NSW Department of Education

Review of Environmental Factors

Leppington Public School Upgrade

Document version: Final V5

Date: 19/03/2025

NSW GOVERNMENT

Acknowledgement of Country

The NSW Department of Education acknowledges the traditional custodians of the land on which the upgrade to Leppington Public School 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 on behalf of the NSW Department of Education and assesses the potential environmental impacts which could arise from the Leppington Public School upgrade at 144 Rickard Road, Leppington.

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

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

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

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Table of Contents

Tables

Figures

Appendices

Appendix	Name	Prepared by
1	Mitigation Measures	Gyde Consulting
2	Architectural Plans	Pedavoli Architects
3	Survey Plan	Monteath & Powys
4	Statement of Heritage Impact	EMM Consulting
5	Transport Impact Assessment	Stantec
6	Arboricultural Impact Assessment Report	Allied Tree Consultancy
7	Landscape Plans	Taylor Brammer
8	Biodiversity Assessment Report	ERM
9	Intrusive Geotechnical Investigation Report	Geotechnique Pty Ltd
10	Detailed Site Investigation	SMEC
11	Stormwater Management Report	Stantec
12	Bushfire Hazard Assessment	Blackash
13	Relevant Map Extracts	Gyde Consulting
14	Certificates of Title	Direct Info
15	Preliminary Indigenous Heritage Assessment and Impact Report	Kayandel Archaeological Services
16	Hazardous Materials Survey	Department of Education
17	Hydraulic Services Report	JHA Consulting Engineers
18	Electrical Services Report	JHA Consulting Engineers
19	Architectural Design Statement	Pedavoli Architects
20	Sustainable Development Plan	JHA Consulting Engineers
21	Construction & Demolition Waste Management Report	Foresight Environmental
22	Civil Drawings	Stantec
23	Operational Waste Management Report	Foresight Environmental
24	Regulatory Compliance Report	Mckenzie Group
25	Design Review Report - Accessibility	Mckenzie Group
26	Previous Consents	Camden Council
27	Section J Part J4 & J6 Performance – Based Design Brief	JHA Consulting Engineers
28	Noise and Vibration Impact Assessment	JHA Consulting Engineers

Abbreviations

Abbreviation	Description
AEC	Areas of Environmental Concern
AHD	Australian Height Datum
BC Act 2016	*Biodiversity Conservation Act 2016*
BC Regulation	Biodiversity Conservation Regulation 2017
BCA	Building Code of Australia
CEMP	Construction Environmental Management Plan
CNVMP	Construction Noise Vibration Management Plan
COLA	Covered Outdoor Learning Area
CPTED	Crime Prevention Through Environmental Design
CWC	Connecting with Country
The department	NSW Department of Education
DCP	Development Control Plan
DBH	Diameter at Breast Height
DPHI	Department of Planning, Housing and Infrastructure
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
Gyde	Gyde Consulting
HBM	Hazardous Building Material
LEP	Local Environmental Plan
LGA	Local Government Area
LPS	Leppington Public School
MNES	Matters of National Environmental Significance
NCC	National Construction Code
NPI	Noise Perception Index
NPW Act	*National Parks and Wildlife Act 1974*
OLS	Obstacle Limitation Surface
OSHC	Outside School Hours Care
OSD	On-Site Detention
Planning Systems SEPP	*State Environmental Planning Policy (Planning Systems) 2021*

Abbreviation	Description
PP	Planning Proposal
Precincts SEPP	*State Environmental Planning Policy (Precincts Precincts—Western Parkland City) 2021*
Proponent	NSW Department of Education
REF	Review of Environmental Factors
RL	Relative Level
Resilience and Hazards SEPP	*State Environmental Planning Policy (Resilience and Hazards) 2021*
RFS	NSW Rural Fire Service
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
SMP	Stormwater Management Plan
SoHI	Statement of Heritage Impact
SSD	State Significant Development
SSMP	Saline Soil Management Plan
STARS	Significance of a Tree Assessment Rating System
SULE	Safe Useful Life Expectancy
SWGA	South West Growth Area
TfNSW	Transport for NSW
TI SEPP	*State Environmental Planning Policy (Transport and Infrastructure) 2021*
TRH	Total Recoverable Hydrocarbons

Executive Summary

This Review of Environmental Factors (REF) has been prepared by Gyde Consulting (Gyde) for the NSW Department of Education (the department). The department is proposing the construction and operation of new school facilities at the existing Leppington Public School (LPS) located at 144 Rickard Road, Leppington.

The proposal is defined as an *activity* pursuant to Section 5.1 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

This REF has considered the activity and its environmental impacts in accordance with the provisions of Part 5 of the EP&A Act and the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation), and other relevant statutory requirements. In accordance with Section 5.5 of the EP&A Act this 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 activity. In particular, the REF has taken into account the factors set out in Section 171 of the EP&A Regulation.

The Site

As noted above, the proposed activity will be undertaken at the existing LPS. The site has frontage to Rickard Road and comprises buildings and facilities for the school. A summary of the site's key characteristics are as follows:

- The site's topography is undulating and falls towards Byron Road at the northeast.
- The site has frontage to the eastern side of Rickard Road and comprises existing educational facilities, open space, parking area and scattered vegetation.
- The site is zoned B7 Business Park under the Schedule 5 of State Environmental Planning Policy (Precincts—Western Parkland City) 2021 (Precincts SEPP). The B7 zone is a prescribed zone which permits the use of the site for educational purposes.
- The southern portion of the site is a locally listed heritage item (item I9 under Precincts SEPP), containing the original Raby School (now known as LPS).
- The site is also listed on the department's Section 170 Heritage and Conservation Register. The buildings designated as having significant heritage significance are officially listed as B00H, B00I, B00J, B00K, B00L, and B00M.
- The site has no Aboriginal archaeological site records.
- The site has saline soil.
- The site comprises topsoil/fill and residual soils underlain by bedrock shale/siltstone.
- The site is not mapped as bushfire prone land.
- Soil contamination conditions are below adopted human health criteria.
- Hazardous materials, including white, brown and blue asbestos were identified on site.
- The site is within an Obstacle Limitation Surface (OLS) area set for Western Sydney Airport.
- 119 trees were assessed on and adjacent to the site.
- The site is located in the South-West Growth Area (SWGA) and is subject to biodiversity certification which means separate assessment and approval for development under the BC Act or the EPBC Act is not required. As the site is biodiversity certified, the preparation of a BDAR or SIS is not required.
- The site is located within an area that is transitioning from greenfield rural land to residential subdivisions, reflecting ongoing urban growth in the region.

The Proposed Activity

The proposed activity involves upgrades to the existing LPS to modernise the facilities. The works include:

- Removal of nine temporary classrooms (demountable) and demolition of three permanent teaching spaces.
- Construction of a new three storey building containing 20 permanent teaching spaces and three support teaching spaces.
- Construction of a new hall, comprising a canteen and OSHC hub, and COLA.
- Extension of the existing library.

Other ancillary works include:

- Upgrades to the sports and play facilities.
- Relocation of the yarning circle.
- Upgrades to site services, footpaths, fencing and other associated ancillary works and landscaping.

No works are proposed in the public domain as part of the activity.

The activity will increase the capacity of the school from 430 to 621 students. The number of FTE staff will also increase from 22 to 35.

The proposed activity is located within an area that will continue to experience significant transformation and urban growth as a result of the proposed Leppington Town Centre. The proposed Leppington Town Centre will provide homes for over 25,000 people along with 11,000 jobs. The site has a frontage to Rickard Road and comprises existing educational facilities, open space, parking areas and scattered vegetation. Given the site's location within the proposed town centre, it will contribute to the transforming locality through upgrades to the school to cater for increased demand for learning places.

Permissibility

The site is currently zoned B7 Business Park under the Precincts SEPP. The existing *educational establishment* is permitted with development consent, as it falls within '*any development not specified in item 2 or 3*' in the B7 land use table.

The proposed activity is permissible as it complies with the requirements of Section 3.37 of *State Environmental Planning Policy (Transport and Infrastructure) 2021* (TI SEPP) in that the works will be located *'within the boundaries of an existing or approved government school*'.

A small portion of the south-west corner of the site is zoned SP2 Infrastructure (classified road). This portion of the site relates to the future expansion of Rickard Road to facilitate its widening. The proposed activity does not extend into this corner of the site.

Planning Approval Pathway

The proposal involves works by the department (a public authority) within the boundaries of the existing LPS. Accordingly, under Section 3.37 of the TI SEPP, the proposed works are classified as development which may be carried out without consent.

Therefore, the proposal is considered an 'activity' for the purposes of Part 5 of the EP&A Act and is subject to an environmental assessment. For the purposes of this activity, the department is the proponent and the determining authority. The required environmental assessment is in the form of a REF. The REF has been prepared in the accordance with the *Guidelines for Division 5.1 Assessments* (DPHI, June 2022) and the *Guidelines for Division 5.1 assessments - consideration of environmental factors for hospital and school activities Addendum* (DPHI, October 2024).

There are some discreet aspects of the activity that would ordinarily, in isolation, be categorised as exempt development, for example, landscaping works. However, all of these minor works are ancillary to the overall activity and have therefore been considered as part of the application for development permitted without consent.

Consultation

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

Comments received will be carefully considered and responded to prior to determination of the activity.

In addition, non-statutory consultation has been undertaken with a range of community and government stakeholders throughout the design process.

Environmental Impacts

The proposed activity will have a minor impact on the overall heritage significance of LPS and a minor impact on the listed heritage buildings B00H, B00I, B00J, B00K, B00L, and B00M, provided that the mitigation measures outlined in the Statement of Heritage Impact (SOHI) are adhered to. Noise impacts from construction and operations can be reasonably mitigated through the recommended measures, including acoustic barriers and compliance with noise standards, ensuring minimal disturbance to surrounding areas.

Environmental considerations include the removal of 24 trees, offset by the planting of seven new trees, enhancing biodiversity on the site. Existing high value trees, in particular the existing Cumberland Plain Woodland, along the southern part of the site will be retained and integrated into the site upgrades. Of the 24 trees being removed, nine are high significance, 11 are medium significance and four are low significance.

Contamination risks, including soil salinity and asbestos, will be mitigated through remediation and management plans.

Other more minor impacts have been considered as detailed in this REF.

Overall, the project is designed to improve functionality, sustainability, and safety while minimising environmental and community impacts.

All potential environmental impacts are either minor or capable of being managed or ameliorated through the measures identified in this REF.

Justification and Conclusion

Based on the environmental assessment undertaken as part of this REF, it has been determined that the activity will not result in any significant or long-term detrimental impacts. The potential impacts identified can be reasonably mitigated and where necessary, managed through the adoption of suitable site practices and adherence to accepted industry standards (**Appendix 1**).

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

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

1. Introduction

The department proposes to undertake upgrades to the existing school infrastructure (the activity) at Leppington Public School (LPS) located at 144 Rickard Road, Leppington (the site).

This REF has been prepared by Gyde on behalf of the department to determine the environmental impacts of the proposed school infrastructure upgrades at LPS. For the purposes of these works, the department is the proponent and the determining authority under Division 5.1 of the EP&A Act.

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

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

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

- Whether the proposed activity is likely to have a significant impact on the environment and therefore the necessity for an EIS to be prepared and approval to be sought from the Minister for Planning and Public Spaces under Division 5.2 of the EP&A Act; and
- The potential for the activity 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 the department to examine, and consider to the fullest extent possible, all matters affecting, or likely to affect, the environment by reason of the proposed activity.

2. Proposed Activity

The sections below provide an overview of the site and the proposed activity. Detailed Architectural Plans accompany this REF and are provided in **Appendix 2**.

2.1 The Site

2.1.1 Site Details

LPS (the site) is located at 144 Rickard Road in the suburb of Leppington, within the Camden Local Government Area (LGA). The site is owned by The Minister for Education and Early Learning.

The site is located on the eastern side of Rickard Road and 500m north of Ingleburn Road. It has primary access via Rickard Road with the boundary being approximately 155m long. The site is within the Leppington Town Centre and is also within the 800m walking catchment of Leppington railway station. An aerial view of the site is shown in **Figure 1** below.

Figure 1: Aerial view of the site, with Rickard Road to the west of the site (Source: Nearmap)

The site is an irregular sized parcel comprising of several allotments, being:

- Lot 1 DP 439310 (central-north lot)
- Lot 1 DP127446 (north lot)
- Lot 38E DP 8979 (central-south lot)
- Lot 39C DP 8979 (south lot)

These allotments have a combined site area of approximately 3.013 ha. **Figure 2** below identifies the allotments that comprise the site.

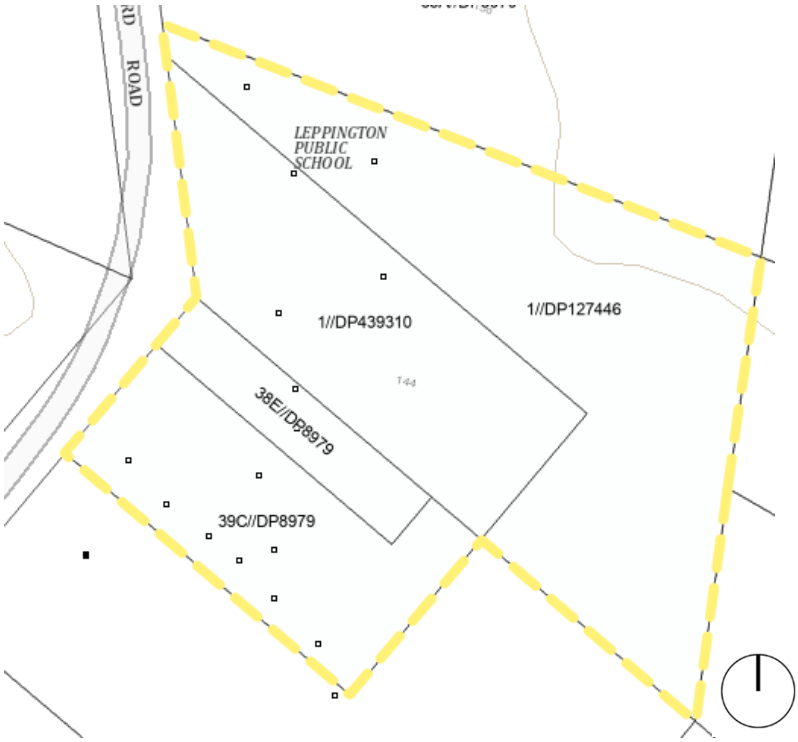


Figure 2: Subject site allotments (Source: NSW Planning Portal eSpatial Viewer)

The site is currently a co-education primary (K-6) public school accommodating 430 students. The school comprises 14 permanent buildings, nine demountable classrooms, interconnected paths and covered walkways, play areas and on-grade parking, as described in **Table 1** and illustrated in **Figure 3**. The buildings are one storey in height and there is a sports oval in the eastern portion of the site. The existing buildings are clustered in the northern and western parts of the site.

The existing on-site buildings comprise:

Table 1: Existing Accommodation (source: Pedavoli Architects)

Building No.	Description / Function	Building No.	Description / Function
A	Administration	J	Classroom
B	Classroom / Hall	K	Practical Activities
C	Toilets	L	Classroom / Programs
D	Classroom and Staff Room	M	Classroom / Stores
E	Library	N	Store
F	Canteen	P	Clinic
G	Toilets	Q	Handwash
H	Classroom	R	Toilet
I	Classroom	DHB	Demountable Teaching Spaces

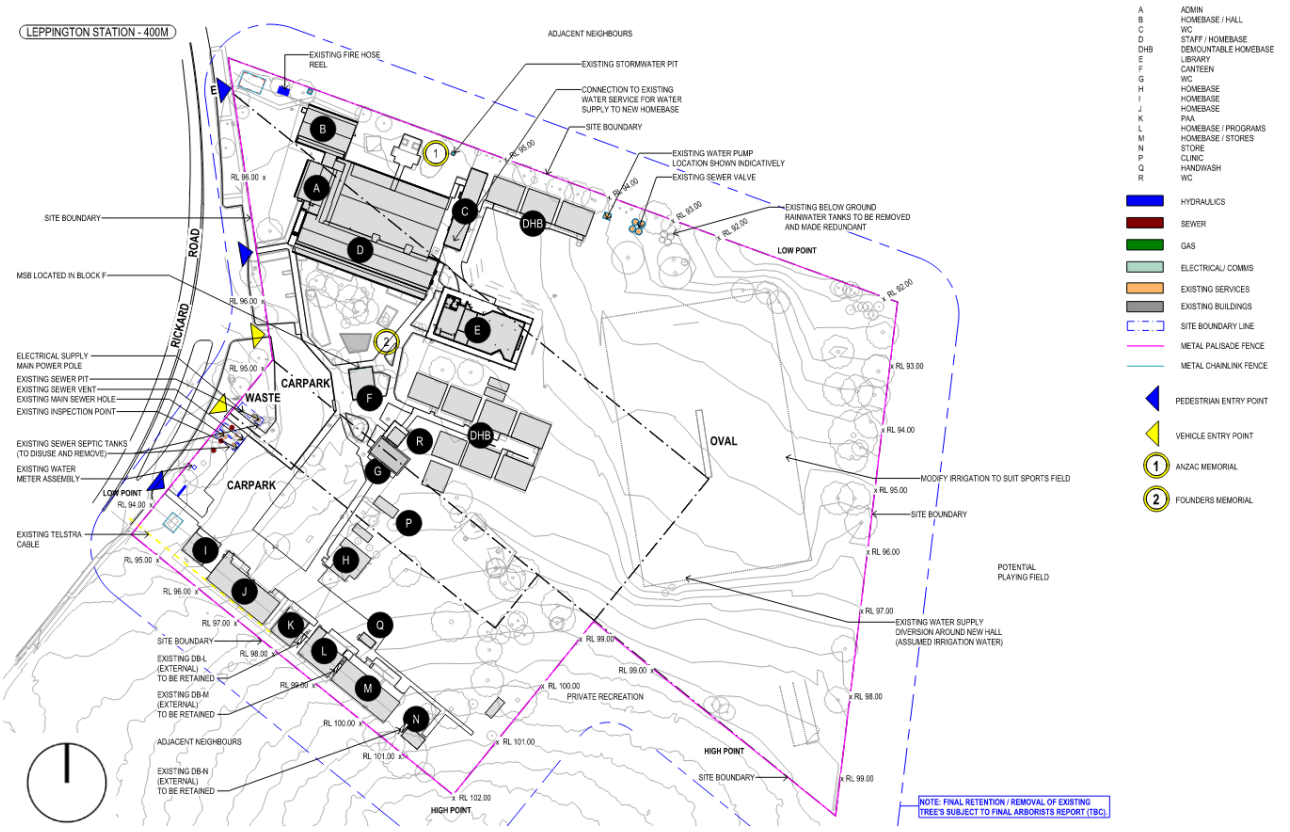


Figure 3: Existing improvements at subject site (Source: Pedavoli Architects)

The following photographs (**Figure 4**– **Figure 11**) were taken by Gyde during a site visit on 27 June 2022. They depict the existing condition of the site and the existing structures. Whilst the site visit was taken some time ago, we have been advised by the project managers that the site conditions have not changed since this time.

Figure 4: Entrance at the west of the site (Source: Gyde)

Figure 5: View of Building G and Building R (Source: Gyde)

Figure 6: View of side of school library (Source: Gyde)

Figure 7: View along the footpath of the demountables at the centre of school (Source: Gyde)

Figure 8: View of sandpit and associated demountables at centre of site (Source: Gyde)

Figure 9: View of school library building (Source: Gyde)

Figure 10: View of school COLA (Source: Gyde)

Figure 11: View of demountables along northern boundary (Source: Gyde)

2.1.2 Site Locality and Context

LPS is located within the SWGA. The SWGA comprises 14 precincts, all of which are being rezoned for urban development purposes to accommodate population growth by providing opportunities for new land uses, buildings and open spaces . An image of regional context of the site is provided below in **Figure 12**.

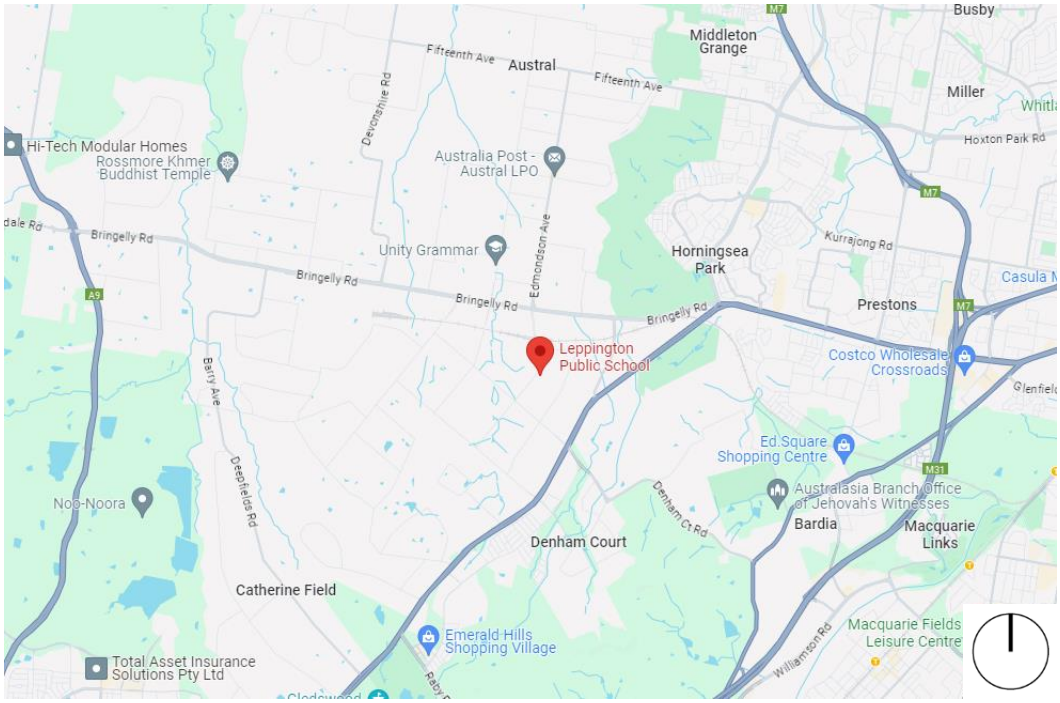


Figure 12: Regional context map, site identified with red marker (Source: Google Maps)

The site is located in the Leppington Town Centre, which is part of the Southwest Priority Land Release Area. The original Precinct Plan was finalised in March 2013, with the associated Development Control Plan (DCP) being finalised in June 2021 and later updated in March 2023.

The Leppington Town Centre Planning Proposal (PP-2023-284) proposes alternative land uses and urban design response to the redevelopment of the Leppington Town Centre which will transform the area from a commercial/industrial precinct, with some pockets of residential development, to a more integrated precinct that offers increased opportunities for commercial, industrial and residential development. The PP also acknowledges LPS, the existing public school, with a more appropriate land use zone nominated (being SP2 Infrastructure (Educational Establishment)) and proposes that the site be part of an educational precinct, with parklands and new roads surrounding the site. The site forms part of the educational precinct alongside the future proposed Leppington High School, to the south of LPS. An excerpt of the draft ILP is provided below in **Figure 13**. The site is identified by yellow, with the future high school identified by red hatching.

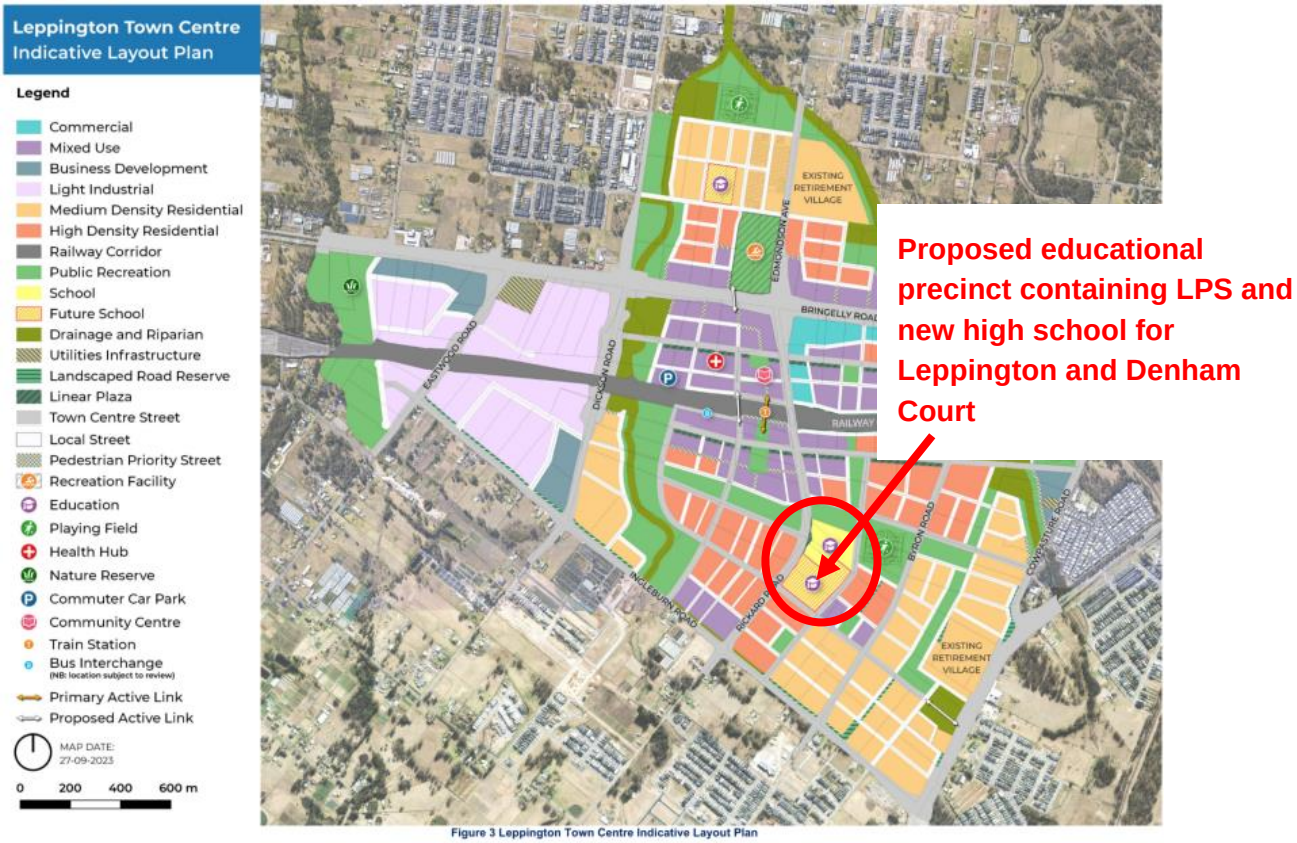


Figure 3 Leppington Town Centre Indicative Layout Plan

Figure 13: Draft Leppington Town Centre Indicative Layout Plan (source: NSW DPHI)

In December 2024, the PP became a State Assessed Rezoning Project (SARP) and is being assessed by DPHI rather than Camden Council.

2.1.3 Topography

The site's topography is undulating and falls towards Byron Road at the northeast. The lowest point of the site with a relative level (RL) of 91.1 is located at the northern boundary adjacent to the oval. The highest point of the site is at the south-eastern corner with an RL of 101.85. The change in levels across the site varies about 10m. A Survey Plan accompanies this REF at **Appendix 3**.

2.1.4 Heritage

With reference to the Statement of Heritage Impact (SoHI) in **Appendix 4**, local heritage listed buildings are located along the south boundary of the site and are of historical significance. Building H (as shown on the Architectural Drawings in **Appendix 2**) is the original 'Raby Public School' building which was established in 1922 and officially opened in 1923. The first school building served the initial 28 students enrolled. The building was extended in 1942 to accommodate a larger number of students and further buildings were built between 1950 and 1970. The school was officially renamed in 1955 to 'Leppington Public School'.

Figure 14: View of Building H (heritage listed; Raby Public School), the first school building (Source: Gyde)

Figure 15: View of Building L and Building Q (Source: Gyde)

Under the Precincts SEPP, the southern part of the site is mapped and described as a local heritage item (item no. 9). Further, as LPS is a government owned and managed asset, it is listed on the department's Section 170 (s.170) heritage and conservation register. The s.170 register specifically relates to Buildings H, I, J, K, L and M (in **Appendix 2**). The register also identifies the curtilage of the heritage items, which indicates the original school site (refer to **Figure 17**).

Figure 16: Locally listed heritage item in southern part of the site (Source: NSW Planning Portal)

Figure 17: Heritage curtilage identified in shading (Source: EMM)

2.1.5 Transport and Accessibility

A description of the existing transport and accessibility infrastructure is provided in **Appendix 5** in the Transport Impact Assessment.

Surrounding Road Network

The site is only accessible from Rickard Road. Rickard Road is currently a dual carriageway, with parking permitted on both its western and eastern sides.

No other roads bound the site.

Vehicular and Pedestrian Access

There are five access points from the Rickard Road boundary onto the site. Three pedestrian access points are located at the north, centre and south and one vehicular access point is located near the centre of the boundary on Rickard Road. There is also a kiss and drop facility on the Rickard Road boundary. **Figure 18** details the transport and access features of the site.

Emergency vehicle, loading zone and waste truck access is located adjacent to the on-site staff parking.

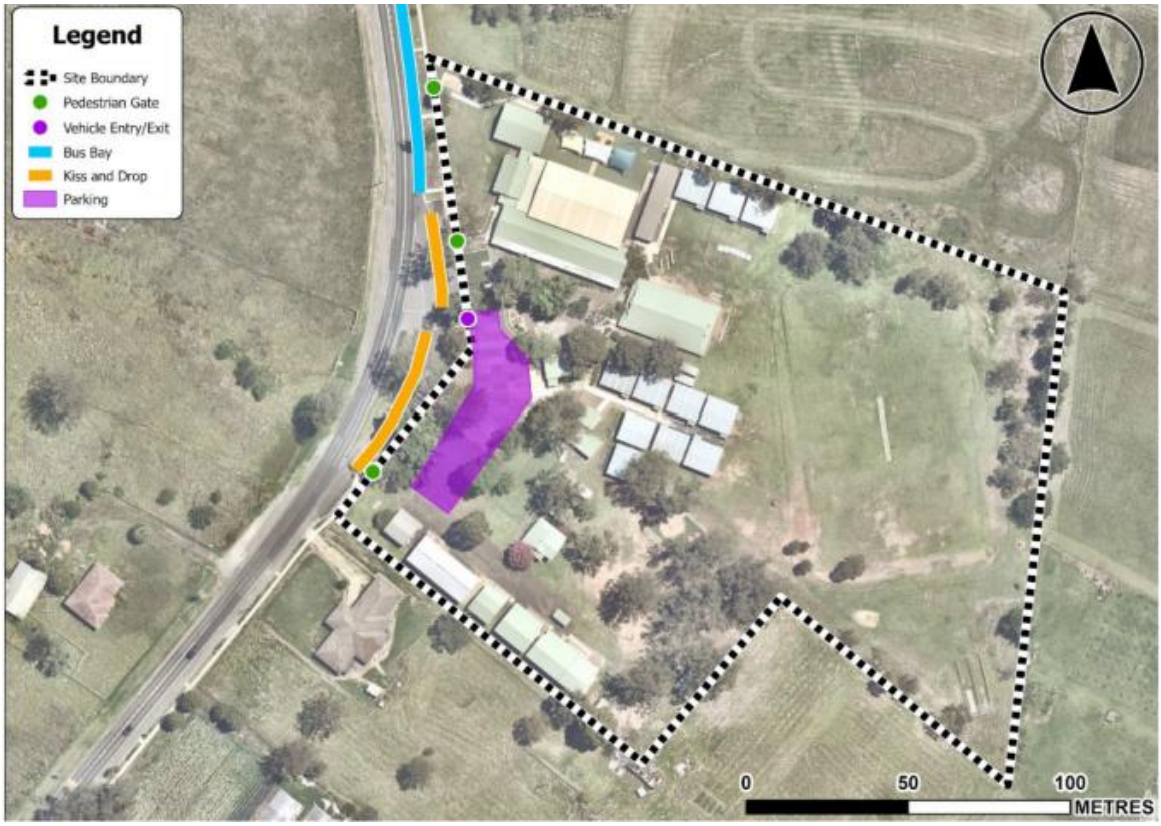


Figure 18: Transport and access options (source: Stantec)

On-Site Parking

There are currently 34 on-site parking spaces for staff. No on-site parking is allocated to students or visitors. Visitors can use the kiss and drop facility, outside of the hours of its usage.

