landscaping and upgrades to site infrastructure to support the new building.

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 EIS to be prepared and approval to be sought from the Minister for Planning and Public Spaces under Part 5 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.

The REF addresses the requirements of Section 5.5 of the EP&A Act, which requires that the department examine, and consider to the fullest extent possible, all matters affecting, or likely to affect the environment by reason of the proposed activity.

The technical assessments are appended to this REF and mitigation measures have been provided at **Appendix 1**. The survey plans prepared for the site are provided at **Appendix 2** and the Section 10.7 Planning Certificate is at **Appendix 3.**

2. The Proposal

Table 1 provides details of the proposed activity, including details of the site and its surrounding environment.

Table 1: Description of the proposal

Project Element	Description
Proponent	Department of Education (the department)
Proposal	Dundas Public School (DPS) upgrade
Description	**Proposed Activity** The proposed activity involves upgrades to the existing DPS, including the following: • Creation of a new single-storey building with 6 new teaching spaces,2 learning commons and 2 multipurpose spaces • Installation of covered walkways connecting the new building to the existing school network • Landscaping and external works around the new building and eastern entry • Upgrades to site infrastructure and services to support the new building. The intent of the activity is to increase the number of permanent teaching spaces (PTS) from 9 to 15 and students from 331 to 345 to address forecasted capacity required for the school over the next 10-15 years. There is no proposed change to access arrangements, and all works will be contained with the site. The works are contained in a single stage, and students will continue to learn out of the existing classrooms and temporary school facilities located across the site until such time that the new building and facilities are completed. Detailed Architectural Drawings provided at **Appendix 4** and Landscape Drawings at **Appendix 5** depict the proposed activity and works proposed within this REF.

Project Element	Description

Figure 1: Aerial Image of the site outlined in red (Source: Nearmap, taken 30 October 2024)

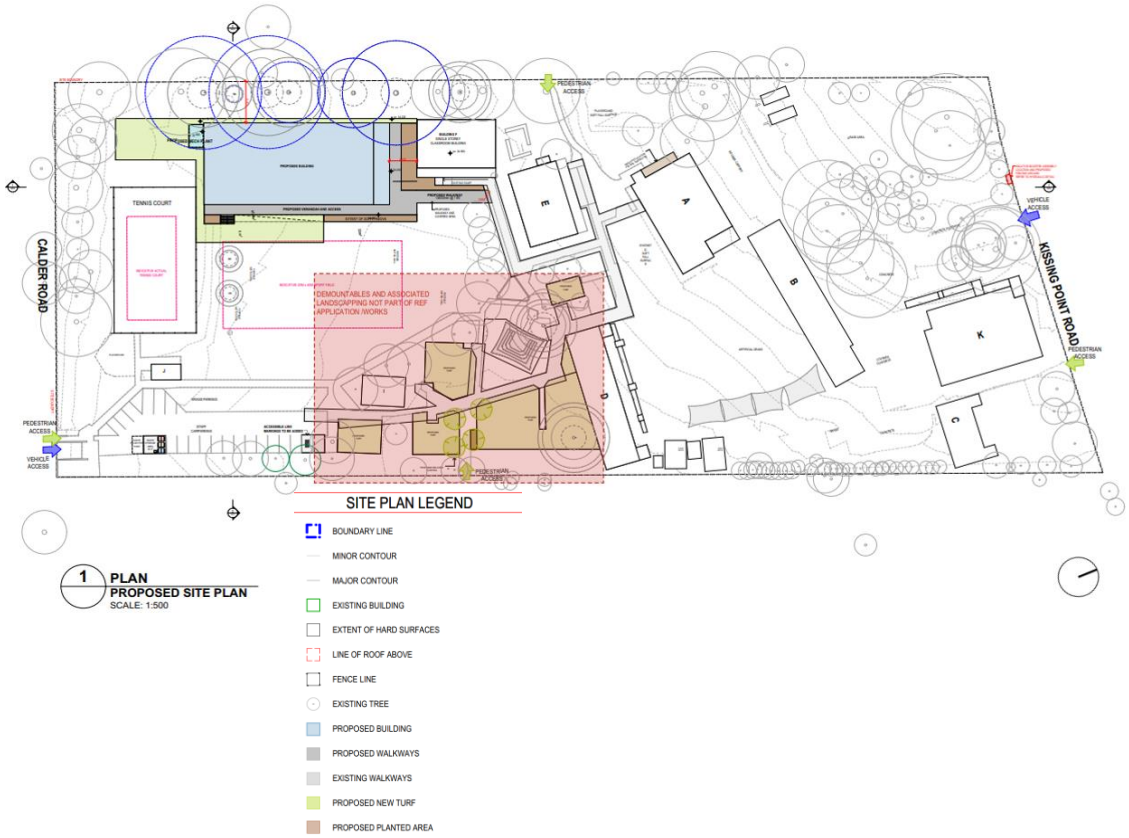


Figure 2: Proposed site plan (Source: Fulton Trotter Architects)

Project Element	Description

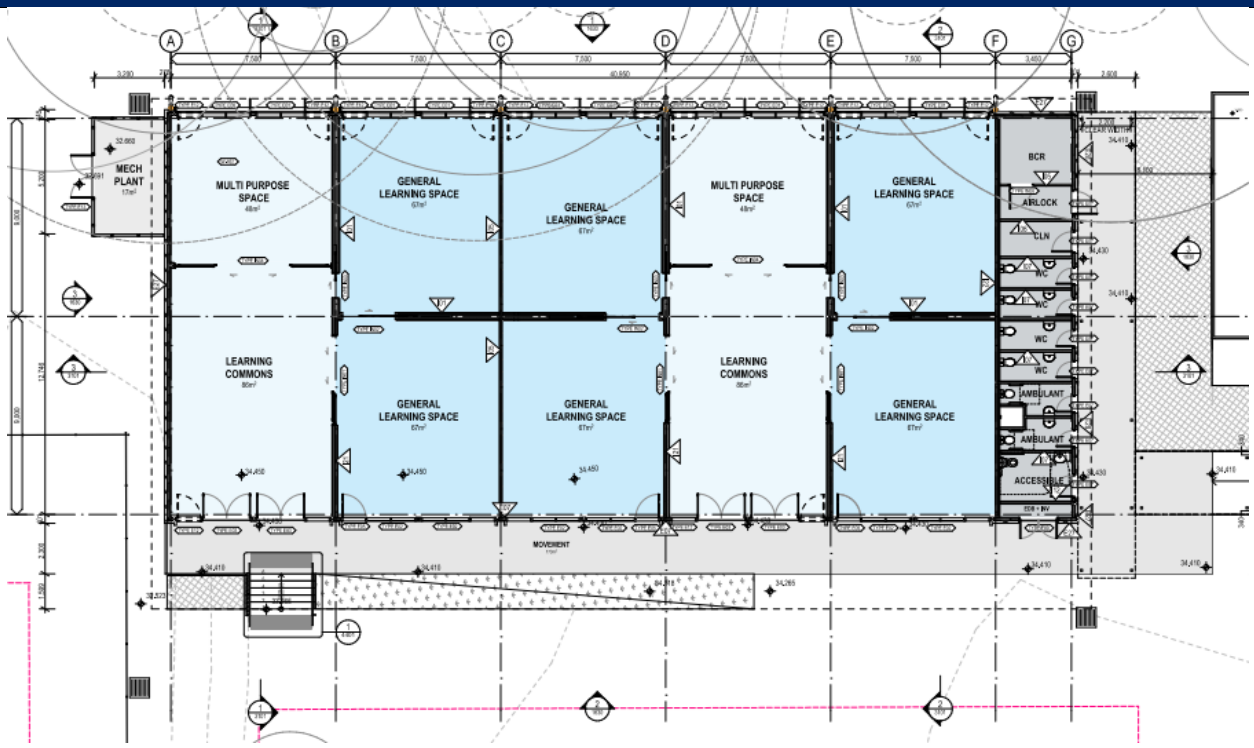


Figure 3: Ground floor plan of new building (Source: Fulton Trotter Architects)

Design Quality Principles

The Architectural Design Report (at **Appendix 6**) has undertaken a detailed assessment of the activity against Schedule 8 Design Quality Principles in Schools of the TI SEPP and the associated Design Guide.

Indigenous Artwork and Cultural Programs

The activity will include indigenous artwork opportunities to internal and external areas of the building and landscape to continue existing indigenous programs at the school. This forms part of the 'Cultural Artwork Opportunities' which occurs in the Department.

Landscaping

A detailed landscaping strategy is provided in both the Architectural Drawings (**Appendix 4**) and the Landscape Drawings (**Appendix 5**). An excerpt of the landscape masterplan is provided below.

Project Element	Description

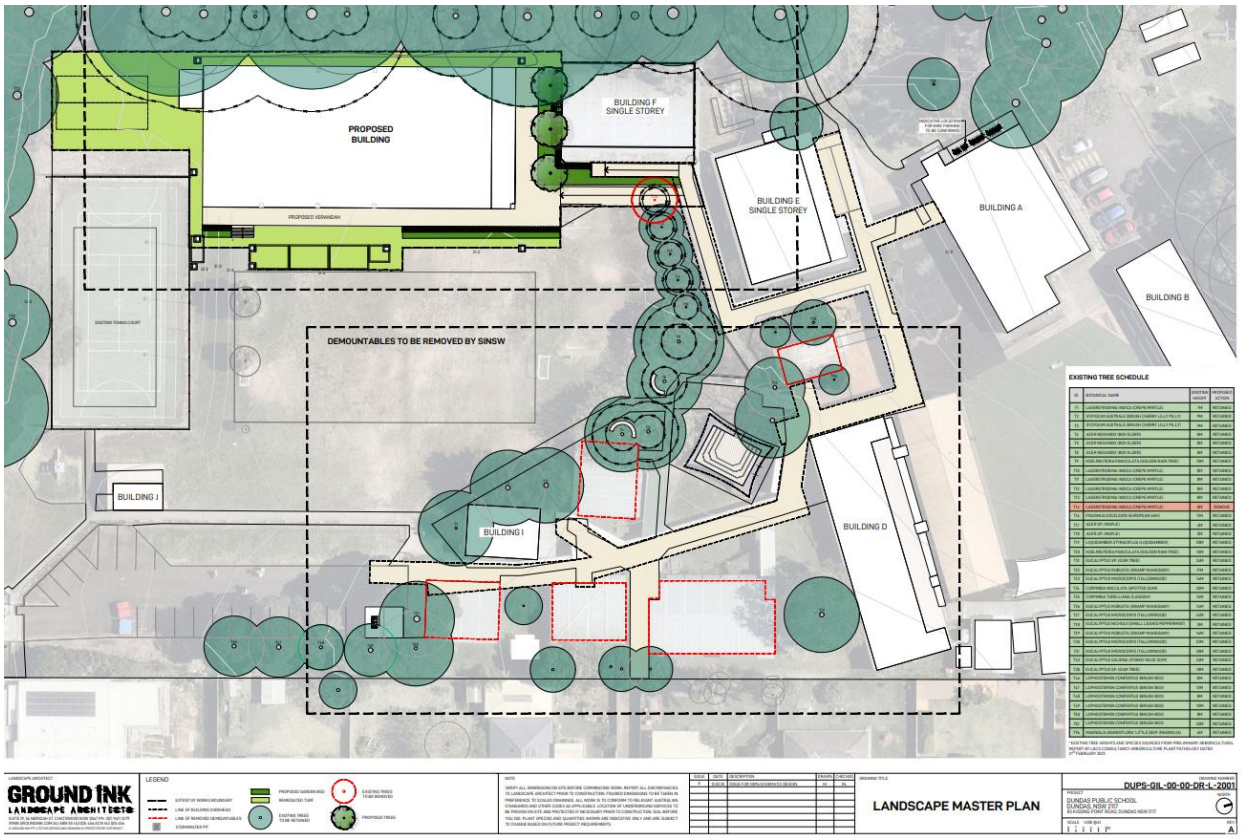


Figure 4: Landscape masterplan (Source: Ground Ink)

Tree Removal

The Arboricultural Impact Assessment (AIA) (**Appendix 7**) identifies that 12 trees will need to be removed as part of the activity out of the 47 identified in the study area.

The trees are identified for removal (numbered as per the AIA) are:

- Tree 13
- Tree 14
- Tree 20
- Tree 31
- Tree 36
- Tree 42
- Tree 56
- Tree 61
- Tree 68
- Tree 69
- Tree 102
- Tree 103

These are shown in **Figure 5** below. These trees fall within the new building footprint and covered walkway or are required to be removed in order to accommodate new services such as electrical and stormwater connections. The environmental impact of these works is outlined in **Section 6.3** below.

