NSW Department of Education

Review of Environmental Factors

Cammeray Public School upgrade

Document version: Final V6

Date: 23/05/2025

NSW GOVERNMENT

Acknowledgement of Country

The NSW Department of Education acknowledges the traditional custodians of the land on which the Cammeray 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 Cammeray Public School upgrade at 68 Palmer Street, Cammeray.

This REF has been prepared in accordance with the *Guidelines for Division 5.1 Assessments* (the Guidelines), the *Guidelines for Division 5.1 assessments—Consideration of Environmental Factors for Health Services Facilities and Schools Addendum* (DPHI), October 2024, 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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Table of Contents

Tables

Figures

Appendices

Appendix	Name	Prepared By
1	Mitigation Measures	Gyde Consulting
2	Survey Plans	SDG Pty Ltd
3	Section 10.7(2 & 5) Planning Certificates	North Sydney Council
4	Architectural Drawings	Fulton Trotter Architects
5	Landscaping Drawings	Ground Ink
6	Architectural Design Report and Schematic Design Report	Fulton Trotter Architects
7	Statement of Heritage Impact	City Plan Heritage
8	Arboricultural Impact Assessment and Tree Protection Specification	Laurence and Co
9	Hydraulic & Fire Engineering Services report	ACOR
10	Electrical and Mechanical Services Report	NDY
11	Stormwater Management Plan	Meinhardt
12	Preliminary Construction Management Plan	RP Infrastructure
13	Construction Waste Management Plan	EcCell
14	Operational Waste Management Plan	EcCell
15	GIPA Analysis	Gyde Consulting
16	Flora and Fauna Assessment	Water Technology
17	Detailed Site Investigation	ADE Consulting
18	Geotechnical Investigation Report	ADE Consulting
19	Flood Impact Risk Assessment	Orion
20	Stakeholder Engagement Report	RP Infrastructure
21	Transport and Access Impact Assessment and School Transport Plan	Crossley Transport Planning
22	Civil Drawings and Structural and Civil Report	Meinhardt
23	Integrated Water Management Plan	Acor
24	Acoustic Report	NDY
25	Air Quality Assessment	Red OHMS
26	Preliminary Indigenous Heritage Assessment and Impact Report	AMAC-AEGIS Pty Ltd
27	Building Code of Australia Report	Matt Shuter and Associates
28	Access for People with Disabilities Report	Matt Shuter and Associates
29	Bushfire Risk Assessment Letter	GHD
30	Sustainable Development Plan	NDY
31	Net Zero Statement	NDY
32	Hazard Assessment of LPG Storage at Service Station	Arriscar

Abbreviations

Abbreviation	Description
ACM	Asbestos containing materials
AEP	Annual exceedance probability
AHD	Australian Height Datum
AHIMS	Aboriginal Heritage Information Management System
AIA	Arboricultural Impact Assessment
BC Act 2016	*Biodiversity Conservation Act 2016*
BC Regulation	Biodiversity Conservation Regulation 2017
BCA	Building Code of Australia
BDAR	Biodiversity Development Assessment Report
BFPL	Bushfire Prone Land
CEMP	Construction Environmental Management Plan
COLA	Covered outdoor learning area
CPS	Cammeray Public School
CWC	Connecting with Country
CWMP	Construction Waste Management Plan
The department	NSW Department of Education
DDA	*Disability Discrimination Act 1992*
DPE	Department of Planning and Environment
DPHI	Department of Planning, Housing and Infrastructure
DPWC	Development permitted without consent
Design Guide	*Design Guide for Schools* published by the Government Architect in May 2018
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
GIPA Act	*Government Information (Public Access) Act 2009*
GLS	General learning space
Ha	Hectares
HCA	Heritage conservation area
LEP	Local Environmental Plan
LGA	Local Government Area
LPG	Liquid petroleum gas

Abbreviation	Description
MNES	Matters of National Environmental Significance
MRV	Medium rigid vehicles
NCC	National Construction Code
NSLEP	*North Sydney Local Environmental Plan 2013*
OLS	Obstacle limitation surface
OWMP	Operational Waste Management Plan
PAA	Practical activity area
PCMP	Preliminary Construction Management Plan
PMF	Probably maximum flood
PTS	Permanent teaching space
Planning Systems SEPP	*State Environmental Planning Policy (Planning Systems) 2021*
Proponent	Department of Education
REF	Review of Environmental Factors
Resilience and Hazards SEPP	*State Environmental Planning Policy (Resilience and Hazards) 2021*
Roads Act	*Roads Act 1993*
SCPP DoE	*Stakeholder and community participation plan,* published by the NSW Department of Education October 2024
SCPP DPHI	*Stakeholder and community participation for new health services facilities and schools* published by the Department of Planning, Housing and Infrastructure October 2024
SEPP	State Environmental Planning Policy
SoHI	Statement of Heritage Impact
SRV	Small rigid vehicles
TfNSW	Transport for NSW
TI SEPP	*State Environmental Planning Policy (Transport and Infrastructure) 2021*
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 description of the proposed activity and associated environmental impacts have been undertaken in 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 Cammeray Public School (CPS) and involves upgrades to the existing school to provide permanent teaching spaces (PTS). The activity includes the construction of a two-storey building on the south-western corner of the site, external covered walkways, landscaping, egress lift and stairs for access, removal of three demountables on the eastern boundary of the site and replacement with 50 bicycle parking spaces, and upgrades to site infrastructure including a new switchboard in a heritage listed building, Block A.

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

- Whether the proposed activity is likely to have a significant impact on the environment and therefore the necessity for an Environmental Impact Statement (EIS) to be prepared and approval to be sought from the Minister for Planning and Public Spaces under 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 take into account 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 Certificates are 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	Cammeray Public School (CPS) upgrade
Description	**Proposed Activity** The activity involves upgrades to the existing CPS, including the following: • Removal of three demountables on the eastern boundary of the site, • Construction of a two-storey building (Block G) comprising four new permanent teaching spaces (PTS), two general learning spaces (GLS) and two practical activity areas (PAA), • Demolition of the existing western façade and staircase in Block E, • New egress lift and stairs for access to Block G at all levels, • External covered walkways connecting Block G to the existing school network, • Landscaping and external works including compensatory planting, • Upgrades to site infrastructure and services to support the new buildings, including a new switchboard in Block A (heritage listed item as outlined in **Section 6.3**), and • 50 bicycle parking spaces to be located along the eastern boundary where the existing demountables are currently located, near the Bellevue Street pedestrian entry. Detailed Architectural Drawings provided at **Appendix 4** and Landscape Drawings at **Appendix 5** depict the proposed activity and works proposed within this REF. An aerial photograph of the school site and a site plan illustrating the location of the activity described above is provided at **Figures 1** and **2**.

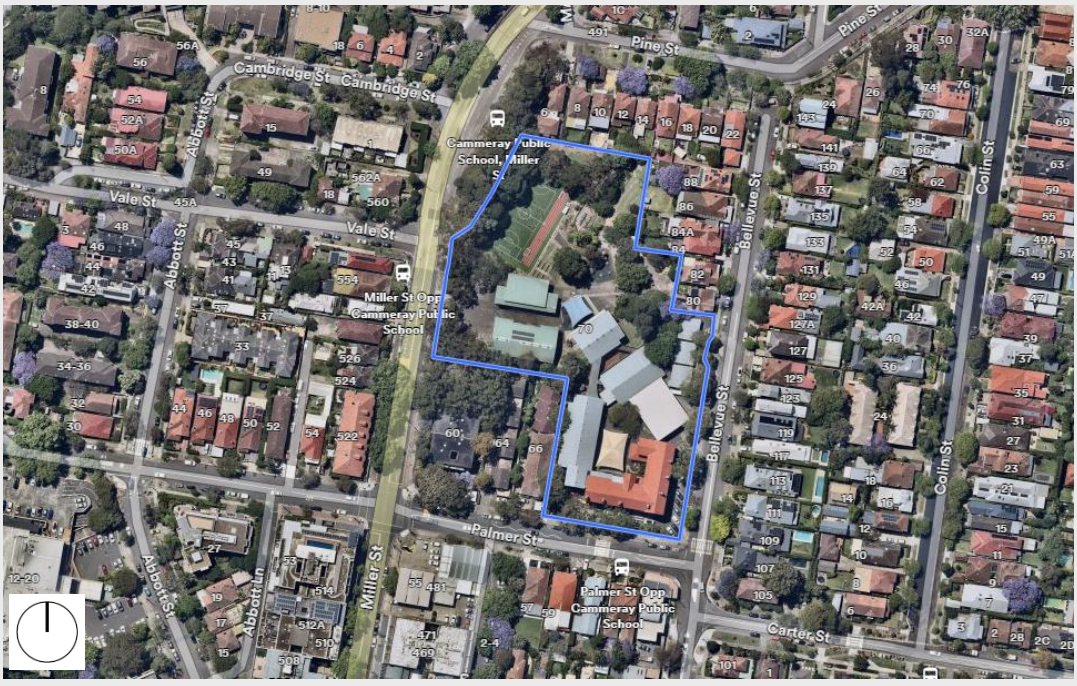
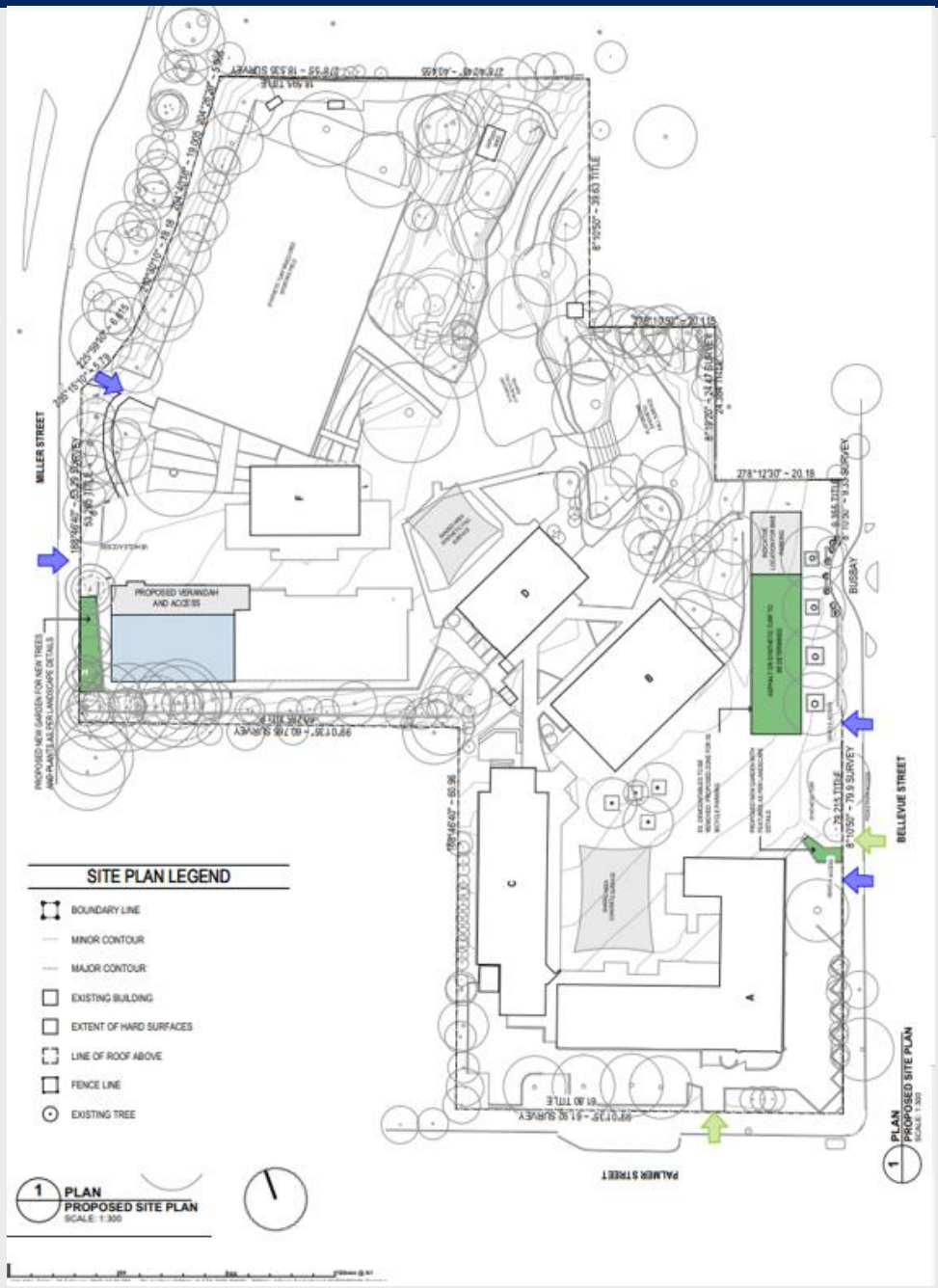


Figure 1: Site context plan (Source: Nearmap, taken 30 October 2024)

Project Element	Description
	 **Figure 2: Proposed site plan (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. A summary is provided below. *Principle 1— Context, Built Form and Landscape* The proposed activity involves constructing a two-storey building that aligns with the existing school structures. It will be set back from Miller Street to preserve the landscaped frontage and heritage character. The building will feature brickwork to match the existing campus and a gable roof similar to adjacent buildings. A new welcome garden with an acknowledgment of Country and native plants is also proposed along the Bellevue Street boundary.