Kiss and Drop

A kiss and drop facility is located along the western boundary of the site, on the eastern side of Rickard Road. There are currently 12 parking spaces available for kiss and drop within two sections, separated by the entry to the staff parking area.

Walking and Bicycle Access

The existing footpath infrastructure to access the site is limited, with only one footpath available on the eastern side of Rickard Road. The footpath connects the site with the Leppington Train Station to the north and to Neptune Road to the south, which provides access to Leppington Village and new residential neighbourhoods.

Public Transport

The site is currently serviced by both school buses and public buses. There are two school buses and three public buses servicing the school in the morning, and four school buses and three public buses in the afternoon.

There is an existing bus stop on the western side of Rickard Road which primarily services morning drop-offs for the students. Another bus stop is located on the eastern side of Rickard Road, to the north of the kiss and drop zone, which mainly facilitates afternoon services.

The existing bus routes include:

Table 2: Bus routes that service the subject site (Source: Stantec)

Bus Number	Type of Bus	Route	Time
841	Public	Leppington to Narellan via Gregory Hills	AM & PM
858	Public	Oran Park Town Centre to Leppington	AM & PM
861	Public	Denham Court to Carnes Hill via Austral	AM & PM
1020	School	Catherine Fields to Carnes Hill Marketplace	AM
1025	School	Leppington (South) to Leppington PS and Carnes Hill	AM
2028	School	John Edmondson HS to Leppington	PM
2032	School	Good Shepherd PS to Bringelly & Kelvin Park	PM
2044	School	Leppington PS to Ridge Square & Narellan	PM
2051	School	John Edmondson HS to Rossmore & Leppington	PM

The site is within an 800m walking catchment to the Leppington Train Station.

2.1.6 Trees and Vegetation

The site is heavily vegetated on the western, south-eastern and northern/north-western boundaries. These areas comprise both recently planted species (a combination of native and exotic species), together with species of significant biodiversity comprising Cumberland Plain Woodland which will be protected, retained and extended along the southern boundary. The accompanying Arboricultural Impact Assessment Report, in **Appendix 6**, has identified and assessed a total of 119 trees, with 107 trees being located in the site, eight trees immediately adjoining the boundary of the site and four trees on the southern boundary.

An analysis of the existing trees has been prepared as part of the Landscape Design (in **Appendix 7**). The drawing below shows the location of the trees proposed to be retained and those proposed to be removed is illustrated below in **Figure 19**. 24 trees (nine high significance trees, 11 are medium significance trees and four are low significance trees) are proposed to be removed to accommodate the activity, with seven replacement trees being included near the new Yarning Circle. These replacement species have been selected from the Cumberland Shale Woodland ecological community and will strengthen the Connection with Country principles and restore biodiversity on the site.

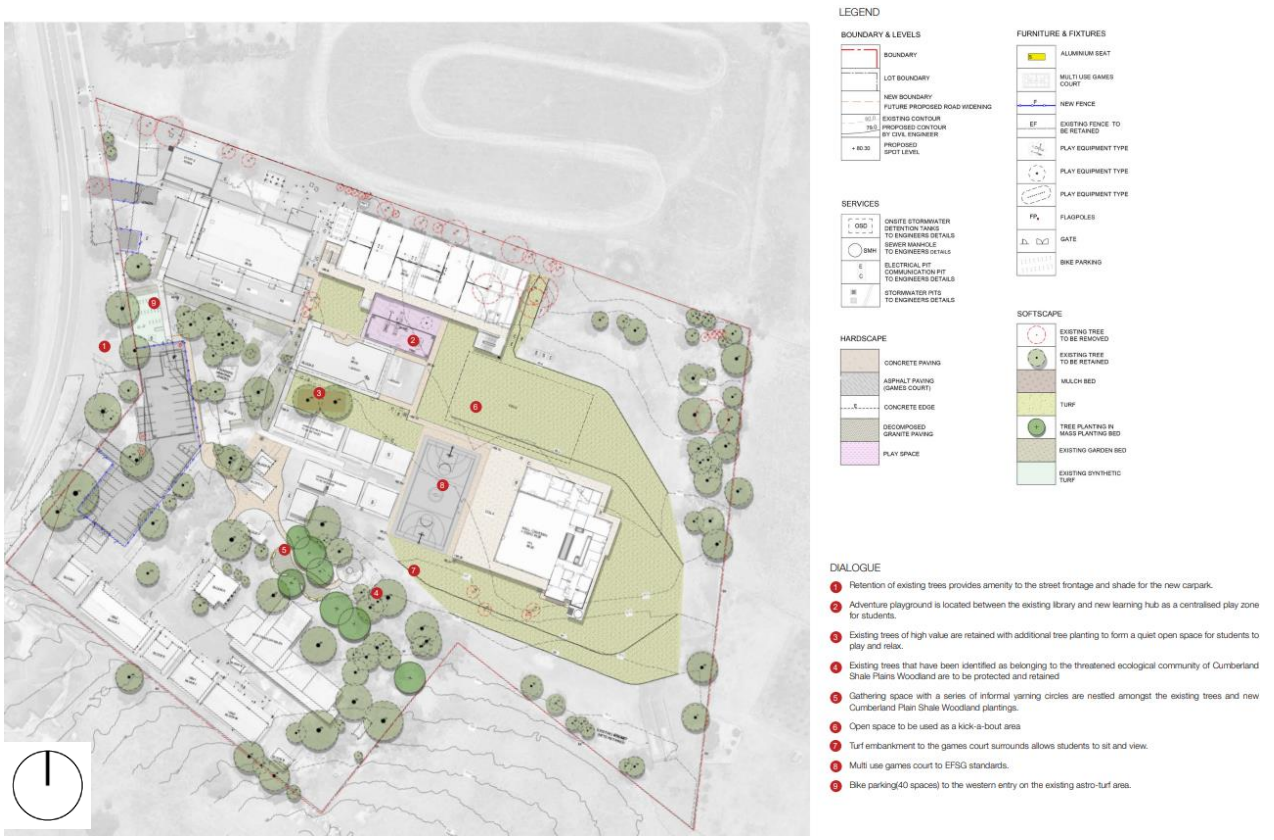


Figure 19: Landscape: Tree retention / removal plan (Source: Taylor Brammer)

2.1.7 Ecology

The Biodiversity Assessment Report (in **Appendix 8**) confirms that the site is located within the Sydney Basin Bio Region, IBRA sub-region Cumberland.

The site is located in the SWGA which received Biodiversity Certification under the former *State Environmental Planning Policy (Sydney Region Growth Centres) 2006* (the provisions have been transferred to the Precinct SEPP). The Order was made under Section 126G(1) of the *Threatened Species Conservation Act 1995* by the Minister Assisting the Minister for Climate Change, Environment and Water (Environment), Verity Firth M.P., and took effect on the 11 December 2007. This certification allows development in certified areas to proceed without further biodiversity assessment, provided the agreed conservation outcomes are undertaken.

The site is mapped as containing Cumberland Plain Woodland (Plant Community Type 3320), which is listed as critically endangered under the BC Act 2016. It is also listed as a Threatened Ecological Community under the EPBC Act, with any impacts to the species requiring a potential referral to the Commonwealth for assessment.

The activity seeks to retain the Cumberland Plain Woodland species and ensures the new building works are located away from these species so as to avoid any impact.

Given the highly modified nature of the site, no threatened fauna species were observed during the site inspection. Further, the majority of the trees inspected have a diameter at breast height of less than 50cm and a height of less than 15m, which have limited development of hollows that could be used by native fauna.

Figure 20: Site vegetation survey outcomes (Source: ERM)

2.1.8 Geotechnical

Geology

From a desktop review of the geological conditions, which can be found in the Intrusive Geotechnical Investigation Report in **Appendix 9**, the site is likely to comprise:

- Bringelly Shale bedrock that belongs to the Wianamatta Group of rocks, and includes shale, carbonaceous claystone, laminate, fine to medium grained lithic sandstone and rare coal; and
- Blacktown Group landscape which includes gently undulating rises on Wianamatta Group shales, with local relief to 30m, ground slope of less than 5% and broad rounded crests. The sub-surface soil is likely to be up to 3m thick, moderately reactive, highly plastic and has poor drainage.

Soil Salinity

The site is likely to have moderately to high salinity which may exhibit erosion. Saline soils may also be encountered.

Groundwater

There are no groundwater bores within 500m of the site. It is likely that the groundwater levels vary in depth between 3m and 5m from the existing ground surface. However, fluctuations in the level of groundwater may occur in rainfall events and result in localised flooding.

Acid Sulfate Soils

No acid sulfate soil materials were discovered at the site as the ground surface elevation (RL 90.0m AHD) is higher than areas known to be affected by acid sulfate soil.

2.1.9 Contamination

A Detailed Site Investigation (DSI) in **Appendix 10** identifies five potential areas of environmental concern (AEC) and one potential contamination source associated with the AECs. **Figure 21** shows an aerial view of the areas of environmental concern whilst **Table 3** details the likelihood of contaminants and contaminants of potential concern.

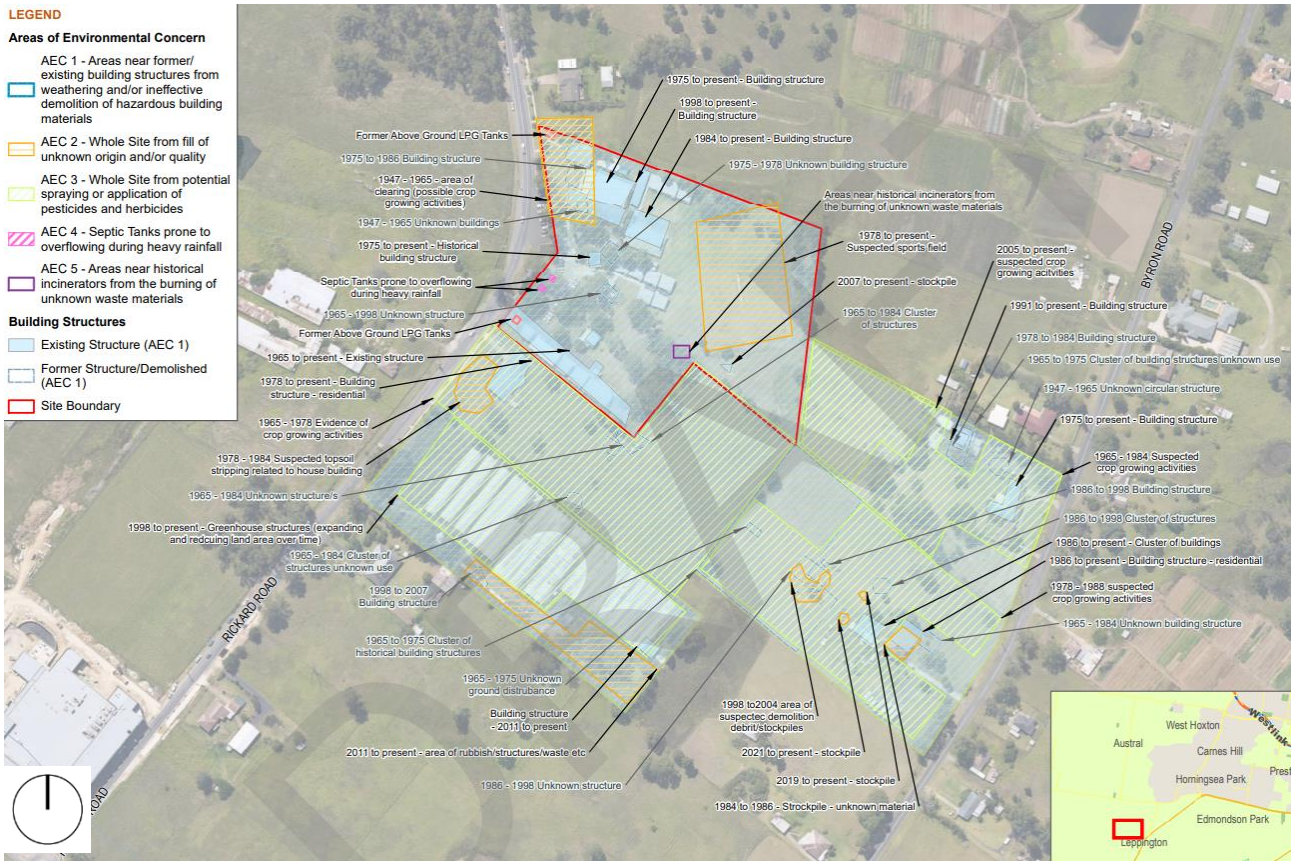


Figure 21: Map of the areas of environmental concern (Source: SMEC)

These areas include:

Table 3: Potential Areas of Environmental Concern (Source: SMEC)

AEC No.	Potential AEC	Likelihood of Contamination	Contaminants of potential concern (CoPC)	Comment
Potential Areas of Environmental Concern				
1	Areas near former/existing building structures from weathering and/or ineffective demolition of hazardous building materials including unknown rubbish materials to the south of the greenhouse structures and in the crawl spaces beneath some structures.	Moderate	Asbestos Lead (from lead-based paints) Zinc (from weathering of galvanised iron)	Records show hazardous materials including asbestos within existing buildings with demolition waste observed within crawl spaces.
2	Areas of possible filling of unknown origin and/or quality including scattered small stockpiles and areas	Low to moderate	Heavy metals (As, Cd, Cr, Cu, Pb, Hg, Ni, Zn), PAHs, TPH, BTEX, PCB, OCP,	The site generally appears to be at grade with the surrounding

AEC No.	Potential AEC	Likelihood of Contamination	Contaminants of potential concern (CoPC)	Comment
	of unknown rubbish debris.		OPP, asbestos (potentially others depending on source)	natural topography, however, some filling may have occurred to level the site during various construction phases
3	Whole site from potential spraying of pesticides and herbicides and from application of pesticides relate to crop growing activities including crop growing with in on-site greenhouses and also general agricultural activities.	Low to moderate	PAH, OCP, OPP, phenoxy acid herbicides, lead and arsenic	Potential use of pesticides and historical agricultural activities
4	Septic tanks prone to overflowing during heavy rainfall at the eastern portion of the school property	Moderate	Faecal coliforms, nutrients	Interview and anecdotal information confirmed that the septic tanks are prone to overflowing during heavy rainfall
5	Areas near historical incinerators from the burning of unknown waste materials	Low to moderate	PAH, TRH, BTEX, metals (potentially others depending on waste incinerated)	Potential for burnt/buried waste. Location not confirmed
Potential contamination sources associated with above AECs				
6	Contaminants associated with above AECs		Ingestion of potential contaminated soil Direct contact with potentially contaminated soils Migration of contaminated dust/fibres (inhalation) Migration of contaminated run-off Leaching from soils to groundwater	Future users of the site eg students and staff Site workers during future construction works or maintenance activities Off-site residential receptors (from windblown dusts/fibres) On-site and off-site terrestrial ecology eg protected trees On-site and off-site groundwater

More detailed assessment of each of these AECs has been undertaken with mitigation measures included in the report.

2.1.10 Stormwater Discharge

The accompanying Stormwater Management Report (**Appendix 11**) states that the site:

- Is surrounded by developments and roadway. Therefore, no external catchments impact the site;
- Contains pit and pipe infrastructure that discharge the roof waters, via gutters and downpipes, to the inground drainage infrastructure; and
- Discharges stormwater either towards the landscape area at its north, via overland flow, or via pits that direct stormwater towards the existing kerb inlet pit on Rickard Road.

2.1.11 Bushfire

The Bushfire Hazard Assessment in **Appendix 12** states that the site is not designated as Bushfire Prone Land, does not contain any hazardous vegetation and is not impacted by a 30m buffer zone of the Category 2 vegetation (Coastal Valley Grassy Woodland) which is located to the north-west of the site.

The Bushfire Hazard Assessment identifies that the site is located in a semi-rural neighbourhood with not a lot of development in close proximity to the school.

2.1.12 Flooding

The site has been identified in the Upper South Creek Floodplain Risk Management Study and Plan, prepared by Camden Council, and referenced in the Stormwater Management Report (**Appendix 11**). Council's Study indicates that the site is not flood affected by regional / mainstream flooding impacts.

However, there is some localised flooding affecting the eastern side of the existing library building, which results in the playing field on the eastern side of the site being waterlogged. However, the Stormwater Management Report determined that the localised flooding is not a risk in its current condition and on-site detention services will be provided on site to mitigate any impacts.

2.1.13 Site Constraints and Opportunities

Consideration of site constraints has been undertaken through a review of the Section 10.7 (2 & 5) Planning Certificates dated 4 November 2024, mapping under relevant Environmental Planning Instruments (EPIs), and a review of specialist consultant reports and other desktop assessments.

A summary of the identified site constraints has been provided in **Table 4** below, with relevant map extracts at **Appendix 13**.

Table 4: Site Constraints and Opportunities

Consideration	Impacted	Source	Description
Hydrology Flooding	Minor – localised flooding	Stormwater Management Report (**Appendix 11)**	The site is not flood affected in all storm events up to and including the PMF event, as identified in the Upper South Creek Floodplain Risk Management Study and Plan. It is however affected by localised flooding to the east of the existing library which leaves the playing field

Consideration	Impacted	Source	Description
			waterlogged.
Drinking Water Catchment	No	Precincts SEPP	The site is not mapped as being within a drinking water catchment.
Topography	N/A	Survey Plan (**Appendix 3)**	The site's topography is undulating and falls towards Byron Road at the northeast. The lowest point of the site is RL of 91.1 at the northern boundary adjacent to the oval. The highest point is at the south-eastern corner with an RL of 101.85. The change in levels across the site varies about 10m.
Easements	No	Survey Plan (**Appendix 3)** and Certificates of Title **(Appendix 14)**	No identified easements. Lot 39C DP 8979 is affected by a covenant. Minor landscaping is proposed for the northern part of this lot to embellish the landscaping in and around the proposed yarning circle. No other works are proposed in the activity for the southern, heritage affected lot.
Aboriginal Cultural Heritage	No	Preliminary Indigenous Heritage Assessment and Impact Report (**Appendix 15**)	The site has no Aboriginal archaeological site records. There is no social or cultural significance that has been identified for the site. An AHIMS search was conducted on 16 October 2024 which did not identify any Aboriginal sites within the school site.
Non-Aboriginal Heritage	Yes	Statement of Heritage Impact (**Appendix 4**)	Part of the site is a locally listed heritage item (item I9 under Precincts SEPP), containing the original Raby School (now known as LPS). The site is also listed on the department's s. 170 Heritage and Conservation Register. The buildings designated as having significant heritage significance are officially listed as B00H, B00I, B00J, B00K, B00L, and B00M.
Acid Sulfate Soils	No	Precincts SEPP Detailed Site Investigation (**Appendix 10**)	The site is not mapped as being affected by Acid Sulfate Soils.
Salinity	Yes	Detailed Site Investigation (**Appendix 10**)	The DSI confirms that the site has saline soil.
Geotechnical Conditions	Yes	Intrusive Geotechnical Investigation Report (**Appendix 9**)	The site comprises topsoil/fill and residual soils underlain by bedrock shale/siltstone. Fill is minor and localised. The depth to bedrock is approximately 2m-5m from existing ground surface.
Groundwater Conditions	No	Intrusive Geotechnical Investigation Report (**Appendix 9**)	Depth to groundwater is more than 6m from existing ground surface under normal conditions.
Bushfire	No	Bushfire Hazard Assessment (**Appendix 12)**	The site is not mapped as bushfire prone land. The buildings are not subject to Planning for Bushfire Protection 2019 or Specification 43 of the NCC.
Site Contamination	Yes	Detailed Site Investigation	Soil conditions are below adopted human health criteria.

Consideration	Impacted	Source	Description
		(**Appendix 10**)	TRH exceeded adopted ecological criteria, although the exceedances are minor. Overflowing existing septic system needs to be rectified. A Hazardous Building Material Management Plan is required to be prepared as a mitigation measure.
Asbestos and Hazardous Materials	Yes	Hazardous Building Materials Survey (**Appendix 16)**	Hazardous materials, including white, brown and blue asbestos were identified on site.
Aviation	No	Precincts SEPP	The site is within an OLS area set for Western Sydney Airport. The applicable OLS is penetrated by structures higher than 225.5m. The proposed activity does not penetrate the OLS.
Vegetation	Yes	Biodiversity Assessment Report (**Appendix 8)** Arboricultural Impact Assessment Report (**Appendix 6**)	Of the 119 trees assessed on and adjacent to the site, 95 have been identified for retention and 24 will require removal. None of the existing trees identified as belonging to the Cumberland Plain Woodland TEC. Of the 24 trees being removed, nine are considered high significance, 11 are medium significance and four are low significance. Seven replacement trees will be planted in the centre of the site, near the new Yarning Circle. These replacement trees have been selected from the Cumberland Shale Woodland ecological community and will have a pot size of 45 litres. The existing trees are a combination of remnant and planted, where the remnant trees are classified as being high significance and forming part of a Critically Endangered Environmental Community, being Cumberland Plains Woodland, and protected under *Biosecurity Act 2015* and under the EPBC Act. These significant trees are to be protected, retained and extended along the southern boundary
Biodiversity	Yes	Register of biodiversity certification orders Biodiversity Assessment Report (**Appendix 8)**	The site is located in the SWGA which received Biodiversity Certification under the former *State Environmental Planning Policy (Sydney Region Growth Centres) 2006* (the provisions have been transferred to the Precincts SEPP). The Order was made under Section 126G(1) of the *Threatened Species Conservation Act 1995* and took effect on the 11 December 2007. This certification allows development in certified areas to proceed without further biodiversity assessment, including the preparation of a Biodiversity Development Assessment Report (BDAR) and/or Species Impact Statement (SIS) is not required for activities conducted in these areas, provided the agreed conservation outcomes are undertaken. Further, as the site is certified, the Biodiversity Offsets Scheme does not apply. As such, there are no additional requirements for offsets for clearing and developing the land. However, all

Consideration	Impacted	Source	Description
			necessary actions have been undertaken to retain and protect existing species of Cumberland Plain Woodland.
Infrastructure – Transport	Yes	Transport Impact Assessment (**Appendix 5**)	Pedestrian infrastructure surrounding the site is limited to a footpath located on the eastern side of Rickard Road. There are no pedestrian crossings on Rickard Road at the site frontage or dedicated cycling infrastructure connected to the site. The school is serviced by four public bus services and two school bus services in the AM period, and three public bus services and four school bus services during the PM period. The site has frontage to the eastern side of Rickard Road which is a local road bounded by Bringelly Road to the north and Heath Road to the south. There is an existing school zone that exists around the adjoining public school, limiting the speed to 40 km/hr.
Infrastructure - Services	Yes	Services Report – Hydraulic Services (**Appendix 17**) Services Report – Electrical Services (**Appendix 18**)	There are no existing Sydney Water sewer mains in the immediate vicinity of the site. The site is serviced by an existing septic system. The septic tank is proposed to be replaced with a new underground tank. There is an existing 250mm Sydney Water water main located on the north-western side of Rickard Road, which supplies the site through an existing 40mm water connection. There are no gas mains in the vicinity of the site. Endeavour Energy supply electricity to the school via an existing overhead service cable.

2.2 Proposed Activity

The proposed activity involves upgrades to the existing LPS, including the following:

- Demolition of existing structures and removal of trees;
- Erection of a new three-storey teaching space along the northern boundary that includes 20 permanent teaching spaces and three support teaching spaces;
- Erection of a new hall and COLA comprising a hall, canteen and OSHC hub towards the eastern boundary of site;

Ancillary to the activity, the department will be undertaking a suite of other minor, low impact site improvements in the on the site. If these works were considered in isolation, they could be classified as exempt development under Chapter 3 of the TI SEPP. Nevertheless, for transparency and to enable a robust assessment, the full scope of these works has been assessed under this REF, including:

- Upgrades to the sports and play facilities.
- Relocation of the yarning circle.
- Upgrades to site services, footpaths, fencing and other associated ancillary works and landscaping.

Some of these activities, including footpaths, fencing, landscaping and natural turf can be delivered under exempt provisions (section 3.39 of the TI SEPP). However, as the works are ancillary to the proposed scope of works, they have been considered as part of the assessment of the Part 5 activity under Chapter 3 of the TI SEPP.

The Architectural Drawings at **Appendix 2** indicate other works that will be undertaken at the site, which fall within exempt development provisions. These works include internal alterations and reconfiguration of existing Buildings B and D, as well as reconfiguration of the existing staff car park. Whilst these works are shown on some of the drawings, they do not form part of this REF and will be undertaken separately to the proposed activity. These works are clearly identified and annotated to indicate that they are ancillary to the activity and shown on the relevant drawings for transparency purposes and will be undertaken separately to the works proposed in this activity. The works have not been included within the scope of the proposed activity as the intention is for these minor works to be undertaken within a shorter timeframe than the site preparation for the overall works in the activity.

Table 5 provides a summary of key aspects of the activity.

Table 5: Summary of the activity

Project Element	Description
Site Area	3.013 ha
Project Name	Leppington Public School Upgrade
Project Summary	Upgrade of an existing government school including partial demolition, new buildings and structures, landscaping, sport and play spaces and associated supporting infrastructure.
Use	Educational establishment
Student and Staff Numbers	Increase from 430 to 621 students. Increase from 22 to 35 staff.
Car Parking and Bicycle Spaces	34 car parking spaces for staff to be retained. 40 bicycle parking spaces are proposed.
Height	The proposed new three-storey building along the northern boundary has a maximum height of 14.033m. The other proposed buildings do not exceed one storey in height.
Play Space	10,450sqm, which exceeds the requirement of 10sqm per student (ie total of 6,210sqm).
Canopy Cover	Existing tree canopy – 3,325sqm Proposed tree canopy at maturity – 3,717sqm

The key features of the proposed activity are shown in **Figure 22** to **Figure 30**.