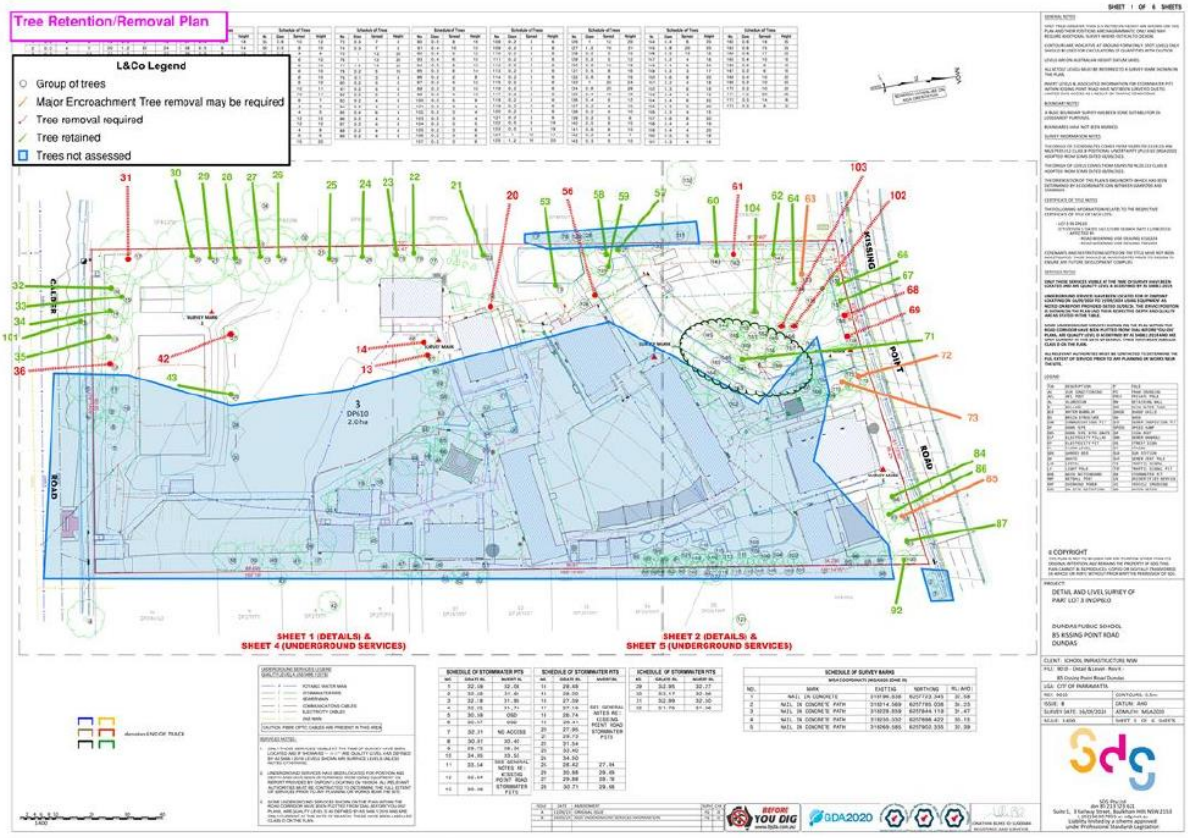
Project Element	Description
	

Figure 5: Tree retention and removal plan with area shown in blue excluded from activity (Source: Laurence & Co)

	Utilities and Services An assessment of the relevant utilities and services has been undertaken and confirms the following: <u>Sewer</u> The existing sewer mains are adequate and augmentation is not required. A new connection to the existing sewer mains is proposed south-west of the of the proposed building. The accompanying Hydraulic Integrated Water Management report in **Appendix 8** confirms the location of and connection to the existing sewer main. <u>Potable Water</u> Existing potable water supply mains surrounding the site have suitable flow and pressure, augmentation is not required. The site is fed from a Sydney Water main located in Kissing Point Road to the north. The capacity of the existing network is confirmed in the Hydraulic Integrated Water Management report at **Appendix 8.** <u>Electricity</u> The site will require an increased supply size based on the maximum demand calculation. However, the main switchboard is suitable for re-use. This is confirmed in the Electrical and Mechanical Services Report in **Appendix 9.** The site is currently supplied by two low voltage connections and contains one main switchboard location in an external enclosure outside Block A.

Project Element	Description
	The existing padmount substation will be upgraded and the transformer size will be increased. However, this does not result in any physical changes to the existing substation as all upgrades will be contained within the existing structure. New consumer mains cabling will be installed within in-ground conduits to connect Block L, between the existing switchboard and connection point at the Kissing Point Road boundary. These mains have been directed as to avoid any tree protection zones (TPZs) as shown in **Figure 6** below.

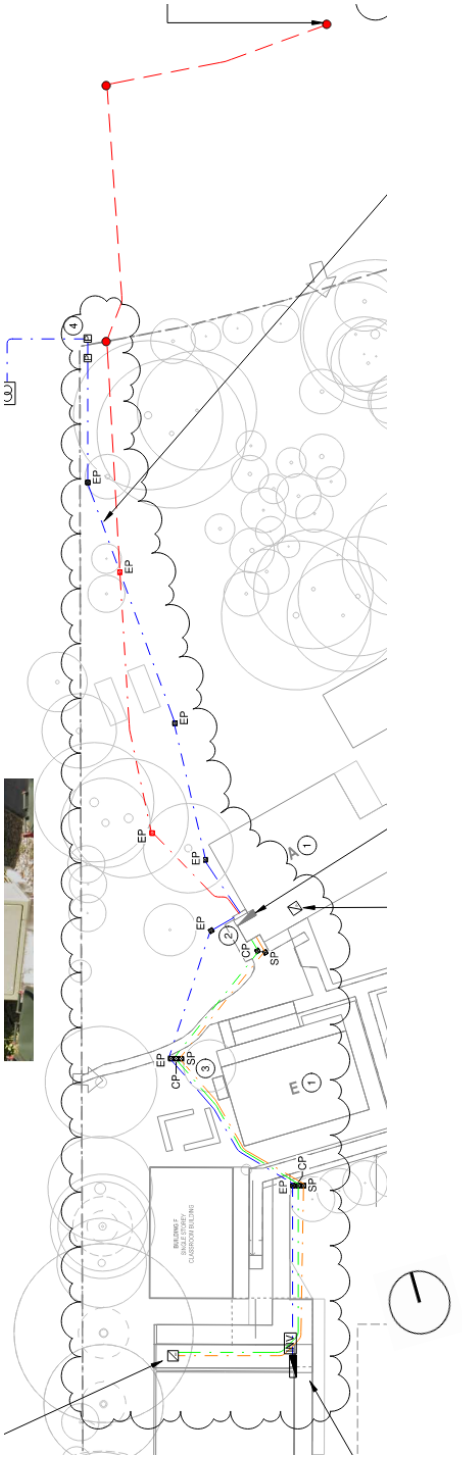


Figure 6: Exert showing electrical main connections, avoiding TPZs (Source: NDY)

	A new 21 kWp solar system will be installed on the new building including photovoltaic modules and inverter. Photovoltaic panels are proposed on the roof of Block L to satisfy the EFSG requirements to offset power consumption

Project Element	Description
	of the proposed activity. Mechanical Block L will be provided with air conditioning (A/C) units and ventilation as required in the Electrical and Mechanical Services Report at **Appendix 9.** The A/C units will be internal, in-ceiling ducted fan coil units and will have relief air discharge louvres on the façade, facing both eastern and western frontage. These units will be linked to a condenser located in the mechanical plant on the southern corner of the new building. The mechanical plant will be visible from the school grounds but has been designed to match the new buildings materials and finishes. The mechanical services have been designed in accordance with the relevant Australian Standards, the Educational Facility Standards and Guidelines (EFSG). Lighting All lighting will comply with relevant Australian Standards, the EFSG, Patternbook and National Construction Code (NCC) 2022. The activity will have new LED luminaires installed both internally and externally including in GLS, staff rooms, corridors, storerooms and external stairs and corridors (refer to **Appendix 9**). Appropriate emergency luminaires and exit signs will be provided and installed, in accordance with the NCC and relevant Australian Standards. All lighting, both internal and external will be controlled via a programmable control system that will have a timer to ensure the lights switch off when not in use. External lights will be contained within the site boundaries, for the purposes of wayfinding and safety. These lights will not have an impact on adjoining neighbours as they are of a low luminosity. They can connect to the existing lighting control system which operates within the school. Mitigation Measure ESD 13 requires all lighting to be designed and installed in accordance with AS 4282 and AS/ NZS 1158, and in turn to reduce the light pollution of the external lighting of the building. Communications The existing communications network at DPS is required to be modified to support the upgrades. The new building will have a new back-end router connected to the school system via new cabling, running from between Building L and F to the existing control room. Gas No gas services will be provided as part of the proposed activity. Stormwater Additional stormwater drainage will be required to convey generated stormwater from the new impervious areas into the existing network. An on-site detention (OSD) tank is proposed and will require a storage volume of 57m^3. The OSD will be located in front of Block L underground, as shown in **Figure 7** below and as demonstrated at **Appendix 8.**

Project Element	Description

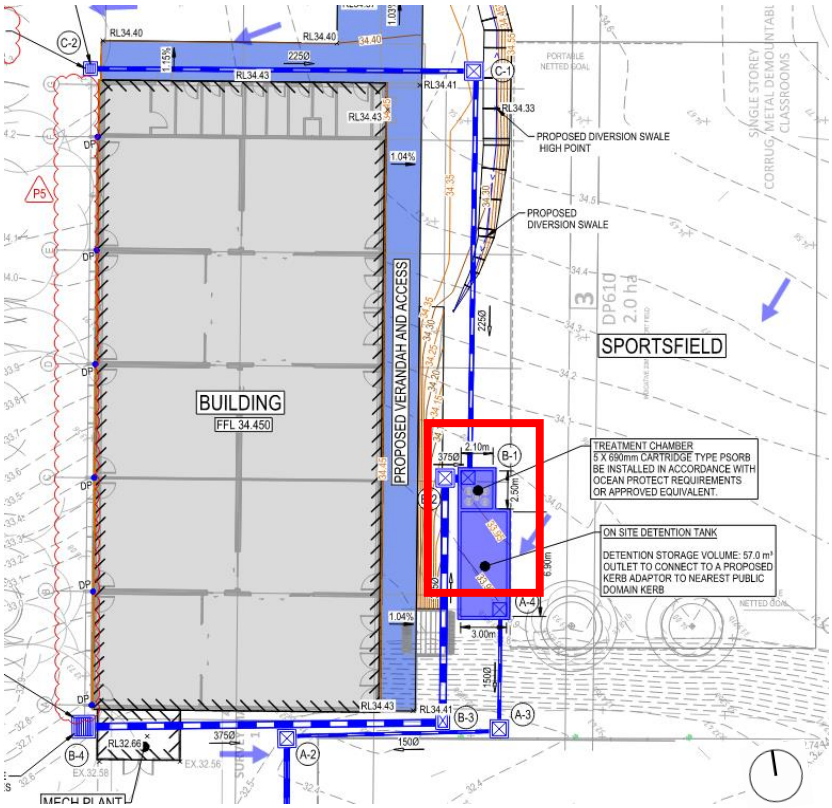


Figure 7: Excerpt showing OSD and treatment chamber outlined in red (Source: Meinhardt)

Legal Description	85 Kissing Point Road, Dundas Lot 3 DP 610

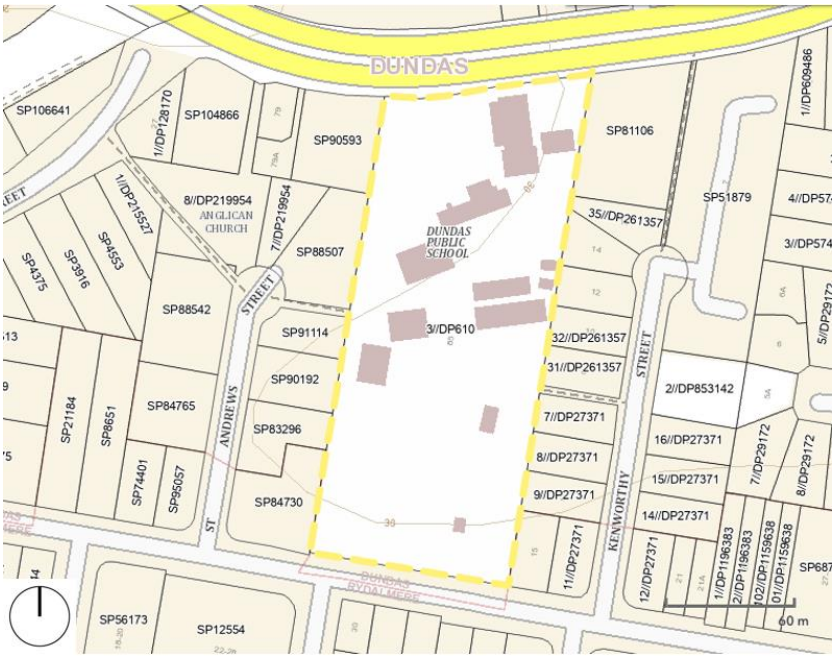
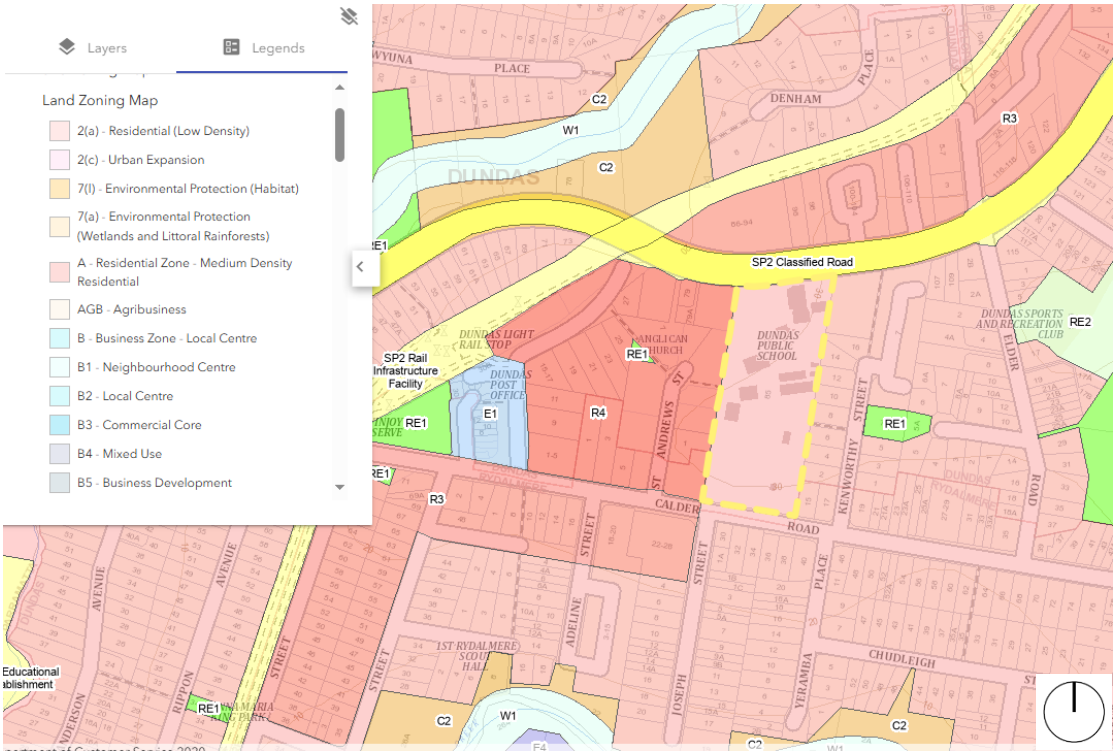