Project Element	Description
	Principle 2— Sustainable, Efficient and Durable Passive cooling with high windows and nearby trees, sun shading and roof overhangs to reduce solar heat gain, and light-coloured materials to mitigate the urban heat island effect are proposed. It features a regular column grid and open floor plates for future flexibility, uses robust, low-maintenance materials for durability, and incorporates PV solar cells on the roof. *Principle 3— Accessible and inclusive* The proposed activity includes matching the building levels with the adjacent Block E for easy pedestrian access, adding a lift for access to both levels and the lower play space areas, and maintaining the school's ability to share facilities with the community. *Principle 4— Health and Safety* The proposed activity maintains existing boundary security, includes blinds and doorways for emergency lockdowns, and is designed as an extension to Block E for easy access. A lift will provide access to all building levels and the playground. *Principle 5— Amenity* The proposed activity includes generous windows for natural light and ventilation, acoustic protection from Miller Street and other external noises, and measures to ensure acoustic separation between teaching spaces for privacy and comfort. *Principle 6— Whole of Life, Flexible and Adaptive* The proposed activity includes a regular column grid and open floor plates for maximum flexibility, consolidated services and wet areas, and a variety of learning and teaching spaces with different levels of openness. It also features operable walls for flexible use, robust and low-maintenance materials, and pre-finished or naturally finished materials that don't require ongoing painting. *Principle 7— Visual appeal* The proposed activity maintains the scale of neighbouring school buildings, uses brickwork for material and colour continuity, and incorporates colours in window framing and sun shading for visual interest. The building will have well-articulated, unobtrusive elevations that blend with the streetscape and existing campus. **Connecting with Country** The activity will include a new welcome garden bed and welcoming statement signage at the existing school entry off Bellevue Street, as identified in the Landscape Drawings (**Appendix 5**) and Architectural Design Report (at **Appendix 6**). **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 at **Figure 3**.

Project Element	Description

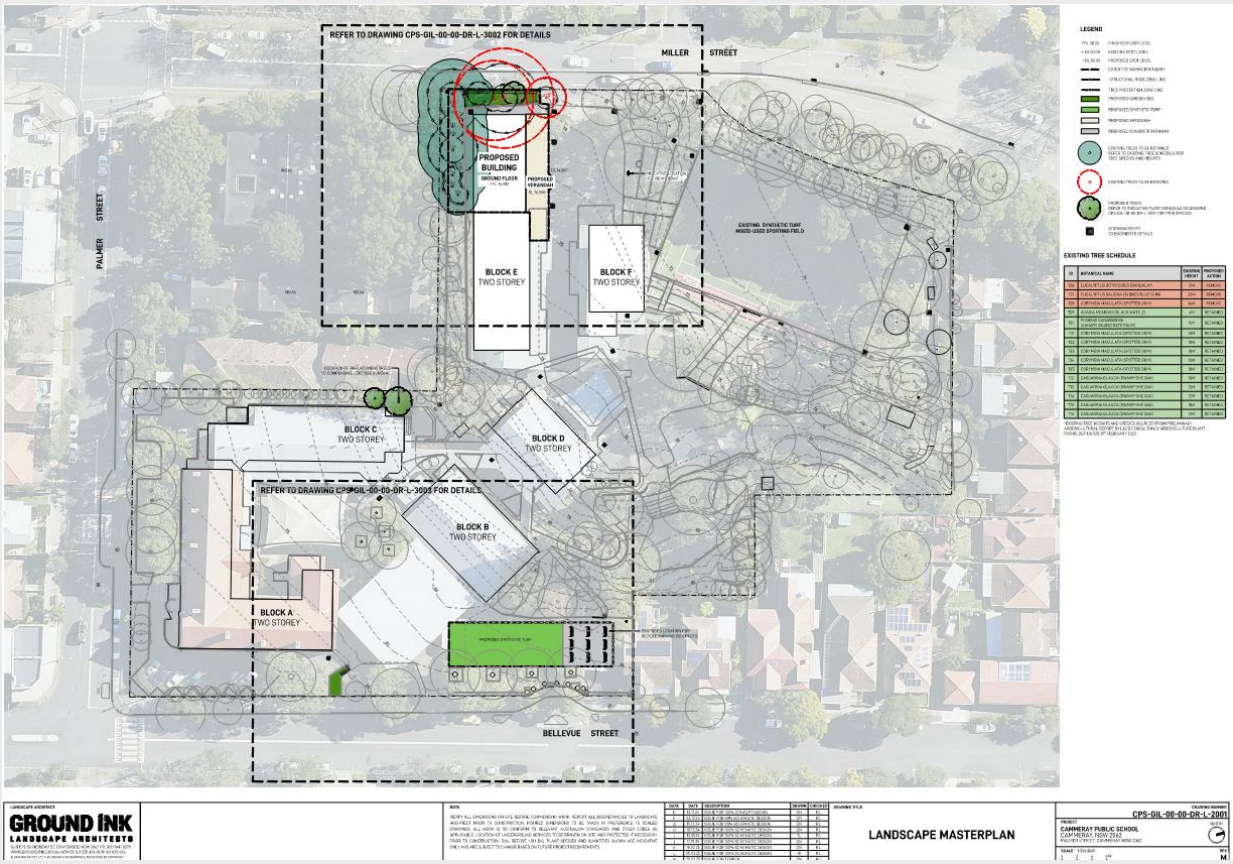


Figure 3: Landscape masterplan (Source: Ground Ink)

Locally Listed Heritage Item

The site is partially listed as a heritage item under Schedule 5 of the NSLEP. 'Cammeray Public School' is listed as item no. I0019. The local heritage listing relates to Block A, which is the original school building, located on the southern boundary of the site, at Palmer Street. The school is also partially identified in the Plateau Heritage Conservation Area (HCA) (Part 2 Schedule 5 of the NSLEP). The school is listed on the department's Section 170 Heritage Conservation Register as 'Cammeray Public School'.

Minor works are proposed in this activity to the existing heritage building to replace the existing main switchboard in Block A (refer to description of proposed works to the existing utilities and services below).

The site is approximately 115m from a State heritage item (I0004) being the electricity substation at 143 Bellevue Street and in close proximity to locally heritage listed items.

A Statement of Heritage Impact (SoHI) (**Appendix 7**) has been prepared to accompany the REF to assess the environmental impacts of the proposed works.

Tree Removal

The Arboricultural Impact Assessment (**Appendix 8**) indicates that three trees (out of the 25 trees assessed in and around the site), Trees 26, 27 and 28, will need to be removed as part of the activity. The trees are being removed as the proposed works associated with the activity result in a major encroachment into their Tree Protection Zones (TPZs) and as such their removal is recommended, together with replacement of appropriate species. The landscape master plan recommends planting a *Corymbia Maculata* (Spotted Gum) and a *Tristaniopsis 'luscious'* (Watergum) adjacent to Block A and a *Tristaniopsis 'luscious'*

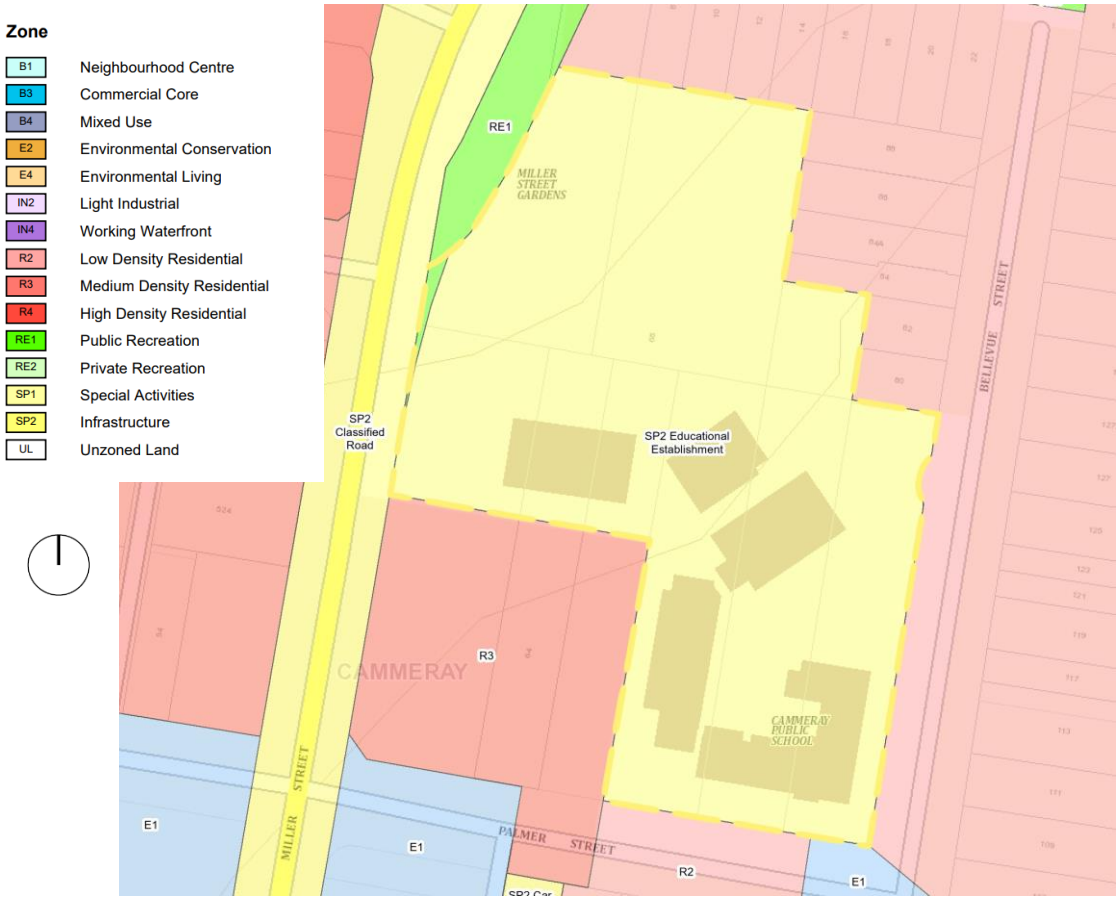
Project Element	Description
	(Watergum) along the Miller Street frontage as replacement trees. **Utilities and Services** An assessment of the relevant utilities and services has been undertaken and confirms the following: <u>Sewer</u> The existing mains are adequate and augmentation is not required as a result of the activity. A new connection to the existing sewer mains along the Miller Street boundary is proposed. The accompanying Hydraulic & Fire Engineering Services report in **Appendix 9** 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 and augmentation is not required. The site is fed from a Sydney Water main located in Bellevue Street. The capacity of the existing network is confirmed in the Hydraulic & Fire Engineering Services report in **Appendix 9**. <u>Electricity</u> There is no requirement for an increase in electrical supply based on the maximum demand calculation for the school. However, a new main switchboard will be installed in Block A to provide additional capacity, as indicated in the Electrical and Mechanical Services Report in **Appendix 10**. Existing consumer mains will be removed with new consumer mains to be installed between the substation and the new main switchboard to support the increased site load. A new 17kW solar system will be installed on the new building including photovoltaic modules and inverter. <u>Mechanical</u> Block G will be provided with air conditioning (A/C) units and ventilation as required in the Electrical and Mechanical Services Report at **Appendix 10.** Given the site is within the Plateau HCA, the A/C condensers will be located within the void below the proposed new building to minimise any potential environmental impacts on the heritage curtilage and the HCA of the surrounding area. Other mechanical works including the control system will be installed within the new building. <u>Lighting</u> All lighting will comply with relevant Australian Standards, the Educational Facility Standards and Guidelines (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 10**). 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 and automatically switch off outside of school hours.

Project Element	Description
	Solar Photovoltaic panels are proposed on the roof of Block G to offset power consumption of the proposed activity. Communications A new Building Communications Room will be located on the ground floor of Block G and will house a security field panel and communication rack(s). The new Building Communications Room will service both floors of the new building (refer to **Appendix 10)**. Gas No gas services will be provided as part of the proposed activity. Fire Hydrant There is an existing fire hydrant booster valve located along the Bellevue Street boundary. The existing system is connected to an external fire hydrant standpipe located about 25m north of the proposed building and offers full coverage of the site, as indicated in the Hydraulic & Fire Engineering Services report in **Appendix 9**. Stormwater No rainwater harvesting is proposed. Stormwater runoff will be directed to the existing stormwater system, as indicated in **Appendix 11**. This will be achieved using above ground spoon drains along the south of the new Block E.
Legal Description	68 Palmer Street, Cammeray Lot 11 DP 837836 Lot 1 DP 316130 Lot 1 DP 316706 Lot 1 DP 123406 Lot 2 DP 174370 Lot 1 DP 174370 Lot 4 Sec 35 DP 758790 Lot 5 Sec 35 DP 758790 Lot 66 DP 1049613 Lot 3 DP 571310 Lot 4 DP 571310

Project Element	Description

Figure 4: Image of allotments of site, outlined in yellow (Source: NSW Planning Portal Spatial Portal)

Local Government Area	North Sydney
Site Description	CPS is located at 68 Palmer Street, Cammeray on the northern side of Palmer Street, bound by Bellevue Street to the east and Miller Street to the west. The site has an area of 1.36 ha and comprises 11 allotments listed above. The site currently comprises an existing co-education primary (Years K-6) public school with six permanent buildings, three demountable structures, covered walkways linked at multiple levels, play areas, on-grade parking, sports court, covered outdoor learning area (COLA) and vegetation/green spaces with mature trees.