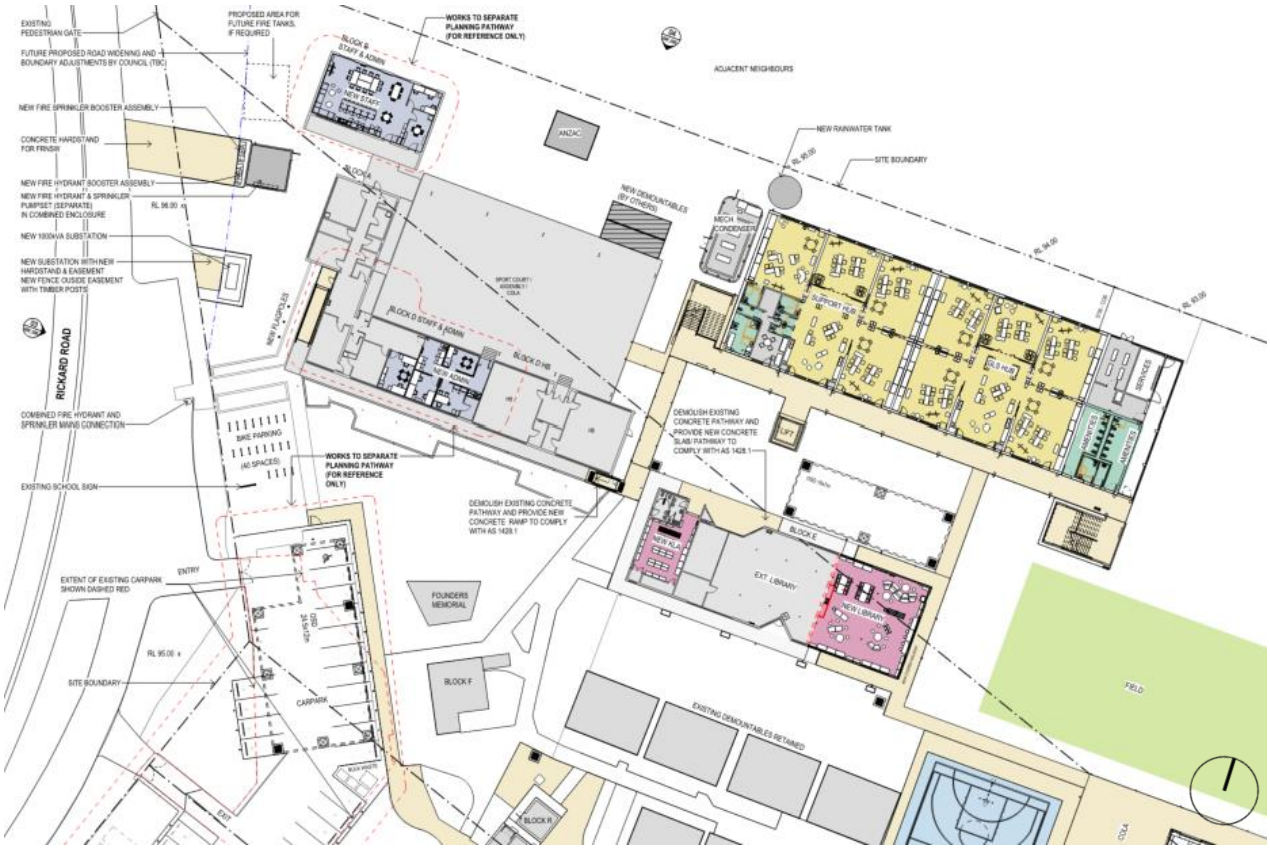


Figure 22: Proposed ground floor plan – northwestern (Source: Pedavoli Architects)

Figure 23: Proposed ground floor plan - eastern (Source: Pedavoli Architects)

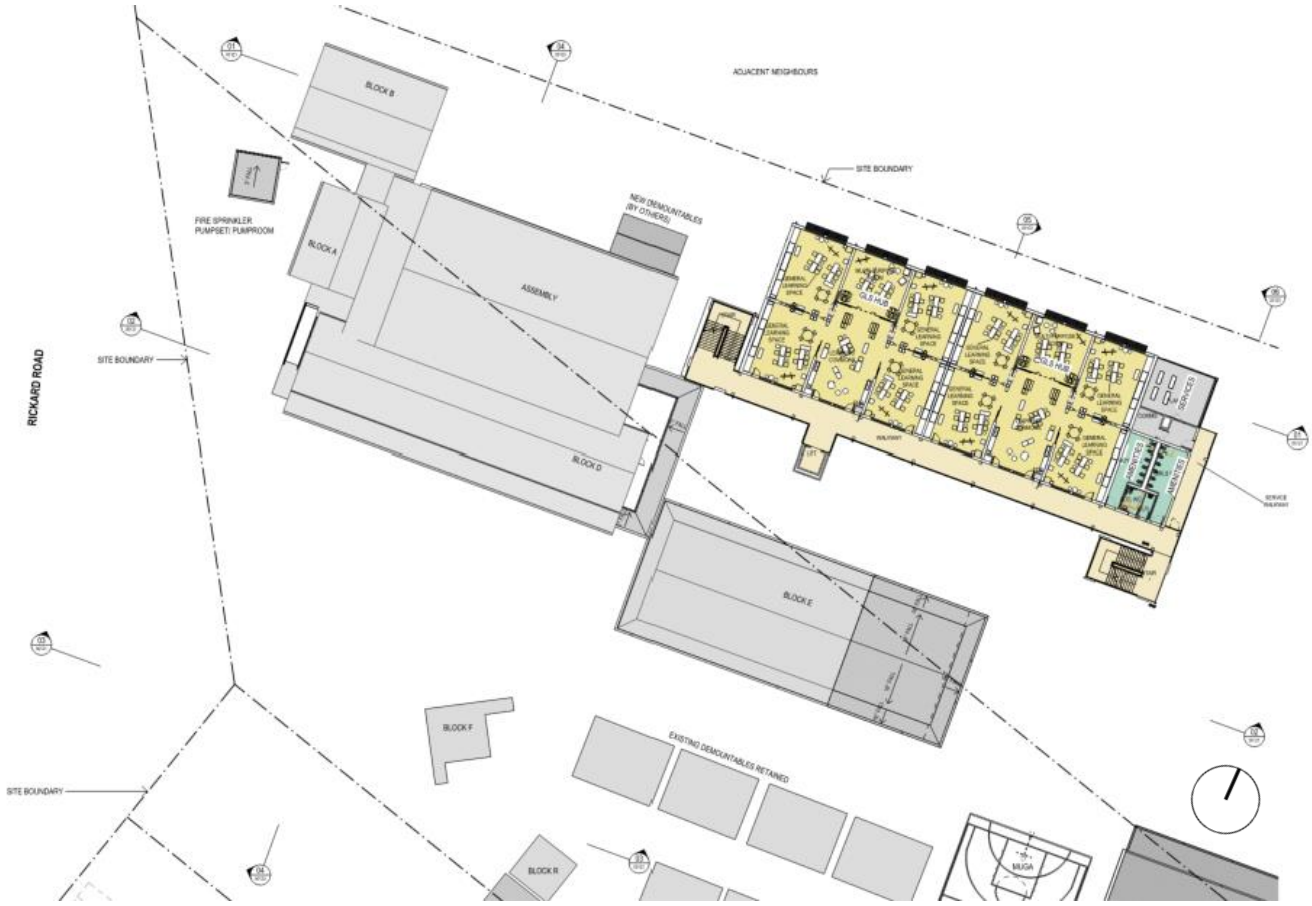


Figure 24: Proposed level 1 floor plan (Source: Pedavoli Architects)

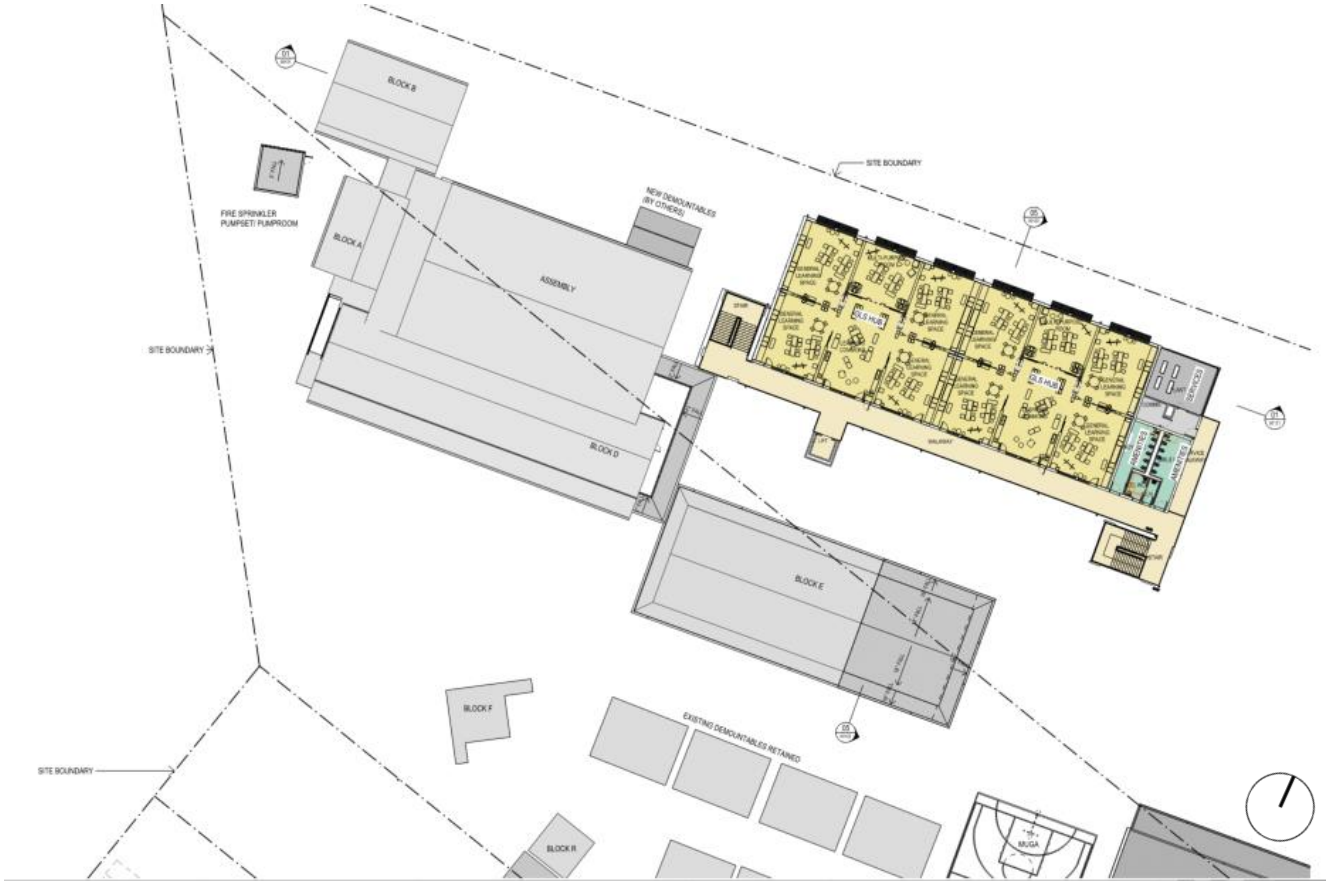


Figure 25: Proposed level 2 floor plan (Source: Pedavoli Architects)

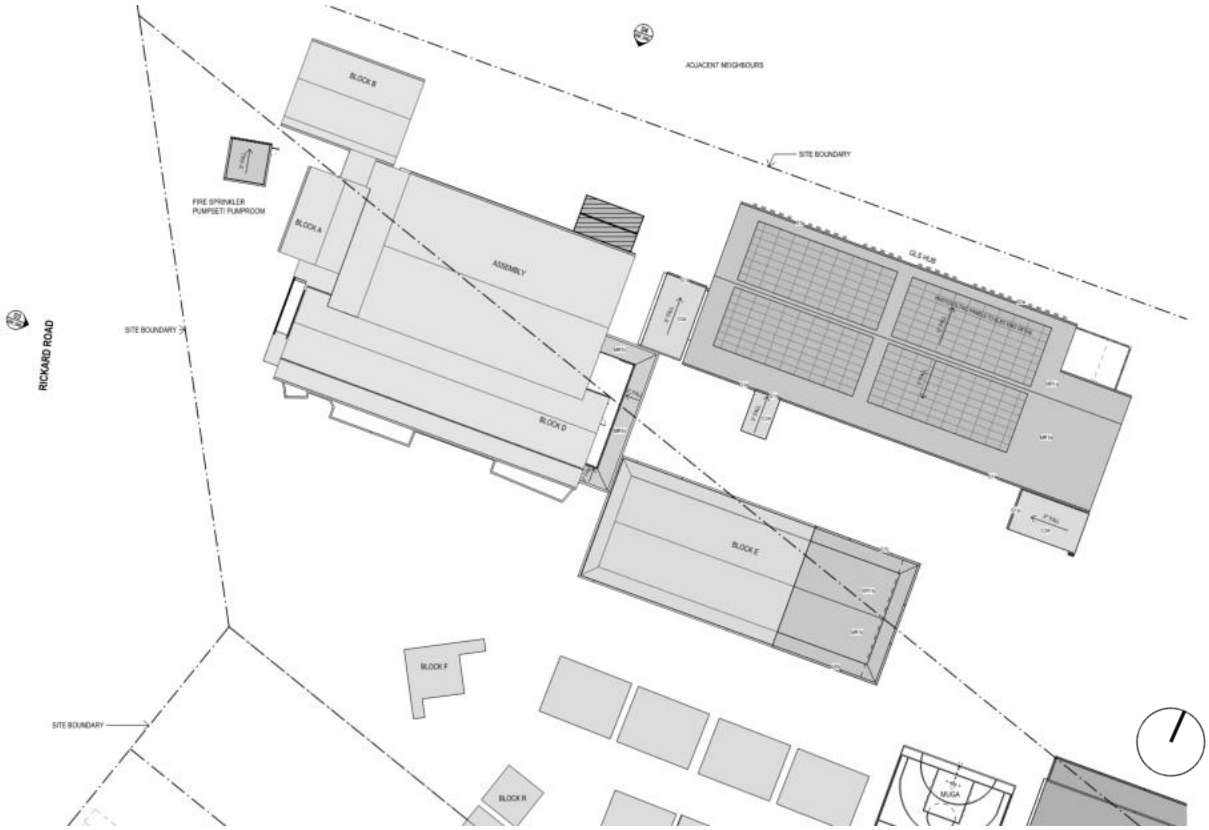


Figure 26: Proposed roof plan – northwestern (Source: Pedavoli Architects)

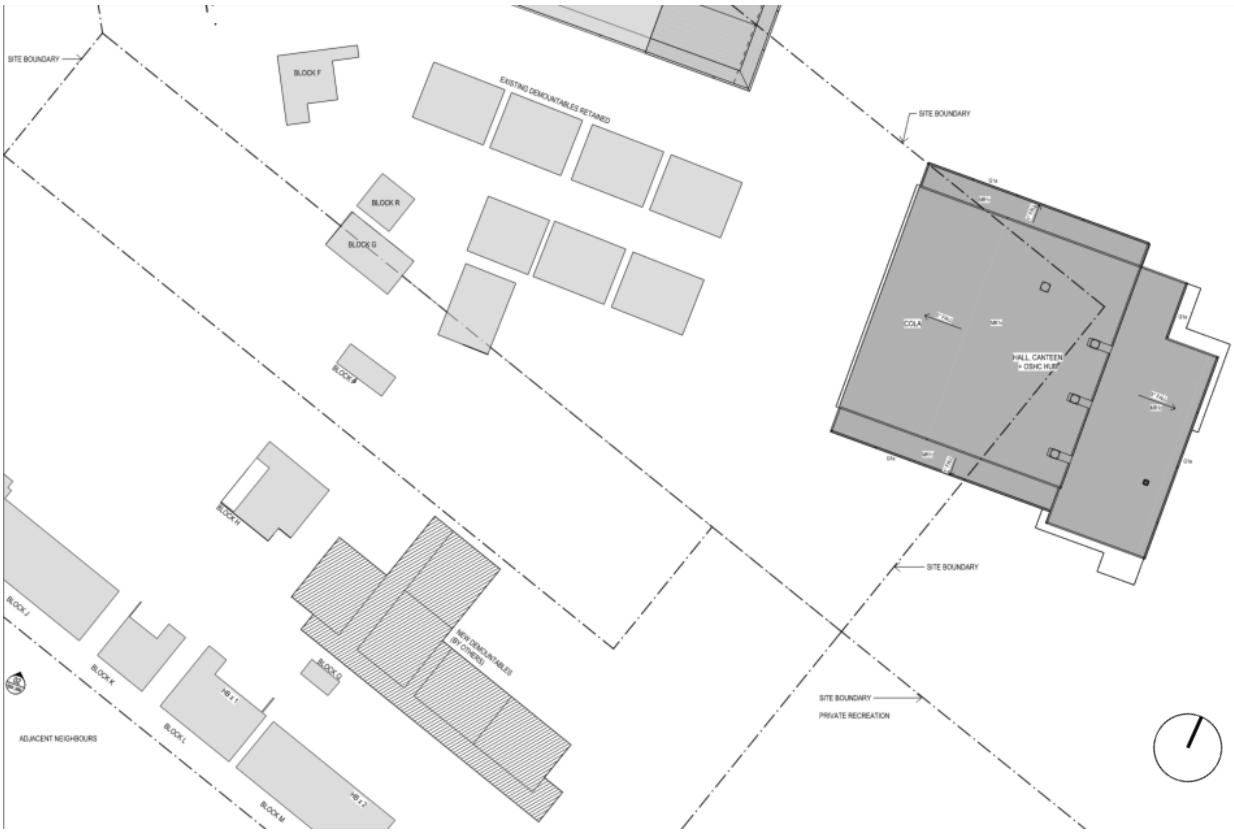


Figure 27: Proposed roof plan – eastern (Source: Pedavoli Architects)

Figure 28: Aerial view of proposed site - looking southeast (Source: Pedavoli Architects)

Figure 29: Aerial view of proposed hall and COLA (Source: Pedavoli Architects)

Figure 30: View of proposed library extension (Source: Pedavoli Architects)

2.2.1 Design development

Background

The design of the activity has been developed following an extensive review process, from master planning (and consideration of a range of options) through to concept design and now into schematic design. The design approach balances authority requirements relevant to site constraints, EFSG requirements and opportunities to connect with Country.

The architects and project team conducted extensive research, engaged with stakeholders, and employed strategic visioning exercises to develop a range of master plan options. These plans incorporated innovative design principles and practical considerations, focusing on site-specific constraints, building codes, and budgetary limitations. Key elements of the planning process included improving site circulation, conserving trees, integrating community-use spaces, creating outdoor learning zones, and accommodating future expansion. By aligning these priorities, the team ensured the master plan balanced immediate functionality with future adaptability.

During the concept design phase, the team advanced a refined plan that optimised the use of existing spaces through phased refurbishments and targeted new construction. This approach minimised disruption while achieving the desired improvements.

New three-storey Learning Hub

The activity includes the erection of a new three-storey building that will facilitate an increased number of teaching spaces at the school. The building will also include an additional support spaces and amenities modules. The building will have a maximum building height of 14.033m. It will be setback 5.75m from the northern boundary.

The building is rectangular in shape with the longer façade facing north and south to improve amenity and accessibility. A small plant room, communications room and master switchboard are located at each level of the building on the north-eastern corner of the site and accessible via the side of the building.

Internally, the building will feature new learning spaces, support facilities, toilet amenities and services. These provisions are proposed across the ground, first and second floor.

The ground floor **(Figure 31**) consists of six general learning spaces, two learning commons, two withdrawal/multipurpose rooms, a support hub/meeting room, toilet facilities including accessible toilets and an adult changing facility for staff.

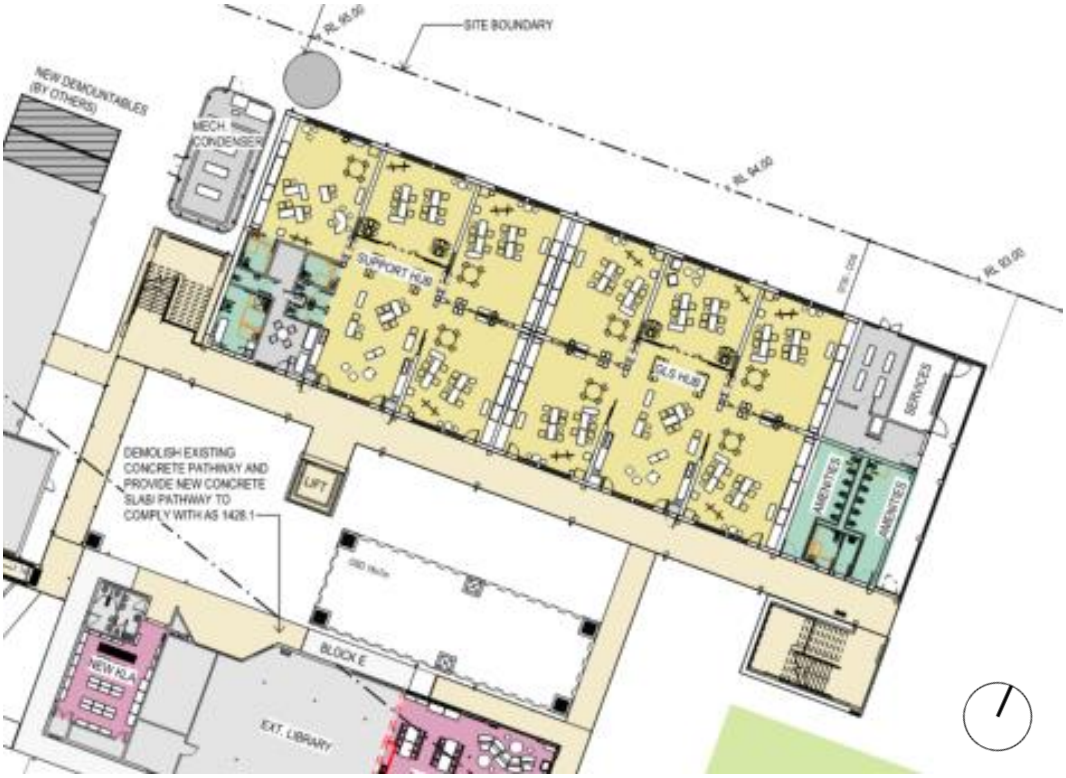


Figure 31: Homebase Ground floor plan (Source: Pedavoli Architects)

Level 1 and 2 (**Figure 32**) each consist of eight general learning spaces, two learning commons, two withdrawal/ multipurpose rooms, plant and communications rooms and toilet facilities.

Figure 32: Homebase Indicative Level 1 and 2 floor plan (Source: Pedavoli Architects)

Externally, the building will feature two semi-enclosed staircases: one at the western side and the other at the eastern. A lift is located on the south-facing aspect at the centre of the building to provide additional access to the building. It is accessible via an undercover walkway. The roof of the building also contains photovoltaic solar panels (refer to **Figure 26**).

Figure 33: North elevation (Source: Pedavoli Architects)

Figure 34: East elevation (Source: Pedavoli Architects)

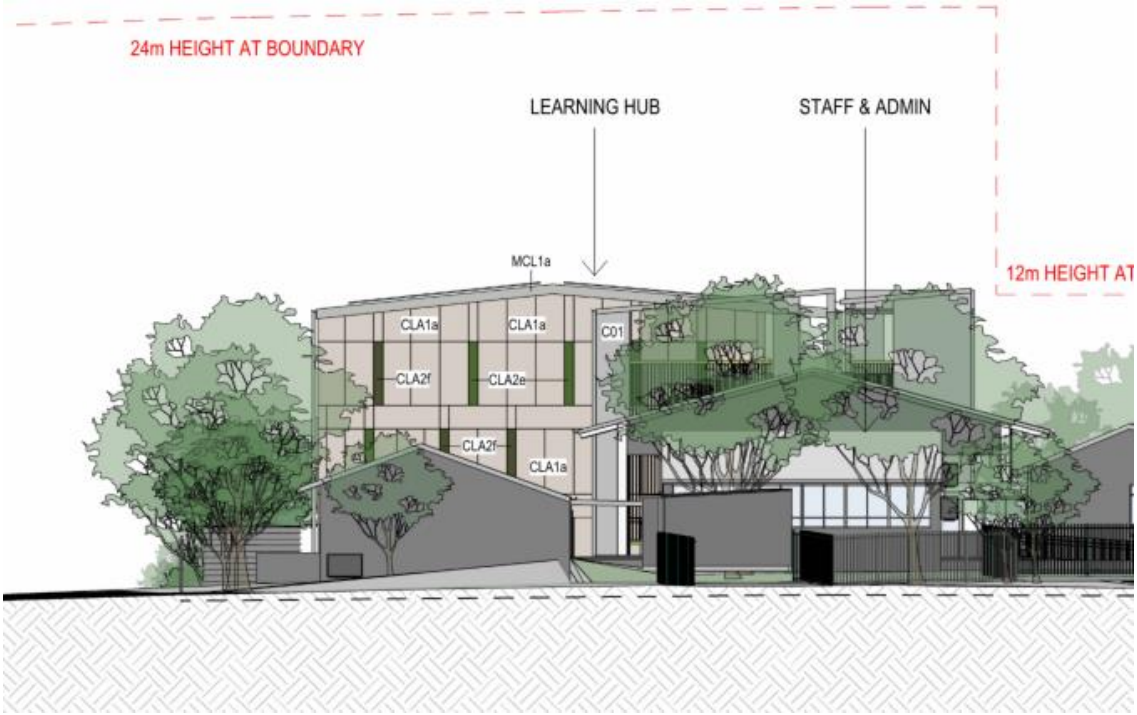


Figure 35: West elevation (Source: Pedavoli Architects)

Figure 36: Composite section looking north (Source: Pedavoli Architects)

New Hall, COLA and Canteen

The design of the new Hall, COLA and Canteen has been influenced by the department's Standard Hub designs. The final design of the new Hall differs from the Standard Hub to ensure that access to/from and orientation of the building responds to the existing site conditions. Toilet facilities and storage areas are located along the eastern part of the Hall.

The COLA is proposed to be located on the western side of the Hall. It provides a visual and physical connection with the playground area. It also provides shade protection to the north facing doors and windows.

The new Canteen and OOSH/OSHC facilities are located on the northern side of the Hall. Both of these facilities can be accessed from both the outside and inside of the Hall, to assist with deliveries and after-hours access. The servery for the Canteen will be located on the western elevation of the building.

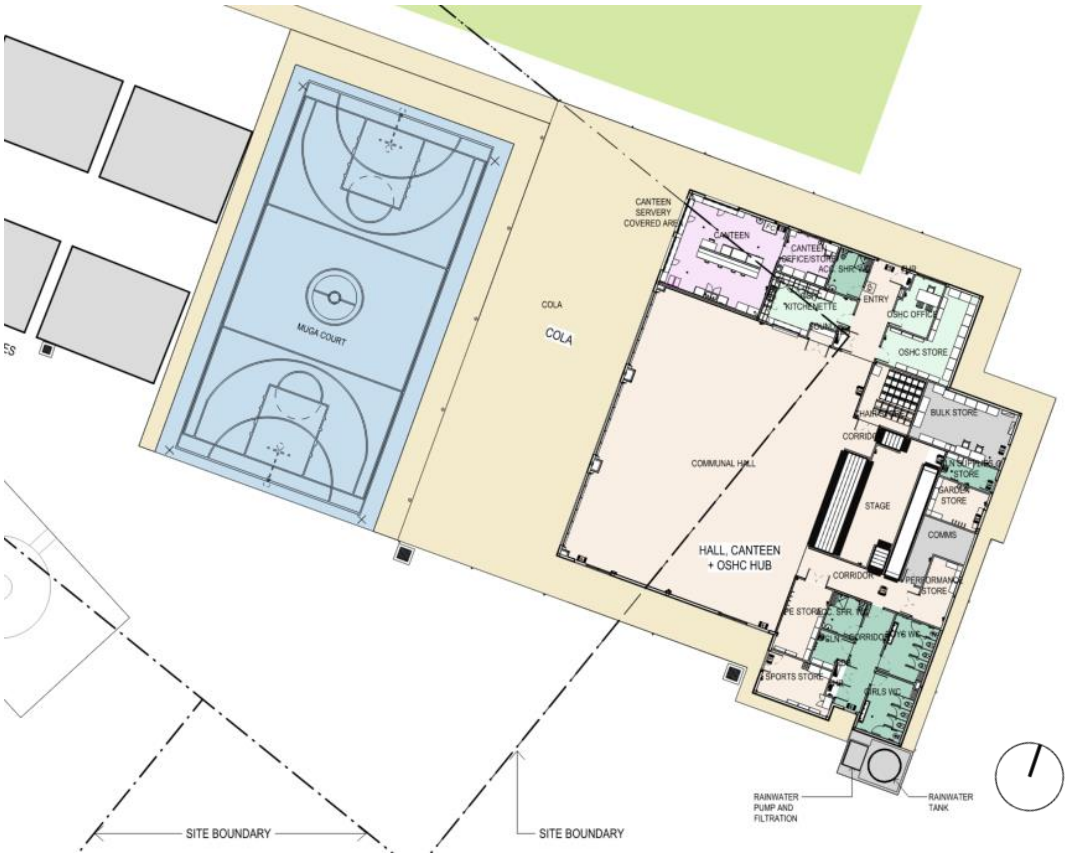


Figure 37: Proposed new Hall, COLA and Canteen (source: Pedavoli Architects)

Extension of existing library

The existing library is a single storey rectangular building with a pitched roof. The building has a gross floor area of approximately 260sqm and is currently being used as the school library, office, storage and communications room. The existing library is annotated on the Architectural Drawings as Block E.

The activity will extend the library to the east and create a larger space.. The works involve the demolition of the eastern wall, columns and windows to facilitate the extension as shown in **Figure 38** below.

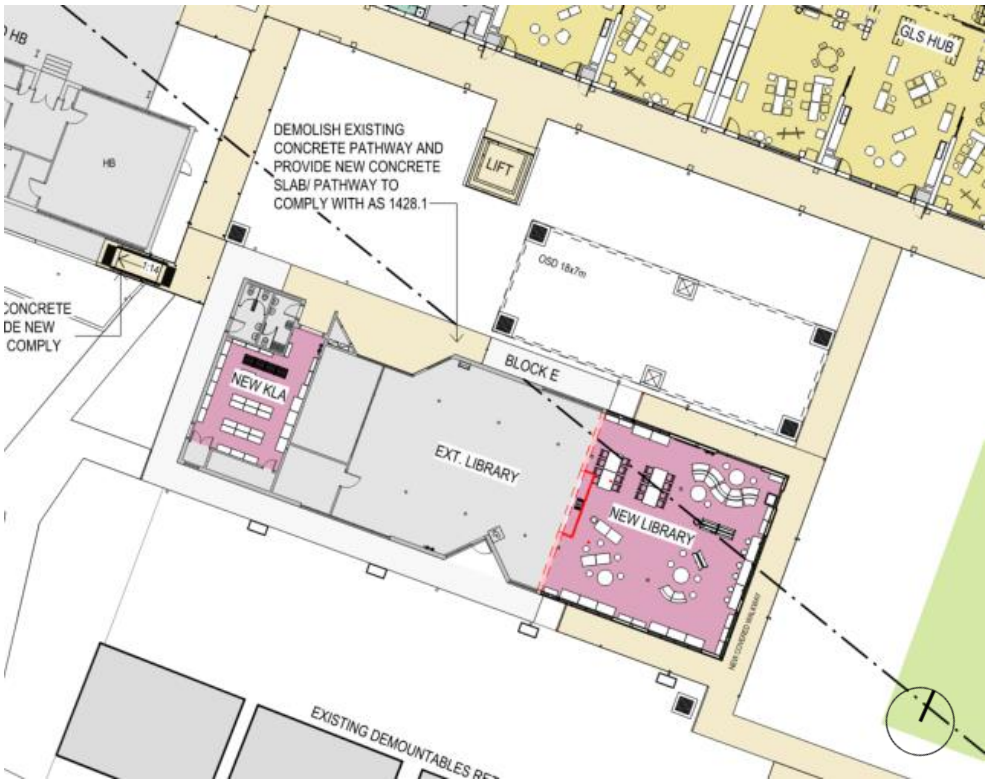


Figure 38: Proposed Extension of Existing Library (Source: Pedavoli Architects)

Upgraded sports field and play facilities

The existing oval is proposed to be relocated northwest, to be located more centrally on the site. This will be supported by a new multi-use games area proposed to be located on the western side of the new hall and COLA. **Figure 39** detail the existing location of the oval and the proposed site layout.

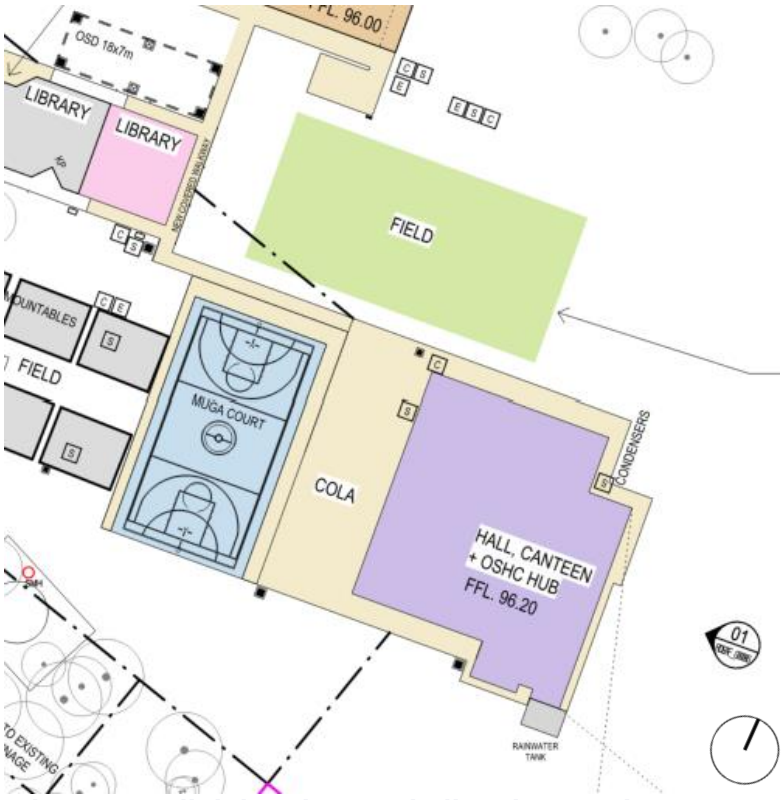


Figure 39: Proposed MUGA, adjoining the new hall and COLA (Source: Pedavoli Architects)

An adventure playground is proposed in between the library and the new learning hub to support the current and future incoming students in a central location. The play area will have rubber softfall paving and play equipment as detailed in the Landscape Plans provided at **Appendix 7**. An excerpt of landscape drawings is provided below to illustrate the location of the adventure playground.