Figure 8: Image of allotments of site, outlined in yellow (Source: NSW Planning Portal Spatial Viewer)

Local Government Area	City of Parramatta

Project Element	Description
Site Description	DPS is located at 85 Kissing Point Road, Dundas. The school is bound by Kissing Point Road to the north and Calder Road to the south. Kenworthy Street is located parallel to the site to the east as is Saint Andrews Street to the west. The site has an area of 1.99 ha and comprises 1 allotment legally known as Lot 3 DP 610. The site currently comprises an existing co-education primary (K-6) public school with 9 permanent buildings, 6 demountable structures (1 demountable includes 2 classrooms), interconnected covered walkways, play areas, on-grade parking, sports court and green spaces with mature trees. The majority of the buildings are 1 storey with only one 2-storey building being Building A (Admin/staff hub and amenities building). Buildings are clustered to the north of the site, with the southern portion of the site comprising of a large play area/informal sports oval and a sports court. The site is surrounded by low density housing to the east and medium density housing to the north and west. Densities increase to the west with the nearby Dundas Village and Dundas light rail station which are approximately a 5min walk. The site is located approximately 3km north-east of Paramatta CBD. The survey plan has been provided at **Appendix 2**.
Site Context	The site is surrounded by residential uses ranging from predominantly low density to the east and south to medium and high density to the north and west. This is shown in **Figure 9** below.
	 **Figure 9: Site and surrounding land use zoning (Source: NSW Planning Portal Spatial Viewer)**
	To the immediate north is a State Classified Main Road known as Kissing Point Road which is a six-lane carriageway running east to west. On the northern side of Kissing Point Road is medium density residential uses including townhouses, characterised as one- and two-storeys with pitched roofs.

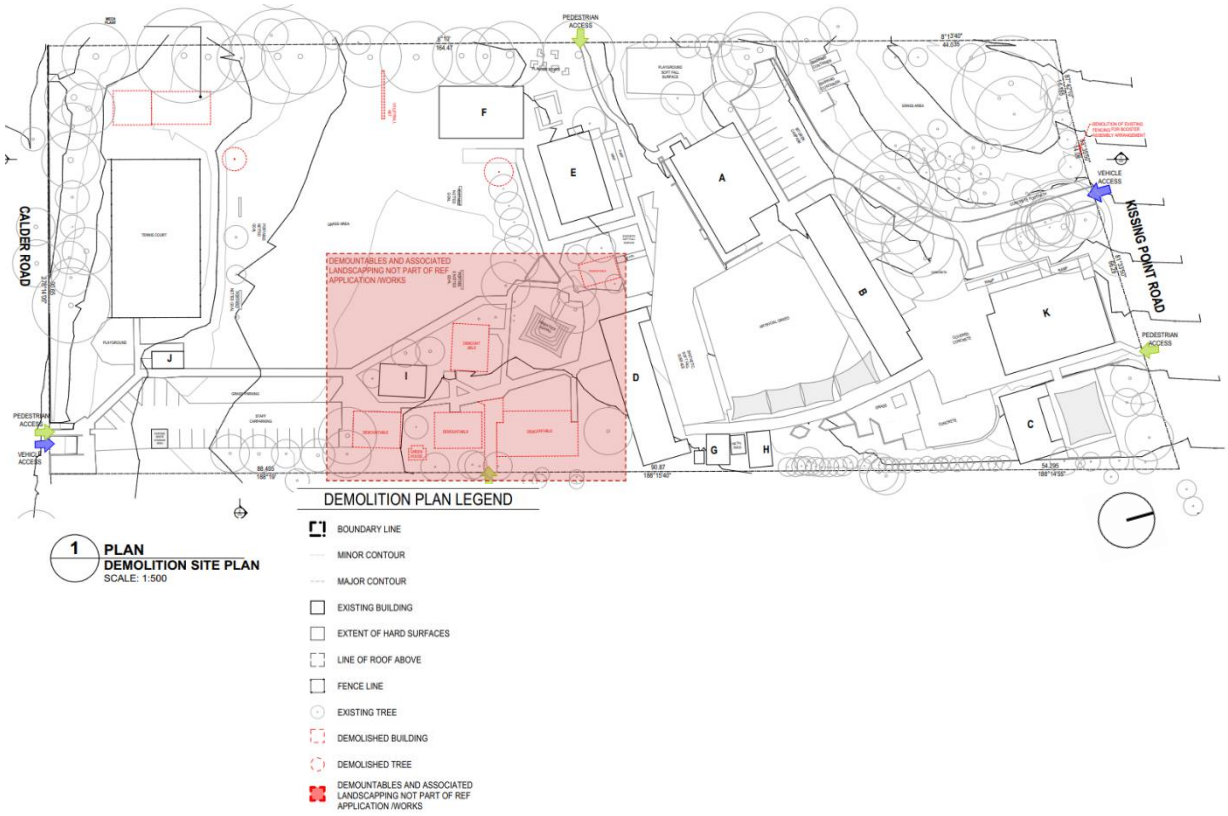
Project Element	Description
 **Figure 10: Image of townhouses on Kissing Point Road, looking north (Source: Google Streetview, Oct 2024)**	
	To the east is low density residential uses characterised by one-storey red brick dwellings with pitched roofs. Kenworthy Street also has a small open space park known as Arrunga Street Park which connects Kenworthy and Arrunga Street.
 **Figure 11: Image of Arrunga Street Park and residential dwelling looking east (Source: Google Streetview, Oct 2022)**	
	To the south of the site is Calder Road which ranges from low density residential uses to the east to medium density dwellings to the west, characterised as one or two-storey dual occupancies and three storey residential flat buildings.

Project Element	Description
	 **Figure 12: Image of properties on southern side of Calder Road (Source: Google Streetview, Oct 2024)**
	To the west of the site is high density residential uses characterised as four- to five-storey residential apartment buildings. Further west is Dundas Local Centre with the Light Rail Station behind it to the north-west.

Project Element	Description
 **Figure 13: St Andrews Street residential apartment buildings and pedestrian access to site (Source: Google Streetview, Sept 2020)**  **Figure 14: Image of Dundas shops from Calder Street, looking north-west (Source: Google Streetview, Oct 2024)**	
Environment of the Activity	**Topography** The site is gently sloping with the highest point at the centre being RL34.5 and a gradual fall to both the north and south boundary of approximately 4.5m. In the south-western corner of the site, where the location of the activity will occur, the site is relatively flat with a gentle slope towards Calder Road to the south. Within the bounds of the activity, the site falls from RL 34.26 to RL 33.54. Refer to the Survey Plan at **Appendix 2**. **Vegetation and Trees** There are 173 trees scattered around the site. Denser vegetation covers the northwest portion of the site with large clusters in the centre and along the southern boundary of the site. Manicured gardens and lawns extend around the school buildings and the central areas, with mature canopy trees around the southern and south-western perimeter. The AIA (**Appendix 7**) identifies that 12 trees will need to be removed as part

Project Element	Description
	of the activity out of the 47 identified in the study area. The trees are identified for removal (numbered as per the AIA) and their landscape significance value (out of low, moderate or high) are as follows: • Tree 13 (low) • Tree 14 (low) • Tree 20 (moderate) • Tree 31 (high) • Tree 36 (moderate) • Tree 42 (low) • Tree 56 (high) • Tree 61(low) • Tree 68 (moderate) • Tree 69 (low) • Tree 102(low) • Tree 103 (low) These trees fall within the new building footprint and covered walkway or are required to be removed in order to accommodate new services.
Need for the proposal	The proposed activity is part of the NSW Government's plan to rebuild public education with $8.9 billion allocated to new and upgraded schools as part of the 2024-2025 Budget. The proposed upgrades will replace the temporary demountables located along the eastern boundary of the site. These are proposed to be removed following construction completion on the new building (Block L) to ensure the activity does not interfere with the operation of the school. The new building will be accessible via a covered walkway, connected into the broader site network. An existing ramp located outside of Building F will also be used as accessible entrance to the building. A staircase will be located on the southern end. The intent of the activity is to assist in reducing the reliance on the demountables to meet the current and ongoing demands forecasted at the school.
Alternatives	The proposed activity has been developed following a consideration of options and alternatives to address the need identified. The summary of the options is provided below: <u>Option 1: The proposed activity</u> The proposed new building (Block G) will be located adjoining the existing Block F along the western boundary of the site. New Block L will be one storey in height and provide a consistent finished floor level to link it with the connected walkways on site. Block L will comprise six new permanent, modern general learning spaces (GLS), together with two learning commons and two multipurpose spaces. <u>Option 2: Alternative location</u> An alternative location for the new building was considered during the masterplan verification phase of the project. This alternative location was located along the eastern boundary and would require the removal of all the temporary demountables prior to construction. Ultimately, this option was not pursued for the following reasons: • The location would disrupt ongoing operation of the school during construction, requiring the removal of temporary demountables used

Project Element	Description
	currently for teaching; • The location would require several trees of significance to be removed to facilitate the new building; • The location would block the eastern pedestrian access gate to Kenworthy Street and circulation would need to be redefined; and • The location would impact the amount of playspace and timber desk area for students, and access to the play area during construction would be affected; <u>Option 3: Do nothing</u> The activity is a part of a State Government election campaign undertaking to provide modern, permanent and fit-for-purpose teaching spaces at DPS. The site has capacity to accommodate new teaching facilities, without resulting in a significant environmental impact, providing improved spaces for the existing student population. The do nothing approach is not an option as it will continue the reliance on demountables within the school and not assist in meeting current and future demand for primary schooling in the school's catchment.
Justification	The proposed activity can be justified on the following grounds: • It responds to an existing need within the community; • It provides modern, accessible and fit-for-purpose teaching facilities; • It generally complies with, or is consistent with all relevant legislation, plans and policies; • It has minimal environmental impacts; and • It involves appropriate mitigation measures to address any impacts.
Construction Activities	**Demolition** 12 trees on site will be removed to accommodate the new building and associated services. Also, the five existing demountables on the eastern boundary will be removed and replaced with turf as a concurrent project which is detailed in **Section 3.1**.

Project Element	Description
	 **Figure 15: Demolition Plan to be undertaken as a concurrent project (Source: Fulton Trotter Architects)**
	Construction A Preliminary Construction Management Plan (PCMP) has been prepared (**Appendix 10**). 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 A total of approximately 30 construction workers will be onsite at one time. The indicative construction timing is scheduled for commencement in July 2025 and completion in July 2026, indicating 12 months of construction on site. Construction activities include site establishment works, ground works and removal of trees. Site establishment works have been provided in the PCMP in (**Appendix 10**). This includes: • The contractor will complete a thorough dilapidation report for the site and immediately adjoining properties • The site will be secured and made safe from the public through perimeter fencing • Exclusion zones around existing trees to be retained will be erected. As construction will occur during the ongoing operation of the school, the safety of the staff and students will be prioritised and upheld by all contractors. The

Project Element	Description
	PCMP has ensured this through a series of mitigation measures (Mitigation CONM08-36 (inclusive)) and are summarised as follows: • Secure hoarding of the construction site is to be installed • Appropriate signage to help staff manage children's movements • Heavy vehicle movement will be limited to off-peak times including between 08:00-09:00 and 14:30-15:30. • All construction vehicles entering and exiting the site will do so in a forward-facing manner, and with licensed traffic controllers • A site-specific safety management plan will be prepared by the Contractor • Upgrades to the site services and the new switchboard are to be undertaken during school holidays and/or after hours to minimise disruption to school operations (Mitigation Measure CONM25 at **Appendix 1**) • Any work outside the nominated construction zone is subject to approved Disruption Notification procedures A Preliminary Construction Traffic Management Plan has also been prepared (**Appendix 11**) in association with the PCMP. This report details the vehicle access points, vehicle movement times, types of vehicles and other measures. Construction noise management has also been considered in the Acoustic Report prepared. Please see **Section 6.7** for the full details. **Waste Management** The Construction Waste Management Plan (CWMP) at **Appendix 12** details the waste management strategies and auditing requirements during the construction and demolition of the proposed activity. The CWMP notes the following waste management practices and objectives for the duration of the demolition and construction stages of the activity. *Construction waste management equipment, bin sizes and collection frequency* All waste will be removed by a licensed waste contractor using 10 sqm and 15m^3 bins on-site, supplemented by 2m^3 transfer bins. The construction and demolition waste will be moved off-site for recycling when bins are full and within the construction site's operating hours to reduce disturbance of the neighbours and disruption to the school. *On-site waste management and storage requirements* The site will have a designated waste storage area for the disposal and storage of demolition, excavation and construction waste prior to collection. *Reuse and recycling* Where practical, reuse and recycling will be used to reduce the volume of materials waste generated during construction. A lay-down area will be allocated for the storage of materials to be reused, including timber off-cuts, cardboard boxes, plasterboard off-cuts, timber crates and more. *Hazardous waste materials* All excavation waste removed from the site will be classified by a suitably qualified environmental consultant.
Operation Activities	**Hours of Operation** The school will maintain the current hours of operation with bell times of 9:00 for the morning and 15:00 in the afternoon. **Waste Management** The Operational Waste Management Plan (OWMP) at **Appendix 13** details the waste management strategies during the operation of the site including general

Project Element	Description
	waste, recyclables, garden waste, sanitary waste, and electronic waste. The Waste Consultant has confirmed that there is no change to the current waste collection practices of the school. Waste will continue to be collected from the current waste collection point, then the appointed waste contractors will wheel the bins for each waste stream from their positions to the back of the truck for collection then wheel the bins back as per the current waste contract. This is all contained on site. Collection occurs outside of school hours, particularly to avoid the peak traffic times of drop off and pick ups.
Other relevant projects, programs and plans	The scope of upgrades to DPS extends beyond the scope of this REF. **Concurrent Project/s** The proposed activity does not include removal of the demountables from the site. These works will be undertaken as a separate process as detailed further is **Section 3.1** below. **Other surrounding development applications** A search of City of Paramatta Council's (Council) Development Application (DA) tracker of nearby and surrounding properties has not identified any significant projects that would result in impacts or affect the delivery of this activity. As such, there would be no cumulative impacts from nearby projects on the activity.