Project Element	Description
	The existing school buildings are clustered towards the southern portion of the site and comprise both single and two storey buildings. The northern portion of the site contains the sports court, vegetable garden and play equipment. The north-western portion of the site is heavily vegetated with trees of high landscape significance that are protected with fencing. The site is partially identified as a locally listed heritage item (I0019) under Schedule 5 Environmental Heritage pursuant to the *North Sydney Local Environmental Plan 2013* (NSLEP).
Site Context	The site is surrounded by predominantly low to medium density residential uses as shown in zoning map at **Figure 5** and depicted in photographs at **Figures 6 - 10**.
 **Figure 5: Site and surrounding land use zoning (Source: NSW Planning Portal Spatial Viewer)**	
	To the north, east and south low density residential development surrounds the site, characterised by one storey dwellings with pitched roofs.

Project Element	Description
 **Figure 6: Image of residential dwelling on Bellevue Street, looking east (Source: Gyde, July 2024)**	
	To the west and south-west is medium density residential development characterised by 2 storey manor houses, town houses and dwellings.
 **Figure 7: Image of town houses on Miller Street, looking west (Source: Google Streetview, Dec 2024)**	
	Immediately to the north-west of the site is a small pocket of public recreation space with mature trees being densely vegetated.

Project Element	Description
 **Figure 8: Image of RE1 zoned land looking north-east along Miller Street (Source: Google Streetview, Dec 2024)**	
	There is a local centre to the south of the site known as Cammeray Local Centre on the corner of Palmer and Miller Street to the south-west (**Figure 9**). There is a service station located on the corner of Palmer and Miller Street (**Figure 10**) and shop-top housing traveling south along Miller Street. Further north is a large recreational area known as Flat Rock Creek which adjoins Northbridge Suspension Bridge Reserve and Tunks Park and flows into Middle Harbour.
 **Figure 9: Image of corner of Cammeray Local Centre, looking south-west (Source: Gyde, July 2024)**	

Project Element	Description
	 **Figure 10: Image of Service station at corner of Palmer Street and Miller Street (Source: Gyde)**
Environment of the Activity	**Topography** The site is significantly sloping with the highest point at the south eastern corner of the site being RL 86.79 falling about 19m to the north western corner at Miller Street. In the south-western corner of the site, where the location of the activity will occur, the site is gently sloping with a fall of approximately 1m towards the west to Miller Street. Refer to the Survey Plan at **Appendix 2**. **Vegetation and Trees** There is vegetation scattered through the site. A total of 25 trees, which are located within the site or immediately adjoining, were assessed to inform the activity. Three trees are proposed for removal as the activity will have a major encroachment into their TPZs and Structural Root Zones (SRZs). One tree identified for removal is a Sydney Blue Gum identified as *Priority for Retention* in the Arboricultural Impact Assessment (refer to **Appendix 8**). Three replacement trees (Spotted Gum; 100 litre install size and a Watergum; 100 litre install size adjacent to Block A and the other is a Watergum; 100 litre on the Miller Street frontage) will be planted as part of the activity to compensate for the tree removal.
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 seek to provide accessible, modern teaching facilities, including support areas, for the existing students at CPS. A lift will be installed into the new building that will provide access to both the new building (Block G) and the adjoining building (Block E). No additional students or staff will attend 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 existing Block E in the south eastern corner of the site. New Block G will comprise two storeys in

Project Element	Description
	height and provide consistent finished floor levels, linking it with the adjoining Block E. A new lift will be installed in Block G, to provide access to both Blocks E and G. The location for Block G has been facilitated by the previous removal of two temporary demountables from the site. The demountables were installed on a concrete surface, which has now been exposed following their removal. Block G will comprise four new PTS's, two GLS's and two PAA's. <u>Option 2: Alternative location</u> An alternative location for the new teaching spaces was considered during the masterplan verification phase of the project. This alternative location was central within the site, and would require the removal of a single temporary demountable and existing Block D. The proposed building would comprise three storeys and include eight general learning spaces and two practical activity areas. The existing upper level connection with Block C would be retained. Ultimately, this option was not pursued for the following reasons: • The location presents highly constrained construction access from Miller Street, with access required between existing Blocks E and F • The location would impact the amount of playspace for students, and access to the play area during construction • The location would impact the ability of surrounding buildings and classrooms to be used during construction, and • Disability access to the new teaching spaces, and the overall school campus, would be challenging. <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 CPS. 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 due to pressures of the existing 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 • It is supported by appropriate mitigation measures to address identified environmental impacts.
Construction Activities	**Demolition** Three trees on the western boundary will be removed to accommodate the new building. Also, three existing demountables on the eastern boundary will be removed and replaced with synthetic turf and 50 bicycle parking spaces. The existing services for these demountables will be capped and made redundant. The activity proposes to demolish the existing western façade and staircase of Block E to accommodate the activity to construct Block G. Some minor alterations will be made to the built fabric of Block A to expand the services capacity of the site. These works include relocating the Wireless

Project Element	Description
	Access Points (WAPs) from certain ceilings to walls, replacing the Main Switchboard and upgrading the existing communication room (replacing shelving). Minor excavation works are proposed to accommodate the installation of new consumer mains cables from the existing substation to the new Switchboard.

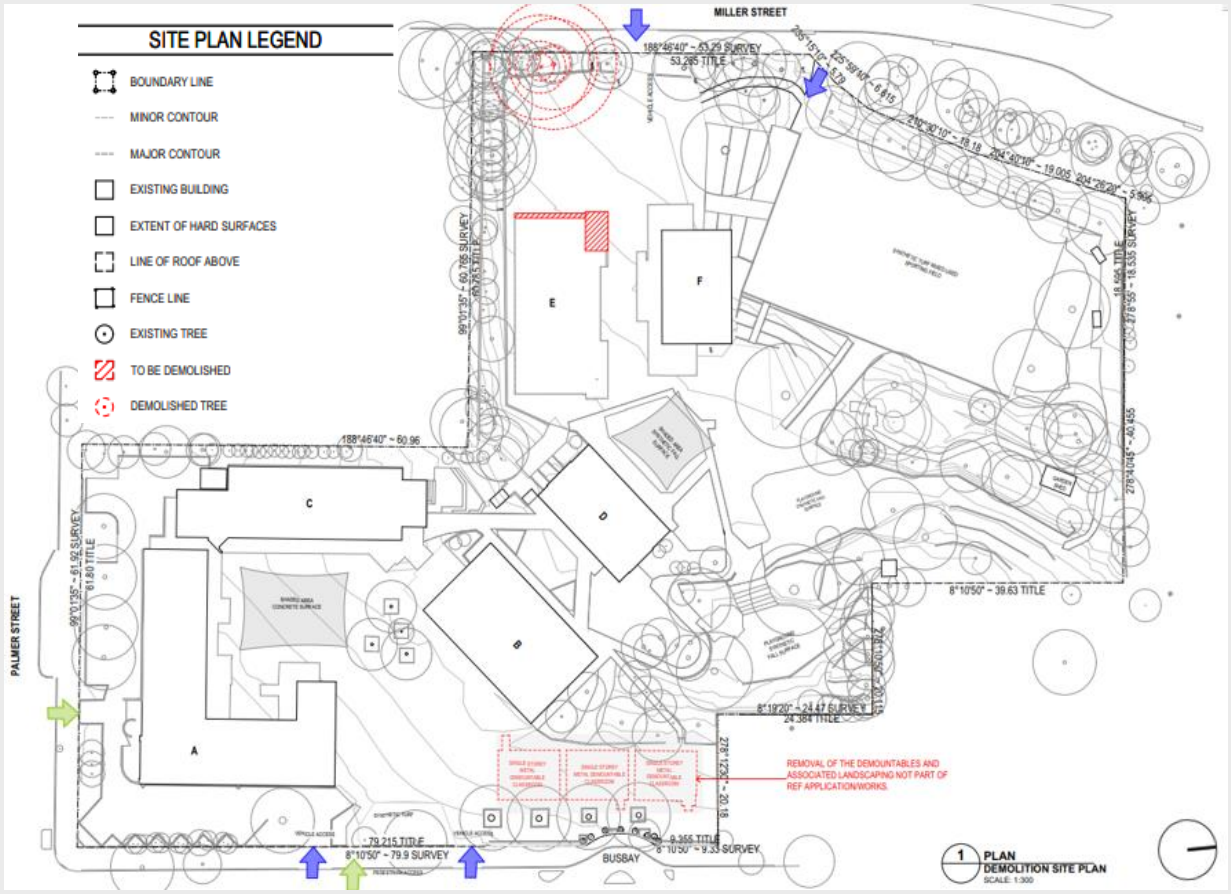


Figure 11: Demolition plan (Source: Fulton Trotter Architects)

Project Element	Description

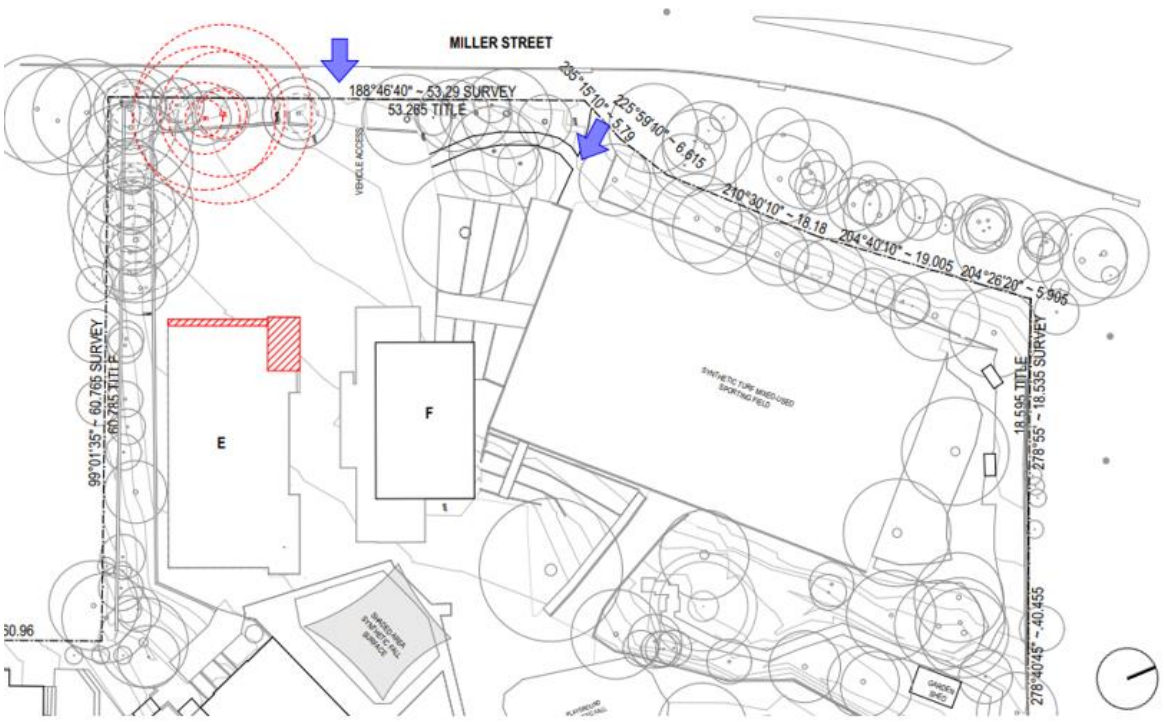


Figure 12: Demolition plan – north-western section of site (Source: Fulton Trotter Architects)