Figure 40: Location of adventure playground (source: Taylor Brammer)

The rationale of the proposed built form responds to the design quality principles in Schedule 8 of the TI SEPP and the associated Design Guide. A summary of the architect's response to Schedule 8 is provided below in **Table 6**. The detailed response is in the Architectural Design Statement in **Appendix 19**.

Table 6: Schedule 8 of the TI SEPP – Response to Design Quality Principles (source: Pedavoli Architects)

Design quality principle	Response
1. Responsive to context *Schools should be designed to respond to and enhance the positive qualities of their surroundings.* *In designing built forms and landscapes, consideration should be given to a Country-centred approach and respond to site conditions such as orientation, topography, natural systems, Aboriginal and European cultural heritage and the impacts of climate change.* *Landscapes should be integrated into the overall design to improve amenity and to help mitigate negative impacts on the streetscape and*	The new three-storey building reflects the desired future land use, bulk and scale of development identified in the Indicative Layout Plan for the Leppington Town Centre. Indigenous heritage of the site will be recognised by including an 'Acknowledgement of Country' statement at the entry to the school. Native vegetation is a key component of the landscape scheme to improve the green setting of the school and mitigating visual impacts of the new buildings on the existing context.

Design quality principle	Response
neighbouring sites.	
2. Sustainable, efficient and resilient *Good school design combines positive environmental, social and economic outcomes and should align with the principles of caring for Country.* *Schools should be designed to be durable and resilient in an evolving climate.* *Schools and their grounds should be designed to minimise the consumption of energy, water and other natural resources and reduce waste.*	Environmentally sustainable development principles have been considered in the orientation, access to natural ventilation and passive thermal design of the new three-storey and hall buildings. Adaptable and flexible learning spaces are a key part of the design, to respond to changing use requirements of the school. Materials have been selected that are long lasting, prefinished to minimise maintenance and safe if students contact the surfaces of the buildings.
3. Accessible and inclusive *School buildings and grounds should be welcoming, easy to navigate and accessible and inclusive for people with differing needs and abilities.* *Schools should be designed to respond to the needs of children of different ages and developmental stages, foster a sense of belonging and seek to reflect the cultural diversity of the student body and community.* *Schools should be designed to enable sharing of facilities with the community and to cater for activities outside of school hours.*	An accessible walkway at the entry is currently provided, and the activity will provide new walkways and a lift in the new three-storey building ensure accessibility for all students, staff and visitors. Appropriate wayfinding signage will be included in the school, that includes and reflects Connecting with Country, ensures legibility. The new hall will provide a multi-purpose space for day-to-day assemblies gathering, performances and sports, and for community events and out-of-school-hours care.
4. Healthy and safe *Good school design should support wellbeing by creating healthy internal and external environments.* *The design should ensure safety and security within the school boundaries, while maintaining a welcoming address and accessible environment.* *In designing schools, consideration should be given to connections, transport networks and safe routes for travel to and from school.*	The existing 2.1m perimeter fencing will be retained to ensure safety of all students. Sightlines and passive surveillance have been considered in the placement and orientation of new buildings. The proposed activity will also support and encourage health and wellbeing through the provision of new playgrounds and sports fields to encourage active movement for all the students.
5. Functional and comfortable *Schools should have comfortable and engaging spaces that are accessible for a wide range of formal and informal educational and community activities.* *In designing schools, consideration should be given to the amenity of adjacent development, access to sunlight, natural ventilation, proximity to vegetation and landscape, outlook and visual and acoustic privacy.* *Schools should include appropriate indoor and outdoor learning and play spaces, access to services and adequate storage.*	The new buildings are designed to ensure access to natural light, ventilation and good acoustics. General learning spaces have outlooks to natural landscaped areas. Outdoor and indoor learning spaces are diverse to facilitate a range of flexible learning options. The minimum play space requirements of 10sqm per student are achieved in the proposed design. The latest ICT/AV equipment will be installed to support contemporary learning practices.
6. Flexible and adaptable *In designing schools, consideration should be given to future needs and take a long-term approach that is informed by site-wide strategic and spatial*	The proposed grid layout of the new three-storey building ensures flexibility and adaptability to respond to future needs of the school. Common learning spaces and the extension to the

Design quality principle	Response
planning. *Good design for schools should deliver high environmental performance and ease of adaptation and maximise multi-use facilities.* *Schools should be adaptable to evolving teaching methods, future growth and changes in climate, and should minimise the environmental impact of the school across its life cycle.*	library provide alternative learning opportunities and options for varying group sizes and learning styles. The new hall building will be fitted with large doors that can be opened to facilitate community events and school meetings, becoming an asset for both the school and wider community.
7. Visual appeal *School buildings and their landscape settings should be aesthetically pleasing by achieving good proportions and a balanced composition of built and natural elements.* *Schools should be designed to respond to and have a positive impact on streetscape amenity and the quality and character of the neighbourhood.* *The identity and street presence of schools should respond to the existing or desired future character of their locations.* *The design of schools should reflect the school's civic role and community significance.*	The external design of the new three-storey building will create a balanced and regular rhythm through the placement of cladding joints and pops of colour. The colour palette is neutral and consistent with the school's natural setting.

Connecting with Country

The design documentation accompanying this REF provides details regarding First Nations engagement throughout the design development process.

A Walk on Country occurred on 27 June 2022 and enabled representatives from the Dharug people to inform key aspects of the design and how it connects with Country. Key components of the architectural and landscape design that have been informed by Connecting with Country include:

- Meeting spaces –a new yarning circle to encourage the exchange of knowledge and learning, in particular about the environment.
- Welcome – installing an 'Acknowledgment of Country' statement at the entrance of the school either through text in a unique sign or a more sculptural element. This statement indicates an awareness of and respect for the Traditional Custodians of the land.
- Curved pathway – acknowledging that Aboriginal people, when traversing through the environment, do not walk in straight lines, but rather meander to their destination.

Further, wayfinding and signage proposed for the school will also offer opportunities to use symbols, illustrations, colour, imagery and names to reflect the environment and Indigenous history of the land.

Sustainability and Climate Change

The proposed measures in the Sustainable Development Plan (**Appendix 20**) reflects a comprehensive approach to environmental responsibility, addressing key principles and aligning with regulatory standards. The project is targeting 5 Star Green Star Design.

The following key strategies are identified in the ESD report as being adopted within the proposed design, ensuring a sustainable outcome including:

Construction Waste Management Plan

- The Construction and Demolition Waste Management Plan (**Appendix 21**) provides strategies to:
    - Minimise waste generation,
    - Maximise reuse, recycling and reprocessing,
    - Reduce volume of materials for landfill
    - Reuse cut and excavation materials for backfilling or for grading purposes.

Heating, Cooling and Ventilation Systems

- Designing air conditioning and ventilation systems to exceed the NCC 2022 Section J Energy Efficiency Part J6 requirements.
- Installing a high-efficiency air-cooled heat rejection system to minimise energy consumption by ensuring the schedule and setpoints are appropriate to the intended operation of the buildings.
- Designing ductwork systems to minimise system pressure losses to reduce power required by fan motors.

Lighting

- Using LED fittings to minimise energy consumption and optimise lighting efficiency.
- Capitalising on access to natural daylight.

Domestic hot water

- Using heat pump-based technology to generate hot water efficiently.

Building Envelope Performance

- Using thermal breaks within the walls, floors and roofs to ensure a continuous thermal barrier to reduce flow of thermal energy between conductive materials.

Building Fabric

- Installing insulation for the buildings' walls and roof/ceilings to reduce heat loss during winter and heat gain in summer.

Shading and Daylighting

- Ensuring passive solar heating, to gain heat in winter and lose heat in summer, by installing appropriate external shading devise in the form of eaves.

Photovoltaics

- Installing roof mounted photovoltaic system that covers at least 20% of the roof area of a building to reduce the building's grid electricity consumption and greenhouse gas emissions

Electricity Metering and Monitoring

- Monitoring and managing electricity consumption by installing sub-meters to monitor and record energy data.

Fittings and Fixtures

- Installing water efficient fixtures and fittings in the bathrooms and kitchens, and any relevant lab areas.

Rainwater Collection and Reuse

- Capturing rainwater through the installation of rainwater tanks.

Water Sensitive Urban Design

- Implementing a Stormwater Management Plan (in **Appendix 11**) to manage stormwater runoff and reduce demand for landscape irrigation.

Landscaping

Relocation of the Yarning Circle

The Yarning Circle is proposed to be relocated from the northern boundary of the site to a more central location (refer to **Figure 41**). The gathering space will have a series of informal yarning circles to encourage Connecting to Country.

Anzac Memorial

The 2016 ANZAC memorial located behind Building D, will be carefully dismantled, stored and reinstated as part of the activity. This item holds significance and importance to the school history.

Landscape Scheme

Figure 41: New location of Yarning Circle (Source: Taylor Brammer)

A detailed landscape scheme (in **Figure 42** and **Appendix 7**) illustrate the following key features:

- A total of seven new trees shrubs are to be planted on site
- Existing high value trees are to be retained and integrated into the site upgrades
- Retention of existing trees provides amenity to the street frontage and shading for carpark
- Existing trees of high value will be retained with additional tree planting to form open spaces for students to play (marked as 3)

- Existing trees that have been identified as belonging to the Cumberland Plain Woodland will be protected, retained and extended along the southern boundary (marked as 4 and 12)
- New bicycle parking will be provided along the Rickard Road boundary (marked as 13).

Figure 42: Proposed landscape plan (Source: Taylor Brammer)

Access and Parking

The activity involves the following access and parking arrangements:

Pedestrian and cyclist access

Both pedestrian and cyclist access will remain from the three existing entry points from Rickard Road, as shown in **Figure 43**.

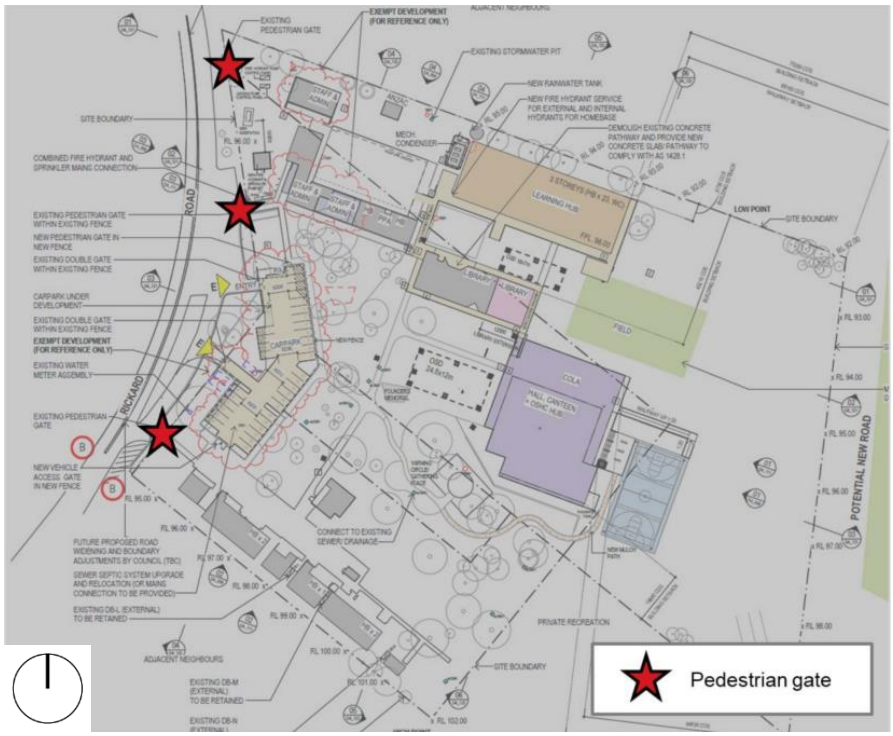


Figure 43: Existing pedestrian and cyclist access points (source: Stantec)

Bicycle parking spaces will be provided immediately north of the existing staff car park. A total 40 spaces will be provided for the students and staff.

The existing footpath along Rickard Road will be the main pedestrian and cyclist thoroughfare to connect students to LPS.

Car parking

The existing staff car park comprises 34 parking spaces. Although there will be an increase in the number of staff at LPS, increasing from 22 to 35, the number of on-site car parking spaces will be retained. Vehicular access to the car park will remain from Rickard Road.

As a separate scope of works, under exempt development provisions, the existing car park will be reconfigured to improve access in and around the car park. These works do not fall within the scope of this activity.

Kiss and Drop

The existing kiss and drop facility will remain in its current location and retain the 12 parking spaces along the western boundary of the school, on Rickard Road.

The accompanying Transport Impact Assessment in **Appendix 5** includes as a mitigation measure the staggering of bell times for the existing primary school, and again between the primary school and the future high school to the south, as a mitigation measure to address the current congestion and queuing distances resulting from the existing kiss and drop facility.

Emergency vehicles, deliveries and waste management

Emergency, delivery and waste management vehicle access is proposed to remain constant, with these vehicles accessing the school via the driveway for the staff car park. All deliveries and waste collection are currently, and in the future, will occur outside of the start and end of the day, to avoid congestion with staff and parents accessing the parking facilities at the western boundary of the school.

2.2.2 Construction

Construction hours will be as follows:

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

A Preliminary Construction Transport Management Plan has been prepared and provided within the Transport Impact Assessment at **Appendix 5**.

The activity will be carried out in two construction sequences:

- The learning hub building slab and sub-structure (Crown Certificate 1)
- The remaining works (Crown Certificate 2).

This is to expedite the program so that the learning hub building can be delivered as quickly as possible and address the significant growth in numbers at the school and to minimise impact to the school's operation.

The REF activity will be undertaken in a number of construction stages so that the school can remain operational. A temporary site access is proposed to be constructed along the northern boundary of the site to enable construction vehicles to access the site. Staff, parents and students of LPS will continue to use the main school pedestrian and vehicle entry points on Rickard Road and the car park.

All construction traffic is to be undertaken safely in accordance with the Construction Traffic Management Plan (in the TIA in **Appendix 5**) and controlled via traffic control. The Contractor shall establish appropriate site fencing separation and clear delineation between the Construction Site and school operations. This separation must be finalised in consultation with the School Principal. Given space constraints and operational requirements, the Contractor shall prioritise maximising open space for the school.

2.2.3 Demolition

To facilitate the required upgrades and expansion of LPS, demolition of some existing site features is required as detailed below.

Majority of demolition is proposed to occur in the north of the site to accommodate the new three-storey building. The demountable buildings along the northern boundary have already been removed. Proposed demolition works include demolishing Block C and removing some trees. The buildings and structures proposed to be demolished are identified in **Figure 44** below.

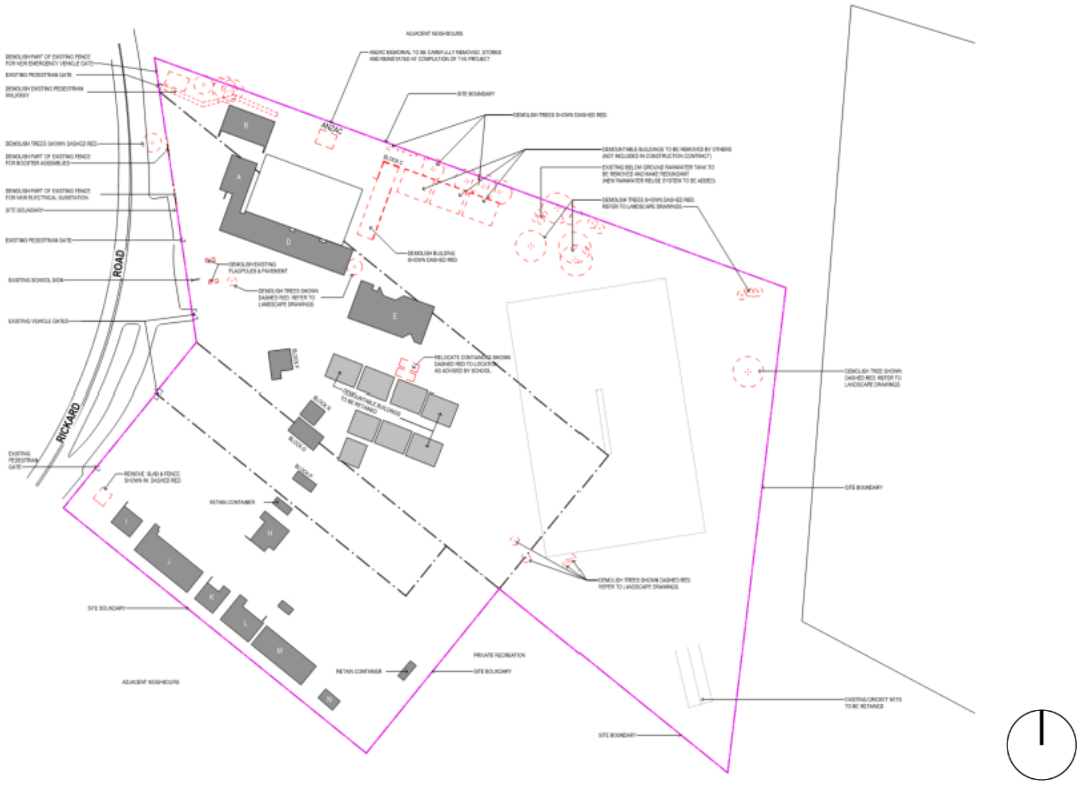


Figure 44: Demolition Plan (Source: Pedavoli Architects)

2.2.4 Earthworks

The activity involves bulk earthworks, comprising fill and excavation and other site preparation works, mainly in the western part of the site. The overall cut is approximately 1,473m^3, with the fill being about 4,084m^3. The net position will be 2,612m^3 of fill.

Site preparation for the activity is likely to involve excavation and fill works. Excavations will be undertaken using conventional earthmoving equipment, for example excavators and dozers. Fill will be managed in accordance with Australian Standard AS3798. It is unlikely that the proposed excavation works will encounter significant ground water. Should ground water be encountered, then the inflow or seepage can be handled with conventional sump and pump methods.

These bulk earthworks are ancillary works forming part of the activity.

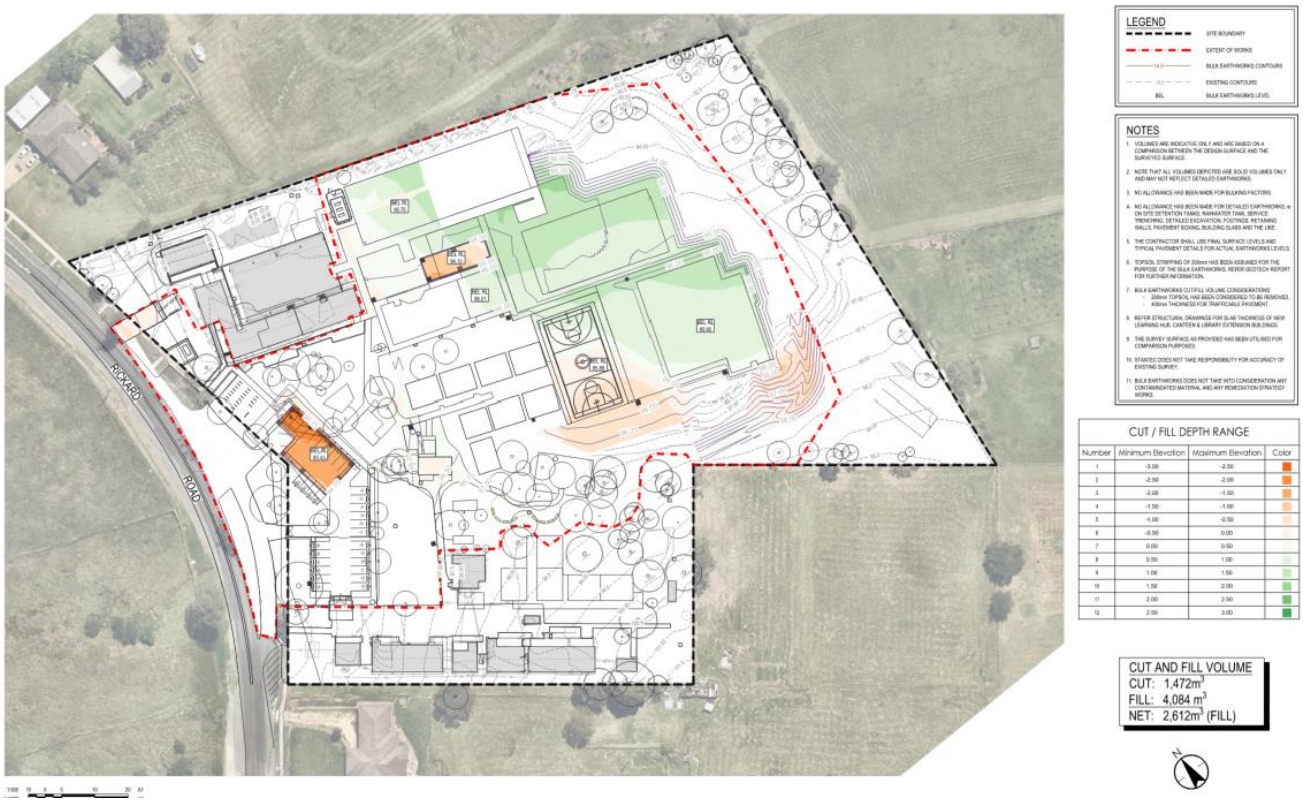


Figure 45: Bulk earthworks (source: Stantec)

2.2.5 Remediation

A DSI was undertaken (**Appendix 10**) and found that the soil analysis results were below adopted human health criteria and are not a risk to human health. The soil analysis did detect Total Recoverable Hydrocarbons (TRH) that exceeded adopted ecological criteria, but these exceedances are considered to be minor.

The existing septic tanks are prone to overflowing during heavy rainfall. The DSI found that there are elevated concentrations of nutrients (total phosphorous, ammonia and nitrogen) and TRH fractions in the shallow soils in the vicinity of the septic tanks. As such, the DSI considers there to be a moderate risk from the system. The DSI includes a mitigation measure for shallow soils within the area of the overflowing septic system to be stripped and disposed offsite due to the sensitive land use and aesthetic considerations.

As part of the activity, the existing septic pump out system will be also replaced with a new underground tank to minimise the risk of overflowing and further contamination on the site. The proposed septic tank will have a total capacity of 85,000L.

A review of Section 4.8 of the Resilience and Hazards SEPP concludes that the activity does not meet the requirements for Category 1 remediation work that needs consent.

2.2.6 Tree and Vegetation Removal

The site has Biodiversity Certification under the former *State Environmental Planning Policy (Sydney Region Growth Centres) 2006* (the provisions have been transferred to the Precincts SEPP) (see **Figure 46**). There are no additional requirements for offsets for clearing and developing the land.

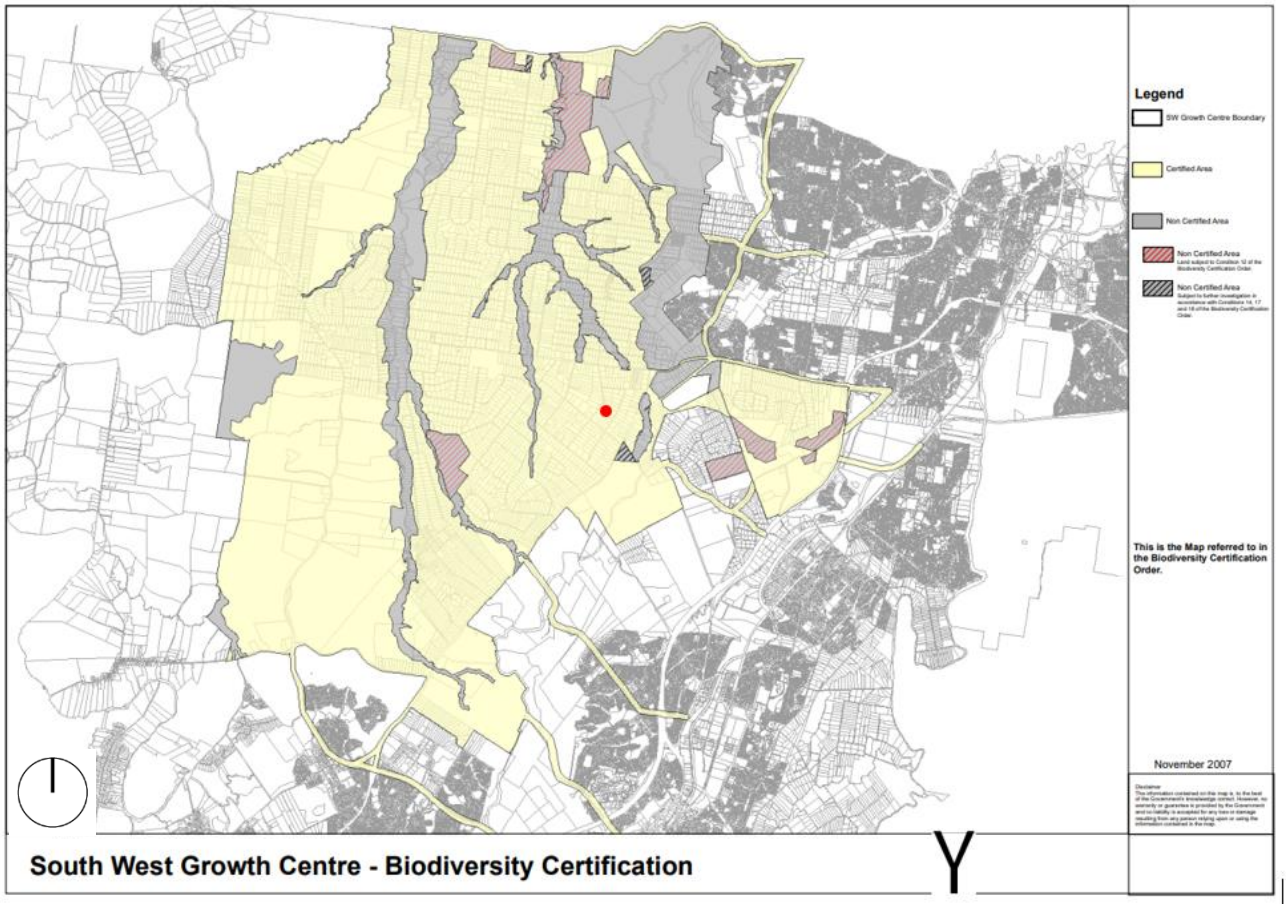


Figure 46: SWGA Biodiversity Certification Map with site identified with red dot (source: Biodiversity Certification Order)

The Arboricultural Impact Assessment Report attached (**Appendix 6**) provides specific information on the trees that are to be removed. A total of 24 trees (Trees No. 4, 14, 15, 18-31, 63-66, 128 and 146-147) are proposed for removal to facilitate the activity.

Figure 47: Landscape site plan detailed trees for removal (Source: Taylor Brammer)

2.2.7 Utilities and Services

Substation

A new substation will be located at the northwestern boundary of the site near Rickard Road, to the west of Buildings A and B. The substation will increase the capacity of electrical and hydraulic services due to an increase in anticipated users. **Figure 48** below shows the substation location (outlined in red) on the site plan. The substation will be subject to an additional Utility Service (Endeavour Energy) approval and does not form part of the REF activity.

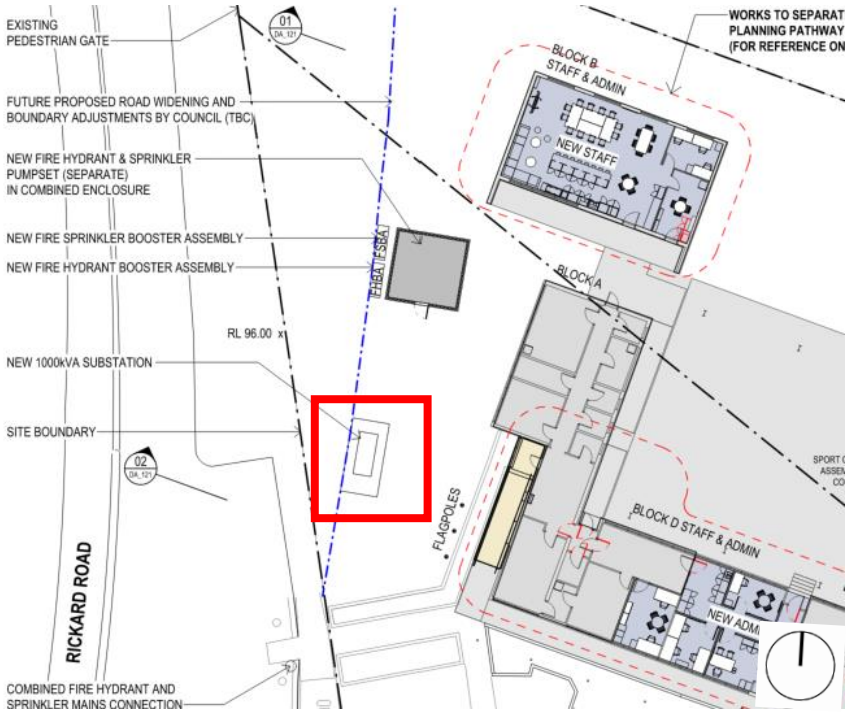


Figure 48: Proposed substation subject to an alternative approval pathway, outlined in red (Source: Pedavoli Architects)

On-site detention systems

Two on-site detention (OSD) tanks are proposed as part of the upgrades to the site. The larger of the two, will be in the existing car park, as shown in **Figure 49** below. The second is to be located between the library building and new learning hub. Detailed drawings of the OSD tanks are provided in the Civil Drawings found at **Appendix 22**.