3. Permissibility as a Division 5.1 Activity

Table 2 sets out which provisions of the TI SEPP that the proposed activity is permissible as development permitted without consent (DPWC).

Table 2: Description of proposed activities under the TI SEPP

Division and Section within TI SEPP	Description of Works
Development Permitted without Consent	
3.37(1)(f)	The proposed activity involves upgrades to the existing DPS, including the following: • Creation of a new single-storey building with 6 new teaching spaces, 2 learning commons and 2 multipurpose spaces • Installation of covered walkways connecting the new building to the existing school network • Landscaping and external works around the new building and eastern entry • Upgrades to site infrastructure and services to support the new building. This scope of works can be considered as an activity associated with the operation of the existing school, and meets the requirements of a DPWC.

Table 3 details how the proposed activity complies with the relevant provisions in order to qualify as development permitted without consent.

Table 3 Permissibility of proposal to be assessed as Division 5.1 Activity

Reference	Assessment		Comment
For works under Chapter 3			
EP&A Act Part 5.1 **TI SEPP Section 3.37(1)**	Is the proposal to be carried out by or on behalf of the department?	☒ Yes ☐ No	The proponent is the department.
TI SEPP Section 3.37(1)	Is the proposal within the boundaries of an existing or approved government school site?	☒ Yes ☐ No	The proposed activity falls entirely within the boundaries of the existing school site as demonstrated in the Architectural Plans (**Appendix 4**). Landowners consent has been provided demonstrating that the Minister for Education and Early Learning is the landowner.
TI SEPP Section 3.37(1)	Is the development specified in Section 3.37(1)(a)-(f) of the T&I SEPP as being development which can be carried out without consent?	☒ Yes ☐ No	As indicated above in **Table 2** the proposed activity complies with the requirements of Section 3.37(1)(f) being associated with the operation of an existing school.
TI SEPP Section 3.37(2)	If the development involves the construction of a building, do the building(s) have a height less than the greater of: (a) the maximum height limit for a building under the	☒ Yes ☐ No ☐ N/A	The proposed building has a height of 1 storey, or 7.57m tall. The PLEP permits a maximum building height of 9m for the site. However, under the TI SEPP, a maximum building height of

Reference	Assessment		Comment
	environmental planning instrument applying to the land; or, (b) four storeys?		four storeys is permissible. As the provisions of the TI SEPP override the requirements in PLEP, the proposed single storey building complies. .
TI SEPP Section 3.37(4)	Is the proposal consistent with (i.e. would not result in a contravention of) any existing condition of the development consent currently operating that applies to any part of the school, relating to hours of operation, noise, vehicular movement, traffic generation, loading, waste management or landscaping.	☒ Yes ☐ No	A request for all development consents applying to the site was submitted to Council on 26/07/2024 under the *Government Information (Public Access) Act 2009* (GIPA Act). A copy of the consents and an analysis of their conditions is at **Appendix 14.** In summary, the scope of works proposed in this activity do not contravene any previous consent, or condition imposed on that consent. It is noted that the existing school does not have any overarching consent, which is not atypical of a school of this age. Of note, mitigation measures have been proposed at **Appendix 1** to ensure no works occur within the vicinity of the playground in the south-eastern corner of the site. This is to ensure that the consent for DA979/98 (construction of playground equipment between the Tennis/Netball Court and the car park) is not contravened.
3.37 (5A)	Has the proposal considered the following— (a) the design quality of the development, evaluated in accordance with the design quality principles set out in Schedule 8, (b) the design principles set out in the design guide.	☒ Yes ☐ No	The Architectural Design Report (**Appendix 6**) has considered an assessment against the provisions of the Design Principles set out in Schedule 8 of the T&I SEPP and the Design for Schools Guide. The proposed activity is considered to align with the principles as outlined in both of these provisions.

3.1 Concurrent Projects

The scope of the upgrades to DPS extends beyond the scope of this REF. The following details the concurrent projects that will occur on the site under a separate planning approval pathway:

- Removal of the demountables on the eastern boundary of the site (D1332, D11163, D13396, D15059 and D18172) following the construction of Block L. This will ensure that the necessary teaching spaces remain available throughout the transition allowing the school to maintain continuous operation.
- The removal of the greenhouse in between the demountables
- Concrete path to pedestrian access via Kenworthy Street
- Removal of the cricket net in the south-west corner of the site
- Removal of the volleyball net near Building F

4. Statutory Planning Legislation and Strategic Plans

An assessment of the relevant statutory planning legislation and strategic policies has been undertaken. There are no site specific strategic plans or policies that are relevant to this activity

Table 4 provides a summary of relevant statutory legislation that applies to the activity.

Table 4: Regulatory Statutory Legislation

Statutory Legislation	Applies?	Comment
Acts		
Biodiversity Conservation Act 2016	☐ Yes ☒ No	The site is not mapped as being affected with biodiversity values under the mapping shown in **Figure 16**. Therefore, the provisions of the BC Act are not triggered.

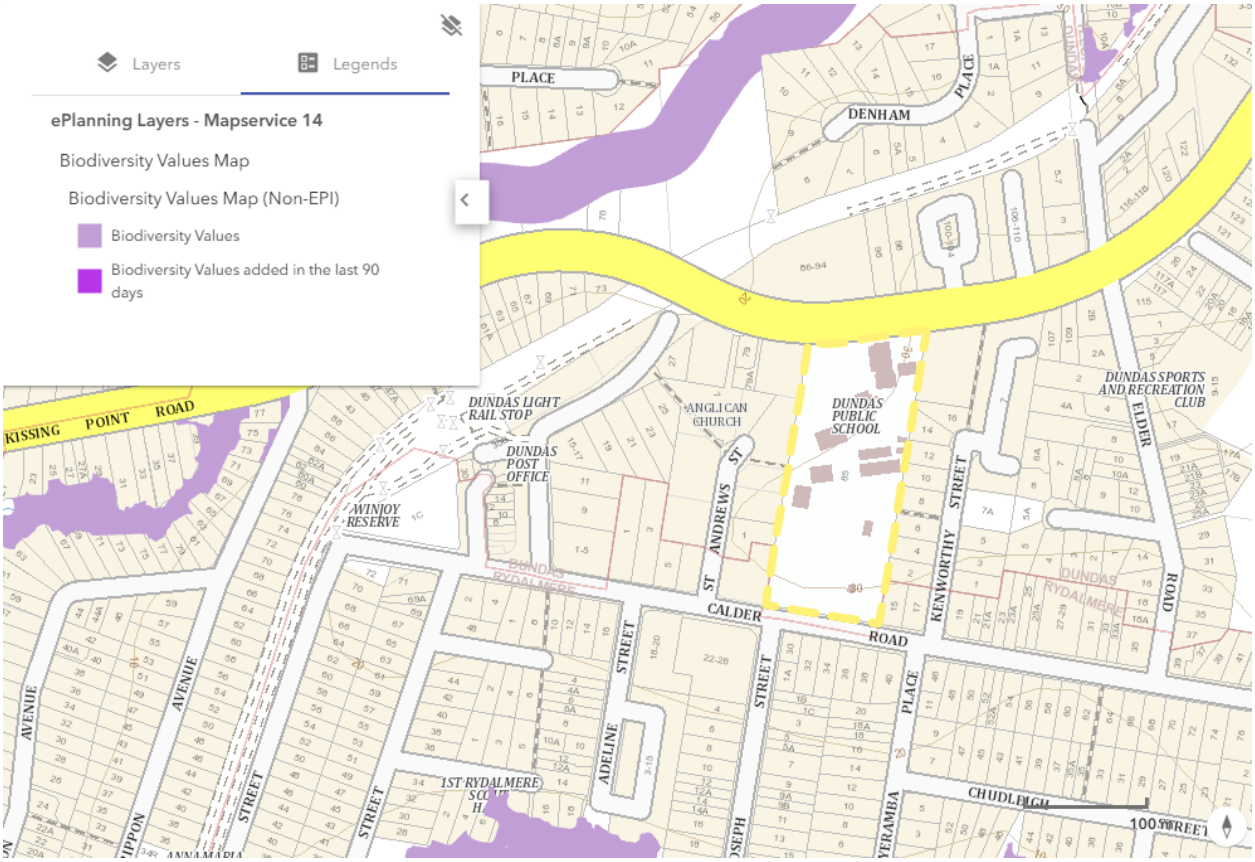



Figure 16: Biodiversity Values Map, with site outlined in yellow (Source: NSW Planning Portal Spatial Viewer)		
Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act)	☐ Yes ☒ No	Table 1 of the Flora and Fauna Assessment (**Appendix 15**) outlines the assessment and consideration of Matters of National Environmental Significance (MNES) as listed under the EPBC Act. The Assessment indicates that there was one potential MNES to occur within the study area, that being the *Pteropus poliocephalus* (Grey-headed Flying-fox). However, their professional assessment

Statutory Legislation	Applies?	Comment
		concluded that the proposed activity is unlikely to result in a significant impact on this species. As such, the activity does not trigger any of the requirements (including a referral to the Commonwealth) under this Act.
State Environmental Planning Policies (SEPPs)		
State Environmental Planning Policy (Biodiversity and Conservation) 2021 Chapter 2 Vegetation in non-rural areas	☒ Yes ☐ No	The activity proposes to remove 12 trees from the location of the proposed activity to accommodate Block L. The AIA (**Appendix 7**) and the Flora and Fauna Assessment (**Appendix 15**) have determined that the activity: • Will not detrimentally impact the biodiversity value of existing vegetation, as the new building is located away from the significant trees • Seeks to retain as many trees adjoining the site as possible, by locating the new building, and the associated services, away from existing tree roots and canopies. A full assessment on the impact of the tree removal is provided in **Section 6.3** of this report. The AIA recommends replacement tree planting to be provided when trees are removed. As 12 trees are to be removed then 12 trees are to be planted on site and supplied on site as an advanced sized stock to offset the loss of amenity due to the removal of trees. This requirement has been included in the Mitigation Measures as ARB15.
State Environmental Planning Policy (Resilience and Hazards) 2021	☐ Yes ☒ No	The Supplementary Detailed Site Investigation (**Appendix 16**) and the Geotechnical Investigation Report (**Appendix 17**) has assessed contamination on site as per Chapter 4: Remediation of land. The Contamination Consultant has prepared a series of reports for DPS: • In 2023, a Preliminary Site Investigation (PSI) was undertaken which included a review of available desktop information, a site inspection. The conclusion of this report was that there is a low to moderate potential to have occurred on site as a result of past and previous land uses, but the site was suitable for the activity pending further investigation. • In 2024, a Detailed Site Investigation (DSI) was prepared which built on

Statutory Legislation	Applies?	Comment
		the PSI and included on site intrusive investigations in the proposed building footprints. From the samples collected and analysed, the conclusion was there was a low risk of contamination, and these areas tested were suitable for the proposed activity and ongoing land use as a school. • A further supplementary DSI was undertaken to determine the suitability of an additional area within the site for the siting of the new building. Again, this conclusion was a low risk of contamination and these new areas tested were suitable for the proposed activity and ongoing land use as a school. The key outcomes from the contamination assessments are: • The site has been used as a school since it was established in 1948. • Prior to the establishment of the school, the site was used as a plant nursery between 1945-1948. • There has been ongoing development on the site during this period. • One of the key construction activities was the rebuilding of the Devlin Building, which occurred due to the result of an arson related fire. • Development around the site has been significant, namely due to the construction of higher density residences. • There was no signs of gross contamination identified on site. • There was a low risk of potential PFAS and heavy metal contamination as a result of firefighting efforts and the demolition of the building due to the arson attack was identified. • An Asbestos Register was reviewed (and provided by the client) which noted that no previous historical fibro in grounds investigations or events that have been recorded against the school. • Based on the results of the soil samples analysed on site, the soils present a low risk of contamination and are considered to be suitable for the proposed activity and ongoing land use as a primary school. Section 4.6 requires a consent authority to

Statutory Legislation	Applies?	Comment
		consider if the land is contaminated, and if so, if the land is suitable (after remediation) for the purpose of the development which is proposed to be carried out, and if so, the land can be remediated prior to the use of the land. Based on the findings of the contamination reports, it is deemed that the land is low risk of contamination and is suitable for the ongoing land use as a school. The contamination report provides a series of mitigation measures which are to be carried out during the construction period. These are standard construction management plan provisions.