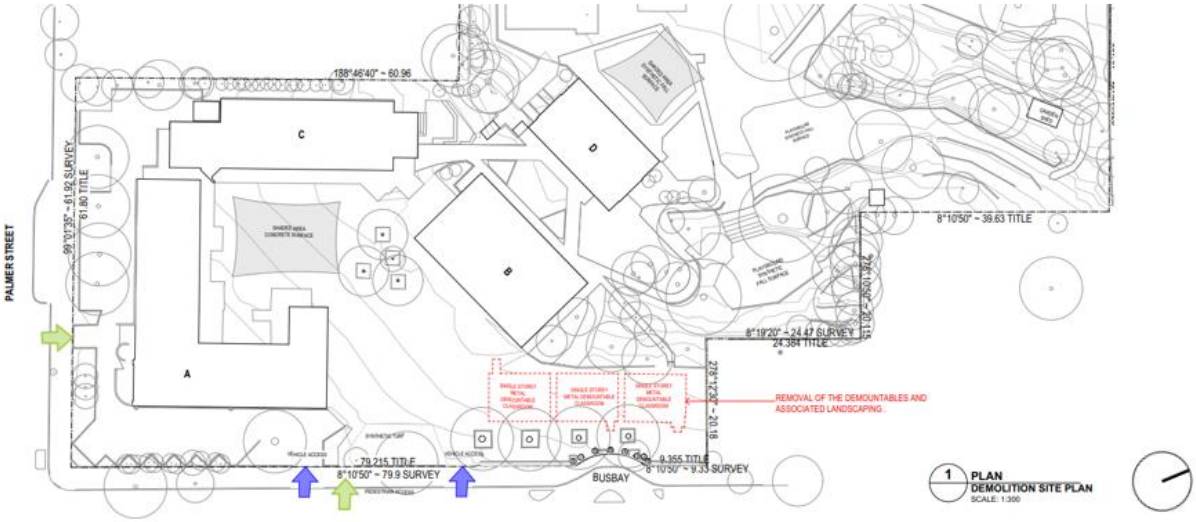


Figure 13: Demolition plan – south-eastern section of site (Source: Fulton Trotter Architects)

	Construction A Preliminary Construction Management Plan (PCMP) has been prepared for the activity (**Appendix 12**). 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 Site establishment works have been outlined in the PCMP. This includes: • The contractor will complete a thorough dilapidation report for the site and

Project Element	Description
	immediately adjoining properties • The site will be secured and made safe from the public through perimeter fencing • TPZs around existing trees will be established and maintained through the demolition and construction process, in accordance with the mitigation measures in the Arboricultural Report (in **Appendix 8**). 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 PCMP has ensured this through a series of mitigation measures 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 6:00am to 9:00am and 3:00pm and 6:00pm Monday to Friday • 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 • Any work outside the nominated construction zone is subject to approved Disruption Notification procedures **Waste Management** The Construction Waste Management Plan (CWMP) at **Appendix 13** details the waste management strategies and auditing requirements during the construction and demolition of the proposed activity. The CWMP includes waste management practices and objectives for the duration of the demolition and construction stages of the activity. Non-friable asbestos containing material (ACM) has been identified through surveys of the site. Prior to any disturbance works being undertaken in these surveyed areas or in a building constructed prior to 2003, the extent of ACM needs to be confirmed. Removal and disposal of non-friable asbestos materials shall be undertaken in accordance with the *Work Health and Safety Act 2011* and *Work Health and Safety Regulation 2017*.
Operation Activities	**Hours of Operation** The school will maintain the current hours of operation. School gates are open from 7:30am to 6:00pm, with teaching hours between 9:15am and 3:15pm. **Number of Students and Staff** The number of students and teachers will not change as a result of this activity. **Waste Management** The Operational Waste Management Plan (OWMP) at **Appendix 14** details the waste management strategies during the operation of the site including general waste, recyclables, garden waste, sanitary waste, and electronic waste. Waste collection is to occur between 7am and 8am, or 6pm and 9pm Monday to Saturday.
Other relevant projects, programs and plans	A search, on 3 September 2024, of North Sydney 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: • Removal of three demountables on the eastern boundary of the site, • Construction of a two-storey building (Block G) comprising four new permanent teaching spaces (PTS), two general learning spaces (GLS) and two practical activity areas (PAA), • Demolition of the existing western façade and staircase in Block E, • New egress lift and stairs for access to Block G at all levels, • External covered walkways connecting Block G to the existing school network, • Landscaping and external works including compensatory planting, • Upgrades to site infrastructure and services to support the new buildings, including a new switchboard in Block A (heritage listed item as outlined in **Section 6.3**), and • 50 bicycle parking spaces to be located along the eastern boundary where the existing demountables are currently located, near the Bellevue Street pedestrian entry. 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. Furthermore, the school is in an SP2 Infrastructure zone, which is a prescribed zone for DPWC activities under the TI SEPP.

Table 3 details how the proposed activity complies with the relevant provisions in order to qualify as development 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 CPS, 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.

Reference	Assessment		Comment
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 environmental planning instrument applying to the land; or, (b) four storeys?	☒ Yes ☐ No ☐ N/A	The proposed building has a height of two storeys, or 11.74m. NSLEP permits a maximum building height of 8.5m. However, under the TI SEPP, a maximum building height of four storeys is permissible. As the provisions of the TI SEPP override the requirements in NSLEP, the proposed two storey building complies with the four storey maximum requirement.
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 July 2024 under the *Government Information (Public Access) Act 2009* (GIPA Act). A copy of the consents and an analysis of their conditions in **Appendix 15**. In summary, the scope of works proposed in this activity do not contravene any previous consent, or condition imposed on that consent.
3.37 (5A)	A public authority, or a person acting on behalf of a public authority, must not carry out development under this section unless the authority or person has 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**) includes 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.

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.

A summary of relevant statutory legislation that applies to the activity is provided in **Table 4**:

Table 4: Relevant Statutory Legislation

Statutory Legislation	Applies?	Comment
Acts		
Heritage Act 1977	☒ Yes ☐ No	The activity involves works to the locally listed heritage building, Block A, including relocating WAPs, replacing the main switchboard, and upgrades to the existing communication room. Other works involve minor excavation to install new consumer mains cables from the existing substation to the new main switchboard. A detailed assessment of the works is outlined in **Section 6.3.**
Biodiversity Conservation Act 2016	☐ Yes ☒ No	As shown in **Figure 14** below, there are no threatened species at the site, and as such, does not trigger any of the requirements under this Act.
 **Figure 14: Biodiversity Values Map, with site outlined in yellow (Source: NSW Planning Portal Spatial Viewer)**		
Environmental Protection and Biodiversity Conservation Act 1999	☐ Yes ☒ No	The Flora and Fauna Assessment (**Appendix 16**) states that the site does not contain any Plant Community Types (PCTs). The Assessment also found that only the Grey-headed Flying-fox and Powerful Owl have a moderate likelihood of being found within the site based on the habitat present. However, should these species be found within the site, it would be for foraging rather than a permanent breeding location. As such,

Statutory Legislation	Applies?	Comment
		the activity does not trigger any of the requirements under this Act.
State Environmental Planning Policies (SEPP)		
State Environmental Planning Policy (Biodiversity and Conservation) 2021 **Chapter 2 Vegetation in non-rural areas**	☒ Yes ☐ No	The activity proposes to remove three trees from the south western part of the site to accommodate new Block G and includes three replacement trees species, two near Block A and one other on the Miller Street frontage. The Arboricultural Impact Assessment (**Appendix 8**) and the Flora and Fauna Assessment (**Appendix 16**) 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. As such, the activity will only remove those trees which would be detrimentally affected by the location of the new building. All other existing trees will be retained, to ensure that the amenity of the site is preserved. Mitigation measures CMM2 (requiring the preparation of a CEMP), and TMM2-TMM9 (relating to tree protection measures) are included in **Appendix 1**.
State Environmental Planning Policy (Resilience and Hazards) 2021	☒ Yes ☐ No	The Detailed Site Investigation (DSI) (**Appendix 17**) analysed soil samples throughout the investigation area and they were found to present a low risk of contamination and were considered to be chemically suitable for the proposed activity and ongoing use as a school. Marginal exceedances of the CT1 criteria for general solid waste was recorded in the road base fill material for Nickel at four locations and for Benzo(a)pyrene in one location. Should this material be required to be disposed offsite, a material classification assessment will need to be undertaken for the surplus material. A soil vapour assessment was also conducted on the site which concluded that the offsite service station is unlikely to have impacted the area beneath the investigation area and soil vapour detections are not representative of a contamination risk to receptors. Subject to the implementation of the mitigation measures at **Appendix 1**, including developing an unexpected finds protocol (LCMM1), soil and water management plan (SWMM1), CEMP (CMM2) and construction waste management plan

Statutory Legislation	Applies?	Comment
		(CMM18), the site is deemed suitable for the proposed activity. Refer to **Section 6.10** for further details.
North Sydney Local Environmental Plan 2013 (NSLEP)		
Zoning	☒ Yes ☐ No	The site is zoned SP2 Infrastructure for educational use. The proposed activity is consistent with the objectives of the zone. Further, the SP2 zone is a prescribed zone under the TI SEPP for the purposes of DPWC.
Height of Buildings	☒ Yes ☐ No	The NSLEP establishes a maximum building height of the site of 8.5m. The proposed building has a maximum height of 11.74m. Although the maximum height of the new building exceeds the development standard in the NSLEP, the height complies with the maximum four storey limit established under section 3.37 of the TI SEPP and is therefore permissible.
Heritage Conservation	☒ Yes ☐ No	Block A is a locally listed heritage item under Schedule 5 of the NSLEP, item no. I0019. The building is listed on the NSW Department of Education's s170 heritage register. The site is also located within the Plateau Heritage Conservation Area (CA02). A SoHI (**Appendix 7**) concludes that the proposed activity will have *no significant impact on the heritage locality, community and environment.* Refer to further consideration in **Section 6.3**.

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

Table 5: Consultation requirements

Consultation Requirement	Applies?	Comment
Section 3.8 Consultation with councils—development with impacts on council-related infrastructure or services The department is of the opinion 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*	☐ Yes ☒ No	The activity does not impact council-related infrastructure or services. Notwithstanding, written notice was given to Council on 12 February 2025. No response was received from Council.

Consultation Requirement	Applies?	Comment
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).*		
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	Block A is a locally listed heritage item. Further, the site is within the Plateau HCA. The accompanying SoHI (**Appendix 7**) confirms that the activity will not impact the heritage integrity of the site. Written notice was given to Council on 12 February 2025, with no submission being received.
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. The Flood Impact Risk Assessment at **Appendix 19** confirms that the site is not impacted by storm events up to and including the PMF event. There are significant areas of the site which have overland flow risk as it is not contained by the existing drainage system. The site is not however flood liable land as defined by the *Flood risk management manua*l, Department of Planning and Education (DPE) 2023, being “flood prone land susceptible to the PMF event”. Therefore, notification is not required to the State Emergency Service. Written notice was however given to Council on 12 February 2025, with no submission being received.
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,	☐ Yes ☒ No	The site is not on land immediately adjacent to a rail corridor.

Consultation Requirement	Applies?	Comment
involves the placing of a metal finish on a structure, or involves the use of a crane in air space above any rail corridor.		
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* *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.*	☒ Yes ☐ No	The site has existing direct access to Miller Road, a State Classified Main Road. However, the activity does not seek to increase the number of students or staff attending the school. As such, no notification is required to be given to Transport for NSW (TfNSW).
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)(f) as outlined above in **Section 2**. Written notice was given to Council and adjoining land occupiers on 12 February 2025. No response was received from Council or from any adjoining landowners or occupiers.

4.1 Other Approvals

Although development permitted without consent does not require development consent from a consent authority under the *Environmental Planning and Assessment Act 1979*, other approvals may still be required by other environmental legislation. This section outlines if other non-planning legislative approvals are required.