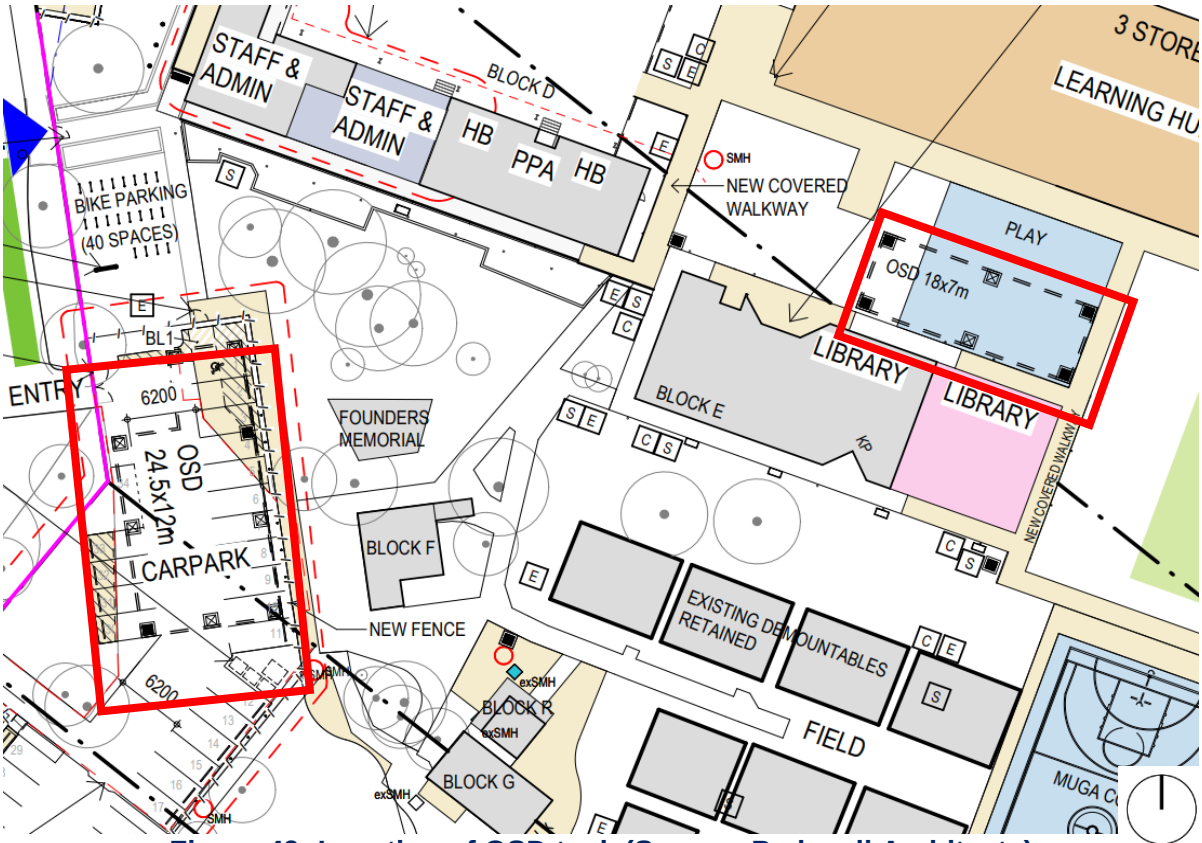


Figure 49: Location of OSD tank (Source: Pedavoli Architects)

2.2.8 Drainage and stormwater

The site is subject to localised flooding due to site specific constraints including topography and stormwater drainage system capacity restrictions as outlined in **Section 2.1.12** of this REF.

The proposed upgrades include roof and surface drainage systems to improve stormwater impacts. This includes:

- Roof downpipes directed to re-use rainwater tanks for use within the building's amenities and external landscaping.
- Surface areas drained via surface pits and directed to the on-site detention tanks where it will then be discharged.
- Water quality treatment is proposed to reduce the pollutant loading of stormwater discharged into the council drainage system. The water treatment train includes:
    - 3 x Ocean Protect 690mm Psorb Cartridges to be located with Stormfilter Chamber for each of the OSD tanks;
    - 4 x Ocean protect OceanGuards with Grated Inlet Pits; and
    - 2 x Rainwater tanks.

The Stormwater Management Report (**Appendix 11**) details the technical specifications.

2.2.9 Waste Management

Waste Management Plans relating to Construction & Demolition and Operation have been prepared by the waste consultant and provided at **Appendix 21 & 23**.

Construction & Demolition

The demolition of the various buildings and structures will produce approximately 161 tonnes of waste, comprising plasterboard, metal, green waste, timber, general rubbish, brick and concrete.

The construction of the proposed works is likely to generate 1,879 tonnes of waste, including asphalt, green waste, metal, timber, plasterboard, general waste, recycling residual, bricks, tiles and concrete.

The management plan for this waste involves the following principles:

- Avoid and reduce
- Reuse
- Recycle
- Disposal.

The waste is to be sorted within the confines of the site to enable more efficient recycling and disposal and processing at an appropriate offsite facility.

Designated waste storage areas will be established for the collection of all waste and recyclables. The waste storage areas will have appropriate signage to clearly identify the area to construction workers and to prevent unauthorised access to the area.

Stockpile size or bin numbers will be minimised by regular removal of waste from site. The waste storage areas will be covered where possible to prevent transmission of dust and fine particles, odour, wind impacts, vermin and vandalism or theft.

Any hazardous waste will be disposed of in accordance with the EPA guidelines to protect the environment and personnel. This includes the discovery of any asbestos.

Operational

The main forms of waste generated by the school are and will be:

- General waste (60%)
- Mixed recycling (plastics, glass, aluminium, steel) (20%)
- Paper and cardboard (20%)
- Other smaller waste streams.

The existing waste management systems are adequate to handle the future projected increase on waste generated at the school.

The waste storage area is currently adjacent to Rickard Road, on the western side of the car park. Future waste storage will and can be accommodated within this area. It is likely that four bins will be required with the school population increase, and this can fit within the existing bin storage area. Bulky waste storage also occurs at this central location.

General waste and recycling are currently serviced by Camden Council, and the intention is to continue with Council's service. The Council waste contractor will be able to access the site off Rickard Road, into the parking lot and conduct collection.

Overall, it is demonstrated that waste generated by the demolition, construction and operational phases of the activity has been adequately considered.

2.2.10 BCA and Accessibility

Building Code of Australia

The Architectural Drawings have been assessed (Regulatory Compliance Report in **Appendix 24**) to ensure compliance with the *Building Code of Australia* (BCA). There are currently elements of the design that deviate from the deemed-to-satisfy provisions of the BCA. These items can be addressed to ensure compliance is achieved, either through amendments to the design or through a performance solution demonstrating compliance with the Performance Requirements of the BCA. These amendments can be implemented through the imposition of a mitigation measure.

Accessibility

The proposed works are capable of meeting the minimum technical provisions of the BCA and the *Federal Disability (Access to Premises – Buildings) Standards 2010*. This capability is indicated in the Design Review Report (in **Appendix 25**).

2.2.11 Operation

The upgrades to LPS are expected to service:

Table 7: Comparison of existing and proposed student and staff numbers

	Existing	Proposed
Students	430	621
Staff	22	35

There will be no change to existing hours of operation for the school.

2.3 Related activities

Some exempt development works are proposed to be undertaken separately to the REF works. These proposed works include:

- Internal refurbishment to Blocks B and D
- Reconfiguration of the existing car park

These works will be undertaken under Division 4 Exempt Development in Part 3.2 General of Chapter 3 Educational establishments and child care facilities. **Figure 50** below shows the location for these works. These works are being undertaken outside the scope of the activity as they will be undertaken before the construction works commence. The exempt works have been included on the architectural drawings to provide clarity on all works being undertaken at LPS.

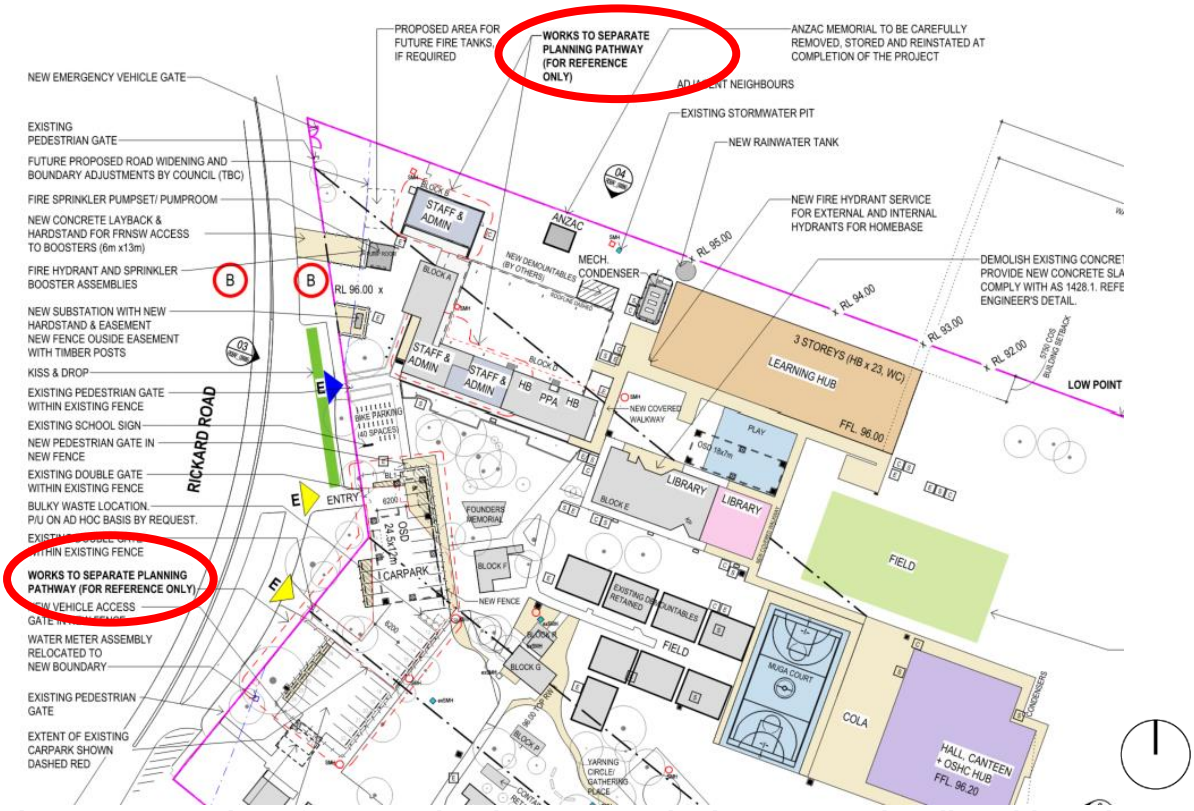


Figure 50: Location of exempt development works (Source: Pedavoli Architects)

3. Proposal Need and Alternatives

3.1 Proposal Need

The SWGA is experiencing significant population growth, in particular in and around the Leppington Town Centre. This will be further exacerbated when the Leppington Town Centre rezoning review is completed as it envisages an uplift of residential density around the school.

The existing teaching spaces fail to meet the benchmarks and requirements established in the EFSG. The current traditional closed classroom configuration restricts flexible learning methods and prevents a collaborative approach of learning between students and teachers. Also, the essential facilities such as a hall, library and administrative areas are inadequate in meeting current requirements.

Furthermore, the current facilities do not provide any support teaching spaces. The lack of these spaces does not cater or address the emerging need for a dedicated environment for students who have alternative needs.

3.2 Alternatives

The proposed activity has been developed following a consideration of options and alternatives to address the need identified above. A summary of the options considered is provided in **Table 8**.

Table 8: Assessment of Options and Alternatives

Option	Discussion	Preferred Option
Option 1: The Proposed Activity	The proposed activity will provide a transformative upgrade of the Leppington PS, replacing 10 permanent and nine demountable teaching spaces and enhancing core facilities. The proposed enhancement of the teaching spaces and core facilities is anticipated to reinforce community ties by offering a modern hub for diverse activities as well as improve safety, accessibility, and a focus on sustainability, ensuring a future-ready and inclusive learning environment.	Option 1 is preferred as it seeks to accommodate the increasing population, address equity concerns, and supply fit-for-purpose educational infrastructure for the immediate and mid-term future. In particular, the activity: • Realises the benefits of avoiding overcrowding by increasing capacity to address the immediate service need in the study area. • Addresses the EFSG requirements for Large Core Facilities, including three Support learning spaces and delivery of fit-for-purpose assets. • The addition of 44 PTS and new core facilities significantly boosts the contemporary learning environment within the school. • Addresses the forecasted demand at LPS.
Option 2: Alternative Designs	An extensive due diligence process was undertaken by the department to determine the most suitable options and designs for the site. Three alternative options were considered for the staging of the masterplan against their ability to	The alternative designs were considered to provide reduced benefits to the site than the preferred design. A number of advantages and disadvantages were identified including: • Option 1 – advantages include the new buildings having optimal orientation and providing a full suite of core facilities to

Option	Discussion	Preferred Option
	address the service need drivers.	suit a large school. Disadvantages include not providing a complete large school. • Option 2 – advantages include the new buildings have optimal orientation and providing a full suite of learning spaces to suit a large school. Disadvantages include not providing a hall and COLA, retaining existing demountable classrooms and not providing a complete large school. • Option 3 – advantages include completing a new large school, buildings having optimal orientation, addressing planned road to the east of the site in accordance with Camden Council's ILP and providing a dedicated area to the pre-school. Disadvantages include requiring the establishment of the roads in the ILP. The preferred option offered a more cost-effective and efficient solution for the site, aligning with broader planning efforts to enhance the educational infrastructure in the area. The advantage of this design is that the new buildings will have optimal orientation, provide a full suite of core facilities to suit a large school and its suited to future delivery of complete new school. The disadvantage of this option is that it relies on a staged delivery, that is a future stage 2, pending construction of the road to the east.
Option 3: Do Nothing	If the project was not to proceed, then there is a likely a significant shortfall of secondary school infrastructure within the locality.	This option is not preferred as it perpetuates overcrowding, reliance on outdated teaching spaces, and increased use of demountables, which are costly to maintain and unsuitable for modern educational needs. This approach fails to address growing demand or align with legislative obligations, ultimately resulting in long-term economic, operational, and educational disadvantages for the school and the broader community.

4. Statutory and Strategic Framework

4.1 Permissibility and Planning Approval Pathway

Section 4.1 of the EP&A Act states that if an EPI provides that development may be carried out without the need for development consent, a person may carry the development out, in accordance with the EPI, on land to which the provision applies. However, the environmental assessment of the development is required under Part 5 of the Act.

The TI SEPP aims to facilitate the effective delivery of infrastructure and educational establishments across the State and provides that various developments for the purposes of a government school are permitted without consent. The proposed activity is development permitted without consent as outlined at **Table 9**.

As part of the broader scope of works being undertaken at LPS, the department will be undertaking other works as exempt development, under section 3.39 and Schedule 5 of the TI SEPP. Nevertheless, for transparency and to enable a holistic understanding of the full scope of the upgrade, **Table 9** also provides delineation of these works that are exempt and those that are permitted without consent and therefore, subject to assessment in this REF.

Table 9: Description of Proposed Activities under the TI SEPP

Description of Works	Division and Section within TI SEPP	Exempt or Development Permitted Without Consent?
Demolition of existing structures and removal of trees, as well as other site preparation works;	Section 3.37(1)(e) - *demolition of structures or buildings (unless a State heritage item or local heritage item),* The existing structures on the site are not affected by a State or local heritage-listing, making their demolition permissible. The removal of the trees within the southern part of the site is permitted without consent as they are not considered to be structures, and do not trigger this requirement. The demolition plan, in **Appendix 2** shows the extent of buildings and structures being demolished from the non-heritage listed portions of the site, and structures and trees being removed from the heritage listed portion of the site.	Development Permitted Without Consent
Erection of a new 3-storey building comprising teaching spaces that includes 20 permanent teaching spaces and three support teaching spaces;	Section 3.37(1)(a)(iii) *construction, operation or maintenance of any of the following—(iii) a permanent classroom,* The proposed new structure is a 3-storey building incorporating classrooms and is therefore permissible.	Development Permitted Without Consent
Erection of a new hall and COLA comprising of a hall, canteen and OSHC hub towards the eastern boundary of site;	Section 3.37(1)(a)(viii) *construction, operation or maintenance of any of the following—(viii) a hall with an associated covered outdoor learning area or kiosk,*	Development Permitted Without Consent

Description of Works	Division and Section within TI SEPP	Exempt or Development Permitted Without Consent?
	The proposed new structure is a hall with an associated COLA is therefore permissible under this section. Section 3.37(1)(a)(v) *a cafeteria or canteen carried out in accordance with AS 4674—2004 Design, construction and fit-out of food premises,* The proposed new canteen is permissible under this section. Section 3.37(1)(f) *if the land is in a prescribed zone—construction, operation or maintenance of a building associated with the operation of the school.* The proposed OSHC hub is permissible under this section as the site is located within a prescribed zone (B7) and OSHC facility is a building associated with the operation of a school.	
Walking paths, fencing and associated works;	Walking paths permissible under section 3.39(1)(f) *walking paths (including raised walking paths), boardwalks, ramps, minor pedestrian bridges, stairways, gates, seats, barbecues, shelters and shade structures.* Fencing permissible under section 3.37(1)(d) *security measures, including fencing, lighting and security cameras.*	Development Permitted Without Consent
Bulk earthworks, comprising fill and excavation and other site preparation works including tree removal, landscaping and upgrades to the sports field and play facilities.	Section 3.37(5) - *Construction works* are permissible in connection with the purpose of construction, operation and maintenance of permanent classrooms, preschool, administration building and minor alterations or additions. Construction works are defined in section 3.3(3) and include clearing of vegetation (including tree removal) and landscaping, demolition, relocation or removal of infrastructure and temporary construction yards and lay down areas.	Development Permitted Without Consent
Works undertaken separate to the Activity		
Internal reconfiguration	Schedule 5 Exempt development – Chapter 3: *Building internal alterations.*	Exempt development, this scope of works will be undertaken separately to the main upgrade works as these works will be delivered prior to the construction of the activity.
Reconfiguration of car park	Schedule 5 Exempt development – Chapter 3: *Car parks – at grade car parks only.*	

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

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

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

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

In summary, the proposal is considered an ‘activity’ and ‘development permitted without consent’ for the purposes of Part 5 of the EP&A Act and is therefore subject to an environmental assessment through a REF.

4.2 Pre-conditions to Pathway

Under the TI SEPP, there are several requirements which must be complied with in order for development to be undertaken as development without consent. Compliance with the relevant sections and requirements of the TI SEPP are outlined below:

Table 10: Compliance with pre-conditions to the 'development without consent pathway'

Section of T&I SEPP	Comment Section	Complies
3.8 Consultation with councils – development with impacts on council-related infrastructure or services	This section applies where there is likely to be a substantial impact on stormwater management, traffic capacity of the road system, the sewerage system, water supply system, more than inconsequential excavation in a road reserve or installation of a temporary structure on a public place. While the activity will not trigger any of these threshold requirements for consultation under Section 3.8, notification of Camden Council will be made as part of the broader exhibition of this REF and accompanying documents.	Yes
3.9 Consultation with councils—development with impacts on local heritage	The site contains heritage items on the southern boundary and therefore written notice to Camden Council must be undertaken.	Yes
3.10 Notification of councils and State Emergency Service—development on flood liable land	Whilst the site is not flood liable land, given there is some localised flooding, the SES will be notified during the public exhibition of this REF.	Capable of complying
3.11 Consideration of Planning for Bush Fire Protection	Whilst the site is not bushfire prone land, the site directly adjacent to mapped bushfire prone land. Therefore, the RFS will be notified during the public exhibition of this REF.	N/A

3.12 Consultation with public authorities other than councils		The activity will not involve: • Development adjacent to land reserve under the NPW Act. • Development on land immediately adjacent on a rail corridor that would have an effect on rail safety (noting the rail corridor south of the site is dis-used and not intended to be reinstated). • Development that would increase the amount of artificial light in the night sky. • Development on land within a mine subsidence district. The activity will however involve access to a road and an additional school capacity of more than 50 students. Therefore, notification of Transport for NSW (TfNSW) is required under this section of the TI SEPP. The requirement for consultation under section 3.12 will be satisfied as part of the broader exhibition of this REF and accompanying documents.	Capable of complying subject to exhibition of this REF prior to determination and provision of written notification to TfNSW.
3.37 Existing or approved government schools—development permitted without consent			
(1)	Within the boundaries of an existing or approved school	The activity is on land within the boundaries of an existing school	Yes
(4)	Contravention of any existing condition of the development consent currently operating (other than a complying development certificate) that applies to any part of the school, relating to hours of operation, noise, vehicular movement, traffic generation, loading, waste management or landscaping.	Refer to the discussion following this table for detail regarding the existing conditions of consent for the site and compliance with Section 3.37(4).	Yes
(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,	These design principles are addressed above in **Table 6** and the accompanying Architectural Design Statement at **Appendix 19**.	Yes

	(b) the design principles set out in the design guide.		
3.38 Notification of carrying out of certain development under Section 3.37		As the activity involves development to which Section 3.37(1)(a) applies, written notice of the intention to carry out the activity to Council and occupiers of adjoining land for 21 days is required. The requirement for notification of these stakeholders under Section 3.38 will be satisfied as part of the broader exhibition of this REF and accompanying documents.	Capable of complying subject to exhibition of this REF prior to determination and provision of written notification to Council and occupiers of adjoining land.

For those parts of the activity that are captured under Chapter 2, there are consultation requirements that will need to be satisfied in Division 1 (of Part 2.2) of the TI SEPP. There are additional notification requirements in Sections 2.111 and Section 2.45 that may apply. Notwithstanding, these notification requirements are similar to those that fall under Chapter 3 (as noted in **Table 10** above). Notification with Camden Council, adjoining landowners and the various State agencies will cover all consultation requirements in Chapter 2 and Chapter 3.

Compliance with Section 3.37(4) of the TI SEPP

As noted in the table above, the abovementioned section does not permit the carrying out of development under Section 3.37(1) *"in contravention of any existing condition of the development consent currently operating other than a complying development certificate) that applies to any part of the school, relating to hours of operation, noise, vehicular movement, traffic generation, loading, waste management or landscaping"* on the site. This excludes any complying development certificate and only relates to conditions regarding hours of operation, noise, vehicular movement, traffic generation, loading, waste management or landscaping.

A request for all development consents applying to the site was submitted to Camden Council under the *Government Information (Public Access) Act 2009* (GIPA Act). The development consent(s) listed in **Table 11** were received on 16 December 2024.

Table 11: Development consents applying to the site

Development Application #	Description	Date Determined
DA 21/97	Erection of a school hall	16 April 1997
DA 261/97	Construction of a covered outdoor learning area	25 November 1997

The consent relating to the construction of a covered outdoor learning area (COLA) in the north-west area of the site (**DA261/97**) involved minor works that do not affect operational conditions such as hours of operation, noise, vehicular movement, traffic generation, loading, waste management, or landscaping. These works under this previous consent are physical expansions or utility improvements that do not alter the operational or functional aspects of the school, as outlined in the TI SEPP. This activity will not impact the existing COLA.

The consent relating to the erection of a school hall (**DA21/97**) does not appear to have been implemented, as there is no hall at this location approved by the DA on the site. The proposed site of this hall comprises demountables, which are to be retained as part of the upgrade works. Therefore, we are of the view that this development consent is not “currently operating” at the site and the consent has lapsed. As a result, it is considered that the proposed activity will not contravene any existing conditions of these previous consents related to the operational aspects specified in the SEPP. Currently, there is no hall located at LPS.

A physical inspection of Council's archives was conducted on 14 January 2025, as Council could not provide copies of the consented plans. During this inspection, it was found that the plans provided by Council did not affect the ability of the proposed upgrade works to be considered as development permitted without consent. Further, the proposed activity would not contravene any existing condition of the above consents 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.

In conclusion, the listed consents and the absence of conflicting conditions for the main school buildings ensure that the proposed works will comply with 3.37(4) of the TI SEPP.

Refer to **Appendix 27** for a copy of the consents provided by Council.

4.3 Environmental Protection and Biodiversity Conservation Act 1999

The provisions of the EPBC Act do not affect the proposal as it is not an activity that takes place on or that will affect Commonwealth land or waters or Matters of National Environmental Significance. Further, it is not an activity carried out by a Commonwealth agency or an activity on Commonwealth land, nor does the proposed activity affect any matters of national significance. An assessment against the EPBC Act checklist is provided at **Table 12**.

Table 12: EPBC Act Checklist

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

4.4 Other Approvals and Legislation

Table 13 identifies any additional approvals that may be required for the proposed activity.

Table 13: Consideration of other approvals and legislation

Legislation	Relevant?	Approval Required?	Applicability
State Legislation			
National Parks and Wildlife Act 1974	Yes	No	The activity is accompanied by a Preliminary Indigenous Heritage Assessment and Impact report at **Appendix 15.** Based on the identified disturbance within the subject area, distance to water sources, and landforms present, it was concluded that there is a low potential for Aboriginal sites to be present. An AHIP is therefore not required for the activity.
Rural Fires Act 1997	No	No	Not applicable. The site is not bushfire prone.
Water Management Act 2000	No	No	Not applicable. The activity is not located within 40m of a watercourse or coastline. It is more than 120m from the nearest waterway.  **Figure 51: Hydroline Mapping (Source: SEED)**
Biodiversity Conservation Act 2016	Yes	No	The project area is located within an area of certified land under the SWGA biodiversity certification. This certification is prepared at a strategic level across the SWGA and for developments that require impacts to biodiversity in certified land, no additional assessments or approvals are required under the BC Act. As the site is biodiversity certified, the preparation of a BDAR or SIS is not required. Refer to the Biodiversity Assessment Report at **Appendix 8** for further detail.
Pesticides Act 1999	No	No	Not applicable. The proposed activity will not require large quantities or dangerous pesticides to be used.
Heritage Act 1977	Yes	No	The department's s.170 heritage conservation register is applicable to this project. Part of the site is also identified as a local heritage item under the Precincts SEPP. A SoHI accompanies this REF at **Appendix 4**.

Legislation	Relevant?	Approval Required?	Applicability
			No demolition is proposed to be undertaken in the parts of the site that are affected by the local heritage listing or within the curtilage of the heritage items. Demolition of buildings and structures are proposed for the central and northern parts of the site that are not affected by the local heritage listing.
Fisheries Management Act 1994	No	No	Not applicable. The proposed will not result in permanent obstructions to water tidal patterns or flows or harm marine vegetation.
Contaminated Lands Management Act 1997	No	No	Not applicable.
Protection of the Environment Operations Act 1997	No	No	Not applicable.
Roads Act 1993	Yes	No	No off-site works are proposed that would impact the adjoining roads.
Local Government Act 1993	No	No	Section 68 and 68A of the *Local Government Act* apply to the replacement of the existing septic tank and require Camden Council approval.
Mine Subsidence Compensation Act 1961	No	No	Not applicable.
Environmental Planning and Assessment Regulation 2021 (Section 171A)	Yes	No	The Guidelines for Division 5.1 Assessments (DPHI June 2022) and the Guidelines for Division 5.1 assessments Consideration of environmental factors for health services facilities and schools Addendum (DPHI October 2024) provide a list of environmental factors that must be taken into account for an environmental assessment of the activity under Part 5 of the EP&A Act. These factors are considered in detail at **Section 6** of this REF. Further, Section 171(4) outlines circumstances where an REF must be published on the department's website or the NSW Planning Portal. This REF is required to be published as the activity has an estimated development cost of more than $5 million and the determining authority considers that it is in the public interest to publish the review. In addition, Section 171A of the EP&A Regulation requires the consideration of the impact an activity in a defined catchment. The site is located within a regulated catchment being the Hawkesbury-Nepean Catchment. The site falls within the Upper South Creek Catchment. The proposed activity will include provision of water quality treatment measures as part of water-sensitive urban design.
State Legislation – State Environmental Planning Policies			
State Environmental Planning Policy (Planning	Yes	No	The proposal is not classified as State Significant Development (SSD). While the cost is below the $50 million threshold, irrespective, the proposal is an activity as defined in Section 5.1 of the EP&A Act. It is development permitted without consent under Section 3.37 of the TI

Legislation	Relevant?	Approval Required?	Applicability
Systems) 2021			SEPP and is therefore subject to assessment under Part 5 of the Act.
State Environmental Planning Policy (Biodiversity and Conservation) 2021	Yes	No	Chapter 2 Vegetation in non-rural areas applies to the activity. However, no additional approvals or permits are required as the site is part of the biodiversity certification for the SWGA. Chapter 6 Water catchments also applies to the site. However, as Section 3.37A of the TI SEPP enables the activity to occur as 'development permitted without consent', no further approvals are required.
State Environmental Planning Policy (Sustainable Buildings) 2022	Yes	Yes	The Sustainable Buildings SEPP aims to simplify and coordinate the way that we plan for and design sustainable buildings in NSW. The policy introduces new requirements into the Regulations to explain key design requirements. In accordance with Chapter 3.1, the General Sustainability Provisions are applicable to all non-residential development, including educational establishments, and these requirements include consideration of the general sustainability provisions to be considered and documentation that reports on embodied emissions. A Sustainable Development Plan (in **Appendix 20**) accompanies this REF and has reviewed the key ESD commitments to determine an overall Green Star Rating. These commitments include: • Good access to natural daylight; • Well-deigned openings to promote natural ventilation; • Appropriate construction and glazing selection; • Energy efficient air-conditioning systems; • LED luminaries; • Rainwater recycle tanks; • Efficient water fixtures; • Waste management plan; and • Water-wise landscaping. According to the assessment undertaken in the Plan, the proposed activity achieves a 5 Star Green Star Rating. Furthermore, a Section J Part J4 & J6 performance-based design brief (**Appendix 28**) indicates that the proposed activity will be able to achieve compliance with the relevant sustainability provisions of the Building Code of Australia.
State Environmental Planning Policy (Resilience and Hazards) 2021	Yes	No	The DSI in **Appendix 10** considers the site generally suitable for the proposed activity and continued use as a school provided the mitigation measures are implemented. The DSI takes into consideration the site conditions and surrounding environment including topography, vegetation and geology, hydrology and site observations. The DSI concluded the following: • AEC 1 – Areas near former / existing building structures

Legislation	Relevant?	Approval Required?	Applicability
			– no exceedances of the identified contaminants of concern were recorded. The likelihood of contamination associated with this AEC is considered to be low, notwithstanding no investigation could occur directly beneath the footprint of the existing structures for hazardous materials due to safety constraints; • AEC 2 – Areas of possible filling of unknown origin and/or quality – the samples collected contained contaminants of concern did not exceed adopted assessment criteria. As such, the likelihood of widespread contamination associated with this AEC is considered low; • AEC 3 – Whole site from potential spraying of pesticides and herbicides – no exceedances of contaminants found, with the likelihood of widespread contamination considered to be low; • AEC 4 – Septic tanks prone to overflowing – contaminants of nutrients associated with effluent were found, indicative of an overflowing septic system. There is considered to be a moderate risk from the overflowing of the septic system, with management measures being recommended; • AEC 5 – Areas near historical incinerators – no exceedances of contaminants were recorded. As such, the likelihood of widespread contamination is low; • Soil tests on the site are not considered to represent a human health risk to existing or future users; • Exceedances in certain ecological criteria are considered to be minor and are subject to the mitigation measures outlined below; and • The stripping and separation of shallow soils within the area of overflowing septic system is recommended and is to be disposed offsite. The assessment of likely impacts can be found in **Section 6.3** of this REF and is based on the following mitigation measures made by the environmental consultant: • A Construction Environmental Management Plan (CEMP) must be prepared to include any unexpected findings including areas underneath the building footprints; • Shallow soils impacted by the overflowing septic system must be separated, stripped and disposed offsite at a licensed facility; • A Hazardous Building Material (HBM) Management Plan must be prepared and include removal of HBMs in a safe and effective manner and also protocols for post demolition soil surfaces; and • If any disturbances arise, further assessment must be carried out to target these areas and avoid unexpected finds.