Table 5 provides an assessment of the proposed activity against relevant legislative requirements and strategic policy provisions.

Table 5: Consultation Requirements

Statutory Legislation	Applies?	Comment
Section 3.8 Consultation with councils—development with impacts on council-related infrastructure or services The department is of the opinion that the activity: • *will have a substantial impact on stormwater management services provided by a council, or* • *is likely to generate traffic to an extent that will strain the capacity of the road system in a local government area, or* • *involves connection to, and a substantial impact on the capacity of, any part of a sewerage system owned by a council, or* • *involves connection to, and use of a substantial volume of water from, any part of a water supply system owned by a council, or* • *involves the installation of a temporary structure on, or the enclosing of, a public place that is under a council's management or control that is likely to cause a disruption to pedestrian or vehicular traffic that is not minor or inconsequential, or* • *involves excavation that is not minor or inconsequential of the surface of, or a footpath adjacent to, a road for which a council is the roads authority under the Roads Act 1993 (if the public authority that is carrying out the development, or on whose behalf it is being carried out, is not responsible for the maintenance of the road or footpath).*	☐ Yes ☒ No	The activity does not significantly impact council-related infrastructure or services, such as stormwater and traffic. Notwithstanding, written notice was given to Council between 7-28 February 2025 and their response has been included in the REF, as outlined in **Section 5.2.**
3.9 Consultation with councils—development with impacts on local heritage Is the development: likely to affect the heritage significance of a local heritage item, or of a heritage conservation area, that is not also a State heritage item in a way that is more than minimal?	☐ Yes ☒ No	The proposed activity is not on a site listed as a heritage item or within a heritage conservation area. As such consultation with the Council in this respect is not required.

Statutory Legislation	Applies?	Comment
3.10 Notification of councils and State Emergency Service—development on flood liable land Is the activity (other than demolition of buildings or structures, or internal works to existing buildings) on flood liable land?	☐ Yes ☒ No	The activity is not on flood liable land. Flooding was considered at the due diligence stage of the proposal, which confirmed that the site is not impacted by mainstream or overland flooding events, up to and including PMF. Written notice to Council and the SES was not required to respond to this provision (noting that Council was notified using other provisions).
3.12 Consultation with public authorities other than councils Is the development adjacent to land reserved under the *National Parks and Wildlife Act 1974* or acquired under Part 11 of that Act?	☐ Yes ☒ No	The site is not adjacent to land reserved or acquired under the *National Parks and Wildlife Act 1974* and therefore written notice to NSW Environment and Heritage is not required.
Is the development on land immediately adjacent to a rail corridor that— is likely to have an adverse effect on rail safety, or if the rail corridor concerned is used by electric trains, involves the placing of a metal finish on a structure, or involves the use of a crane in air space above any rail corridor.	☐ Yes ☒ No	The site is within the proximity to the Paramatta Light Rail Corridor, approximately 600m from Dundas Light Rail Station. Written notice was given to Paramatta Light Rail and TfNSW between 7-28 February 2025 and the TfNSW response has been included in the REF, as outlined in **Section 5.2**.
May the development increase the amount of artificial light in the night sky and that is on land within the dark sky region as identified on the dark sky region map?	☐ Yes ☒ No	The activity does not increase the amount of artificial light in the night sky and is not on land within the dark sky region as identified on the dark sky region map.
Does the proposal involve any of the following? *the site has access to a road and the development will result in the school being able to accommodate 50 or more additional students, or* *the site has access to -* *a classified road, or* *a road (the connecting road) that connects, within 90 metres (measured along the alignment of the connecting road) of the access point, to a classified road,* *and the development will result in the provision of an additional 50 or more car parking spaces, or* *no road to which the site has access is classified and the development will result in the provision of an additional 200 or more car parking spaces, or*	☒ Yes ☐ No	The site has direct access to Kissing Point Road, a State Classified Main Road. However, the activity is 133m from the main road. The proposed activity will not result in the provision of an additional 50 or more car parking spaces. Nonetheless, written notice was given to TfNSW between 7-28 February 2025 and their response has been included in the REF, as outlined in **Section 5.1**.

Statutory Legislation	Applies?	Comment
the development will result in - *a new vehicular or pedestrian access point to the school from a public road, or* *a change in location of an existing vehicular or pedestrian access point to the school from a public road, or* *the development will involve excavation to a depth of 3 or more metres below ground level (existing) on land within or immediately adjacent to a classified road within the meaning of the Roads Act 1993.*		
3.38 Notification of carrying out of certain development under section 3.37 Is the development being pursued as an REF under section 3.37(1)(a) of the TI SEPP?	☒ Yes ☐ No	The activity is being pursued under Section 3.37(1)(a) as outlined above in Section 3. Written notice was given to Council and adjoining land occupiers between 7-28 February 2025 and their response has been included in the REF, as outlined in **Section 5.2**.

Table 6 provides an assessment of the proposal against the applicable pre-conditions set out in Section 3.13 of the TI SEPP.

Table 6: Compliance with pre-conditions to the 'development without consent pathway'

Exception	Applies?	Comment
(a) they would require notice of the intention to carry out the development to be given to a council or public authority from whom an approval is required in order for the development to be carried out lawfully, or	☐ Yes ☒ No	No additional approvals are required for the activity.
(b) they would require notice to be given to a council or public authority with whom the public authority that is carrying out the development, or on whose behalf it is being carried out, has an agreed consultation protocol that applies to the development, or	☒ Yes ☐ No	No protocol applies. As indicated above, notification was given to Council between 7-28 February 2025 of the proposed activity.
(c) they would require notice to be given to a council or public authority that is carrying out the development or on whose behalf it is being carried out, or	☒ Yes ☐ No	Council is not the proponent.
(d) the development is exempt development under any environmental planning instrument (including this Chapter), or	☐ Yes ☒ No	There are works outside of this REF scope which can be considered exempt development under Section 3.39 of the TI SEPP. These works are for the removal of the demountables along the eastern boundary as outlined in **Section 3.1** above and have not been included in this assessment.
(e) the development comprises emergency works that— *(i) involve no greater disturbance to soil or vegetation than necessary, and* *(ii) are carried out in accordance with all applicable requirements of the Blue Book.*	☐ Yes ☒ No	No emergency works are included in the activity.

5. Consultation

5.1 Stakeholder engagement

Table 7 provides a summary of early stakeholder (non-statutory) consultation undertaken to inform project development and preparation of the REF.

Please refer to **Appendix 18** for a full detailed description of the stakeholder engagement including dates and copies of consultation.

Table 7: Summary of Stakeholder Engagement

Stakeholder	Summary of matters raised	Response
City of Paramatta Council Planning Department	Meeting held 16.12.2024 Informal meeting to discuss the proposed works on site. There were no objections raised with the proposed activity and no detailed responses to be considered.	The meeting is acknowledged, and no design changes or mitigation measures were required.
TfNSW/ Parramatta Light Rail (PLR)/ Council Traffic – Transport Working Group	The Rapid Transport Assessment was presented to these agencies. There were a series of requests provided (such as the review of the green walk time across Kissing Point Road, the provision of additional bus shelters and safety information to be provided to students around Parramatta Light Rail), however these works are outside the scope of activity and can continue to be managed as part of the existing operations of the school.	The requests are acknowledged and as stated will continue to be managed outside the REF assessment process. No design changes or mitigation measures were required.
School Community	The project was presented to the Project Reference Group (PRG) formed within the school. The PRG gave general endorsement to the current design as part of this process. The PRG agreed to the removal of the cricket nets and no reinstatement required (separate planning pathway). There was a question around the relocation of bicycle storage.	It is noted that the location of the proposed building does not contain any existing bicycle storage. The bicycle storage falls outside the current scope of works and has the potential to be undertaken as a separate planning pathway. It is noted that the architectural plans do show an indicative location for bike parking adjacent to Building A on site, however this is to be confirmed with future design and not subject to this REF. Therefore, no further action is required, and no other design changes or mitigation measures were required.
Department Communications and notifications	The local school community was notified about project specific investigations occurring on site such as noise loggers and geotechnical investigations.	No design changes or mitigation measures were required.
Endeavour Energy	The electrical and mechanical services consultant requested information through Endeavour Energy in relation to	The required upgrades to the substation and electrical supply have been

Stakeholder	Summary of matters raised	Response
	existing substation supply. Endeavour Energy provided a Connection Officer in relation to the required upgrades necessary to the existing sub station.	provided on the plans. A Mitigation Measure has been included requiring that the necessary separate approvals are obtained through Endeavour Energy prior to these works commencing. No further mitigation measures are required.
Sydney Water	An application for water supply adequacy was undertaken and the results included within the Hydraulic report prepared for the REF.	The requirements have been included within the hydraulic report for the works. A mitigation measure has been included requiring that the relevant Section 73 approval of the *Sydney Water Act 1994* is obtained through Sydney Water prior to works commencing on site. No further mitigation measures are required.
Aboriginal stakeholders	Consultation with Registered Aboriginal Parties (RAPs) with regards to the stages outlined in the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW 2010c).	As per Section 3.2 of the Aboriginal Cultural Heritage Assessment Report (ACHAR) (provided at **Appendix 19**), the consultation followed the relevant guidelines, and those who reviewed the ACHAR provided their approval to the recommendations and processes that has been undertaken to date. No further design changes are required. The ACHAR includes a series of mitigation measures to be followed through the construction process. These are standard measures and have been included.

5.2 Statutory Notification

Notification has been undertaken with in accordance with statutory requirements under the TI SEPP and having regard to the *Stakeholder and community participation for new health services facilities and schools* published by the Department of Planning, Housing and Infrastructure (SCPP DPHI) October 2024 and the *Stakeholder and community participation plan,* published by the Department of Education (SCPP DPE) October 2024. This includes:

- sending notices to adjoining neighbours, owners and occupiers inviting comments within 21 days, and
- sending notices to the local council and relevant state and commonwealth government agencies and service providers inviting comments within 21 days.

Table 8 outlines the submissions received as a result of notification already undertaken and how the submissions have been considered.

Table 8: Response to considerations raised during consultation

Submission	Comment	Consideration
Council **7-28 February 2025**	Concern is raised in relation to removal of trees along the western side boundary of the site.	Noted. The design of the activity has been carefully considered to minimise the removal of trees on site, with a total of 12 out of the 47 trees assessed to be removed. As outlined in **Section 6.3**, the activity has avoided removal of the majority of the highly significant trees on site, and where not possible minimised the extent of trees of high landscape significance to two. As per the recommendations of the Arboricultural Report, the trees to be removed will be replaced with advanced specimen plantings on site. The siting of the building is finalised on this basis.
	Measures to be installed to ensure that the privacy of the adjoining dwellings along St Andrews is not significantly impacted.	Noted. The activity proposes a single storey building, and partnered with the tree retention along the boundary, there is not considered to be any significant impacts on privacy to neighbouring dwellings.
	In the absence of any landscape plans and arborist report, the responsibility is on the applicant to ensure that the removal of the proposed trees is essentially an exempt activity pursuant to *State Environmental Planning Policy (Transport and Infrastructure) 2021* and/or *State Environmental Planning Policy (Exempt and Complying Development Codes) 2008*.	Noted. However, the activity is occurring under Section 3.37 of the T&I SEPP. The educational establishment is permitted as development without consent under these provisions. That includes any works (such as tree removal) associated with this activity pursuant to Section 3.3(3)(f) of the TI SEPP. Therefore, the tree removal does not have to be classified as 'exempt development'.
	In the absence of any stormwater plans the responsibility is on the applicant to ensure that the proposed will not have a substantial impact on stormwater management services provided by a council.	Noted. The proposal includes installation of an On-Site Detention (OSD) tank to contain stormwater and provide water quality management in line with Council's guidelines. As such the activity is not considered to have a significant impact on Council's stormwater system in the locality.
Transport for New South Wales (TfNSW) **7-28 February 2025**	A written submission was received via email on 6 March 2025. TfNSW recommended that a Construction Pedestrian Traffic Management Plan (CPTMP) detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control should be submitted to and approved by Council, as the relevant Road Authority, prior to commencement of any works.	TfNSW's submission is noted. A CPTMP has been prepared for the activity and included within this assessment. A Mitigation Measure is proposed for this CPTMP to be updated with any site-specific mitigation measures and in consultation with Council and submitted to Council for information purposes and approval if required, and at the discretion of the Crown Certifier
Parramatta Light Rail (PLR) **7-28 February 2025**	No submission was received from PLR during this notification period	No further points of consideration.

Submission	Comment	Consideration
Neighbour notification **7-28 February 2025**	No responses were provided by the neighbours during this period	N/A

6. Environmental Impact Assessment

6.1 Summary of Environment Factors Reviewed

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. These factors are assessed in **Table 9** below. Additional and/or key impacts identified are addressed in subsections below.

Note: Section 171A of the EP&A Regulation is assessed through **Section 3.1** of this report.