Table 6 Consideration of other approvals

Assessment		Action	Relevant Act	Potential approval authority
Would the proposal potentially significantly affect an area of National Environmental Significance? These include: World Heritage Property National Heritage Places RAMSAR Wetland Commonwealth listed threatened species or endangered community Listed migratory species Nuclear actions Commonwealth marine areas Commonwealth land Water resource (with respect to a coal development)	☐ Yes ☒ No	Potential Controlled Action – refer project to a planning consultant for determination if a Referral to Department of Climate Change, Energy, the Environment and Water for an approval is required.	*Environmental Protection and Biodiversity Conservation Act 1999*	Commonwealth Department of Climate Change, Energy, the Environment and Water
		Comment: No area of National Environmental Significance is in the vicinity of the site.		
Would the proposal potentially affect a NSW National Park?	☐ Yes ☒ No	Obtain advice from Ecological consultant – Additional approval may be required.	*National Parks and Wildlife Act 1974*	NSW National Parks
		Comment: No, the activity will not have an impact on any areas identified as NSW National Park.		
Is the proposal located on bushfire prone land?	☐ Yes ☒ No	Section 100B (3) of the *Rural Fires Act 1997* requires a person to obtain a bush fire safety authority.	*Rural Fires Act 1997*	NSW Rural Fire Service
		Comment: No, the site is not mapped as bushfire prone land.		
Would the proposal be located within 40 metres of a watercourse or coastline (e.g. river, natural creek, wetland etc.)? Does the proposal involve drainage or flood work?	☐ Yes ☒ No	Contact NSW Environment and Heritage to confirm if project exempt from obtaining water related environmental approvals. Additional approval may be required.	*Water Management Act 2000* and *Biodiversity Conservation Act 2016*	NSW Environment and Heritage

Assessment		Action	Relevant Act	Potential approval authority
		Comment: The site is not located within 40 metres of a watercourse or coastline.		
Would the proposal potentially affect threatened flora or fauna or a critical habitat?	☐ Yes ☒ No	Obtain advice from Ecological consultant. Additional approval may be required.	*Biodiversity Conservation Act 2016*	NSW Environment and Heritage
		Comment: No, the activity will not impact on any threatened flora or fauna or a critical habitat.		
Would the proposal require large quantities or dangerous pesticides to be used?	☐ Yes ☒ No	Seek clarification of usage criteria. Additional approval may be required.	*Pesticides Act 1999*	NSW EPA
		Comment: No, the work will not require large quantities or dangerous pesticides.		
Would the proposal potentially affect Natural heritage, Indigenous Heritage, archaeology or Native Title?	☐ Yes ☒ No	Engage a heritage consultant to provide advice if required. Additional approval may be required.	*National Parks and Wildlife Act 1974*	NSW Environment and Heritage
		Comment: No, the activity will not affect Natural heritage, Indigenous Heritage, archaeology or Native Title.		
Would the proposal potentially affect State Heritage or Archaeology site?	☐ Yes ☒ No	*Engage a relevant consultant to provide advice if required. Additional approval may be required.*	*Heritage Act 1977*	*NSW Environment and Heritage*
		Comment: No State Heritage or Archaeology site is in the vicinity of the site.		
Would the proposal result in permanent obstructions to water tidal patterns or flows? Would the proposal harm marine vegetation?	☐ Yes ☒ No	Engage a relevant consultant to provide advice if required. Additional approval may be required.	*Fisheries Management Act 1994*	NSW Department of Primary Industries
		Comment: No, the proposed activity will not result in any obstructions to water tidal patterns or flows.		
Would the proposal result in unearthing of contaminated land or ground water?	☐ Yes ☒ No	Engage a relevant consultant to provide advice if required. Additional approval may be required.	*Contaminated Lands Management Act 1997* *State Environmental Planning Policy (Resilience and Hazards) 2021*	NSW EPA
		Comment: The activity will not result in unearthing of contaminated and or ground water. However, a mitigation measure (LCMM1) relating to unexpected finds is included in **Appendix 1**.		
Would the proposal result in significant air, noise, water or waste	☐ Yes ☒ No	Engage a relevant consultant to provide advice if required.	*Protection of the Environment Operations Act*	NSW EPA

Assessment		Action	Relevant Act	Potential approval authority
pollution?		Additional approval may be required.	*1997*	
		Comment: No, the activity will not result in any air, noise, water or waste pollution. Construction noise and any air pollution associated with construction will be managed through a CEMP (CMM2).		
Would the proposal result in road closures, blocking of pathways etc.	☐ Yes ☒ No	Contact Local Council or TfNSW and obtain relevant approvals and/or Work Permits.	*Local Government Act 1993* *Roads Act 1993*	Local Council or TfNSW
		Comment: All works are internal to the site.		
Would the proposal be undertaken on land not owned by DoE?	☐ Yes ☒ No	Obtain land owners consent. If Crown Land, owners consent from the Minister for Crown Lands needs to be obtained.	EP&A Act / *Crown Land Management Act 2016*	The relevant owner of the land
		Comment: All proposed works are located within the school boundary.		
Is the proposal in a mine subsidence district?	☐ Yes ☒ No	Contact NSW Subsidence Advisory to determine if approval required.	*Mine Subsidence Compensation Act 1961*	NSW Subsidence Advisory
		Comment: No, the site is not located within a mine subsidence district.		

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 20** 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
North Sydney Council Planning Department	Various requests for information required to inform the REF package including Section 10.7 Planning Certificates and current flood models.	No response received.
Utilities	Dial Before You Dig applications lodged with Sydney Water, Telstra/NBN/Optus/Verizon and Gas (Jemena).	Noted. No change in scope required.
	Connection application to upgrade mains supply with Ausgrid for Energy provision.	Approved.
TfNSW **Transport Working Group Meeting #1** **22/08/2024**	Presentation of the Transport Report prepared by Crossley.	Noted. TfNSW requested bicycle parking be provided for both students and staff, and accommodation for e-bikes should be made. Response: additional bicycle parking spaces have been included on the eastern side of the school site.
School Community	Various iterations of the proposed scope of works were presented.	Noted. No change in scope required.

5.2 Statutory Notification

Consultation has been undertaken in accordance with statutory requirements under Section 3.38 of 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 DoE) October 2024. This includes:

- sending notices to adjoining neighbours, owners and occupiers inviting comments within 21 days

- sending notices to the local council, TfNSW and service providers inviting comments within 21 days.

Consultation occurred from 12 February 2025, for 21 days, until 5 March 2025. No submissions were received during this period. As such, no changes to the proposed activity are required.

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 8** below. Additional and/or key impacts identified are addressed in subsections below.

Note: Section 171A of the EP&A Regulation is assessed through **Section 6** of this report.

Table 8: Summary of environmental factors reviewed in relation to the activity

Environmental Factor	Response/Assessment	Mitigation Measure Reference
(a) 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 technical inputs. Long-term, the proposed activity will have a positive impact on the school community by providing permanent teaching spaces that are modern and fit-for-purpose. The activity will also remove uncharacteristic demountables and replace them with bicycle spaces, encouraging sustainable methods of transport and improving the aesthetic value of the site within the Plateau HCA.	**Construction:** General: CMM1 – CMM18 (inclusive) Traffic: TT1-TT6 (inclusive) Noise: NV3-NV9 (inclusive). Waste:CMM18 **Operation:** Noise: NV1-NV2 (inclusive) Waste: OPMM1-OPMM2 (inclusive).
(b) Any transformation of a locality?	The proposed activity will have a positive impact on school operations and furthermore will improve the visual appearance of the school. No additional students will attend the school as a result in the activity and no additional staff will be	No mitigation required.

Environmental Factor	Response/Assessment	Mitigation Measure Reference
	employed at the school. The new building has been designed in accordance with the existing site conditions and built form, matching the bulk and scale. The two storey building level is consistent with the adjoining Block E to maintain student and teacher connectivity and consistent built form.	
(c) Any environmental impact on the ecosystems of the locality?	The accompanying Flora and Fauna Assessment Report confirms that there are no PCTs, however there is moderate likelihood that the Grey-headed Flying Fox and Powerful Owl may be present at the site. However, should these species be found within the site, it would be for foraging purposes rather than a permanent breeding location. The activity proposes to remove three trees from the south western part of the site to accommodate new Block G and includes three replacement trees species, two near Block A and one other on the Miller Street frontage.	TMM1 - TMM9 (inclusive)
(d) Any reduction of the aesthetic, recreational, scientific or other environmental quality or value of a locality?	During construction, there will be short term impacts on the aesthetic qualities of the site and surrounds, including the Plateau HCA. Mitigation measures have been included to address construction noise, vibration, visual amenity and traffic. Additionally, measures are in place to mitigate environmental impacts of the school's operations. The three replacement trees, together with the proposed landscaping along the Miller Street frontage, will enhance the environmental and aesthetic qualities of the site.	CMM13 – CMM18 (inclusive) Heritage: HER1 Noise: NV3 – NV9 (inclusive) Traffic:TT1-TT6 (inclusive)
(e) 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 SoHI (**Appendix 7**) confirms that the proposed activity will have no discernible physical or visual impacts on the heritage significance of 'Cammeray Public School' heritage item (Item I0019 on the NSLEP), the Plateau HCA (CA02 on the NSLEP) and 'Cammeray Public School - Building B00A' (DoE Section 170 Conservation Register item). It will also have no significant impact on the heritage locality, community and environment. There will be no impact on Aboriginal heritage items (including cultural significance and archaeology) noting that the site does not comprise and is not in proximity to any other such items. Connecting with Country opportunities have been identified and incorporated into the design of the building. The activity will include a new welcome garden bed and welcoming statement signage at the existing school entry off Bellevue Street, as identified in the Landscape Drawings which will have a positive impact on the community.	Heritage: HER1 – HER3 (inclusive) Aboriginal Heritage: HMM1

Environmental Factor	Response/Assessment	Mitigation Measure Reference
(f) 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 need to comply with the *Biodiversity Conservation Act 2016*.	N/A
(g) 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.	TMM1
(h) 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 ensue a sustainable outcome as detailed in **Table 9** and at **Appendix 30**.	General: GMM1-GMM3 (inclusive) Construction: CMM2 Operational: OPMM1 -OPMM7 (inclusive)
(i) 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, vibration and waste management.	Construction: CMM2, CMM15, CMM18 Soil and Water: SWMM1 Noise and Vibration: NV3-NV9 Contamination: LCMM1 Tree Protection: TMM2-TMM9 Operational Management: OPMM1-OPMM7 (inclusive)
(j) Any risk to the safety of the environment?	The proposed activity has been designed in accordance with the environmental constraints of the site. Through the implementation of the mitigation measures (**Appendix 1**), the proposed activity will not result in any adverse safety impacts both during the construction and operation phase. For example, the OWMP (in **Appendix 14**) ensures the waste generated once the activity is operational is handled appropriately, with recycling of waste encouraged.	School Transport: OPMM7 Waste: OPMM1

Environmental Factor	Response/Assessment	Mitigation Measure Reference
	Further, the School Transport Plan in **Appendix 21** encourages students and staff to use public transport or walk and cycle to school to reduce reliance on private cars. These measures, implemented via **Appendix 1**, will ensure the future activity does not pose any risk to the safety of the environment.	
(k) 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.	N/A
(l) Any pollution of the environment?	The activity will not result in pollution of the environment. Stormwater 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.	Soil and Water: SWMM4-SWMM5 Operational management: OPMM2
(m) Any environmental problems associated with the disposal of waste?	A CWMP (**Appendix 13**) and OWMP (**Appendix 14**) have been prepared for the activity which set out all management practices required to reduce, minimise or avoid adverse impacts arising from waste generation and the disposal of waste. All outcomes and recommendations of these reports have been captured in the mitigation measures for the activity.	CMM18 & OPMM1
(n) 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. The CWMP (in **Appendix 13**) and OWMP (in **Appendix 14**) recommends mitigation measures to reduce the consumption of materials. Further, the installation of PV solar cells on the roof on the new building (refer to **Appendix 10**) will reduce energy consumption over the lifetime of the building.	CMM18 and OPMM1
(o) Any cumulative environmental effects with other existing or likely future activities?	This REF considers the cumulative impacts of the proposed activity. Three trees will need to be removed to accommodate the new building and the associated services. Protection measures have been included to ensure that the existing trees are protected through the construction process. A review of North Sydney Council's DA tracker indicates that there will be no cumulative impacts on existing or future activities (**Appendix 15**).	TMM2-TMM9 (inclusive)
(p) Any impact on coastal processes and coastal hazards, including those under projected climate change conditions?	The site is not in a coastal location. Therefore, further consideration of this factor is not required.	N/A
(q) Applicable local strategic planning statement, regional strategic plan or district strategic plan	There are no relevant strategies that guide the redevelopment of the site.	N/A

Environmental Factor	Response/Assessment	Mitigation Measure Reference
made under Division 3.1 of the EP&A Act?		
(r) Any other relevant environmental factors?	There are no further environmental factors that need to be considered in the assessment of the activity.	N/A

6.2 Arboricultural

An Arboricultural Impact Assessment and Tree Protection Specification Report accompanies this REF at **Appendix 8**. A total of 25 trees and group trees were assessed and determined to be a mix of Australian native and exotic species. These trees are identified in the drawing below.