Legislation	Relevant?	Approval Required?	Applicability
State Environmental Planning Policy (Industry and Employment) 2021	No	No	Not applicable. No new external signage is proposed as part of the activity. Minor wayfinding signage will be implemented as required for the activity.
State Environmental Planning Policy (Resources and Energy) 2021	No	No	Not applicable.
State Environmental Planning Policy (Primary Production) 2021	No	No	Not applicable.
State Environmental Planning Policy (Precincts – Eastern Harbour City) 2021	No	No	Not applicable.
State Environmental Planning Policy (Precincts – Central River City) 2021	No	No	Not applicable.
State Environmental Planning Policy (Precincts – Western Parkland City) 2021	Yes	Yes	Refer to **Section 4.4.1** of this REF.
State Environmental Planning Policy (Precincts – Regional) 2021	No	No	Not applicable.

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

Zoning and Permissibility

Under the Precincts SEPP, the site is zoned B7 Business Park and SP2 Infrastructure. An excerpt of the land use zoning map is provided at **Figure 52**.

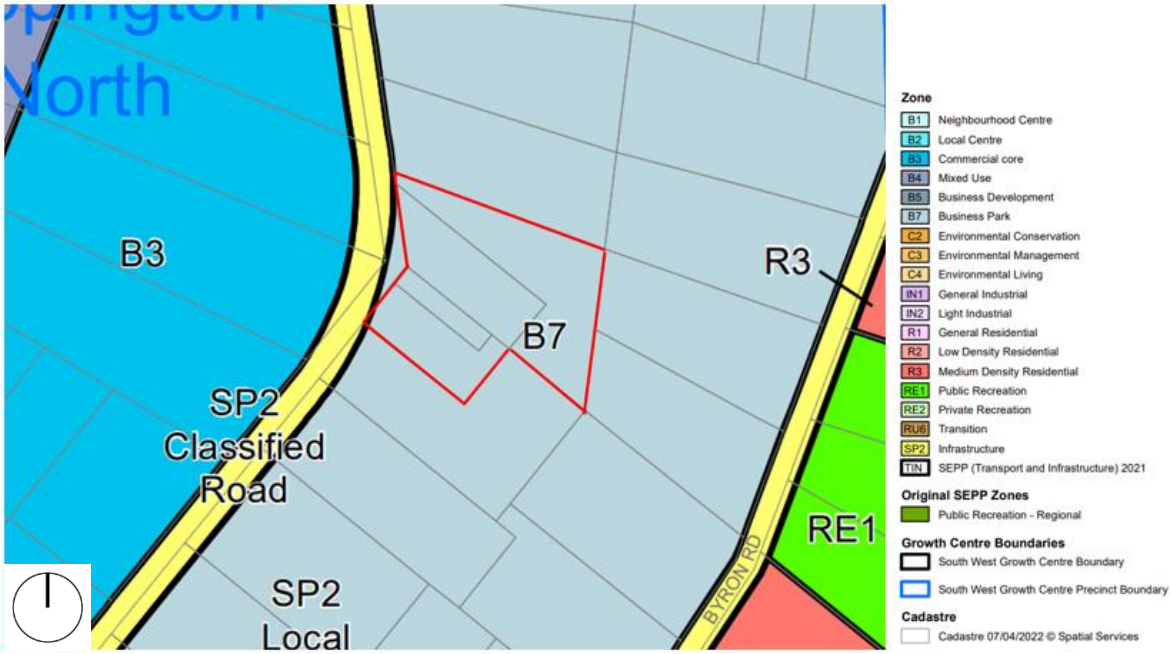


Figure 52: Land use zoning map, site outlined red (Source: NSW Planning Portal Spatial Viewer)

The objectives of the B7 Business Park zone are:

1. *To provide a range of office and light industrial uses.*
2. *To encourage employment opportunities.*
3. *To enable other land uses that provide facilities or services to meet the day to day needs of workers in the area.*

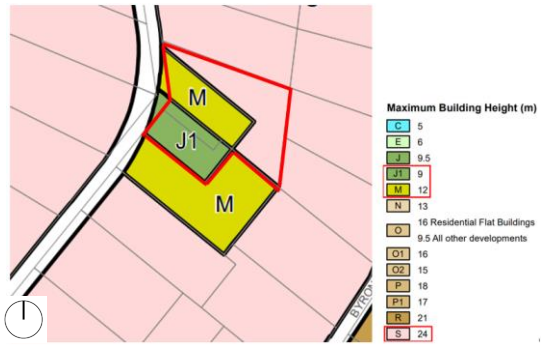
The existing *educational establishment* is permitted with development consent, as it falls within '*any development not specified in item 2 or 3*' in the B7 land use table. The B7 zone is also a prescribed zone under Section 3.34 of the TI SEPP.

A small portion of the south-west corner of the site is zoned SP2 Infrastructure (Classified Road). This portion of the site relates to the future expansion of Rickard Road to facilitate its widening. No activity is proposed for this small corner of the site.

Relevant Provisions

Table 14 below details the relevant provisions of the site under Appendix 5 – Camden Growth Centres Precinct Plan of the Precincts SEPP.

Table 14: Relevant Provisions in Appendix 5 of the Precincts SEPP

Section	Provision	Assessment
4.3 Height of buildings	The height of building on any land is not to exceed the maximum height shown for the land of the height of buildings map.  **Figure 53: Height of buildings map excerpt (source: NSW Planning Portal Spatial Viewer)**	Complies The maximum permissible building height varies from 24m along the northern boundary to 12m central to the site and 9m along the southern boundary. The proposed new three-storey building along the northern boundary has a maximum height of 14.033m. The other proposed buildings do not exceed one storey in height. As such, all proposed buildings, and extensions to existing buildings, comply with the maximum building height control under the Precincts SEPP as well as complying with the maximum four storey height control under Section 3.37(2) of the TI SEPP. **Figure 54** below shows the proposed works with the building height limits overlayed.
 **Figure 54: Overlay of proposed works with building height standards from the SEPP (source: Pedavoli Architects)**		
4.4 Floor space ratio	Establishes a maximum floor space ratio.	The site is not subject to a maximum floor space ratio under the Precincts SEPP.
5.1 Relevant acquisition authority	Establishes the relevant acquisition authority.	The minor portion of the site that is zoned SP2 Infrastructure (Classified Road) relates to

Section	Provision	Assessment
		Rickard Road. According to Section 5.1, the relevant acquisition authority is Transport for NSW. No works as part of this activity are being undertaken within the SP2 portion of the site. The remainder of the site is already owned by the department and not subject to acquisition requirements.
5.9 Preservation of trees or vegetation	Objective is to preserve the amenity of the area through the preservation of trees and other vegetation.	Complies The Arboricultural Impact Assessment Report (**Appendix 6**) provides that 24 trees will need to be removed to accommodate the proposed alterations and additions. 95 existing trees will be retained. Refer to **Section 6.6.1** of this Report for details.
5.10 Heritage conservation	Requirement for consent when impacting heritage items or within a heritage conservation area	Complies Refer to Statement of Heritage Impact Report in **Appendix 4**.
5.12 Infrastructure development and use of existing buildings of the Crown	This Precinct Plan does not restrict or prohibit, or enable the restriction or prohibition of, the use of existing buildings of the Crown by the Crown.	Complies In accordance with this section, the provisions of the Precincts SEPP, cannot restrict the use of existing building by the Crown. The activity includes utilising existing buildings and therefore is consistent with the provisions of Clause 5.12.
6.1 Public utility infrastructure	The consent authority must not grant development consent to development on land to which this Precinct Plan applies unless it is satisfied that any public utility infrastructure that is essential for the proposed development is available or that adequate arrangements have been made.	The supply of water and electricity is adequate and available. Further, the disposal and management of sewage is adequate and available. There are no existing gas mains in the vicinity of the site and gas is not proposed to be provided to the site.

4.5 Strategic Plans

Table 15 considers strategic plans that are relevant to the proposed activity.

Table 15: Consideration of applicable Strategic Plans

Strategic Plan	Assessment
Greater Sydney Regional Plan	The Greater Sydney Regional Plan: A Metropolis of Three Cities was published by the NSW Department of Planning and Environment in 2018 and applies to the site and the wider Greater Sydney Region. It is estimated that an extra 270,000 students will need to be

Strategic Plan	Assessment
	accommodated in government and non-government schools in Greater Sydney by 2036. The rationale for objective 6 of the plan is to ensure 'services and infrastructure meet communities' changing needs'. Upgrades to LPS, particularly the new three-storey building with learning spaces will provide essential improved school infrastructure to support the growing community. These upgrades will facilitate an additional 191 students, which will greatly assist in accommodating future anticipated student numbers.
Western City District Plan	The activity will align with Planning Priority W3 which seeks to 'provide services and social infrastructure to meet people's changing needs'. The upgrades to LPS will ensure that educational facilities within the area can accommodate the population growth and demographic changes. The contemporary design will help provide increased flexible learning spaces and assist in creating and supporting an inclusive and vibrant neighbourhood.
Camden Local Strategic Planning Statement	The activity is consistent with the Camden Local Strategic Planning Statement. Infrastructure delivery is one of the core themes of the LSPS. Local Priority I1 refers to 'aligning infrastructure delivery with growth'. The upgrades to LPS directly align with this priority as the activity seeks to provide am enhanced educational facility to accommodate the growing population and the growth of the Leppington Town Centre. With the current and future growth in Leppington and its surrounding areas, upgrading of key infrastructure is necessary to accommodate the growing population.

5. Consultation

5.1 Early Stakeholder Engagement

Table 16 provides a summary of early stakeholder (non-statutory) consultation undertaken to inform project development and preparation of the REF.

Table 16: Summary of Early Stakeholder Engagement

Stakeholder	Engagement
Aboriginal stakeholders 27 June 2022	A Walk on Country event played a pivotal role in shaping the design of the project, with the principles of CWC guiding its development. The event brought together local Aboriginal representatives, school representatives, and the design team, fostering a dialogue about the cultural significance of the land and sharing valuable insights. This collaboration ensured that Aboriginal perspectives were integrated into the design, aligning the project with cultural values and honouring the land's connection. This engagement led to the following inclusions in the design of the activity: • A new location for the yarning circle • Welcome statement at the entry to the school, involving an 'Acknowledgement of Country' • Curved pathways to reflect the way Aboriginal peoples traverse the landscape • Wayfinding and signage to serve both a functional role and to support Indigenous narratives that link back to the environment and history • Using colours from the common wildflower and ferns of the Cumberland Plains Woodland.
Camden Council	Refer to **Table 18** below.
Traffic Working Groups (TfNSW & Camden Council) TWG 1 – 27 March 2024 TWG 2 – 19 June 2024 TWG 3 – 3 July 2024	The Traffic Working Group (TWG) meetings focused on addressing traffic and transport-related issues for the proposed activity. A summary of discussions, and the impacts on the resulting activity, is included below: TWG 1: • Camden Council has indicated support for a children's crossing on Rickard Road. Council confirmed they are still working on the design of the crossing. • Camden Council stated that they did not support a set down bus space adjacent to the Willowdale Shopping Centre on Jamboree Street. Alternative locations, such as Willowdale Drive, was suggested for further investigation. TWG 2: • Camden Council supports relocating the existing bus zone on the eastern side of Rickard Road to the southern side of the school, beyond the pick up zone. However, Council do not have funds to undertake this work. • DPHI is funding the upgrade to Rickard Road, and as such no definitive timeframe for these upgrades is known at this time. • Camden Council has received a grant for funding the children's crossing on Rickard Road. • Alternative drop off bus stops on Willowdale Drive and

Stakeholder	Engagement
	Jamboree Avenue are in Campbelltown Council. Cambpelltown Council to be invited to the next TWG to discuss option of using a bus stop outside of the Willowdale Shopping Centre. • TfNSW advised that, for capacity purposes, three primary school students can share one bus seats, increasing the capacity of the bus to up to 90. TWG 3: • Campbelltown Council is open to school bus services using existing bus stops on Willowdale Drive and Jamboree Avenue. • The relocation of the bus stop on Rickard Road will require some minor works. Camden Council and the department are reviewing funding opportunities.

In addition to the above, an informal pre-lodgement meeting was held on the 6 February 2024 with Camden Council to discuss potential upgrades to the school as part of a Crown DA (being the former planning approval pathway prior to the recent amendments to the TI SEPP). Council provided a high-level response to the key issues discussed. A response to the issues identified in the pre-lodgement consultation has been provided in **Table 17.**

Table 17: Matters discussed in pre-lodgement meeting with Camden Council

Matter	Council comments	Response
Pick up/ Drop off	Council Officers are seeking mitigation to safety and operational concerns relating to the existing pick up/drop-off facility and any improvements that can be made;	A detailed TIA has been prepared. In response to the concerns around the safety and operational concerns of the existing kiss and drop zone, a mitigation measure will require staggered bell times to reduce the number of students finishing their day at the same time and broader traffic congestion issues. Refer to **Appendix 5** and **Section 6.1.1** of this REF for further details.
Rickard Road upgrades	Confirmation that no funding is currently available to Council to upgrade Rickard Road;	No further updates on the Rickard Road upgrades are available at this point in time. The upgrades will be funded by DPHI and their timing is unknown. The activity has been designed to consider the future road widening and design for the Rickard Road upgrade. As such, these future road works will not impact the activity. Equally, the activity has been assessed based on the current road network/scenario and any impacts mitigated accordingly. When the time comes for Rickard Road to be upgraded, this will no doubt be undertaken in consultation with the department and will ultimately see an improvement in broader traffic movement within the precinct, after the works are completed.
Consultant reports	Confirmation that all identified consultants reports and drawings are required to accompany the Crown DA; and	This REF is accompanied by all the relevant consultant reports to support the proposed activity.
Indicative Layout Plan	Confirmation that there is no established timeframe for the delivery of the proposed roads identified in the draft Indicative Layout Plan in Council's draft DCP.	The delivery of the ILP, and draft ILP roads, do not affect the ability of the department to deliver the proposed activity. The activity does not rely on the future surrounding local road network and ensures no significant environmental impact.

5.2 Statutory Consultation

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

- sending notices to adjoining neighbours, owners and occupiers inviting comments within 21 days.
- sending notices to the local council and relevant state and commonwealth government agencies and service providers inviting comments within 21 days. This will include, the Bradfield Development Authority (previously Western Parkland City Authority), TfNSW and Camden Council. The RFS is also likely to be notified given there is bushfire prone land in proximity to the site.
- making the REF publicly available on the Planning Portal throughout the consultation period.

Comments received will be carefully considered and responded to in an updated REF, prior to determination of the activity.

6. Environmental Impact Assessment

6.1 Traffic, Access and Parking

6.1.1 Assessment

This section outlines the findings of the TIA. The TIA has provided an assessment of the relevant traffic and parking impacts of the activity and the transport strategy to be adopted during the construction and ongoing operation of LPS.

Access to the School

Access to the LPS will be retained from Rickard Road.

Pedestrian and cyclist access will be retained via the existing three pedestrian entry points (as illustrated in **Figure 55**). The main pedestrian and cycling access will continue to be adjacent to the main administration building.

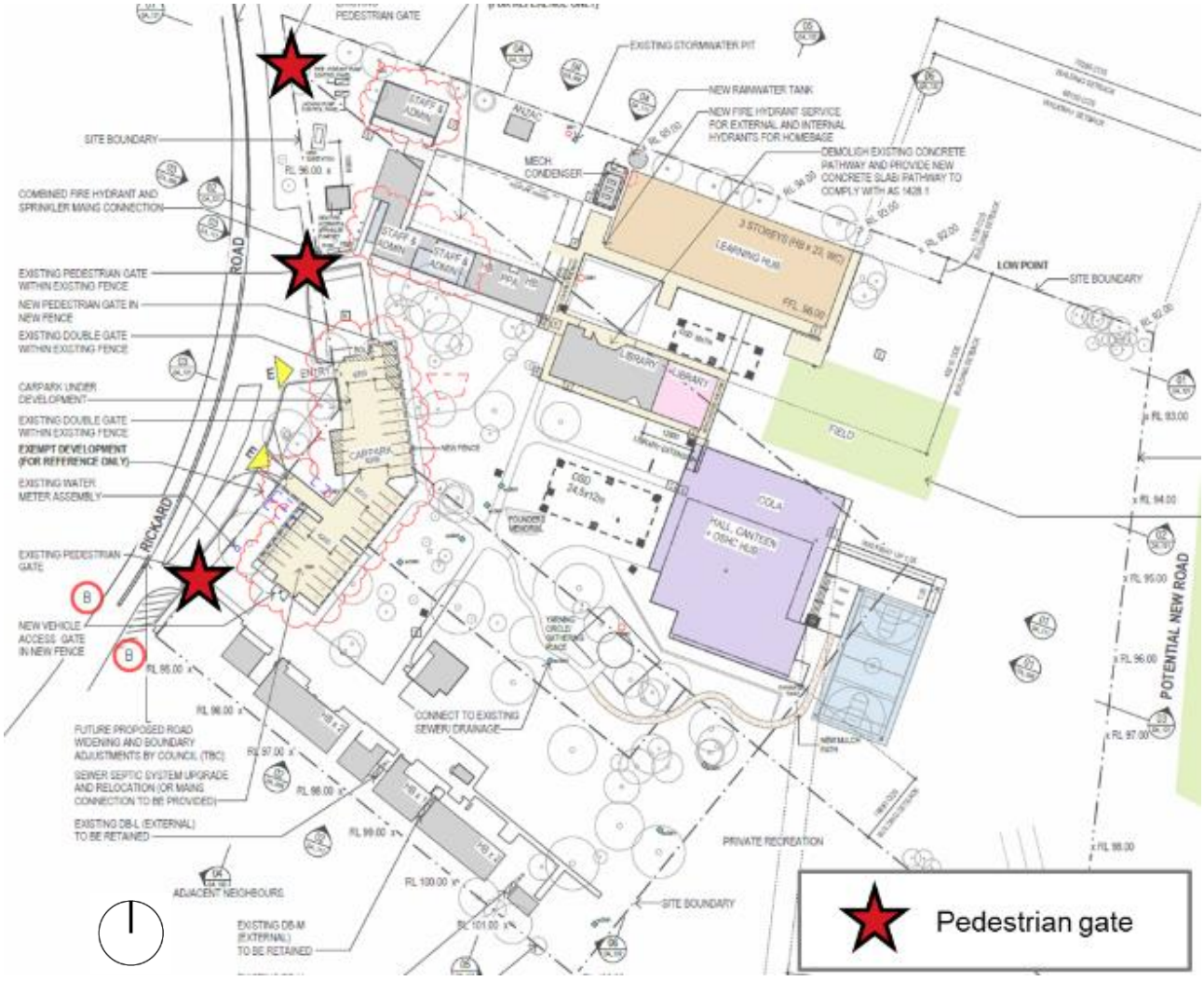


Figure 55: Pedestrian and cycling access (Source: Stantec)

The proposed upgrades are unlikely to affect the walking or cycling mode share among students and staff. This is due to the large catchment area for the school and the low density of residential

development feeding into the catchment. The TIA found that only 11% of students attending LPS in 2029 will live within a 1,200m walking distance from the school.

Public Transportation

It is likely that most of the students attending the school will be eligible for free bus travel under the School Student Travel Scheme as:

- They live more than 1.6km in a straight line away from the school,
- They would need to walk more than 2.3km (on-path distance) from home to school,
- All kindergarten to Year 2 students do not have a minimum walking distance.

Although all kindergarten to Year 2 students, together with approximately 58% of Year 3 to 6 students, are eligible for free travel, it is unlikely that the demand for bus services will increase as shown in **Figure 56**. This is due to the location of the bus routes remaining constant and not servicing a greater number of students. Prior to the widening of Rickard Road, the school bus stop will remain in the current position.

2024 (existing)	2027
10%	10%

Figure 56: Public transport mode share (Source: Stantec)

Cycling Infrastructure

Active transport mode share is not expected to increase prior to the planned densification and upgrade of LPS. It is therefore not expected that walking or cycling mode share amongst students or staff will change.

The existing footpath on the eastern side of Rickard Road, connecting between Neptune Road in the south and Leppington Station in the north, is considered adequate. This footpath additionally allows students of all ages at LPS to ride bicycles alone, as well as with an accompanying adult.

Bicycle access to the site will remain the same as the pedestrian access points. The Camden Growth Centre Precincts DCP does not specify a bicycle parking requirement for educational establishments.

The TIA recommends providing 40 student bicycle parking spaces to provide for the future student population. These spaces will be located at the western entry, north of the existing carpark, along the Rickard Road boundary.

Staff Car Parking and Vehicular Access

Vehicle access to the staff car park will be maintained from Rickard Road.

As a result of the activity, the number of staff at LPS will increase from 20 to 35. There is an existing staff car park that contains 34 car parking spaces.

According to section 4.4.4 Educational Establishments and Places of Worship of the Camden Growth Centres DCP, the parking requirement for schools is:

1 space per staff member plus 1 space per 100 students plus 1 space per 5 students in Year 12.

The activity relates to upgrades at a primary school and as such, there is no requirement or demand generated to provide car parking for students, as none of the students are eligible to drive.

With regards to the number of staff car parking spaces, the activity results in a deficiency of one car parking space. However, as part of the School Transport Plan (in **Appendix 5**, there is an emphasis on encouraging staff to use passive (that is, walking and cycling) and public transport options and ride share opportunities to access the school. These alternative methods will enable the existing 34 car parking spaces to be sufficient for the increase in the number of staff at LPS.

Kiss and Drop

The TIA expects that most of the new and existing students attending LPS will rely on private cars to access the school. As such, the demand on the existing kiss and drop facility will also increase due to this increased reliance on private cars. The impact on the kiss and drop facility has been modelled and it has been found that the resulting queue on Rickard Road would last for an additional eight minutes and would increase the peak length by 440m, to more than 800m long.

According to section 4.4.4 Educational Establishments and Places of Worship of the Camden Growth Centres DCP, a *pick up/drop off facility of sufficient size to accommodate the forecast demand identified through a traffic and parking report. The resultant layout of the facility to be to the satisfaction of Council.*

As there is insufficient space along the Rickard Road boundary to increase the length of the kiss and drop facility, alternative options have been assessed in the TIA (in **Appendix 5)**. As such, the TIA is proposing a mitigation measure for the bell time to be staggered, with the Year K – Year 3, representing 68% of the school population) ending their day at 2:45pm and Year 4 to Year 6 (32% of the school population) students ending at 3:00pm. For families with children in each age group, pick up times will need to be refined. This measure will reduce the overall length of the queue at the kiss and drop facility to a maximum length of 205m, which is significantly less than the current queue of 400m experienced under the current student population. The impact of the staggered bell times is illustrated below.

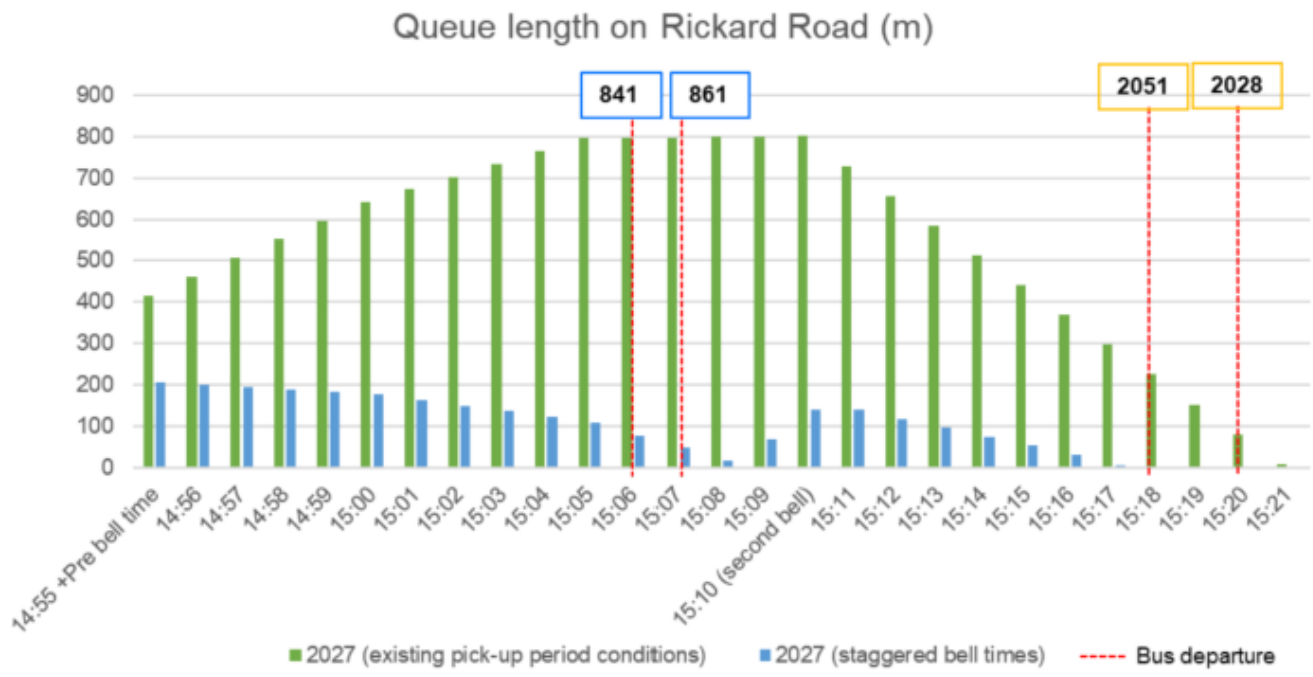


Figure 57: Effects of staggering bell times (source: Stantec)

The bell time for LPS will also be offset to the bell time of the proposed (future) Leppington High School to the south to reduce cumulative impacts of traffic and congestion for both schools.

School Transport Plan

A Preliminary School Transport Plan accompanies the TIA. It identifies transport goals and policies and procedures for LPS staff, parents and students to implement to reduce congestion in and around the school and encourage sustainable travel modes.

The Preliminary School Transport Plan also includes measures to restrict drop off on the western side of Rickard Road by private vehicles, noting that there is currently no school crossing to enable safe passage across Rickard Road. The crossing will be delivered in the future by DPHI, but in the interim, the school will need to implement the STP including the measure to discourage this activity, to maximise safety for students.

The intention is for this Preliminary School Transport Plan to be reviewed regularly to address any concerns with its implementation and ensuring key messages are delivered to all parties.

Waste Collection

The waste collection area is currently located within the staff car park. This will remain in situ as part of the proposed activity.

Conclusion

The proposed staggering of bell times will reduce the queuing times and distance currently experienced at the kiss and drop facility.

Overall, it is considered that by implementing the mitigation measures identified below, the activity will not result in any adverse or significant traffic impact on the local road network or surrounding environment.

6.1.2 Mitigation Measures

Table 18: Traffic and Transport Mitigation Measures (Source: Stantec)

Mitigation Name	Timing	Mitigation Measure	Reason for Mitigation Measure
Traffic Impact Statement			
Kiss and drop	During operation	Queuing is to be reduced on Rickard Road by implementing staggered bell times within the school i.e. two bell times staged by at least 15 minutes apart. The staggering of bell times is to be undertaken in accordance with the approved Transport Impact Assessment, prepared by a suitably qualified traffic engineer.	To reduce queuing on Rickard Road.
Bus stop	Prior to and during operation	The department is to engage with Transport for NSW to facilitate the appropriate relocation of the bus stop further to the south of the site that will effectively service the existing Leppington Public School and the future (adjacent) High School. An assessment of the new location is to be undertaken by a suitably qualified traffic consultant to ensure adequate accessibility and functionality for the existing Leppington Public School.	To consolidate bus stops between Leppington Public School and the future Leppington High School.
Preliminary School Transport Plan			
School Transport Plan	Prior to and during operation	A School Transport Plan must be prepared to the satisfaction of the Department of Education Transport Planning Team. Any existing School Transport Plan is to be reviewed and updated if necessary to reflect the impacts of the REF works, to the satisfaction of the Department of Education Transport Planning Team. The School Transport Plan is to include measures to deter parents, staff and any visitors from using the western side of Rickard Road for pick-up and drop-off until such a time that Council delivers a school crossing.	The School Transport Plan set out objectives and strategies to assist in the development of transport goals, policies and procedures for LPS. These measures promote the use of sustainable travel modes.
School operations	During operation	The School Transport Plan is to be reviewed on an annual basis and updated (if required) to the satisfaction of the department's Transport Planning team to ensure active and sustainable travel measures are implemented.	Implementation of the School Transport Plan.
Preliminary Construction Traffic Management Plan			
Detailed Construction Management Plan	Prior to and during construction	A Detailed Construction Traffic Management Plan (CTMP) is to be prepared prior to the commencement of construction. The CTMP is to be	To reduce impact of construction vehicles on the road network.

		implemented during all site works and is to form part of the CEMP.	
Construction worker parking accommodated on site	Prior to and during construction	The Principal Contractor is required to guide construction workers as to where appropriate parking is available on and around the site on induction and also, to encourage the use of public transport services (mainly buses). During site induction, workers are to be informed of the existing bus networks servicing the site. Appropriate arrangements are to be made for any equipment/ tool storage and drop-off requirements.	Encourage public transport use to reduce strain on on-street parking and road network.
Construction workers arriving by vehicle	Prior to and during construction	The Principal Contractor is required to outline a schedule of worker start and finish times and demonstrate that this does not have any significant impact on local traffic activity. The Principal Contractor is required to implement measures to reduce worker car travel, such as shuttle buses from key transport nodes or designated remote pick-up and parking points as necessary.	To reduce impact of construction vehicles on the road network.
Addition of construction related vehicles to the local transport network	Prior to and during construction	Construction vehicles are to follow specified routes as outlined in the Construction Traffic Management Plan. The Principal Contractor is required to provide traffic guidance scheme for the proposed works.	
Obstructions to pedestrian and cyclist movements	During construction	Where pedestrian or cyclist routes are affected by construction activities, accredited traffic controllers are to be provided to manage the impact and minimise conflict between vehicles and pedestrians or cyclists.	To manage the impact of construction activities on pedestrians and cyclists.
Potential conflicts between construction related vehicles and pick-up and drop-off operations on Rickard Road school frontage.	During construction	All vehicle movements and work zones must not occur during designated pick-up and drop-off periods for Leppington Public School.	To reduce impact of construction vehicles on school operations.

6.2 Noise and Vibration

6.2.1 Assessment

A Noise and Vibration Impact Assessment accompanies this REF at **Appendix 29**. The Assessment identified the nearest noise sensitive receivers surrounding the site includes (refer to **Figure 58**):

1. 156 Rickard Road – a residential premises located less than 5m north of the site.
2. 153, 159, 163 & 173 Rickard Road – a residential property located less than 5m east of the site.
3. 134 Rickard Road & 141 Byron Road – future Leppington High School site.
4. 151 Rickard Road – an industrial property located 15m west of the site.