Table 9: Summary of environmental factors reviewed in relation to the activity

Environmental Factor	Response/Assessment	Mitigation Measure Reference
Any environmental impact on a community?	**During Construction** Short term impacts may arise during the construction process including traffic, noise, access and dust. However, suitable mitigation measures have been included to ensure potential impacts are minimised. This is applicable to both surrounding land uses and the school community. **Operation** Environmental impacts of the proposed activity have been assessed as part of this REF and subject to the implementation of the proposed mitigation measures, the activity will not result in environmental impacts that are greater than minimal. The proposed activity has been designed in accordance with the recommendations of the consultant team and with consideration of the feedback provided by Council. Long-term, the proposed activity will have a positive impact on the school community by providing permanent teaching spaces to the existing school that are modern and fit-for-purpose. The activity will also be beneficial to the community by providing upgraded school facilities at an existing school, within proximity to the public transport being the light rail. It is noted that there were no submissions from the neighbours during the 21 day notification period between 7-28 February 2025.	For construction: Construction Management CONM 01-CONM36 (inclusive) Traffic: TT1-TT5 inclusive) Noise: NV2-NV7 (inclusive) Waste Management: WAS01-05 (inclusive) Operational: Waste: WAS06-12 (inclusive)

Environmental Factor	Response/Assessment	Mitigation Measure Reference
Any transformation of a locality?	The proposed activity will have a positive impact on school operations and further improve the visual locality of the school. The proposal is not considered to significantly change the nature of the locality. The activity proposes one single storey building to be constructed within the grounds of an existing school. The single storey nature of the building is in keeping with the existing character of the school. The new building has been designed in accordance with the existing site conditions and built form, matching the bulk and scale. The one storey building level is aligned with the adjoining Block E to maintain student and teacher connectivity and consistent built form. The Parramatta Light Rail opened in the proximity of the site along Kissing Point Road. This will allow for greater transport accessibility to the precinct. The activity was notified to Parramatta Light Rail between 7-28 February 2025 and no submission was received. It is noted that there were no submissions from the neighbours during the 21 day notification period between 7-28 February 2025.	No mitigation required
Any environmental impact on the ecosystems of the locality?	The Flora and Fauna Assessment at **Appendix 15** concludes that no Plant Community Types (PCTs) or threatened flora and fauna have been mapped or recorded within the site. The site does contain vegetation with marginal foraging habitat resources for one threatened fauna, being the *Pteropus poliocephalus* (Grey-headed Flying-fox). However, tests of significance under the *Biodiversity Conservation Act 2016* were applied and the assessment concluded that the proposed activity will be unlikely to have a significant impact on this entity and therefore referral under the EPBC Act is not required. Mitigation measures have been provided at **Appendix 1** to prevent indirect impacts to threatened species and ecological communities adjacent to the site as a precautionary measure. These include measures such as establishing tree protection zones around trees to be retained on site, ensuring on site inductions for construction staff around the protection of trees on site, establishing and maintaining erosion and sediment control zones, removing weeds, and installing nest boxes to replace any hollows from the trees to be removed on site. The AIA (**Appendix 7**) includes that 12 trees will need to be removed as part of the activity out of the 47 identified in the study area.	ECO01-15 (inclusive) ARB01-08 (inclusive)

Environmental Factor	Response/Assessment	Mitigation Measure Reference
	The trees are identified for removal (numbered as per the Arboricultural Impact Assessment) and their landscape significance value (out of low, moderate or high) are as follows: • Tree 13 (low) • Tree 14 (low) • Tree 20 (moderate) • Tree 31 (high) • Tree 36 (moderate) • Tree 42 (low) • Tree 56 (high) • Tree 61(low) • Tree 68 (moderate) • Tree 69 (low) • Tree 102(low) • Tree 103 (low) These trees fall within the new building footprint and covered walkway, or which are required to be removed in order to accommodate new services, as outlined in **Section 6.3** which is the full assessment on the removal of these trees. It is noted that there were no submissions from the neighbours during the 21 day notification period between 7-28 February 2025. Council did raise concern in relation to the removal of trees along the western boundary as part of their submission, as addressed in **Table 8.**	
Any reduction of the aesthetic, recreational, scientific or other environmental quality or value of a locality?	The proposal is not considered to significantly change the nature of the locality or reduce the aesthetic, recreational, scientific or other environmental quality of the locality. The activity proposes one single storey building to be constructed within the grounds of an existing school. There will be short term impacts on the aesthetic qualities of the site during construction. Mitigation measures have been included to address construction noise, visual privacy and traffic impacts. While there will be 12 trees to be removed as part of the works (with 2 of High Landscape Value), the majority of the trees will be retained on the site. To offset the	Construction Management CONM 01-CONM36 (inclusive) Traffic: TT1-TT5 inclusive) Noise: NV2-NV7 (inclusive)

Environmental Factor	Response/Assessment	Mitigation Measure Reference
	removal of these trees, compensatory planting with advanced trees are proposed.	Tree Impacts: ECO01-15 (inclusive) ARB01-08 (inclusive)
Any effect on locality, place or building having aesthetic, anthropological, archaeological, architectural, cultural, historical, scientific or social significance or other special value for present or future generations?	The proposed activity will not result in any significant effect on a locality, place or building having any aesthetic, anthropological, archaeological, architectural, cultural, historical, scientific or social significance. The site is not identified as a heritage item or within a heritage conservation area. The site also does not comprise any Aboriginal significance or artefacts as detailed in the ACHAR at **Appendix 19.** However, mitigation measures have been included should any unexpected finds be discovered during the construction process. The activity will include indigenous artwork both internally and externally on the new building and in landscaped areas, as identified in the Landscape Drawings, which will have a positive impact on the school and wider community.	ABH 02-04 (inclusive)
Any impact on the habitat of protected animals, within the meaning of the *Biodiversity Conservation Act 2016*?	There are no threatened species at the site and therefore the works do not require compliance with the *Biodiversity Conservation Act 2016*.	Not applicable
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 result in the endangering of any species of animal, plant or other form of life. Mitigation measures have been included to protect the existing trees which are to be retained on site as part of the works.	ECO01-15 (inclusive) ARB01-15 (inclusive)
Any long-term effects on the environment?	The proposed activity has been designed to ensure there will be no unacceptable long-term impacts on the environment. Environmentally Sustainable Development initiatives have been included in the activity to reduce the environmental impacts and ensure a sustainable outcome as detailed at Section 6.11 below and in the Sustainable Development Plan **at Appendix 25**. These initiatives include energy efficient building systems and lighting, design elements such as high-performance façade and effective	ECO01-15 (inclusive) ESD01-06 (inclusive)

Environmental Factor	Response/Assessment	Mitigation Measure Reference
	shading, water efficient fixtures and more as outlined in Section 6.11.	
Any degradation of the quality of the environment?	Appropriate mitigation measures have been included to ensure that the activity will not reduce the quality of the natural environment, including ecology, landscape, stormwater management, noise and waste management.	Construction Management CONM 01-CONM36 (inclusive) Vegetation: ECO01-15 (inclusive) ARB01-08 (inclusive) Stormwater: SW01-04 (inclusive) Noise: NV01-NV7 (inclusive) Waste management: WAS01-12 (inclusive)
Any risk to the safety of the environment?	No risk to the safety of the environment has been identified through the preparation of the accompanying technical inputs.	Not applicable
Any reduction in the range of beneficial uses of the environment?	The proposed activity will not result in a reduction in the range of beneficial uses of the environment.	Not applicable
Any pollution of the environment?	The activity will not result in pollution of the environment. Stormwater and sewage management has been considered in the assessment of potential polluting impacts of the activity and appropriate mitigation measures have been provided at **Appendix 1** to protect the environment.	Stormwater: SW01-04 (inclusive) Sewer: SS03-04 During Construction: CONM19-36 (inclusive)

Environmental Factor	Response/Assessment	Mitigation Measure Reference
Any environmental problems associated with the disposal of waste?	A CWMP (**Appendix 12**) and OWMP (**Appendix 13**) have been prepared for the activity which set out all management practices required to reduce, minimise or avoid adverse impacts arising from the disposal of waste. All outcomes and recommendations of these reports have been captured in the mitigation measures for the activity.	WAS01- 12 (inclusive)
Any increased demands on resources (natural or otherwise) that are, or are likely to become, in short supply?	The activity is unlikely to result in increased demands on resources that are, or are likely to become, in short supply. Measures to reduce the consumption of materials, energy and water over the lifetime of the building have been incorporated into the building's design and so will be implemented through the terms of the activity, once approved.	ECO01-15 (inclusive)
Any cumulative environmental effects with other existing or likely future activities?	The proposed works will not result in any cumulative environmental effects with the existing or future activities on the site. The activity is for the purposes of replacing the existing temporary buildings with a permanent structure with no significant increase in student capacity or staff numbers. Research of adjoining and nearby development applications from Council's website, together with an understanding of how the various technical inputs are integrated to resolve any impacts, results in a conclusion that there will be no cumulative impacts on existing or likely future activities.	Not applicable
Any impact on coastal processes and coastal hazards, including those under projected climate change conditions?	The proposed activity is located away from the coast and will not have an adverse impact on coastal processes and coastal hazards, including those under projected climate change conditions.	Not applicable
Applicable local strategic planning statement, regional strategic plan or district strategic plan made under Division 3.1 of the Act?	The proposed works are minor and will not impact on the goals in the local strategic planning strategies or district strategic plan being achieved.	Not applicable
Any other relevant environmental factors?	No other environmental factors are considered relevant to this proposal.	Not applicable

A detailed assessment on site specific impacts is provided in the sections below.

6.2 Aboriginal Heritage

Aboriginal Heritage has been considered in the design of the activity by way of the Aboriginal Cultural Heritage Assessment Report (ACHAR) and associated Aboriginal Archaeological Technical Report (AATR) at **Appendix 19**.

The key outcomes from the site investigations and research are summarised as follows:

- There was no confirmed Aboriginal archaeological site records located within the study area on the AHIMS. However, there is one registered site within 100m of the study area (that being the school grounds).
- The site is also located within 200m of a second order watercourse which indicates that sub-surface Aboriginal objects and/ or deposits are probable within less disturbed areas.
- Test excavation was done on site which found no Aboriginal objects or features of cultural or archaeological significance at the site.
- Consultation was undertaken with all Registered Aboriginal Parties for a mandatory review period. It is noted that these parties agreed with the recommendations stated in the report and the processes which had been followed.

The ACHAR assesses archaeological and cultural significance against the *Australian ICOMOS Charter for the Conservation of Places of Cultural Significance: the Burra Charter* (Burra Charter) through four parts: aesthetic, historic, scientific, and social value for past, present, or future generations. As outlined in the report (**Appendix 19**), no elements of social, historical, scientific or cultural heritage significance were linked to the study site or shared during the consultation stage.

Cumulative impacts have been determined to be low as the site is in an area of repeated ground disturbance and the consultant has not identified any intangible connections to the site. Archaeology is a non-renewable resource, and the site is within a highly urbanised area making any potential cumulative impacts negligible. Overall, it is determined that there is no significant impact from the activity with respect to Aboriginal Heritage.

The ACHAR has recommended a series of mitigation measures for inclusion within the project, which have been included at **Appendix 1**. These mitigation measures are generally standard for construction processes and include:

- Ongoing consultation with the Aboriginal Community and the Registered Aboriginal Parties throughout the duration of site work. This is also outlined in **Section 5.2.1** of this report.
- The preparation of an Unexpected Finds Protocol on site to manage any discovery of undocumented finds on site during construction.
- A Heritage Induction of construction workers on site to outline the procedures associated with the Unexpected Finds Protocol.
- Nominating the Head Contractor/ Site Foreman as the person responsible for the implementation of the Unexpected Finds Protocol on site at all times.

6.3 Arboricultural

The AIA at **Appendix 7** has assessed a total of 47 trees within the study area. The study area was limited on site to the zone where the proposed construction works would occur. This can be seen in **Figure 17**.