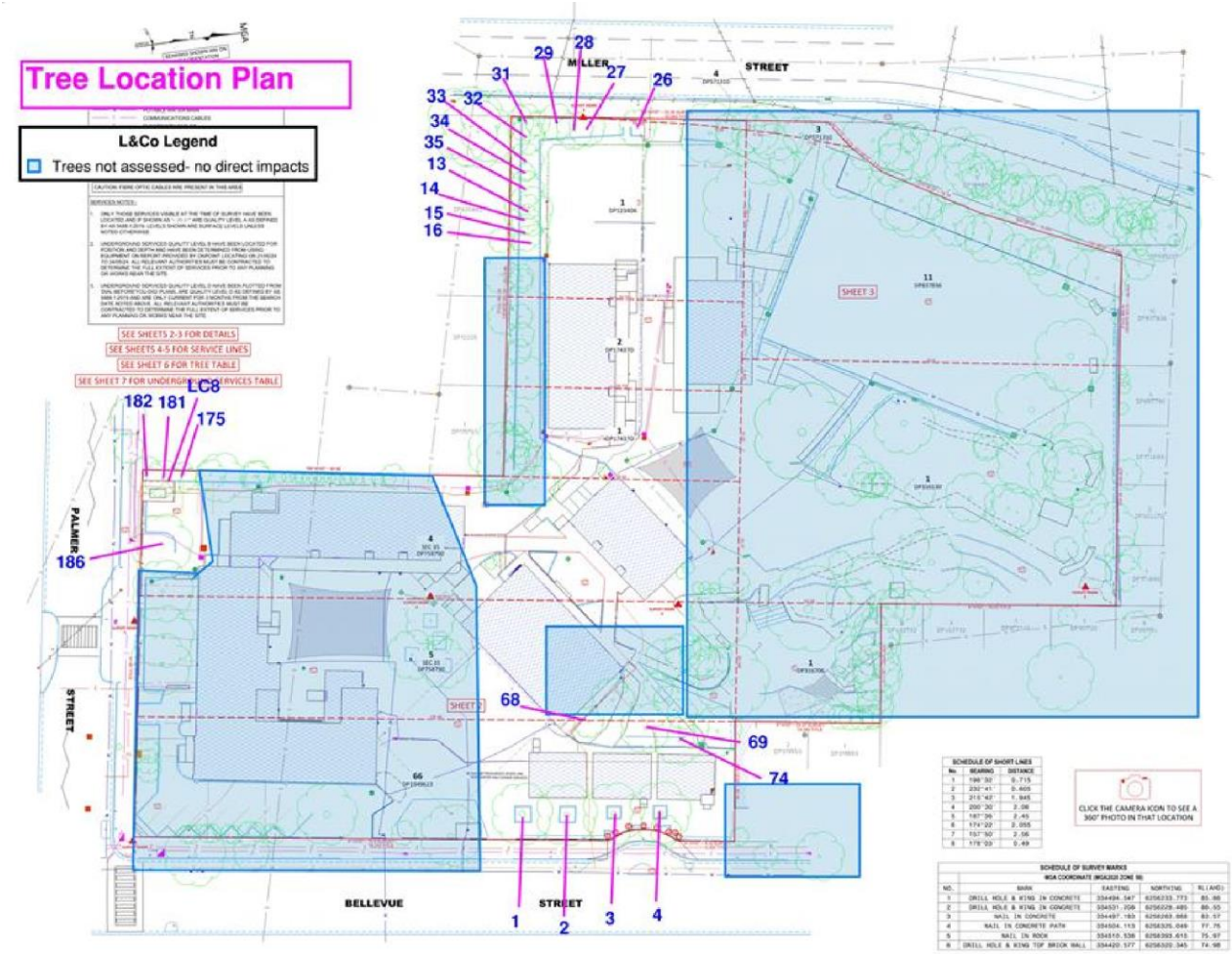


Figure 15: Location of trees assessed in the Arboricultural Impact Assessment Report (Source: Laurence & Co)

In summary, the Assessment Report concluded that, out of the 25 trees assessed, 22 trees can be retained, subject to tree protection measures. These tree protection measures (TMM2-TMM8) for these 22 trees can be summarised as follows:

- Install TPZ fencing before demolition commences and remain in place for the duration of the demolition and construction phases,
- Provide mulch to a depth of 50mm with a non-toxic product with no fines,
- Ensure no materials, waste storage and temporary services are located in the TPZ fenced areas,
- If works are required within the TPZ fenced area, then the Project Arborist is to supervise those works, and
- Coir logs are to be installed on the perimeter of the TPZ fencing to prevent runoff from the building works into the TPZ.

The Report also concluded that three trees (Trees 26, 27 and 28) need to be removed to accommodate the proposed building, with three replacement tree species being included in the landscape design. These replacement species are advanced size stock, being 100L in volume.

With regards to Tree 13, no over-excavation, battering or benching should be undertaken beyond the footprint of any structure unless approved by the Project Arborist. Hand excavation and root pruning along the excavation line should be completed prior to the commencement of mechanical excavation to prevent tearing and shattering damage to the roots (mitigation measure TMM9).

6.3 Non-Aboriginal Heritage

The SoHI at **Appendix 7** confirms that CPS is partially listed as a local heritage item under Part 1 of Schedule 5 of the NSLEP, identified as 'Cammeray Public School', 68 Palmer Street (corner Bellevue Street), item no. I0019. The site is also partially within the Plateau Heritage Conservation Area (HCA) under Part 2 of Schedule 5 of the NSLEP, item CA02. The school is also listed on the department's Section 170 Heritage Conservation Register as 'Cammeray Public School'. The site is also within proximity to several heritage items of local significance as detailed in the SoHI (**Appendix 7**).

The heritage item on site (Item 0019) is Block A located in the south-west corner of the site fronting Palmer Street. The two-storey L-shaped brick building is shown in **Figure 16** below.

Figure 16: View facing north of heritage item Block A (Item No. I0019) (Source: Gyde Consulting, July 2024)

An assessment of significance for the site has been undertaken in accordance with the Heritage Council of NSW's seven criteria and the *Assessing Heritage Significance 2023 guidelines* (Department of Planning and Education (DPE)) which has been summarised below:

- **Historic significance –** Block A demonstrates the historical development and growth of CPS, as its expansion responded directly to the area's increased population and demand for education in the early 20th Century.

- **Historical association –** Block A has some association with prominent architect George McCraw (Acting Government Architect, 1912-1923) however, other buildings in Sydney have a stronger association. CPS is not considered to have a strong or special association that satisfies this criterion.
- **Aesthetic/creative/technical achievement –** CPS demonstrates aesthetic significance through the blended of Federation Arts and Crafts and Inter-War Georgian Revival architectural styles.
- **Social, cultural, and spiritual –** The social significance of the site is not known and requires further investigation to ascertain if there is any existing significance.
- **Research potential –** The site has high levels of disturbance and therefore has little research or archaeological potential.
- **Rare –** CPS is not identified as distinctly rare, being one of a number of schools constructed in the North Shore in the early 20th century to support residential accommodation expansion.
- **Representative –** the school is a representative example of an important cultural building that contributed to the development of the area in the early 20th century.

The proposed activity has also been assessed under the *Guidelines for preparing a Statement of Heritage Impact 2023* (DPE) and determined the following:

New Building (Block G):

- The upgrade works are respectful to the heritage significance of both the heritage item (I0019) and the HCA
- The new building is sympathetic to the heritage item as it is located in an area where it will not visually interact with the heritage item
- The new building is sited away from the heritage item so as to not impact the views or setting of the heritage item

Works to Block A:

- The works to accommodate the new main switchboard and upgrade existing services will have no more than a minor impact on the heritage item
- Trenching around Block A to accommodate the new mains will follow the unexpected finds protocol
- No significant fabric or layouts of the heritage item will be adversely impacted by the upgrade works. None of the works will compromise the integrity or fabric of the building
- The setting of, or important views to and from, the heritage will not be impacted.

New Services and Services Upgrades:

- The existing main switchboard will be removed and replaced to comply with the Australian Standards and to provide spare physical capacity (as identified in the Electrical and Mechanical Services Report in **Appendix 10**). Mitigation measure HER3 ensures that, following the works being undertaken, the surrounding building fabric will be made good and painted to match the character finishes and detailing of the space
- The works include relocating the WAPs from certain ceilings to walls (also for compliance with safety regulations) and upgrades to the existing communication room (replacement shelving). Some minor excavation works will be required to install new consumer mains cables from the existing substation to the new switchboard in Block A. The installation of new services will be limited to areas of previous change and are minor in nature. Mitigation measure HER2 requires WAP units and associated conduits to be fixed externally to walls and not to chased through significant fabric. Further, new fixtures need to be affixed into existing mortar joints

Tree Removal:

- The trees that are being removed as part of the activity are not considered significant to the heritage item
- The trees may be considered to be contributory to the HCA, however, the removal of three trees on the Miller Street boundary would have a negligible impact on the aesthetic qualities of the HCA
- The removal of the trees would not impact the significance and setting of the school. The trees are later plantings within the schoolgrounds, and there is no visual relationship between the trees and the heritage building.

The topography of the site is an important factor that protects the potential heritage impacts of the proposed activity on the heritage item and HCA. This is due to the new building being located near the Miller Street boundary, which is at a significantly lower height than that of the heritage listed Block A. As such, there will be no changes to the setting of the heritage item as there is no direct sightline within Block A.

The design of the new building is consistent with the existing, and adjoining, Block E. The 5m setback and proposed landscaped garden on the Miller Street boundary, which includes compensatory plantings, will soften the appearance of the new building on Miller Street and adjacent residential properties to the west of the site.

The removal of the three trees to accommodate the new building has a minor impact on the amenity and character of the HCA. These trees were planted during the 1960s-1970s and do not form part of the heritage listing. The removal of the trees will also not compromise the character of the landscaped garden suburb.

The removal of the demountables on the eastern side of the school will open up views along Bellevue Street, thereby providing an improved heritage outcome as the views and vistas to and from Block A will be enhanced. The removal of the demountables will also benefit the streetscape and setting of the HCA.

Overall, the proposed activity will have no discernible physical or visual impacts on the heritage significance of 'Cammeray Public School' heritage item (Item I0019 on the NSLEP), the Plateau HCA (CA02 on the NSLEP) and 'Cammeray Public School - Building B00A' (DoE Section 170 Conservation Register item).

Relevant mitigation measures include CMM2 and HER1, which require the preparation of a CEMP including establishing an unexpected finds protocol for non-Aboriginal heritage management and the training of personnel, and mitigation measures HER2 and HER3 which relate to ‘making good’ following the completion of works.

6.4 Construction Management

A Preliminary Construction Management Plan (**Appendix 12**) 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.

The Construction Management consultant has included the following factors to ensure the activity can occur with appropriate construction management and mitigation:

- Securing the boundaries of the construction zone throughout the building period to prevent unauthorised access.
- Limiting construction access to the site from Miller Street 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;
- Limiting construction vehicles (particularly heavy trucks) to access the site out of peak traffic times such as school drop off and pick ups.
- 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. The preliminary construction traffic and pedestrian management plan is included in **Appendix 21** outlines strategies to mitigate construction impacts to ensure safety, minimise disruptions, and maintain smooth movement for all road users, including pedestrians, cyclists, and vehicles.

Construction vehicles, associated with the construction of the new building, will access the site from Miller Street only and are expected to travel along Warringah Freeway before turning into Miller Street**.** Small rigid vehicles (SRV) and medium rigid vehicles (MRV) will be able to enter and exit the site in a forward direction as shown in **Figure 17** and **Figure 18**.

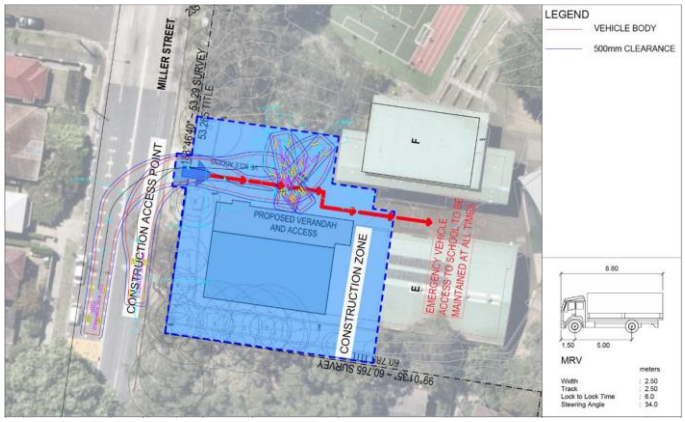


Figure 17: Swept path for a SRV turning in and out of the site (Source: Crossley Transport Planning)

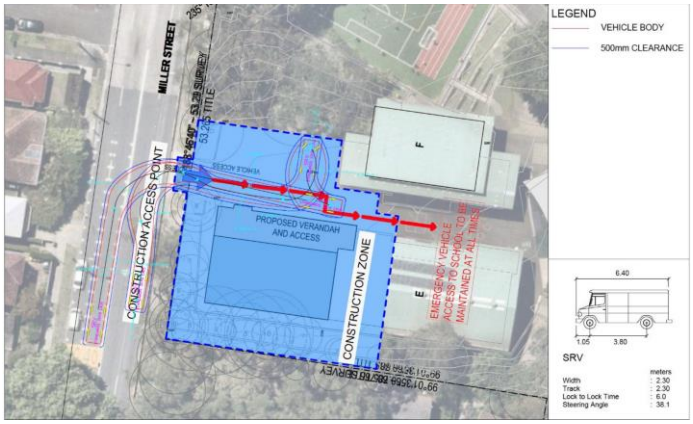


Figure 18: Swept path for a MRV turning in and out of the site (Source: Crossley Transport Planning)

Smaller construction vehicles, associated with the proposed landscaping works and new bicycle parking spaces, will access the site from Bellevue Street, as indicated in **Figure 19.**