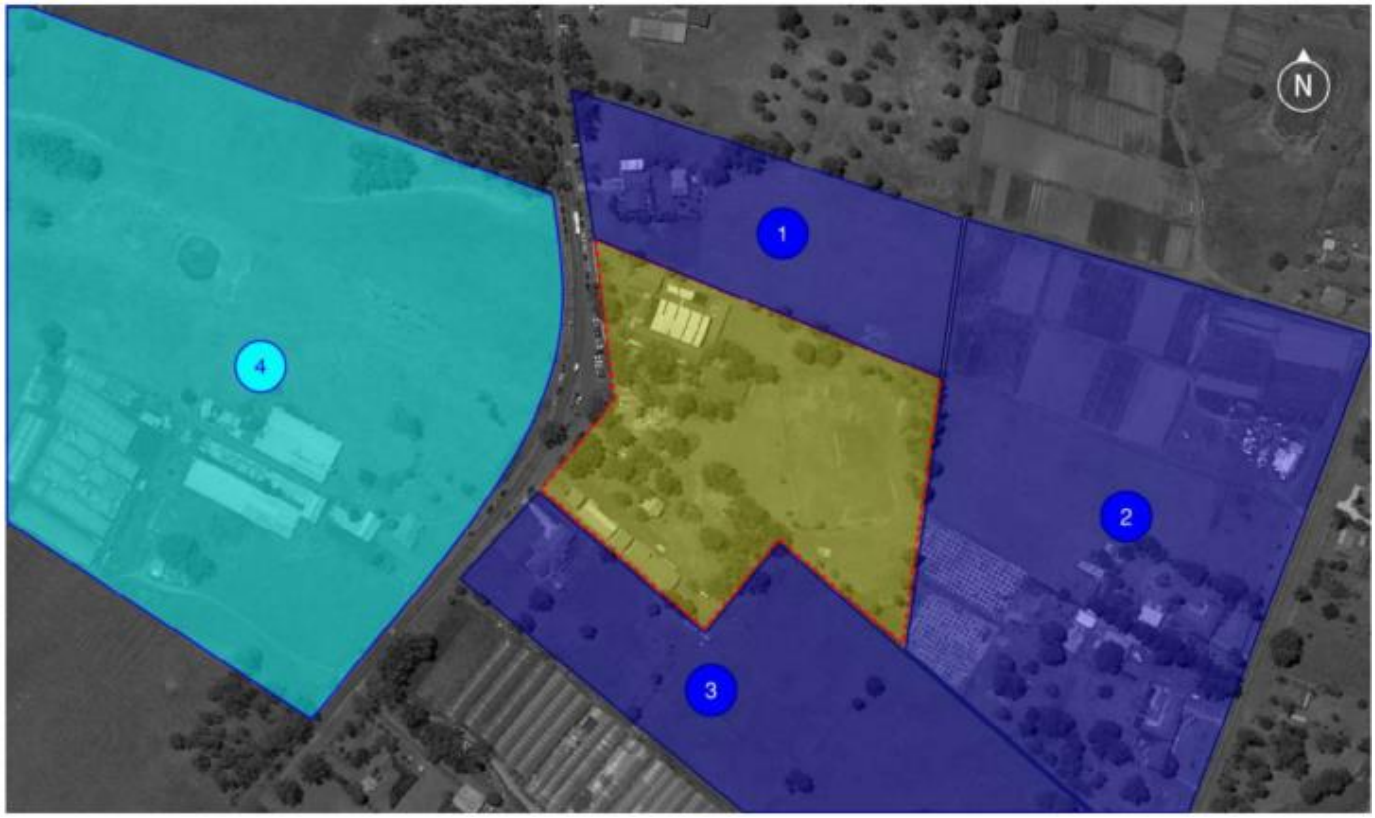


Figure 58: Nearest sensitive receivers (Source: JHA Consulting)

Attended and unattended noise surveys were conducted at the locations shown in **Figure 59** to establish the ambient and background noise levels at the site.

Figure 59: Noise Survey locations (Source: JHA Consulting)

Short-term and long-term noise monitoring was also carried out on the site, which demonstrated that the noise environment surrounding the site is dominated by natural noise (i.e., birds, insects, etc.), agricultural activities and intermittent traffic along Rickard Road. Additionally, increased noise levels were recorded at night likely due to increased wildlife activity at night, particularly insects.

Based on the criteria from the relevant noise standards and guidelines, **Figure 60** below summarises the operational noise level criteria.

Noise Emission	*Standard / Guideline*	*Time Period*	*Noise Level Criteria (dBA)*
External Mechanical Plant	NSW EPA NPI	Day Time (7am-6pm)	46
		Evening Time (6pm-10pm)	43
		Night Time (10pm-7am)	38
Operational Noise	SEPP	Day Time (7am-6pm)	46
		Evening Time (6pm-10pm)	48
Outdoor playground	AAAC Guideline	Up to 4 hours	51
		More than 4 hours	46

Figure 60: Summary of operational noise levels (Source: JHA Consulting)

Noise emissions from the proposed activity have the potential to impact on existing surrounding noise sensitive receivers. For the purpose of the noise impact assessment, the noise sources associated with the activity have been separated into construction and operational noise impacts. These are summarised as follows:

Construction Noise and Vibration

A detailed construction program has not yet been completed; however, a preliminary construction noise assessment has been carried out based on typical plant and machinery expected throughout the construction stages. The preliminary noise assessment has been considered at the nearest existing sensitive receivers, as well as existing school buildings.

Noise

A high-level noise assessment has been carried out to predict the worst-case noise level at the nearest noise sensitive receivers. The existing school has also been considered as a sensitive receiver for this high-level assessment as during construction there will be students attending the existing school.

A Detailed Construction Noise Vibration Management Plan (CNVMP) will be prepared prior to construction, to provide acoustic mitigation measures and management measures based on specific construction works, equipment and locations.

The expected construction noise sources and the predicted noise levels at the nearest sensitive receivers plus existing school receivers are shown below:

Item	Typical Power Noise Level L_{A10} (dB ref 1pW)	Typical Noise Level $L_{A10,15m}$ at 7m (dB ref 20µPa)	Predicted Noise Level $L_{Aeq,15m}$		Complies with Highly Noise Affected Criteria
			Nearest Residential	Existing school receivers	
Angle grinders	104	76	77 – 82	71 – 76	No
Truck (>20 tonne)	108	80	81 – 86	75 – 80	No
Circular saw	115	87	88 – 93	82 – 87	No
Piling rig	120	92	93 – 98	87 – 92	No
10-40tn Excavator	117	89	90 – 95	84 – 89	No
40-50tn Mobile crane	111	83	84 – 89	78 – 83	No
Concrete pump	114	86	87 – 92	81 – 86	No
Concrete truck	110	82	83 – 88	77 – 82	No
Drill	94	66	67 – 72	61 – 66	Yes

Figure 61: Anticipated noise levels for construction equipment and plant used during construction works (Source: JHA Consulting)

Based on the results of the preliminary assessment as shown above, the noise associated with the construction works is expected to exceed the noise limits for highly noise affected receivers within standard hours based on typical noise levels associated with construction sites and machinery. Compliance with the relevant construction noise criteria can however still be achieved through specific noise mitigation measures such as acoustic screening around the site. These noise mitigation measures are to be provided in a detailed Construction Noise & Vibration Management Plan, to demonstrate compliance with the relevant highly noise affected criteria outlined in the JHA assessment.

Vibration

The recommended safe working distances for typical construction plant are provided below.

Plant Item	Description	Cosmetic Damage	Human Response
Small Hydraulic Hammer	5-12 tonne	2m	7m
Medium Hydraulic Hammer	12-18 tonne	7m	23m
Large Hydraulic Hammer	18-34 tonne	22m	73m
Vibratory Pile Driver	Sheet piles	2-20m	20m
Pile Boring	<800mm	2m	N/A
Jackhammer	Handheld	1m	Avoid Contact with Structure

Figure 62: Recommended minimum working distances for vibration intensive plant from sensitive receivers (source: JHA Consulting)

For any vibration intensive plant expected to be within proximity of the minimum distances described above, the contractor must engage a qualified engineer to carry out a vibration survey to assess any potential risks and develop mitigation measures to be included in the CNVMP.

Operational Noise

The following operational noise sources have been identified:

- Mechanical plant from the development to the surrounding receivers.
- Activities and events within the Hall.
- Public address and school bell systems.
- Activities on the outdoor playground.
- Noise emissions from the car park.
- Traffic noise generation.
- Other noise sources.

The following mitigation measures are made to mitigate the potential operational noise generated from the proposed activity.

Mechanical Services

At this stage, mechanical plant selections have not been made. Therefore, a detailed noise assessment has not been able to be carried out. Acoustic assessment of the mechanical plant will be conducted during the design phase of the project in order to confirm any noise control measure requirements.

However, based on the proposed location of the mechanical plant, in order to comply with the NSW Noise Perception Index (NPI) criteria for noise emissions to the nearest sensitive receiver, the maximum allowable cumulative noise emissions from the external mechanical plant shall be controlled to achieve LAeq,15min 65dB(A) at 1m from the plant boundary.

Noise from mechanical plant from the proposed activity should be controlled to ensure external noise emissions are not intrusive and do not impact the amenity of noise sensitive receivers. The noise emissions must meet the noise limits as set out in accordance with the NSW NPI.

Noise controls may need to be incorporated with the design of the mechanical plant to ensure that cumulative noise levels from plant to the nearest noise sensitive receivers meets the noise level criteria. Mechanical plant will operate continuously during school's operational hours and no night-time operation (10pm to 7am) of the external mechanical plant will be allowed.

Public Address and School Bell Systems

As with the mechanical services, the public address and school bell systems have not been selected. So, a detailed assessment of the impacts has not been possible.

These systems will be designed, installed and operated so that they do not unreasonably interfere with the amenity enjoyed by nearby residents. Mitigation measures to reduce the noise impact from the public address and school bell systems include:

- Locate and orient low-powered horn-type speakers to provide a good coverage of the school while being away from nearby residences.
- Mount speakers with a downward angle and as close as possible to the floor.
- Adjust noise level of the systems to that they are clearly audible on the school property without being excessive.
- Once an appropriate noise level has been determined, the systems should be limited to these noise levels so that staff cannot increase the noise levels.
- Systems shall only be used during school hours.

Activities within the Hall

Any noise stemming from the Hall needs to be controlled to ensure no detrimental impacts on nearby residences. The predicted noise level the boundary of the nearest receiver will comply with the TI SEPP daytime and evening criteria with the windows closed. However, with windows open the noise level at the nearest receiver will exceed both the daytime and evening criteria. The Noise and Vibration Impact Assessment (in **Appendix 29**) recommends implementing a Noise Operational Management Plan to minimise any acoustic disruption to the nearest sensitive noise receivers. This has been included in the mitigation measures.

Outdoor Playground

External noise emissions associated with the outdoor playgrounds have been assessed. Based on the projected increase in student numbers, the noise levels will increase the noise level on site by less than 2dB(A). An increase of less than 2dB(A) is considered negligible and it would not be discernible by the average listener. Therefore, noise from the outdoor playground is not expected to affect the amenity of the surrounding noise sensitive receivers.

Car Park Noise

The proposed upgrade works do not involve any changes to the existing staff car park. As such, with no additional vehicle activity in and within the car park, the noise emissions from the car park are not expected to impact the amenity enjoyed by surrounding properties.

Traffic Noise Generation

Traffic noise impacts due to the likely generated vehicle movements of the proposed activity is anticipated to be insignificant, as the noise levels are not expected to increase by more than 2dB at the nearby noise sensitive receivers.

Other Noise Sources

Noise impact from waste collection is likely to be negligible as it will be undertaken during daytime hours (7am – 6pm) and will be within the confines of the school. The school is currently operational, with waste collection occurring, as required. Therefore, existing noise from waste collection is unlikely to change.

Noise Intrusion Assessment

Traffic noise from Rickard Road has been assessed to determine the minimum glazing thickness for the building. A minimum sound insulation performance has been obtained to meet the internal noise level criteria as required under EFSG DG11. The Acoustic Report recommends external glazing have a minimum sound reduction index of RW32. A 6.38mm laminated fixed glazing system will achieve the nominated sound reduction index.

Acoustic design of the façade, other external building elements and ventilation openings of the school will need to be considered throughout the design development stages in order to meet the noise level criteria.

Conclusion

Subject to implementing the various mitigation measures, the proposed will not result in any adverse or significant acoustic amenity impact on the surrounding environment or result in adverse noise intrusion on to the existing school population.

6.2.2 Mitigation Measures

Table 19: Acoustic Mitigation Measures (source: JHA Consulting)

Mitigation Name	Timing	Mitigation Measure	Reason for Mitigation Measure
Plant and Equipment	Prior to construction	Prior to the commencement of the relevant stages of works, acoustic assessment of mechanical plant is to continue during the detailed design phase of the project to confirm any noise control measures to achieve the relevant noise criteria at the nearest noise sensitive receivers. The maximum allowable cumulative noise emissions from the external mechanical plant is to be controlled to achieve LAeq 15 min 56dB(a) at 1 metre from the plant boundary. Compliance is to be confirmed to the Crown Certifier by a suitably qualified acoustic consultant.	To comply with the established noise level criteria.

	Prior to construction	Prior to the commencement of the relevant stage of works, the detailed design process is to ensure mechanical plant is to be strategically located to ensure the cumulative noise levels at the receiver boundaries are met.	
	During construction	Quieter techniques are to be used for all high noise activities such as rock breaking, concrete sawing, and using power and pneumatic tools.	
	During construction	Quieter plant and equipment is to be used, based on the optimal power and size to most efficiently perform the required tasks.	
	During construction	Plant and equipment selection is to be based on low vibration generation characteristics.	
	During construction	Plant is to be operated in the quietest and most effective manner.	
	During construction	The operating noise of equipment is to be limited as far as practically possible during all construction works.	
	During construction	The Principal Contractor is to regularly inspect and maintain plant and equipment to minimise noise and vibration levels to ensure that all noise and vibration reduction devices are operating effectively.	
	During construction	Acoustic noise control measures are to be put in place to minimise noise impacts, in accordance with the Construction Noise and Vibration Management Plan which is to be prepared in accordance with measure G14. These include (but are not limited to): • In-duct attenuation. • Noise enclosures as required. • Sound absorptive panels. • Acoustic louvres as required. • Noise barriers as required.	
	During operation	Night-time operation (10pm to 7am) of the external mechanical plant is not permitted.	
On site	During construction	The distance between noisy construction activities and noise sensitive receivers is to be maximised.	To minimise impact of acoustic amenity by reducing noise from the site.
	During construction	Noisy fabrication work is to be undertaken off-site where possible.	
	During construction	The use of reversing beeping alarms is to be avoided, or alternative	

		systems are to be provided, such as broadband reversing alarms.	
	During construction	Any pre-existing barriers or walls on a demolition or excavation site are to be maintained as long as possible to provide optimum noise control.	
	During construction	Barriers that are part of the project design are to be constructed early in the project to mitigate site noise.	
	During construction	Temporary site building and material stockpiles are to be used as noise barriers.	
Work scheduling	During construction	Respite periods are to be used, including restricting very noisy activities to daytime (7am to 6pm), restricting the number of nights that after-hours work is conducted near residences, or by determining any specific requirements, particularly those needed for noise sensitive receivers.	To minimise impact of acoustic amenity by scheduling work during periods when people are least affected.
	During construction	The Principal Contractor is to schedule noisy activities to minimise impacts by undertaking all possible work during hours that will least adversely affect sensitive receivers and by avoiding conflicts with other scheduled events.	
	During construction	Noisy work is to be scheduled to coincide with non-sensitive periods, to reduce impact on sensitive periods including school examinations.	
	During construction	Noisy activities are to be scheduled to coincide with high levels of neighbourhood noise (including any surrounding construction noise) so that noise from the activities is partially masked and not as intrusive.	
	During construction	The Principal Contractor is to plan deliveries and access to the site to occur quietly and efficiently and organise parking only within designated areas located away from sensitive receivers.	
	During construction	The Principal Contractor is to optimise the number of deliveries to the site by amalgamating loads where possible and scheduling arrivals outside the morning drop off and afternoon pick up times.	
	During construction	The Principal Contractor is to designate, design and maintain access routes to the site to minimise impacts.	

Consultation, notification and complaints	Prior to and during construction	The department and/or the Principal Contractor is to provide regular updates to neighbours before and during construction.	To ensure consultation with community to minimise impact on acoustic amenity.
	Prior to and during construction	The Principal Contractor is to maintain good communication between the community and their staff.	
	Prior to and during construction	The Principal Contractor is to implement all reasonable and feasible mitigation measures for all works to ensure that any adverse noise impacts to surrounding receivers are minimised when noise goals cannot be met due to safety or space constraints.	
Exceedances	During construction	The Principal Contractor is to implement equipment- specific screening or other noise control measures recommended in AS 2436:2010.	To comply with the established noise level criteria.
	During construction	The Principal Contractor is to limit the number of trucks on site at the commencement of site activities to the minimum required by the loading facilities on site.	
	During construction	When loading trucks, best practice noise management strategies are to be adopted to avoid materials being dropped from height into dump trucks.	
	During construction	Any miscellaneous equipment (extraction fans, hand tools, etc) not specifically identified the REF is to incorporate silencing/shielding equipment as required to meet the noise criteria.	
Public address and bell system	Prior to during operation	Prior to the commencement of the relevant stage of works, the public address and school bell systems are to be designed, installed and operated such that the systems do not interfere unreasonably with the comfort and repose of occupants of nearby residences. Noise emissions from public address and school bell systems are to be restricted to the noise levels during the day (7am-6pm) of 46 LAeq dB(A) and during the evening of 48 LAeq dB(A). Acoustic assessment of public address and school bell systems is to continue during the detailed design phase of the project to confirm any noise control measures required to achieve the relevant noise criteria at the nearest noise sensitive receivers.	To comply with the established noise level criteria.

	Prior to and during operation	Low-powered horn-type speakers are to be located and orientated to provide good coverage of the school areas whilst being directly away from residences and near sensitive receivers. System coverage shall be reviewed during the detailed design phase.	
	Prior to and during operation	Speakers are to be mounted from a downward angle and as close to the floor as possible.	
	Prior to and during operation	The noise level of the systems is to be adjusted on site so they will be clearly audible on the school site without being excessive. The systems will initially be set so that the noise at nearby residences and sensitive receivers do not exceed noise level criteria.	
	Prior to and during operation	Once the appropriate noise level has been determined on site, the systems are to be limited to these noise levels so that staff cannot increase the noise levels.	
	Prior to and during operation	The systems are to be set so that it only occurs on school days.	
Activities within the hall	During operation	A Noise Operational Management Plan is to be implemented by the school to minimise any acoustic disruption to the nearest sensitive noise receivers. The plan is to be prepared by a suitably qualified acoustic consultant.	To comply with the established noise level criteria.
Traffic Noise Intrusion	Prior to construction	Prior to the commencement of the relevant stage of works, acoustic design of the façade, other external building elements and ventilation openings of the school is to be considered throughout the design development stages in order to meet the identified noise level criteria.	To comply with the internal noise level criteria.
Waste Collection	During operation	Waste collection and servicing is to be carried out during daytime hours (7am-6pm) and within the confines of the school.	To comply with the established noise level criteria.

6.3 Soil Conditions, Contamination and Hazardous Materials

6.3.1 Assessment

The REF is accompanied by an Intrusive Geotechnical Investigation Report in **Appendix 9** and a DSI in **Appendix 10.**

Soils and Salinity

The subsurface profile across the site comprises a sequence of top soil/fill and residual soils underlain by bedrock shale/siltstone. Fill is minor and localised and the depth to bedrock is anticipated to vary from about 2.0m to 5.0m from existing ground surface. Residual soils are stiff to hard clayey soils of medium to high plasticity.

Reference to the Map showing Salinity Potential in Western Sydney prepared by Department of Infrastructures, Planning and Natural Resources (2002) indicates moderately to high salinity potential across the site.

A Saline Soil Management Plan (SSMP) is required to be prepared to minimise impacts of erosion and soil salinity during earthworks. The objective of the SSMP is to minimise the impact of saline and dispersive soils on the proposed upgrade works and minimise the impact of the proposed works on the existing salinity and hydrology. The SSMP can be prepared prior to site works.

Groundwater

The depth to groundwater across the site is more than 6m from existing ground surface under normal climatic conditions, therefore there will be no adverse impacts. It should however be noted that fluctuations in the level of groundwater might occur due to variations in rainfall and/or other factors not evident during drilling. A mitigation measure has been included to address the unlikely event of groundwater being intercepted during the works.

Earthworks

Site preparation for proposed upgrade works will involve excavation and fill operations. The extent of cut will not adversely affect soil stability of the site or adjoining land and is hence considered minor. It is also unlikely that the excavation works will encounter significant groundwater inflow.

Soil Contamination

As part of the assessment of the site conditions, 41 sample locations were selected to assess the presence of any contamination. As indicated in **Section 2.1.9** of this REF, five AECs were identified as being of concern. Assessment of these AECs conclude:

- AEC 1 – areas near former / existing building structures
    - No exceedances of identified contaminants of concern were recorded above the adopted assessment criteria.
    - As such, the likelihood of contamination associated with this AEC is considered to be low.
- AEC 2 – areas of possible filling of unknown original and/or quality
    - Some minor qualities of anthropogenic fill, eg porcelain, tile and glass, were found. However, generally, contaminants of concern did not exceed adopted assessment criteria.

    - As such, the likelihood of contamination associated with this AEC is considered to be low.
- AEC 3 – whole site from potential spraying of pesticides and herbicides
    - No exceedances of contaminants of concern were found.
    - As such, the likelihood of contamination associated with this AEC is considered to be low.
- AEC 4 – septic tanks prone to overflowing
    - Anecdotal information confirmed that the existing septic tanks are prone to overflowing during heaving rainfall. Contaminants in the vicinity of the tanks indicate effluent in the soil.
    - As such, there is moderate risk from contamination and mitigation measures are proposed.
- AEC 5 – areas near historical incinerators
    - No exceedances of adopted assessment criteria were found.
    - As such, the likelihood of contamination associated with this AEC is considered to be low.

The contamination consultant concluded that all soil analysis results were below the adopted human health criteria and that the site is not considered to present a human health risk to the existing and future occupants of the site. Notwithstanding, should any unexpected contamination be found in areas underneath building footprints and post demolition, or surrounding the existing septic tank, then mitigation measures are included in **Table 20** below.

Hazardous Building Materials

A Hazardous Materials and Risk Assessment (in **Appendix 16**) has been undertaken by the department in conjunction with this REF. Asbestos containing material was identified within 13 buildings on the site. Further, the Assessment assumes asbestos may be contained within the existing demountables. The demountables do not form part of the scope of works in the activity.

As such, standard mitigation measure relating to the removal of asbestos is required to be imposed.

Conclusion

It is considered that the site is generally suitable for the proposed activity and the continued use as a school provided the mitigation measures are implemented.

6.3.2 Mitigation Measures

Table 20: Soil Conditions, Contamination and Hazardous Materials mitigation measures (Source: Geotechnique and SMEC)

Mitigation Name	Timing	Mitigation Measure	Reason for Mitigation Measure
Mitigation Measures outlined in Intrusive Geotechnical Investigation Report			
Geotechnical Risk - Variability in Depth to Bedrock	During construction	A site inspection must be carried out during the relevant stage of works to determine the depth to bedrock and ascertain allowable	To reduce the risk or uncertainties due to variation in thickness of soils and depth to bedrock so that actual

		bearing pressures for design of footings.	founding depths for footings or piers supporting buildings and other major structures are known. This means appropriate, economical and reliable foundation design can be achieved and potential variation claims during construction stage can be minimised.
Geotechnical Risk-Dispersive Soil	During construction	Earthworks, including disturbance and excavation of soils, during proposed activity must be carried out in accordance with an appropriate Soil Management Plan (SMP) to manage and minimize impacts from dispersive soils to the proposed activity and vice versa for the relevant stage of works.	To manage adverse impacts from dispersive soils to the proposed activity and vice versa and to reduce variation claims during construction stage.
Geotechnical Risk-Saline Soil	During construction	Earthworks, including disturbance and excavation of soils, during proposed activity must be carried out in accordance with an appropriate Saline Soil Management Plan (SSMP) to manage and minimize impacts from saline soils to the proposed activity and vice versa. It is possible that non-saline soil may be encountered in some portions of the site. Unless additional testing is carried out to delineate non-saline soil, disturbance, and excavation of localised non-saline soils will also be carried out in accordance with SSMP. This is required for the relevant stage of works that it applies to.	To manage adverse impacts from saline soils to the proposed activity and vice versa and to reduce variation claims during construction stage.
Mitigation Measures outlined in DSI			
Manage known and potential soil contamination	Prior to and during construction	The CEMP is to include a robust unexpected finds procedure to manage potential unexpected finds of contamination including for areas underneath building footprints post demolition. This may include the existing DoE unexpected finds protocol for contamination. The CEMP is to be prepared prior to the commencement of any site works and is to be implemented for the full duration of the works associated with the activity and the relevant stage of works that it applies to.	To better assess the condition of the Site and/or reduce likelihood of dealing with unexpected finds.

Septic System	During construction	During the installation of the septic system, shallow soils impacted by the overflowing septic system are to be segregated and stripped, with classification and disposal offsite at a licensed facility (approx. (3m by 3m by 0.5m depth).	To reduce potential of health impacts from exposure to septic system overflows.
	During operation	A management procedure is to be implemented to prevent access to areas affected by overflows if overflows are unpreventable in certain rain events.	
Hazardous Building Materials	Prior to and during construction	A Hazardous Building Material Management Plan is to be prepared and implemented during all site demolition works for the relevant stage of works that it applies to.	To reduce potential of exposure to HBM and avoid introduction of contaminants to the ground.
	During construction	Removal of all hazardous building materials from structures that require demolition is to be undertaken in accordance with relevant regulations and codes along with adequate assessment and clearance prior to demolition for the relevant stage of works that this applies to.	

6.4 Aboriginal Heritage

6.4.1 Assessment

A Preliminary Indigenous Heritage Assessment and Impact Report accompanies this REF at **Appendix 15**.

The Report concluded that there were no Aboriginal sites or areas of potential that were identified during their assessment. An AHIMS search was conducted on 16 October 2024 which did not identify any Aboriginal sites within the school site. The search area was a 4km square centred upon the site. The site has been moderately to heavily disturbed as a result of earthworks associated with the establishment and ongoing upgrades of the school. Given this heavy disturbance it was considered that there was low potential for artefact scatters to be present. As such, it is considered that there are unlikely to be any adverse Aboriginal heritage impacts arising from the proposed activity and no further investigation is required to inform the REF.

Connecting with Country has been embedded within the design of the proposed activity. A Walk on Country was undertaken on 27 June 2022 with Aboriginal representatives, school representatives, and the design team, fostering a dialogue about the cultural significance of the land and sharing valuable insights. This collaboration ensured that Aboriginal perspectives were integrated into the design, aligning the project with cultural values and honouring the land's connection. This Connecting with Country narrative focused on three important cultural attributes:

- Meeting spaces: The yarning circle and other forms of meeting spaces in the landscape support the exchange of knowledge and learning particularly about the environment

- Welcome: A welcoming statement for all visitors is important, especially for Indigenous people. This welcome would also function as an ‘acknowledgment of country’ and include text directly acknowledging the Dharug lands. It may take the form of a unique sign at the school entrance or a more sculptural element.
- Curved pathway: Aboriginal people when traversing the landscape, tend to take a meandering path to their destination rather than walking in straight lines.

Unexpected finds protocols will be adhered to in the event something is uncovered.

Conclusion

Based on the disturbance within the site, distance to water sources, and landforms present, it is considered that there is a low potential for Aboriginal sites or areas of potential sites to be present. Connecting with Country principles have been embedded within the overall design to enhance the cultural significance of the land.

6.4.2 Mitigation Measures

Table 21: Aboriginal Heritage mitigation measures (source: Kayandel)

Mitigation Name	Timing	Mitigation Measure	Reason for Mitigation Measure
Preliminary Indigenous Heritage Assessment and Impact	Prior to and during construction	All works are to be undertaken in accordance with the recommendations of the approved Preliminary Indigenous Heritage Assessment and Impact prepared by Kayandel, including the requirement to prepare and implement (where required) an unexpected finds protocol.	Keeps the proposed works acceptable from an Indigenous heritage perspective.
Aboriginal heritage site induction (toolbox talk)	Prior to and during construction	All relevant staff and contractors are to be made aware of their statutory obligations for heritage under the *National Parks and Wildlife Act 1974*, which may be implemented as a heritage induction.	To manage unexpected Aboriginal heritage finds. To prevent against inadvertent harm to unexpected Aboriginal finds.
Unexpected Aboriginal heritage finds	During construction	If unrecorded Aboriginal object or objects are identified during the relevant stage of works, then all works in the immediate area must cease and the area should be cordoned off. Heritage NSW and the Local Aboriginal Land Council should be contacted so the site can be adequately assessed and managed.	To manage unexpected Aboriginal heritage finds.
Unexpected Aboriginal human remains	During construction	In the event that skeletal remains are identified during the relevant stage of work, work must cease immediately in the vicinity of the remains and the area must be cordoned off. The Proponent must contact the local NSW Police who will make an initial assessment as	To manage any unexpected Aboriginal human remains.

		to whether the remains are part of a crime scene, or possible Aboriginal remains. If the remains are thought to be Aboriginal, Heritage NSW must be contacted by ringing the Enviroline 131 555. A Heritage NSW officer will determine if the remains are Aboriginal or not; and a management plan must be developed in consultation with the relevant Aboriginal stakeholders before works recommence.	

6.5 Non-Aboriginal Heritage

6.5.1 Assessment

The REF is accompanied by a SOHI (refer to **Appendix 4**).

The subject site has no national or State level significance nor is it within a Heritage Conservation Area. The southern part of the site (Lots 38E and 39C, DP 8979) is listed as a local heritage item and is identified as Item 9 'Leppington Public School' in the Precincts SEPP. It is also identified in the department's s.170 Heritage and Conservation Register and is identified as 'Leppington Public School – Buildings B00H-B00M'. The summary report of initial site investigations identified that other buildings on the site, being Building A, Building B, Building C and Building D, are not included in the heritage listing but have heritage significance by representing two major phases of the school's development, being 1920s and 1950-60s. All buildings (excluding Building C) are being retained as part of the redevelopment of the school.

Demolition

The proposed activity involves the demolition of structures and trees. No demolition is proposed in the heritage mapped area of the site.

Block C (the existing toilet block) is proposed to be demolished and is located outside of the locally listed curtilage. Despite its contributory aesthetic significance as part of a mid-century development group, Building C fails to meet modern standards and does not provide adequate passive surveillance for the safety of children. Its removal is necessary to accommodate expansion plans, resulting in the total loss of its historical and aesthetic significance as a physical structure, but only a minor loss of historical and aesthetic significance to the existing setting.