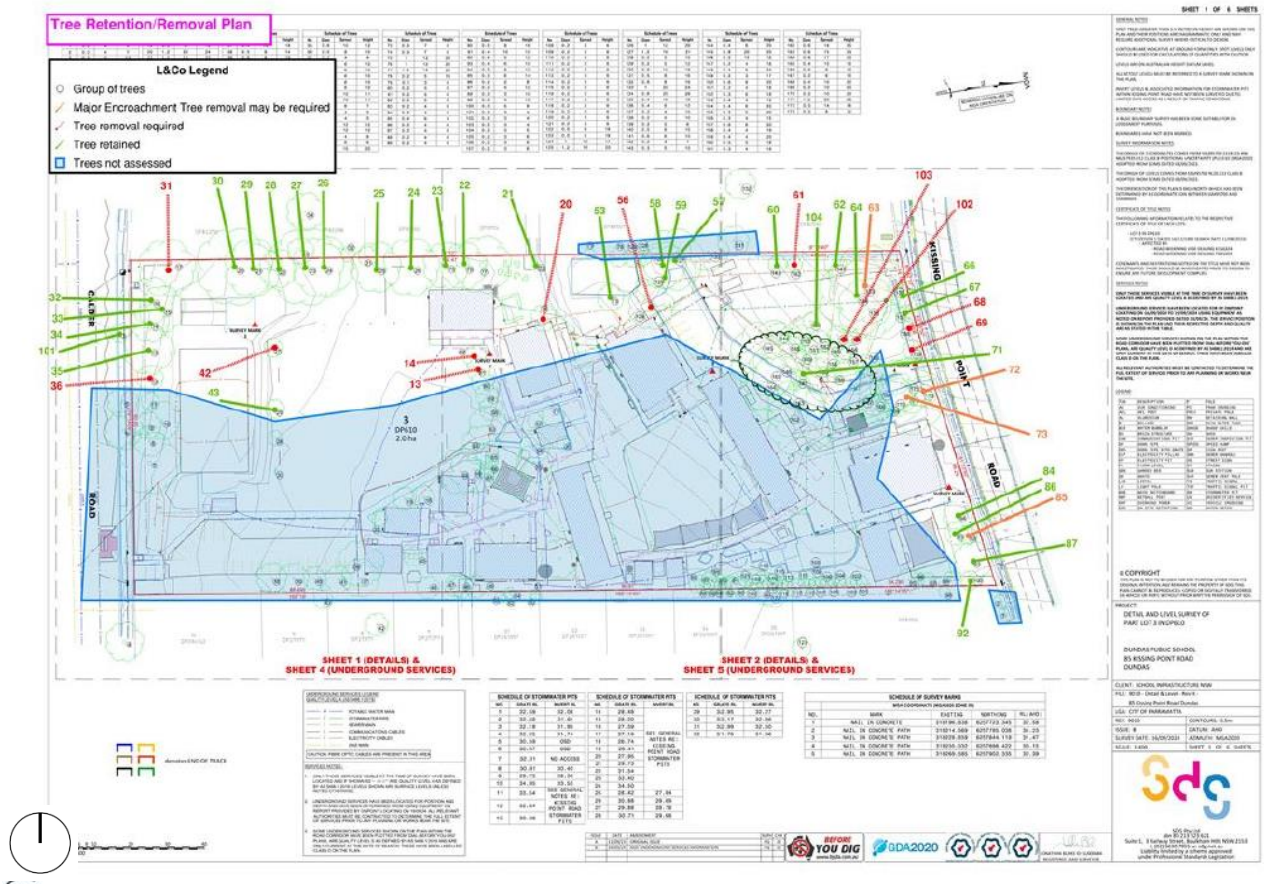


Figure 17: Tree retention and removal plan, with area highlighted in blue excluded from the Arboricultural Impact Assessment (Source: Laurence & Co)

The AIA (**Appendix 7**) determines that 12 trees will need to be removed as part of the activity out of the 47 identified in the study area.

The trees are identified for removal (numbered as per the AIA) and their landscape significance value (out of low, moderate or high) are as follows:

- Tree 13 (low)
- Tree 14 (low)
- Tree 20 (moderate)
- Tree 31 (high)
- Tree 36 (moderate)
- Tree 42 (low)
- Tree 56 (high)
- Tree 61(low)
- Tree 68 (moderate)
- Tree 69 (low)
- Tree 102(low)

- Tree 103 (low)

These trees fall within the new building footprint and covered walkway, or which are required to be removed to accommodate services such as electrical and hydraulic, and to provide for stormwater pipes to a suitable legal point of discharge.

The extent of tree removal is considered to be appropriate. The proposed activity has been designed to first avoid the majority of the significant trees on site, and then to minimise the number of trees of a high landscape value requiring removal. This is demonstrated in the fact that out of the 12 trees to be removed, only 2 are classified of high value. The measures used to avoid tree loss include siting the building further off the western boundary of the site and aligning services to minimise tree loss or the extent of encroachment into TPZs.

In terms of TPZ encroachment, the following trees are defined as having a *Major encroachment* as per AS-4970, which is an encroachment over 10% of the TPZ:

- Tree 27
- Tree 63
- Tree 72
- Tree 73
- Tree 85

The Australian Standard (AS) allows for major encroachments if design factors (such as tree sensitive construction measures) are used to minimise negative impacts.

The AIA identifies that the trees are in good physiological condition for the proposed activity to be accommodated, however this is predicated upon compliance with the tree sensitive construction measures and protection measures as outlined in the AIA. These measures include (but are not limited to) trenching by hand where possible, placing electrical conduits around structural roots where possible, and ensuring the project Arborist supervises these works. These recommendations have been included within the mitigation measures for the activity at **Appendix 1**.

The following trees are defined as having a *Minor encroachment* as per AS-4970, which is an encroachment less than 10% of the TPZ:

- Tree 24
- Tree 25
- Tree 26
- Tree 29
- Tree 30
- Tree 59
- Tree 84
- Tree 87

A minor encroachment is considered acceptable by the Australian Standard (AS) when it is compensated for elsewhere and contiguous within the TPZ. The AIA confirms this has occurred. The AIA recommends that works in the TPZs are appropriately managed to protect the health of the tree. These have been included in the project mitigation measures at **Appendix 1**.

Overall, it is considered that the activity has been designed in order to avoid as many trees on site as possible. When tree removal is unavoidable, the extent has been minimised (both in the number

of trees to be removed, and minimising removal of high landscape value trees). The tree removal will be offset with future plantings on site, with the plantings to replace those being removed which is a total of 12. The recommendation from the project Arborist is for any replacement tree planting to be provided as advanced stock to help offset the loss of amenity of the tree removals, and this replacement planting is to be supplied in accordance with AS2303: Tree Stock for Landscape Use (2015).

6.4 Construction Management

A Preliminary Construction Management Plan (**Appendix 10**) has been prepared for the activity that details site establishment works, preliminary construction traffic management, disruption notices, access, hours of works, deliveries and other management methods to ensure the activity does not cause any adverse environmental impacts. A Construction Traffic and Pedestrian Management Plan (**Appendix 11**) has also been prepared which considers the impacts of construction traffic and how they can be mitigated.

It is noted that the construction of the activity is proposed in a single stage with the expected construction period to be 12 months.

The Construction Management Plan and Construction Traffic and Pedestrian Management Plan has considered factors such as:

- Securing the boundaries of the construction zone throughout the building period to prevent unauthorised access.
- Limiting construction access to the site from Calder Road only;
- Proposing a dedicated construction vehicle route which ensures the shortest possible distances to and from the arterial road network, therefore reducing impacts of construction traffic on surrounding streets and to minimise impacts on the pedestrian crossing and ‘kiss and drop’ zone along Calder Road. This route is shown in **Figure 17**;
- Limiting construction vehicles (particularly heavy trucks) to access the site out of peak traffic times such as school drop off and pick ups.
- Having site personnel stationed at the carpark entrance to manage and guide construction vehicles entering and exiting the site and ensure the safety of pedestrians travelling through the area.
- Providing advanced notification to neighbouring properties in relation to proposed construction activities and movement of construction vehicles.
- Managing noise and vibration throughout the construction period to minimise impacts on the school community and neighbours.
- Ensuring safe pedestrian access is still maintained for the school community.

Management of construction worker parking is outlined in the Construction Traffic and Pedestrian Management Plan at **Appendix 11** and includes the encouragement of alternative travel modes such as carpooling and utilisation of the nearby light rail network which is in walking distance to the site.

The final Construction Environmental Management Plan will ensure that all listed mitigation measures as listed in **Appendix 1** are incorporated into these documents prior to works commencing on site.

6.5 Civil Works

Sediment and Erosion

The proposed activity includes civil works to facilitate the construction of Block L. The impact of construction related erosion and sediment flow is reduced by the implementation of the erosion and sediment control plan in the civil drawings (**Appendix 20**) and details within the Stormwater Management Plan (**Appendix 21**). The plan comprises:

- Silt fences to prevent silt and waste being washed into neighbouring sites and streets which will be fixed to the base of the safety fencing.
- Temporary stockpile within sediment fence
- Catch drains with hay bales to carry and treat site runoff
- A shaker grid at the construction site entrance
- Pits will have silt protection installed to prevent silt from entering the stormwater system during construction.

The earthworks proposed include a total stripped volume of approximately 73m^3 being 157m^3 of cut, 8m^3 of fill and 149m^3 of export volume. The majority of the earthworks will occur at the rear of the proposed building and along the western boundary to level the site and facilitate the installation of the lift and mechanical plant. Refer to the civil drawings at **Appendix 20** for details.

Stormwater

The Structural and Civil Report at **Appendix 20** confirms that due to the increase in the impervious areas on site that additional drainage will be required.

There is one existing stormwater discharge location for the site, located along Calder Road to the south, via kerb adaptors.

The OSD tank included in the activity will have a storage capacity of 57m^3 to ensure peak discharge flows draining from the new building can be managed by the downstream drainage system. Water treatment modelling (as per the industry standard MUSIC model) has been prepared, and industry standard Water Sensitive Urban Design (WSUD) have been used. The stormwater design includes a Filtration System to achieve the stormwater targets set by the DCP.

Ongoing maintenance and monitoring of the stormwater devices is also included in the activity to ensure no blockage or damage occurs, or after significant rainfall events.

These requirements have been included in the mitigation measures in **Appendix 1**.

6.6 Contamination and Geotechnical

Contamination

The supplementary Detailed Site Investigation (DSI) at **Appendix 17** concludes that the proposed location chosen is suitable for the activity. The contamination and geotechnical consultant has conducted a site inspection, intrusive investigation and soil sampling of the site's soil and environmental factors. The site is underlain by shallow topsoil / fill comprised of silty and sandy clay overlaying natural silty and sandy clay and sandstone bedrock. The consultant determined that no visual or olfactory evidence was noted for contamination or asbestos and the lithology across the location was consistent and controlled.

The contamination consultant identified that the site presents a low risk of contamination as per Chapter 4 assessment of the *State Environmental Planning Policy (Resilience and Hazards) 2021*. The consultant has concluded that the site is suitable for the proposed activity. Overall, it is determined that there is no significant impact from the activity on the basis of contamination.

Mitigation measures have been prepared at **Appendix 1** to manage all potential impacts related to contamination. The main mitigation measure is the provision of a protocol around unexpected finds during bulk earthworks in the event contamination is encountered.

Geotechnical

A Supplementary Geotechnical Investigation Report has been prepared at **Appendix 17** which has concluded that no adverse ground conditions were observed. The contamination and geotechnical consultant conducted an assessment of the site's geology, subsurface conditions and groundwater through a site investigation, borehole drilling and soil sampling. The geotechnical consultant had the following key conclusions from the assessment:

- The ground profile at the proposed site of the new building comprised topsoil and fill overlying residual clays and bedrock.
- It is recommended that the topsoil and fill is removed including vegetation and grubbing out of tree roots if required.
- The topsoil can be reused on site subject to meeting Australian Standard AS3798-2007 Earthworks, and ensuring the soil is contamination free.
- Excavated areas can be backfilled with suitably engineered fill layers to the designed subgrade level if required.
- The site is classified as Class M under Australian Standard AS2870-2011 – Residential slabs and footings, subject to the removal of topsoil and fill.
- No groundwater was encountered in any of the boreholes during drilling.

The report concluded that there was no significant adverse ground conditions observed on site where the building is constructed. Overall, it is determined that there is no significant impact from the activity on the basis of geotechnical requirements. Mitigation measures have been included in **Appendix 1** to ensure the design and construction responds to the geotechnical conditions of the site. This includes

- Having a suitably qualified geotechnical consultant confirm that the proposed building foundations comply with the recommendations in Table 1 of the Geotechnical Report, and
- Ensuring the placement and compaction of engineered fill meet the relevant standards and requirements as listed.

6.7 Noise and Vibration

The Acoustic Report at **Appendix 22** has been prepared to assess any noise and vibration effects to and from the proposed activity.

The site is located in a residential zone, surrounded by several sensitive receivers in all directions. During construction, the activity has the potential to cause minor temporary noise and vibration impacts to these nearby receivers. Further, the proposed works have the potential to impact the acoustic amenity of the existing school, which will remain operational during the construction of the activity. For this reason, a noise assessment was conducted using noise loggers deployed on Calder Road and on site.

During construction, the acoustic consultant has noted that the construction equipment has the capability of meeting the necessary noise standards (Noise management levels (between rating background noise level (RBL) + 10 decibels A (dBA) and max. 75 dBA) based on the Environmental Planning Authority's *Construction Noise and Vibration Guideline*, 2016) on site. However, the type of construction equipment is yet to be finalised and may change during the construction period. To mitigate any potential impact on compliance with the relevant noise standards, a mitigation measure has been included which requires a Construction Noise and Vibration Plan (CNVP) to be prepared. This CNVP is to provide further strategies to address any construction equipment which exceeds these noise standards (RBL + 10 dBA and max. 75 dBA), such as utilising respite periods, noise barriers and the like. This will be required to be prepared in consultation with the School Principal and approved prior to any works commencing on site.

During operation, the new building will have four outdoor Heating, Ventilation and Air Conditioning (HVAC) condenser units to be located in the south-western corner of the new building, facing towards Calder Road to the south. This plant location will only operate during school hours so as to not disrupt the adjoining sensitive land uses and the Acoustic Report confirms that the noise from the HVAC can meet the relevant noise levels without additional mitigation.

The acoustic consultant has provided mitigation measures (**Appendix 1**) to manage noise and vibration impacts for both construction and operation of the activity.

Measures include:

- Selecting mechanical equipment to not exceed the listed noise levels in the report.
- Limiting construction hours outside sensitive periods.
- Installing a noise barrier to the nearby sensitive receivers prior to construction.
- Limiting on-time allowances for construction noise equipment to the procedures outlined in the noise report.
- Not using nearby classrooms during particularly noisy periods of construction.
- Requiring nearby classrooms (which can be used) to have windows and doors closed to minimise construction noise impacts internally.
- Using lower energy equipment where possible during construction.