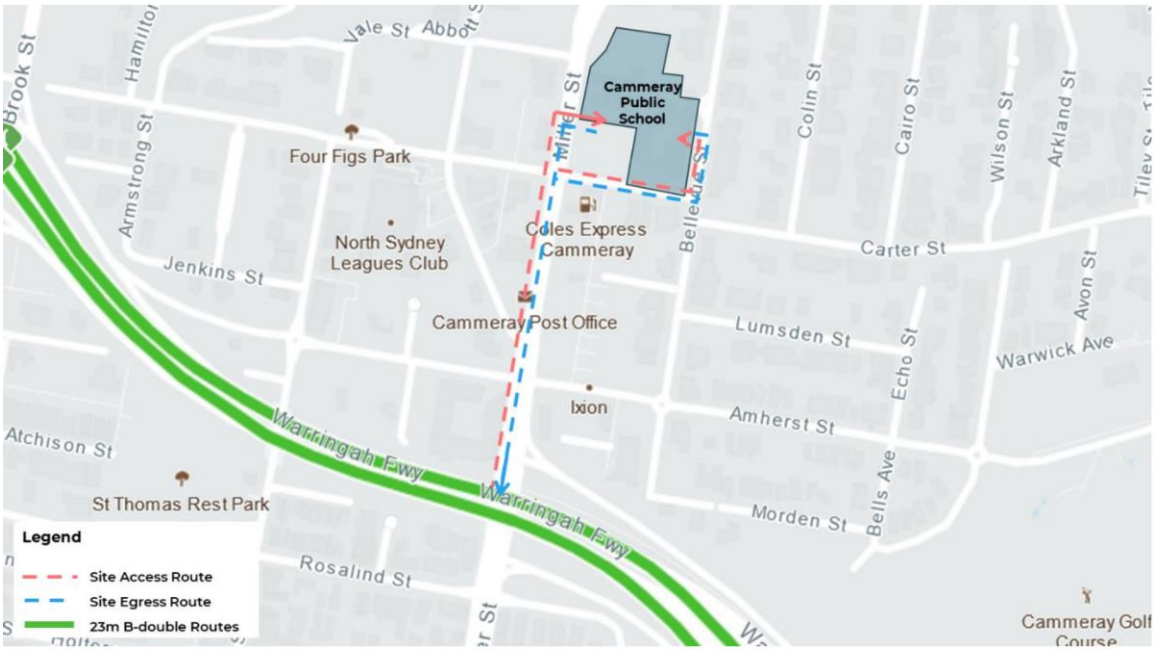


Figure 19: Site access routes for construction vehicles (Source: Crossley Transport Planning)

Relevant mitigation measure CMM2 in **Appendix 1** relates to the requirement to prepare a Construction Environmental Management Plan (CEMP) prior to construction commencing. Mitigation measures, TT1-TT6, ensure management of traffic and pedestrian movements prior to and during construction.

6.5 Traffic, Access and Parking

The Transport and Access Impact Assessment (TAIA) (**Appendix 21**) considers existing travel behaviour, road network conditions, parking availability, public and active transport connectivity and any potential cumulative impacts from the proposed activity.

Traffic Generation

The activity will not generate any additional traffic demand or impact the surrounding transport network as there will be no increase in student or staff numbers. The existing road network, services and conditions remain unchanged as a result of the activity. Existing active transport infrastructure will continue to support walking and cycling movements without requiring any modifications.

Further, as the activity does not propose to change the number of students or staff, no additional car parking spaces are required for the school.

Planned Transport Infrastructure

Upgrades to the Warringah Freeway and 40km/h high pedestrian activity area shared zone will enhance pedestrian, cycling and public transport accessibility, which aligns with the objectives of the activity.

Construction Traffic and Pedestrian Management

The TAIA details a traffic and pedestrian management plan to ensure safety, minimise disruption and maintain smooth movement whilst construction occurs. Details of this management plan have been discussed in **Section 6.4** above.

Mitigation measure CMM2 relates to the preparation of the CEMP, which includes a Construction Traffic and Pedestrian Management strategy.

School Transport Plan

A School Transport Plan (STP) has been prepared (**Appendix 21**) which will guide the implementation of infrastructure and operational measures to improve transport safety, reduce congestion and encourage active and sustainable travel behaviours. The plan sets out specific objectives and strategies to promote sustainable travel modes through site-specific measures and will include reference to the 50 bicycle parking spaces which will be provided as part of the activity.

The STP will be finalised and implemented as part of the overall mitigation strategy, ensuring that the development supports sustainable and efficient transport options for both staff and students at CPS. Mitigation measure OPMM7 has been recommended to ensure the preparation of the STP prior to operation.

6.6 Civil Works

Sediment and Erosion

The proposed activity includes civil works to facilitate the construction of Block G. 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 22**) and details within the Stormwater Management Plan (**Appendix 11**). 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 along Miller Street to ensure that vehicles and machinery leave the site with clean wheels.
- 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 38m^3 being 19m^3 of cut, 10m^3 of fill and 9m^3 of export volume. Most 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 22** for details.

Relevant mitigation measures include CMM2 and SWMM1 which relate to the requirement to prepare an Erosion and Sediment Control Plan.

Stormwater

The Stormwater Management Plan (**Appendix 11**) and the Integrated Water Management Plan (**Appendix 23**) provide information on how the proposed activity will affect stormwater run-off and how potable (drinking) water and wastewater will be collected and disposed.

The new building's drainage design will consist of roof drainage pipes that will connect into the proposed underground stormwater system.

No civil work will occur on the southern side of the existing retaining wall to protect the existing trees and reduce any further possible loss of trees should any excavation occur at this location. As such, the existing overland flow path will remain to drain as per the existing drainage strategy, that is between the existing retaining wall and new suspended building wall.

The Stormwater Management Plan also recommends regular maintenance of existing stormwater structures to ensure the site is not affected by the overland flow that drains on the south side of the new and existing building (refer to mitigation measure SWMM5).

Overall, the site was considered in terms of its accessibility, topography and stormwater flows to understand local factors that could contribute to stormwater management. Given that the proposed activity is minor in nature, the impacts are not considered to be significant.

6.7 Flooding

A Flood Impact Risk Assessment has been prepared (**Appendix 19**) that concludes that CPS is flood free. The proposed activity will not have a significant impact on the environment. The continued operation of the school is unlikely to be significantly affected by the 1% AEP flood event or the PMF event.

The site is susceptible to overland flows as these flows cannot be contained by the existing drainage system. Recommendations stemming from this Assessment Report have been included in the accompanying architectural drawings (**Appendix 4**), civil engineering drawings (**Appendix 22**) and hydraulic drawings (**Appendix 23**).

Furthermore, as Miller Steet to the west is affected by flood events of less than 150mm, the flood consultant has assessed the site to determine if the proposed activity will worsen the existing overall conditions for overland flow and for downstream properties. The consultant has concluded that there is no significant impact by the activity to flood risk. The risk of overland flow has been mitigated by ensuring the design and construction of the activity has sufficient piped capacity to avoid overland flow ingress into the new building and across the school site.

To assist in ensuring no impacts from flooding and stormwater overflow, mitigation measure OPMM3 requires the preparation of a Stormwater Operation and Maintenance Plan.

6.8 Noise and Vibration

The Acoustic Report at **Appendix 24** has been prepared to assess any noise and vibration effects to and from the proposed activity.

Operation

During operation, the new building will have six air conditioning condensers installed facing out to Miller Street. The condensers will be installed together with the mechanical plant in the undercroft and will only operate during school hours. Mitigation measure NV1 limits the number of units to six.

There will also likely be extract fans installed into the new building. Whilst details of these fans are unknown at this stage, it is anticipated that they will comply with the maximum noise limits for the surrounding uses, as required under the NSW Noise Policy for Industry (NPfI). Relevant mitigation

measures include OPMM3 & OPMM4 and NV1-NV2 which relate to ensuring all plant and equipment is used, maintained and operated in accordance with the user manual and not exceed the maximum noise limits under the NPfI.

The selection of mechanical plant needs to ensure that the combined sound pressure levels does not exceed 88 dBA at 1m from the mechanical plant.

The existing school public address system and bells form part of the existing noise emissions from the school. These will be extended to the new building and should be oriented to direct sound away from the neighbouring properties, where possible (mitigation measure NV2).

In terms of vibration during operation, it is unlikely that there will be noticeable impact on the school grounds or nearby residential areas as the units are small and located away from surrounding sensitive areas.

Construction

During construction, there is the potential for temporary noise and vibration impacts as the site is located near several sensitive receivers being residential properties to the south and west. A noise assessment was conducted using noise loggers deployed along the western side of Miller Street. The assessment recommends:

- Construction to occur only during daylight hours (mitigation measure CMM13)
- Should a barrier be required to reduce the impacts of construction on 62 Palmer Street, then a 2m barrier should be installed (mitigation measure NV3)
- Not all machinery is to be used simultaneously (mitigation measure NV9).

In terms of impacts to the existing school buildings, Blocks E & F are located next to and 13m away the construction site, respectively. As the noise and vibration impacts from the proposed activity cannot be effectively mitigated, the assessment recommends that Block E be partially vacated during the course of construction, as required (mitigation measure NV6). Further, Blocks E & F be partially vacated when particularly loud works occur, as required (mitigation measure NV7) and closing classroom windows when loud works occur, as required (mitigation measure NV8). Further, the assessment recommends installing a 2m high noise barrier to Blocks E & F to provide additional reductions in noise and vibration impacts from construction (mitigation measure NV3).

Notwithstanding the Acoustic Report (**Appendix 24**) stating that the activity will not exceed the relevant noise limits, the department's standard mitigation measure (CMM2) will require the preparation and implementation of a Construction Noise and Vibration Management Plan to monitor all noise and vibration matters that may arise from the construction of the activity.

6.9 Air Quality

The Air Quality Assessment at **Appendix 25** has concluded that the proposed activity will not result in any air quality issues. The air quality consultant has assessed the potential air quality impacts which are detailed below:

- Air emissions are expected during the construction stage for minor earthworks, site preparation, delivery vehicles and general construction.
- Dust generation will occur during the construction period but will have short-term impacts and be managed appropriately through mitigation measures. The impacts are not considered significant due to the scale and nature of the proposed activity.

- Air quality emissions from the activity are expected to be minimal, blending with the existing traffic emissions from the adjoining State Classified Main Road being Miller Road. The consultant has confirmed that given the setback to the curb is more than 10m, the site is suitably located away from the noise generation and therefore air quality impacts from traffic emissions are reduced.
- Potential impacts as the school remains operational will be low risk given the activity's scale, nature and timeline.

The consultant has provided a detailed assessment and determined that, given the nature of the construction air emission sources, the receiving environment, and prevailing winds, the activity would not create any air quality issues at this location. Nonetheless, mitigation measure CMM1, which relates to the preparation of a CEMP, will manage potential air quality impacts and minimise exposure for nearby properties during construction.

6.10 Contamination and Geotechnical

Contamination

The Detailed Site Investigation (DSI) at **Appendix 17** involved an intrusive investigation with five boreholes being drilled to enable an assessment of the subsurface lithology and collection of soil samples for analysis. Further, three soil vapour bores were installed for soil vapour sampling. The DSI found the soil analysis results reported below the assessment criteria, although there was a marginal exceedance of CT1 criteria for general solid waste within the shallow fill. A mitigation measure (SWMM2) will be included to deal with the presence of unexpected contamination information or contaminants in the fill. The soil vapour results were also below the adopted criteria and are acceptable. As such, the soils present a low risk of contamination and are considered suitable for the proposed activity and ongoing use as a school. The soil vapour assessment indicates that the nearby service station has not contaminated the site and does not present as a risk to the activity, and school as a whole. No further investigations or assessments are required.

Given the proximity to the service station south of the site, soil vapour analysis was undertaken. This investigation did not find air phase hydrocarbons consistent with the petroleum hydrocarbon source. The consultant has concluded that no further consideration is required.

The Construction Waste Management Plan (**Appendix 13**) states that non-friable ACM has been identified throughout areas of the site that have been surveyed by the DoE. Prior to any disturbance work commencing in a survey portion of the site or in a building that the register applies to, confirmation of the extent, if any, of any ACM. To support this, a mitigation measure (LCMM1) will be imposed to establish protocols for managing unexpected contamination.

A series of mitigation measures are included at **Appendix 1** to manage all potential impacts from the contamination investigation, including the preparation of a CEMP at mitigation measure CMM2.

Geotechnical

The Geotechnical Report included an intrusive geotechnical investigation to assess the subsurface conditions of the location of the activity (**Appendix 18**)**.** Five boreholes were drilled at depths ranging between 0.4m to 0.7m. Shallow bedrock was encountered within a 1m depth below the existing ground level. The subsurface conditions encountered at the site in descending order were asphalt, fill, sand, sandstone and weathered bedrock. The bedrock was assessed to be extremely

weathered and low strength sandstone with the geotechnical consultant determining that normal earthmoving machinery can be utilised for excavation.

No groundwater was encountered in the boreholes during drilling. The borehole excavations also confirmed that the site is non-saline.

No adverse ground conditions were observed, with mitigation measures for geotechnical matters being proposed at **Appendix 1** to deal with noise and vibration monitoring (CMM15), groundwater management to reduce the risk of slope instability and to prevent groundwater infiltration (CMM2 & SWMM4), settlement analysis and removal of unsuitable soils to ensure the foundation of the building is sound (SMWW1).

6.11 Waste Management

Construction Waste Management

The CWMP (in **Appendix 13**) outlines the following measures for demolition and construction waste for the proposed 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
- As the site contains non-friable asbestos containing materials (ACM), works must be completed in accordance with the CWMP
- 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:

- Demolition – A total of 190m^3 of waste will be generated with 84% (75m^3) being reused or recycled and the remaining 16% (30m^3) being disposed.
- Excavation – A total of 160m^3 of waste will be generated with 100% being able to be reused and recycled.
- Construction – A total of 152m^3 of waste will be generated with 81% (123m^3) being reused or recycled and the remaining 19% (29m^3) being disposed.