6.8 Traffic, Access and Parking

The Transport and Access Impact Assessment (TAIA) (**Appendix 11**) considers existing travel behaviour, road network conditions, parking availability, public and active transport connectivity and any potential cumulative impacts from the proposed activity.

The TAIA proposes a construction route for vehicles to enter and exit the site. This route as shown in **Figure 18** is from Kissing Point Road to Calder Road via Park Road. The route has been chosen to ensure the shortest possible distances to and from the arterial road network, therefore reducing impacts of construction traffic on surrounding streets and to minimise impacts on the pedestrian crossing and 'kiss and drop' zone along Calder Road.

A mitigation measure is included to ensure that this route is followed during the construction process and included in any relevant construction management documentation.

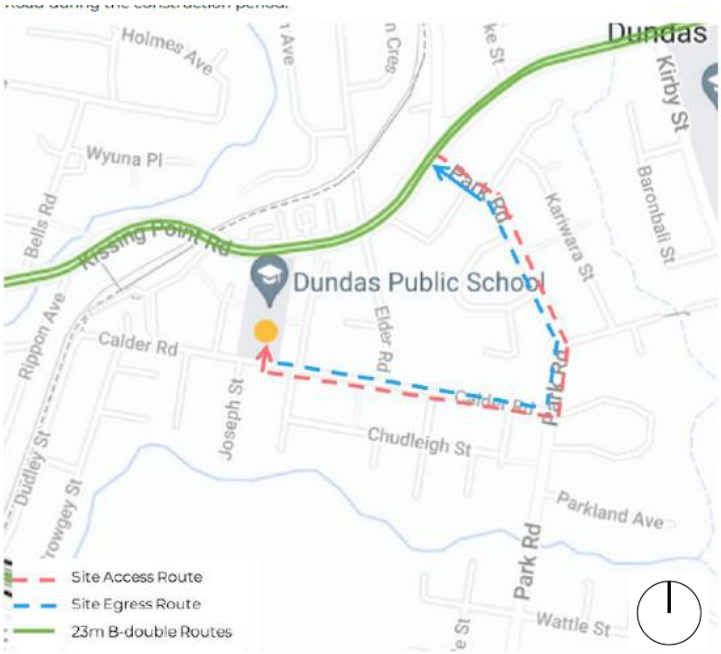


Figure 18: Proposed construction vehicle access route (Source: Crossley Transport Planning)

The activity proposes to utilise the existing on-site staff carparking during the construction period to manage construction vehicles and materials. This means that the existing staff will need to temporarily park on the street during the construction period. The TAIA has reviewed the existing on street parking demands and has determined that there is sufficient capacity to absorb this demand during the construction period. It is noted that this is only a short-term impact of 12 months which will not cause any ongoing significant issue. A mitigation measure has been included which requires the school principal to advise staff in writing of the requirement to utilise on street parking during the construction period. However, the school is served by public transport options, including light rail and bus services, with the Parramatta Light Rail stop a 600m walk from the school, and 7 bus stops located within 400m of the school entry gates. It will be encouraged to both staff and construction workers to use the public transport options available or to utilise carpooling to decrease the on-street parking demand.

The existing road network, services and conditions remain unchanged as a result of the activity as demonstrated in the TIA.

The cumulative traffic impact of the proposed activity is negligible. The background traffic growth and planned development in the area will have minimal cumulative impacts as the activity will result in only 18 additional peak-hour vehicle trips. The consultant has also prepared a travel access guide (**Appendix 11**) to actively encourage walking, cycling, and the use of public transport to school. While there is no target modal shift, the guide is designed to maximise the use of active and public transport options within the school community and generally minimise the traffic impacts created around the existing school at peak periods.

The transport and access consultant has detailed traffic and pedestrian management to ensure safety, minimise disruption and maintain smooth movement whilst construction occurs. These have been included within the Mitigation Measures in **Appendix 1**.

Key elements of these measures are:

- No heavy vehicles to enter and exit the site between peak pedestrian traffic hours of 08:00-09:00 and 14:30-15:30.

- Proposing a construction vehicle access to the site which provides the most direct route of travel between Kissing Point Road (a classified road managed by TfNSW) and the site, therefore minimising the extent of construction vehicles on local roads.
- Establishing alternative pedestrian access points along Calder Road which still allows access to the school without interfering with construction works.
- Notification to the staff by the School Principal to the staff advising of the need to park on the streets surrounding the school during the construction period to prevent staff trying to access the carpark while it is used for construction.
- Requiring all construction vehicles to enter and exit the site in a forward direction and with licensed traffic controllers in place.

6.9 Waste Management

Construction Waste Management

The CWMP at **Appendix 12** details the waste management strategies and auditing requirements during the construction and demolition of the proposed activity. The CWMP notes the following waste management practices and objectives for the duration of the demolition and construction stages of the activity:

- The site will have an on-site waste storage area as identified in the CWMP
- Construction materials and off-cuts will be reused on site where possible
- All excavation waste will be removed from site and classified by a suitably qualified environmental consultant and a waste record file will be maintained on-site at all times
- Should any unexpected finds of potential contamination occur, the procedures in the CWMP must be followed
- Waste generated in the demolition, excavation and construction phases are detailed below:
    - Excavation – A total of 375m^3 of waste will be generated with 100% being able to be reused and recycled.
    - Construction – A total of 237m^3 of waste will be generated with 83.5% (163m^3) being reused or recycled and the remaining 16.5% (39m^3) being disposed.

The waste consultant concludes that the waste generated from the proposed activity is not expected to result in a significant environmental impact. Whilst waste will be generated during the excavation and construction phases, a series of waste minimisation and management practices have been included in the CWMP to ensure these potential impacts are adequately mitigated. These practices have been integrated into the mitigation measures provided in **Appendix 1** to manage any potential impacts and reduce the amount of material sent to landfill, maximising recycling and reuse whilst managing hazardous materials.

Operational Waste Management

The waste consultant has also prepared an OWMP for the site and proposed activity (**Appendix 13**). The OWMP notes the following waste management practices and objectives for the ongoing use of the school:

- Suitably labelled waste and recycling bins to be placed in classrooms as required and recycling stations will be maintained across the site

- Waste will be segregated and monitoring by cleaning staff
- Waste collection will occur outside of school hours
- Signage, education and training will continue to build a strong culture of waste reduction and recycling

The waste consultant has determined, based on the estimated amount of waste generated by the school and the frequency of collection, a total waste storage area of 20m^2 will be required. The existing waste storage area is sufficient for the proposed activity and will remain located in the staff carpark, in the south-eastern corner of the site near the Calder Road vehicular access point. General waste and recyclables will be managed through a system of labelled bins placed strategically across the school premises, including learning spaces, offices, restrooms, common areas, and outdoor zones.

Waste will continue to be collected from the existing access point on Calder Road.

The waste consultant concludes that the changes to waste generated from the proposed activity will not introduce additional ongoing waste challenges to the school. Mitigation measures have been provided in **Appendix 1** to manage any potential impacts and reduce the amount of material sent to landfill, maximising recycling and reuse whilst managing hazardous materials.

6.10 Building Code of Australia and Access

Reports have been prepared for the activity to address BCA compliance (**Appendix 23**) and accessibility requirements (**Appendix 24**).

In terms of accessibility requirements under the accessibility related requirements of the Building Code of Australia and the principles of the *Disability Discrimination Act 1992*, the proposed activity generally complies with 'Access for People with Disabilities'. Further resolution during the detailed design phase will be required, including for the new lift where the manufacturer's details are required during the design development phase to ensure compliance.

However, both reports identify that the proposed activity can readily comply with the relevant requirements and standards subject to detailed design, and where appropriate, provide performance solutions.

Compliance with the recommendations in the reports has been included in the mitigation measures at **Appendix 1** along with general compliance with the BCA, to be addressed in detailed design, prior to construction.

6.11 Other Environmental issues

Table 10 outlines a review of other environmental issues considered in the assessment of the activity.

Table 10: Other Environmental Impacts

Issue	Consideration
Aviation	The site is not mapped as being subject to protection regarding noise exposure nor is it affected by the OLS or subject to airspace protections. No further assessment is required.
Air Quality	Air quality provisions are not triggered as the proposed activity is located at the rear of the site away from Kissing Point Road.

Issue	Consideration
	Generation of dust during construction will be the main potential air pollutant of concern and is to be managed during the construction process by way procedures to be outlined in the Construction Environmental Management Plan. Construction and operation of the activity will not involve odour or significant other potential air pollutant generating activities.
Bushfire	The site is not mapped as being bushfire prone nor is it surrounded by bushfire prone lands. Therefore, no further assessment is required.
Coastal Risks	The site is not mapped as being within a Coastal Management Area or otherwise in close proximity to coastal lands. Therefore, further consideration of coastal risk is not necessary.

Environmentally Sustainable Development Plan	The Sustainable Development Plan at **Appendix 25** details the key initiatives incorporated into the proposed activity. These include:
	
	• Energy efficient building systems and lighting
	• Shading elements and devices to reduce solar heat gains to conditioned spaces
	• Consideration of the building design's resilience and adaptation to climate change impacts.
	• High indoor air quality, acoustic design principles, visual amenity and thermal comfort to support the site functions as training and teaching spaces and private staff areas.
	• Best practice waste management principles in operation, and construction and demolition waste diversion from landfill.
	• Water efficient fixtures and fittings
	• Incorporation of stormwater management systems and water sensitive urban design (WSUD) to minimise pollutants.
	
	Detailed initiatives relating to sustainable design, climate change resilience, and net zero and resource efficiency can be found in the Sustainable Development Plan at **Appendix 25** and the Preliminary Net Zero Statement at **Appendix 26.**
	
	Additionally, a consultant advice notice has been prepared by the Electrical and Mechanical consultant summarising the performance standard requirements for the new building in accordance with the EFSG. The EFSG mandatory requirement is to use the Green Star building v1 Credit 22 methodology with is detailed in the Preliminary Energy Modelling Assessment Letter at **Appendix 27**. A Preliminary Upfront Carbon Assessment Letter has also been prepared to ensure the activity considers environmental impacts of products and materials and low embodied energy and water (**Appendix 28**). A mitigation measure has been included for the Carbon Assessment to be updated and finalised with the construction drawings.
	
	Mitigation measures have been provided at **Appendix 1** to incorporate the recommendations of the abovementioned reports. These include:
	
	• Introducing sustainable waste management practices during construction and operation,
	• Ensuring the design complies with the relevant provisions in Section J of the NCC and in line with the sustainability requirements in EFSG.
	• Choosing appliances and fixtures with high energy and water efficiency for the building.
	• Installing testing practices on site to ensure that the extent of internal air pollution is reduced via the appropriate selection of materials.
	• Installing efficient lighting internally and externally to the building and in accordance with AS 4282 and AS 1158.
	• Updating and finalising the following documents in association with the construction drawings:
	  ○ Preliminary Energy Modelling Assessment Letter;
	  ○ Preliminary Net Zero Statement;
	  ○ Preliminary Energy Modelling Assessment Letter; and

Issue	Consideration
	○ Preliminary Upfront Carbon Assessment Letter.
European Heritage	The site is not mapped as being a listed heritage item or within a heritage conservation area under the LEP. While there are listed heritage items in the vicinity, given that the activity proposes a single storey building on an existing school site with a significant setback from Calder Road, it is unlikely that there will be any impact on any of these heritage items. It is noted that the nearest listed heritage item is across the road at 40 Calder Road Rydalmere, which means that the school is not in the direct visual catchment of this listed heritage item, as it is separated by the road.
Land Use	The activity proposes an additional building on an existing school site. There are no land use changes proposed with the activity. Therefore, there is no potential land use conflict that would result from the activity.
Mine Subsidence	The site is not mapped as being within a mine subsidence area. Therefore, no further assessment is required.
Social Impact	The REF proposes upgrades in the form of a new single storey building at an existing school. This will provide a positive impact on wellbeing as there is a benefit to students with more contemporary, fit-for-purpose school facilities and classrooms to learn in. There will be a minimal temporary impact to the neighbours to the immediate west during construction, however the standard mitigation measures around hours of construction and implementation of the measures outlined in the Acoustic Report and preliminary Construction Management Plan will protect amenity during this period.
Wind	The proposed activity is a single storey building located with significant setbacks from the site's boundaries. Therefore, it will not have an impact on the pedestrian wind environment.
Flooding	The assessment undertaken at Due Diligence phase confirmed that the site is not affected by mainstream or overland flooding (in any events, up to and including the PMF). However, surrounding access roads are impacted, including Kissing Point Road to the north which is affected by depths exceeding 1.5m in the 1% annual Exceedance Probability (AEP) event. Calder Road to the south is also impacted, by overland flows up to 150m near the junction to Elder Road. However, a Flood Emergency Management Plan is not required for the site given there are flood free routes available from the school, and that there will be no potential isolation of the school site if there happens to be flooding of affected roads near the site.

7. Justification and Conclusion

The proposed Dundas Public School upgrade is subject to assessment under Part 5 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 discussed in detail in this REF, the proposal will not result in any significant or long-term impact. 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.

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,
- Adequate mitigation measures have been proposed to address these impacts, and
- The proposed activity has responded to both the consultation undertaken as part of the reiterative design process and the submission received from Council during the notification process.

The activity is not likely to significantly affect threatened species, populations, ecological communities or their habitats, and therefore is not necessary for a Species Impact Statement and/or a BDAR to be prepared.

The environmental impacts of the proposal are not likely to be significant. Therefore, it is not necessary for an environmental impact statement to be prepared and approval to be sought for the proposal from the Minister for Planning and Public Spaces under Part 5 of the EP&A Act.

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.