The CWMP 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 demolition 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 include, but are not limited to:

- Design the building with modular, prefabricated components and materials
- Creation of a designated waste storage area on site prior to collection that is conveniently located
- Reuse of demolition, excavation and construction materials including off-cuts on site
- Use the avoid, reuse, reduce, recycle principles throughout the construction process
- Maintenance of a waste data file to be maintained on-site at all times for excavated material
- Separation and segregation of materials on-site

- Conduct period auditing and monitoring of the correct usage of bins and waste management practices
- Providing an induction training for all contractors and workers on the waste management plan and processes for segregation and disposal

Mitigation measure (CMM18) is recommended 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 14**).

An assessment of other similar sized schools has been undertaken to determine the weekly waste generated each week, to help determine the requirements for CPS. 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 16m^2 will be required. The existing waste storage area is sufficient for the proposed activity and will remain located near the spots field, in the south-west corner towards Miller Street. 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 Miller Street.

The OWMP recommends that the waste be collected outside of school hours, to reduce the risk of conflict with truck movements and students being at school. Further to this, there is a previous condition of consent imposed on DA 472/02 which requires:

> *I1. Garbage is to be collected by garbage collection vehicles only between the hours of 7.00am and 8.00am or between 6.00pm to 9.00pm Mondays to Saturdays only, with no collection to take place on Sundays.*

This condition will be included as part of the mitigation measures in **Appendix 1**.

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 (OPMM1-OPMM2 inclusive) 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.

6.12 Flora and Fauna

The Flora and Fauna Assessment (**Appendix 16**) has been prepared to identify any potential constraints that may impede the proposed activity. The Assessment comprised desktop searches to understand the site's context, a review of vegetation mapping databases using the SEED portal (Sharing and Enabling Environmental Data in NSW), a search of the Department of Climate Change, Energy, the Environment and Water's BioNet Atlas and a site visit. This work determined that there are no PCTs within the site. The Assessment also found that only the Grey-headed Flying-Fox and Powerful Owl have a moderate likelihood of being found within the site based on the habitat present. However, should these species be found within the site, it would be for foraging rather than a permanent breeding location.

The following potential impacts have been identified in the Flora and Fauna Assessment:

- Construction impacts
    - Nests and Hollows – the site assessment found there are potential fauna habitats. These habitats include four bird nests adjoining the air conditioning units on Block E, a nest in the base of the fronds in an exotic *Phoenix canariensis* (Phoenix Palm), an old nest on a native canopy tree and a natural spring. As such, prior to construction, all trees and vegetation in the vicinity of the construction site should be inspected for hollows and nests.
    - Contractors and Staff Inductions – all contractors and staff need to undergo formal induction outlining the ecological sensitivities of the site.
    - Hygiene – basic hygiene protocols need to be implemented to reduce the potential for invasion by plant pathogens.
- Operational impacts
    - No operational impacts are anticipated.

The preparation of a CEMP (mitigation measure CMM2) will mitigate the impacts of the proposed activity on the existing flora and fauna at the site.

6.13 Building Code of Australia and Access

Reports have been prepared for the activity to address BCA compliance (**Appendix 27**) and accessibility requirements (**Appendix 28**).

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 all other licences, permits, approvals and consents (GMM1) and compliance with relevant Australian Standards (GMM2) is required as part of the mitigation measures in **Appendix 1.**

6.14 Other Considerations

Table 9: Other Considerations

Issue	Consideration
Aboriginal Heritage	The Preliminary Indigenous Heritage Impact Report at **Appendix 26** confirmed no Aboriginal archaeological site records located within the study area on the Aboriginal Heritage Information Management System (AHIMS), however there are eight registered site(s) within 1,000m of the study area. An updated AHIMS search (10 February 2025) has been undertaken to accompany this Report. The site is also located within 200m of waters which indicated sub-surface Aboriginal objects and/or deposits are likely in undisturbed areas. They appear to be located close to approximately a 1km distance from the site The AHIMS search, undertaken on 10 February 2025, revealed no Aboriginal archaeological

Issue	Consideration
	site records within the site. Overall, the site was assessed as having high surface disturbances and low potential for any Aboriginal artefacts and/or deposits of archaeological and cultural significance to be present. An Unexpected Finds Protocol is required to be prepared prior to construction (mitigation measures CMM2 & HMM1) as a standard procedure.
Aviation	The site is not mapped as being subject to protection regarding noise exposure nor is it affected by the Obstacle Limitation Surface (OLS) or subject to airspace protections. No further assessment is required.
Bushfire	A Bushfire Risk Assessment Letter has been provided at **Appendix 29** to confirm that the site is not bushfire prone land (BFPL). The letter notes that the closest classified vegetation is located 145m north-west of Lot 1 DP 123406 however, the activity does not trigger any further assessment. The bushfire consultant has also assessed the vegetation on site, as whilst the site is not mapped as BFPL, it may potentially be exposed to a bushfire threat. The consultant has confirmed that as the vegetation is less than 1 hectare, the understory is managed and the site is over 100m away from the hazard it is therefore not applicable to be referred to the NSW RFS under *Planning for Bush Fire Protection 2019*. No further assessment or mitigation measures are required for the site or proposed activity.
Coastal Risks	The site is not mapped as being within a Coastal Management Area or otherwise in close proximity to coastal lands and therefore there is no potential t impact coastal lands or to consider any coastal hazard provisions.
Environmentally Sustainable Development Plan	Key initiatives incorporated into the proposed activity include: • Passive design elements, such as high-performance façade, effective shading and natural ventilation to reduce the energy demand of the buildings and improve indoor environment quality for students and staff. • Energy efficient building systems and on-site renewable energy to reduce greenhouse gas emissions. • 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 30** and the Net Zero Statement at **Appendix 31.**
Hazards	A service station is located on the corner of Miller Street and Palmer Street, south of the site. The service station stores liquid petroleum gas (LPG) cylinders which were required to be assessed for any potential impact of air phase hydrocarbons released on the proposed school upgrade. The accompanying Hazard Assessment in **Appendix 32** concludes that any rupture and fire/explosion would have a localised effect and not impact CPS. Any thermal radiation from a potential pool fire from a hose leak during fuel deliveries would also not reach the school site. Therefore, no mitigation measures are required.
Land Use	The activity proposes an additional building on an existing school site. There are

Issue	Consideration
	no land use changes proposed with the activity therefore there is no potential land use conflict created. Furthermore, there will be no change to the number of students attending, or teachers, attending the school, so no intensification of the use will be experienced by adjoining and surrounding properties.
Social Impact	The REF proposes upgrades in the form of a new building at an existing school. This will provide a positive impact on wellbeing as there is a benefit to students with better school facilities and classrooms to learn in. There will be a minimal impact to the neighbours to the immediate south (62, 64 & 66 Palmer Street) during construction, however standard mitigation measures around hours of construction and the like will protect amenity during this period.
Visual Amenity, Privacy and Overshadowing	**Design Addressing Visual Amenity** The proposed design incorporates a range of features to enhance visual amenity and ensure compatibility with surrounding land uses. These include: • The building form being two storeys in height to be in keeping with the existing buildings on the site as well as the bulk and scale of the surrounding neighbourhood. • The building façade is finished in brickwork in keeping with the existing buildings on the site. • The Miller Street frontage has been maintained as simple and uncomplicated and is designed to sit behind the existing planting along the streetscape. This allows the building to sit comfortably and unobtrusively within the heritage precinct around the school. **Visual Privacy** The proposed activity maintains visual privacy and minimises the potential for overlooking through careful siting and the incorporation of significant existing and new landscaping along site boundaries as shown in **Figure 20** below. The works will be partially visible from adjacent residential properties to the south and Miller Street; however, it is considered that the sites sloping topography and significant landscaping will screen the building when viewed from these areas and reduce privacy concerns.

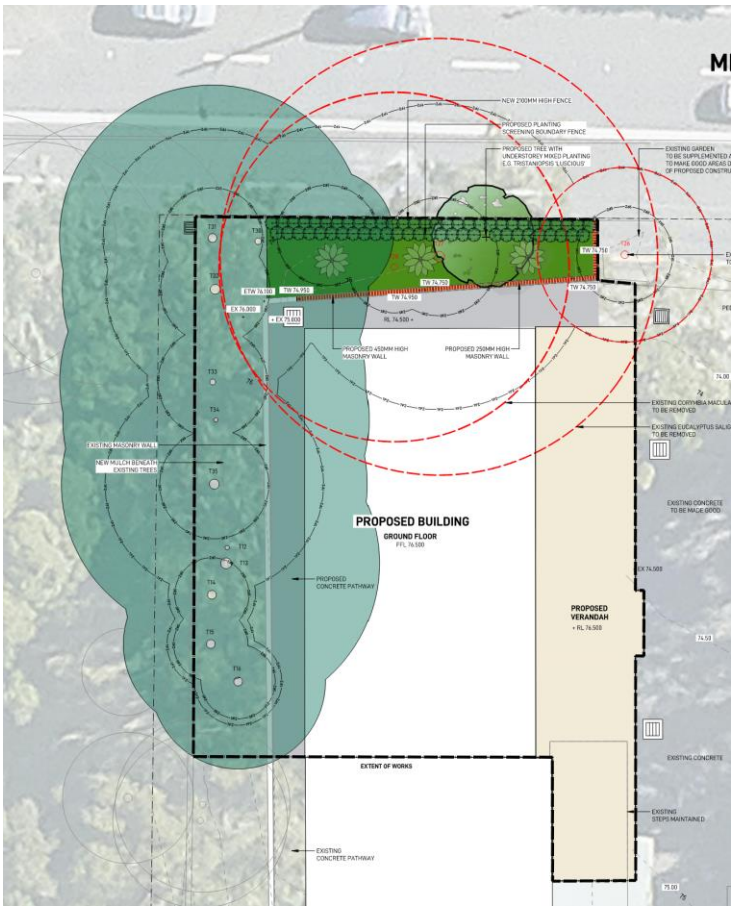
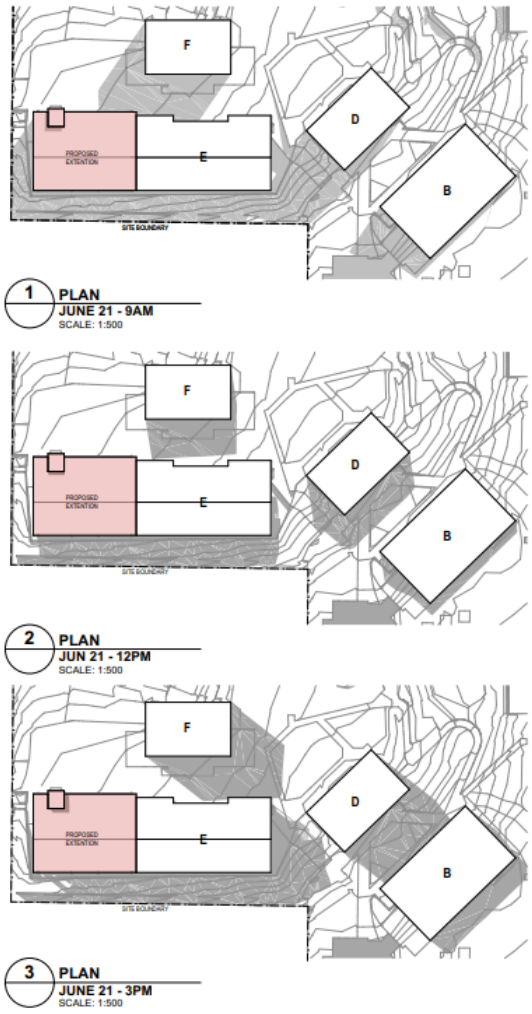


Figure 20: Proposed landscape plan (Source: Ground Ink)

Overshadowing

Shadowing impacts generated from the proposed new building on the winter solstice will be predominantly internal to the site as shown in **Figure 21**. The part of the site most affected by overshadowing is the landscaped area to the rear of Block G, along the southern and western boundary. These areas are not play spaces and contain several existing mature trees which exceed the height of the proposed building, ensuring the canopy is provided with sufficient light This area is not a learning space and is not accessible to students and staff.

The sloping topography of the site minimises overshadowing impacts to the adjoining residential properties to the south of the site. The proposed building and these properties are separated by approximately 25m which consists of a vegetated area with tall, mature trees. The trees provide natural screening between the sites and also reduce the extent of overshadowing from the proposed activity on the adjoining properties.

Issue	Consideration
	 **Figure 21: Shadow diagrams Winter Solstice (Source: Fulton Trotter Architects)**
Wind	The proposed activity is a two storey building, located adjacent to the existing two storey Block E and setback from the site's boundaries, therefore it will not have an impact on the pedestrian wind environment.

7. Justification and Conclusion

The proposed Cammeray Public School Upgrades 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 report, 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
- The proposed activity has responded to the consultation undertaken as part of the reiterative design process.

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

The 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.