New Structures

The new constructions, including the three-storey building, hall and COLA are expected to have minor to moderate visual impacts on existing structures. These impacts have been mitigated through setbacks and landscaping, ensuring a harmonious integration of new and old elements.

The creation of the Yarning Circle within 10m of the heritage listed building B00H is likely to have a minor impact on the heritage significance of the overall place and building B00H. The installation at this location will however enhance the cultural and educational experience for the school community, while respecting the heritage significance of the school. It is also considered that the feature aligns with the rural setting of the site.

Moveable Items

The following movable items and memorials are also being retained as part of the redevelopment of the school:

- The 1981 plaque commemorating the opening of the new accommodation, Building E, by the then Minister for Education (located within Building E); and
- The 1998 plaque commemorating the opening of the Covered Outdoor Learning Area (COLA) by the then Minister for Education and Training (located within Building A).

During construction, it is recommended that these items be removed and stored off site and reinstated once construction has finished.

Conclusion

The SOHI concludes that the proposed upgrade will have a minor-moderate impact on the overall heritage significance of LPS and a minor impact on the listed heritage buildings B00H, B00I, B00J, B00K, B00L, and B00M, provided that the mitigation measures outlined in the SOHI are adhered to.

6.5.2 Mitigation Measures

Table 22: Environmental Heritage (source: EMM)

Mitigation Name	Timing	Mitigation Measure	Reason for Mitigation Measure
Statement of Heritage Impact	Prior to and during construction	All work is to be undertaken in accordance with the recommendations of the Statement of Heritage Impact approved as part of the REF.	Keeps the proposed works acceptable from a heritage perspective
Archival Recording	Prior to construction and prior to operation	Prior to commencing of the relevant stage of work and upon its completion, create an archival recording of Building C and the area of the proposed works around B00H, B00I, B00J, B00K, B00L, and B00M. This should adhere to the guidelines outlined in the Photographic Recording of Heritage Items Using Film or Digital Capture (NSW Heritage Office 2006).	Records historical features and current conditions to support reference, restoration, and research, preserving a detailed account of heritage elements prior to the commencement of construction and demolition.

6.6 Ecology

6.6.1 Assessment

The REF is supported by an Arboricultural Impact Assessment Report prepared by the arborist consultant. The full report is available in **Appendix 6**.

The area of assessment refers to 119 trees and includes the entirety of the subject site, school frontage and the western side of the boundary. The report identifies the Safe Useful Life

Expectancy (SULE) and Significance of a Tree Assessment Rating System (STARS) for each tree identified.

Tree Removal

In summary, a total of 95 trees (Trees No. 5-10, 16, 17, 31-36, 40-62, 67-89, 90-96, 100, 110-113, 115-117, 119-126, 129-131, 133-137, 141-144 and 148) can be retained, while 24 trees (Trees No. 4, 14, 15, 18-31, 63-66, 128 and 146-147) will require removal to accommodate the design. The tree numbers referenced here align with the assessment in the Arboricultural Report. Of the 24 trees that will be removed, nine are considered to be high significance trees, 11 are medium significance trees and four are low significance trees.

Table 23 below summarises the trees identified for removal, together with the element of the proposed activity that is causing the impact.

Table 23: Trees identified for removal (Source: Allied Tree Consultancy)

Tree Name & No.	SULE Rating	STARS	Identified Impacts
Eucalyptus moluccana Grey Box 4	2A/2D	High	This tree is located in the footprint of the proposed hydrant hardstand and would require removal. Notwithstanding this design conflict, this tree also shows signs and symptoms of active decay pathogens that may indicate a risk for failure.
Pinus radiata Monterey Pine 14	2A	Medium	These trees are located along the northern boundary and would be affected by the construction methodology, where access to the new Learning Hub along the northern part of the site is proposed. Notwithstanding this design conflict, Tree Nos. 22 & 23 also show signs and symptoms of active decay pathogens that may indicate a risk for failure.
Eucalyptus scoparia Wallangarra White Gum 15	3D	Low	
Eucalyptus elata River Peppermint 18	1B	High	
Eucalyptus elata River Peppermint 19	1B	Medium	
Eucalyptus elata River Peppermint 20	2A	Medium	
Eucalyptus elata River Peppermint	1B	Medium	

Tree Name & No.	SULE Rating	STARS	Identified Impacts
21			
Eucalyptus tereticornis Forest Red Gum 22	2D	High	
Eucalyptus grandis Flooded Gum 23	3D	Low	
Casuarina cunninghamiana River Oak 24	1B	High	This tree is located in the footprint of the proposed three-storey building along the northern part of the site and requires removal.
Callistemon viminalis Weeping Red Bottlebrush 25	2A	Medium	These trees are located in the footprint of the fill required for the new three-storey building along the northern part of the site and provide a major encroachment of this building. As such, they require removal.
Casuarina cunninghamiana River Oak 26	1B	High	
Callistemon viminalis Weeping Red Bottlebrush 27	2A	Medium	
Eucalyptus elata River Peppermint 28	2A	Medium	These trees are located along the northern boundary and would be affected by the construction methodology, where access to the new Learning Hub along the northern part of the site is proposed.
Eucalyptus elata River Peppermint 29	1B	Medium	
Eucalyptus elata River Peppermint 30	1B	Medium	
Casuarina	1A	Medium	

Tree Name & No.	SULE Rating	STARS	Identified Impacts
cunninghamaniana River Oak 31			
Eucalyptus moluccana Grey Box 63	2A	High	These trees are located in the footprint of the proposed sports court and require removal.
Eucalyptus moluccana Grey Box 64	2A	High	
Eucalyptus moluccana Grey Box 65	2A	High	These trees are located in the footprint of the proposed building, hall and OSHC hub and require removal.
Eucalyptus moluccana Grey Box 66	2A	High	
Eucalyptus saligna Sydney Blue Gum 128	1B	Low	This tree is located in the footprint of the proposed car park extension and require removal.
Callistemon viminalis Weeping Red Bottlebrush 146	2D	Low	These trees are located in the footprint of the fill required for the building, hall, OSHC hub and provide a major encroachment of these buildings. They require removal.
Callistemon viminalis Weeping Red Bottlebrush 147	2A	Medium	

Summary of tree removal impact

24 trees are proposed to be removed to accommodate the proposed design or enable access to the fill for the construction of new buildings and structures. The arborist consultant's assessment considered the 24 trees that are proposed to be removed as part of the activity. Of the 24 trees identified for removal due to conflicts with the design, 23 are native trees, including seven Eucalyptus elata (River Peppermint), one Eucalyptus tereticornis (Forest Red Gum), five Eucalyptus moluccana (Grey Box), four Callistemon viminalis (Weeping Red Bottlebrush), three Casuarina cunninghamiana (River Oak), one Eucalyptus scoparia (Wallangarra White Gum), one Eucalyptus grandis (Flooded Gum), and one Eucalyptus saligna (Sydney Blue Gum). The report concludes that most of the impacted trees have a diameter at breast height (DBH) less than 50cm

and are less than 15m in height and are unlikely to have developed hollows that could be used for native fauna for roosting, nesting or breeding.

Removal of trees on the site has the potential to reduce foraging habitat for species such as the Grey-headed Flying-fox. Given the site is within an area of certified land under the SWGC biocertification, no additional biodiversity assessment or approvals are required for tree removal. Notwithstanding, if, during the works and/or tree removal process, foraging habitat for the Grey-headed Flying-fox is discovered, a suitably qualified ecologist is to provide advice on the appropriate response.

Cumberland Plain Woodland

As informed by desktop surveys and ground-truthed during the field investigation by the biodiversity consultant, an area of Cumberland Plain Woodland TEC is present on the site, located in the south-west of the site. This ecological community is listed as critically endangered and a 'serious and irreversible impact entity' under the BC Act. Despite the area being found in a modified condition, the vegetation still meets the definition of a small patch of Cumberland Plain Woodland. Any of these existing trees identified as belonging to the Cumberland Plain Woodland TEC will be retained and protected.

Proposed landscaping

A detailed landscaping scheme has also been prepared (**Appendix 7**) and provides details on the number, location and species type for compensatory tree planting. The majority of existing high value trees are to be retained and integrated into carpark surrounds and within the site, including by the Yarning Circle where the existing Cumberland Shale Plains Woodland are located. A total of seven new trees will be planted on the site to compensate for the required tree removal.

Conclusion

The proposed activity is unlikely to have a significant effect on the ecological values present within the site. The activity will ensure that the trees of high value are retained where possible with appropriate species being introduced within the boundaries to compensate for any removal of vegetation as a consequence of the activity. Any potential impacts can be adequately mitigated through the mitigation measures detailed below.

6.6.2 Mitigation Measures

Table 24: Mitigation Measures for Ecology (source: Allied Trees and ERM)

Mitigation Name	Timing	Mitigation Measure	Reason for Mitigation Measure
Mitigation Measures outlined in Arboricultural Report			
Tree management	Prior to construction	A suitably qualified arborist (conforms to the AS 4970) is required to be nominated before work starts, and they are to be provided with all related site documents.	Protection of trees
Demolition/Construction	Prior to construction	A Tree Management Plan (Arboricultural Method Statement) is to be prepared by a suitably qualified arborist and issued to the entity responsible for the demolition/construction.	

Tree protection	Prior to construction	Tree protection measures are to be installed as per a Tree Management Plan (Arboricultural Method Statement).	
Tree removal	Prior to construction	Trees are to be identified and marked for removal to prevent incorrect tree removal	Avoid incorrect tree removal.
Tree removal	Prior to and during construction	Native wildlife habitats are to be identified to avoid injury to animals, refer to Biodiversity Report for additional guidance.	Protection of native fauna.
Tree protection	Prior to and during construction	All workers must be briefed about the conditions outlined in the Tree Management Plan before the initiation of work. This is required as part of the site induction process.	Protection of trees.
Tree protection zone	Prior to and during construction	All trenching is to avoid the Tree Protection Zones (TPZ), unless authorised by a qualified Arborist. Otherwise, proposed routes for the subsurface utilities that have not been included in the design will be re-routed outside of the TPZ with under boring required if unable to reroute. Any excavation in the area of a TPZ must be authorised and conditioned by a suitably qualified arborist.	To ensure no impacts to the TPZ.
	During construction	Work-related to demolition/construction, e.g. stockpiling, site sheds, and scaffolding, is to avoid the TPZs. Any activity within a TPZ must be authorised and conditioned by a suitably qualified arborist.	
	Prior to and during construction	No form of material or structure, solid or liquid, is to be stored or disposed of within the TPZ.	
	Prior to and during construction	No lighting of fires is permitted within the TPZ.	
	Prior to and during construction	All drainage runoff, sediment, concrete, mortar slurry, paints, washings, toilet effluent, petroleum products, and any other toxic waste must be prevented from entering the TPZ.	
	Prior to and during construction	No activity that will cause excessive soil compaction is permitted within the TPZ. That is, machinery, excavators, etc. must refrain from entering the area of the TPZ unless measures have been taken, in consultation with a suitably qualified arborist.	
	Prior to and during construction	No site sheds, amenities or similar site structures are permitted to be located or extend into the area of the TPZ unless a suitably qualified arborist. provides prior consent.	
	Prior to and during construction	No form of construction work or related activity such as the mixing of concrete, cutting, grinding, generator storage or cleaning of tools is permitted within the TPZ.	
Tree protection	Prior to and during construction	No part of any tree may be used as an anchorage point, not should any noticeboard, telephone cable, rope, guy, framework, etc. be attached to any part of a tree.	Protection of trees.
	During construction	Any root unearthed which is less than 50mm in diameter must be cleanly cut and dusted with a fungicide, and not allowed to dry out, with minimum exposure to the air as possible.	

	During construction	Any root unearthed which is greater than 50mm in diameter must be located regarding their directional spread and potential impact. A suitably qualified arborist is required to assess the situation and determine future action regarding the tree in a healthy state.	
Mitigation Measures outlined in the Biodiversity Assessment Report			
Fauna and Flora Habitat Management	Prior to and during construction	If microbats, grey headed flying fox camps and/or birds of prey are found during works, the immediate area around the wildlife and/or nest is to be isolated from work, and consultation with a suitably qualified ecologist is to be carried out to address concerns and limit the potential of direct physical harm to the wildlife or loss of habitat.	Protection of native fauna.
	Prior to and during construction	Any sightings of *Phytophthora cinnamomi* and myrtle rust observed in the project area (site and broader works area) must be reported to the NSW Biodiversity Conservation Trust. Plants infected with myrtle rust need to be sprayed with fungicide and enclosed in a plastic bag 3-4 days post spray, and then disposed of into a normal waste bin.	Protection of native flora.
	Prior to and during construction	If a Weed of National Significance (WoNS) is located within the project area, appropriate management measures for the treatment, removal and disposal of WoNS are to be addressed in the manner recommended by relevant state and federal government authorities.	Protection of native flora.

6.7 Hydrology, Drainage and Flooding

6.7.1 Assessment

Flooding

The local constraints surrounding and through the site have been assessed in the Stormwater Management Plan (SMP) in **Appendix 11** to ascertain any areas whether local flooding may be an issue for consideration in the design of the upgrades.

The SMP noted that the site is in the Upper South Creek Floodplain Risk Management Study and Plan which was adopted by Camden Council in 2019. The Study found that the site is not flood prone or in a floodway and as such flooding is unlikely to occur on the site as it currently exists (refer to **Figure 63** below).

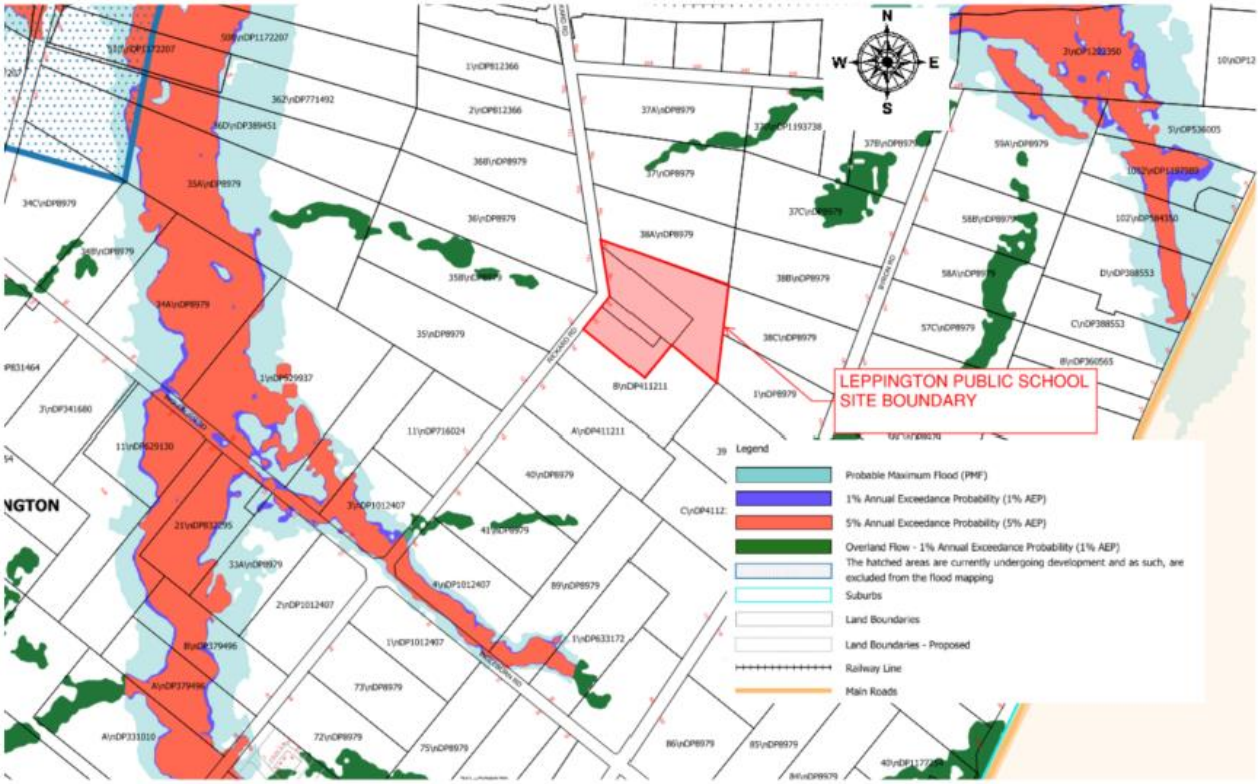


Figure 6: Mainstream Flood Events: 1% AEP, 5% AEP and PMF Flood Events (Upper South Creek Floodplain Risk Management Study and Plan 2019)

Figure 63: Excerpt from Upper South Creek Floodplain Risk Management Study and Plan (source: Stantec)

However, there is known localised flooding to the east of the existing library building that leaves the playing field waterlogged. The existing stormwater infrastructure located to the east of the library is to be investigated and replaced if damaged to mitigate flooding issues. The existing localised flooding has been reduced through the proposed site grading. The proposed site grading changes will relocate the low point of the site towards the north-east corner of the site boundary.

Groundwater

It is not expected that the proposed activity will have any impact on the existing water table. No impervious areas of the site will discharge to the ground and hence no groundwater quality measures are required to ensure Water Sensitive Urban Design requirements are met.

Surface Water / Stormwater Drainage

Construction

Bulk earthworks during construction have the potential for sediment and erosion with resulting impacts to stormwater runoff quality from the site. Sediment and erosion control measures will be implemented to minimise the transfer of soil from the site and minimise adverse impacts to stormwater quality. Subject to the implementation of appropriate sediment and erosion control measures, water quality impacts are expected to be negligible.

Operation

The upgrades to LPS will increase the impervious surface on the site, requiring suitable stormwater drainage to manage stormwater runoff. Stormwater will be managed via two new OSD tanks that will collect stormwater and discharge to the existing point on Rickard Road. The new

inground stormwater network will convey runoff via underground pipes and will be treated via OceanProtect Filter Baskets and StormFilter Cartridge Systems. The resulting stormwater quality impacts are considered negligible.

Conclusion

The activity has been designed with consideration of minimising impacts to soil and geology, stormwater and flooding. There are no significant environmental impacts associated with the proposed activity that cannot be adequately managed or mitigated.

6.7.2 Mitigation Measures

Table 25: Mitigation Measures for Hydrology, Drainage and Flooding (source: Stantec)

Mitigation Name	Timing	Mitigation Measure	Reason for Mitigation Measure
Stormwater and soils	Prior to and during construction	Sediment and erosion control measures are to be implemented to minimise the transfer of soil from the site and minimise adverse impacts to stormwater quality for the relevant stage of works that this applies to.	To prevent erosion as per Landcom 'Managing Urban Stormwater - Soils and Construction'. To ensure buildings / the site is adequately drained.
Flooding	Prior to and during construction	Prior to commencing the relevant stage of works, the detailed design and subsequent construction must ensure effective stormwater catchment and disposal, preventing any risk of flooding to the east of the library.	To increase safety of site occupants.
Groundwater	During construction	Should groundwater be encountered during construction works, all works are to cease immediately. Where groundwater needs to be removed, approval will be required under the *Water Management Act 2000*. This will require an application for a water supply works approval to be submitted to the NSW Natural Resources Access Regulator (NRAR) for assessment and determination. Council is to be contacted to determine the appropriate measures for the management and disposal of the groundwater.	To ensure groundwater is adequately managed should it be encountered during site works.

6.8 Social Impact

6.8.1 Assessment

Crime Prevention Through Environmental Design (CPTED)

CPTED is a recognised model which provides that if development is appropriately designed it can reduce the likelihood of crimes being committed. By introducing CPTED measures within the design of the activity, it is anticipated that this will assist in minimising the incidence of crime and contribute to perceptions of increased public safety. The activity has been designed to take into consideration these principles as follows:

Territorial Re-enforcement*:* This principle provides that well-used places reduce opportunities for crime and increase risk to criminals. The site fronts Rickard Road, with the vehicular, pedestrian and cyclist entry points all being along this frontage. The site is fenced in accordance with the department's (Security SSU) requirements therefore delineating ownership and access. The entry points are clearly defined by built form and signage and encourage access to the site through controlled points.

Surveillance: The principles relating to surveillance relate to spaces in public areas where people can see and interact with others. The activity, with its clear circulation paths, promotes strong natural surveillance of both the public domain and the interior of the site. During weekend and after-hours periods, the site will be secured with site fencing and the buildings fitted with a Back to Base Alarm System. Further, the external lighting for night-time crime deterrence has been designed to the relevant Australian Standard & SSU requirements.

Access Control: This principle provides that barriers to attract/restrict the movement of people minimises opportunities for crime and increases the effort required to commit crime. The activity proposes to utilise fencing to all boundaries, with gates to provide access control. Fencing around the boundary of the site will not restrict surveillance opportunities and will be constructed of optically permeable materials in accordance with EFSG.

Space/Activity management: This principle provides that space which is appropriately utilised and well cared for reduces the risk of crime and antisocial behaviour. The proposed activity achieves this through the design of buildings orientated to promote the use of interior open spaces protected from the public domain. During school operation, the students will be contained generally to the interior of the site. Graffiti resistant materials are used wherever practical to assist in removal.

Overall, the proposed activity provides safety elements which will improve the amenity, casual surveillance and ultimately public safety and sense of security within the site and surrounding area.

Social Impact

Table 26 provides consideration of social impacts.

Table 26: Social impact considerations

Type of Impact	Describe the impacts on the community and how they might be experienced, either positively or negatively	Discussion / Mitigation Measures Required?
Impacts on access – will there be an improvement to the quality of provision and a response to emerging and changing needs?	The upgrades to LPS will provide improved access to a high quality public education facility in a growing area. This access to an enhanced educational establishment will create a positive impact for the community. Access to the school will be retained from Rickard Road. Pedestrian and cyclist access will be retained via the existing three pedestrian entry points, with the main pedestrian and cycling access points continuing to be adjacent to the main administration building. The new learning hub building will have a lift providing accessible access to all levels. The design includes accessible access from the site entrance to the new buildings. Refer to Design Review Report - Accessibility (**Appendix 25)**.	An assessment of the proposed activity against the requirements of the BCA, NCC and DDA has been undertaken to ensure the proposed spaces comply with relevant requirements.
Impacts on privacy, overshadowing, peace and quiet, and visual amenity (views / vistas) - will there be significant change for neighbours and the local area during both construction and operation?	The proposed new three-storey building is adequately setback from the streetscape and surrounding boundaries, which will therefore limit its shadowing to within the school site and minimise its visual impact when viewed from the streetscape. Whilst the setback to the northern boundary is significantly less than the other setbacks (5.75m), the adjoining land use to the north is B7 Business Park. This land use will not contain sensitive future uses like residential dwellings and will rather cater for commercial and industrial uses. Additionally, the adjoining land is proposed to be zoned as RE1 Public Recreation under the Leppington Town Centre PP, which further minimises potential privacy impacts in the future. Any potential (limited) views to this land will be of benefit, promoting passive surveillance of a public asset/space. It is therefore considered that the visual impact of the new building is negligible when viewed from the northern neighbours.	Standard mitigation measures to address noise and vibration impacts during construction works.

Type of Impact	Describe the impacts on the community and how they might be experienced, either positively or negatively	Discussion / Mitigation Measures Required?
Impacts on sense of place - will there be effects on community cohesion or how people feel connected to the place and its character?	The upgraded school will positively influence the sense of place by fostering community cohesion and enhancing connections to the area's character. By integrating modern, sustainable design elements, the school can reflect the community's identity while accommodating growth and contemporary needs. Improved facilities, such as shared recreational spaces, will serve as hubs for interaction, strengthening social ties among students, families, and residents. Careful planning to address concerns about visual impact, traffic, and accessibility will further ensure the school enhances, rather than disrupts, the community's connection to its environment.	Design elements have been included in response to feedback received from the Walk on Country. A mitigation measure to implement engagement with First Nations people throughout the design development phase of the project is included in **Appendix 1** to ensure key Connecting with Country principles are integrated into design.
Impacts on the way people get around – will there be changes associated with traffic or parking in the area?	The proposed activity does not seek to alter the way in which people get to and from the school. The TIA includes a mitigation measure to stagger bell times at the end of the day, both with the school and between the school and the future high school to the south, to reduce queuing times and distances at the existing kiss and drop facility.	A mitigation measure to stagger bell times is included.
Impacts on wellbeing - will there be benefits for students and the community associated with better school facilities, sporting facilities and grounds, and active transport options?	The upgrades will provide benefits to students through the provision of an enhanced learning environment and core school facilities. The new fit for purpose learning spaces will help cater for the future community needs by providing modern educational facilities in an area expected to grow significantly as a result of the Leppington Town Centre redevelopment.	No mitigation measures required.

Conclusion

The proposed activity will provide significant benefits to the community by providing a high quality educational establishment in a growing area. The upgrades have been designed to consider safety requirements as well as ensuring the amenity and sense of place of the school remains both during construction and operation.

6.8.2 Mitigation Measures

The mitigation measures included in Table 26 above are referenced from previous mitigation measures tables in this REF report.

6.9 Other Considerations

Table 27: Other Considerations

<table>
<tr><th>Issue</th><th>Consideration</th></tr>
<tr><td>Visual Amenity and Privacy</td><td>Visual Amenity
The proposed new buildings will have the following setbacks:
Table 28: Proposed building setback
<table>
<tr><th>Building No. / Name</th><th>Northern Setback</th><th>Eastern Setback</th><th>Southern Setback</th><th>Western Setback (Rickard Road)</th></tr>
<tr><td>Three-storey learning hub</td><td>5.75m</td><td>68.15m (walkway)
70.28m (building)</td><td>153m</td><td>72.5m</td></tr>
<tr><td>Library extension</td><td>43m</td><td>98m</td><td>144m</td><td>79m</td></tr>
<tr><td>Hall</td><td>61m</td><td>34.9m</td><td>27m</td><td>117.2m</td></tr>
</table>
Visual impacts of the activity will be mitigated by the above setbacks of the new buildings and extensions to existing buildings.</td></tr>
</table>

Figure 64: Proposed landscaping scheme around the new learning hub, library extension and new hall (Source: Taylor Brammer)

The activity has been designed in accordance with Schedule 8 Design Quality Principles in Schools of the TI SEPP. The proposed activity will provide positive visual and design outcomes as identified in the Architectural Design Statement in **Appendix 19**.

Potential for overlooking neighbouring properties

The new three-storey learning hub is located 5.75m from the northern boundary. Whilst this is in relatively close proximity to the boundary, it is considered acceptable in terms of visual privacy and overlooking due to the adjoining zone being B7 Business Park. Land uses within this zone are predominantly centred around office and light industrial uses rather than residential uses, reducing privacy and overlooking concerns from the new building. It should also be noted that the proposed future zoning for the adjoining site as part of the Leppington Town Centre is RE1 Public Recreation, which limits overlooking concerns into the future. Based on the surrounding zoning, it is considered that the overlooking concerns to the northern boundary are negligible.

The library extension and new hall are significantly setback from the site boundaries to ensure sufficient distance from any sensitive uses and to ensure no overlooking concerns as shown in **Figure 65**.

Figure 65: Photomontage of new hall, library extension and new learning hub (Source: Pedavoli Architects)

Materials and Finishes

The colour palette is neutral and consistent with the school's natural setting, complementing the surrounding environment.

Three-storey Building

The new building will follow contemporary school precedents, using a mix of face brickwork and sheet wall cladding with metal roofing. The colour palette will be predominantly neutral, light to medium tones. Sunshade elements will provide accent colour. Stairs will include colour for wayfinding.

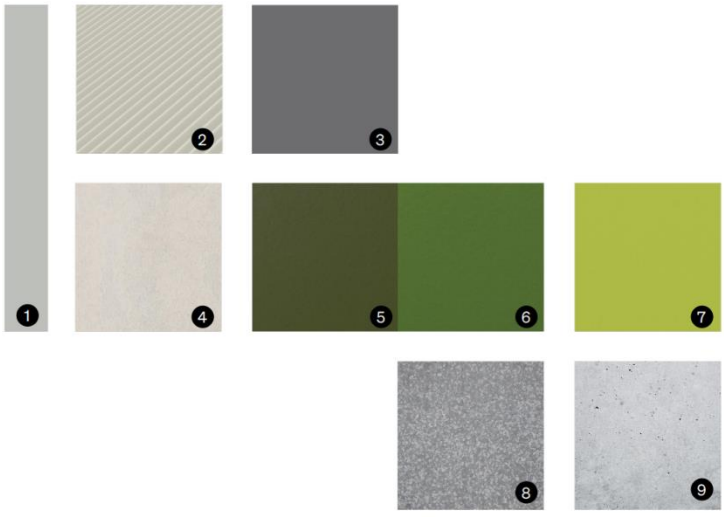
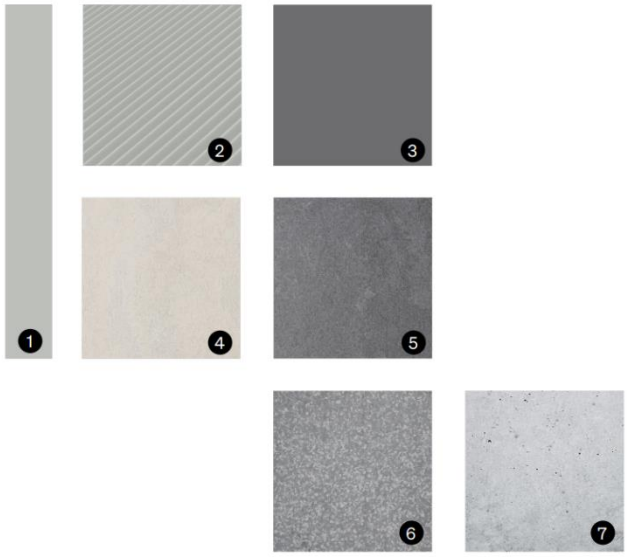
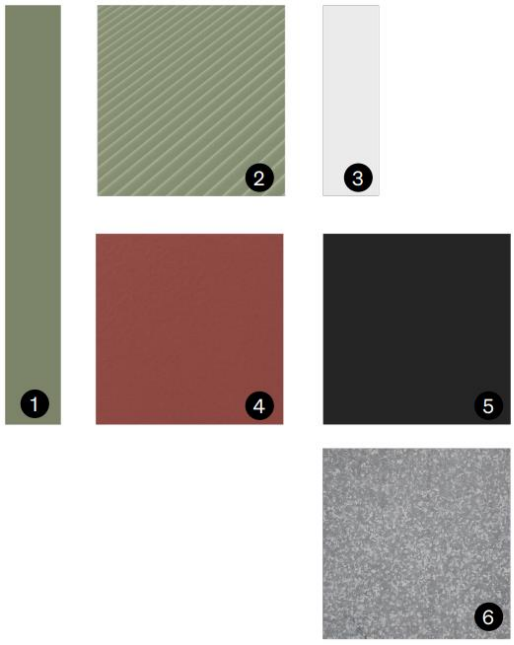


Figure 66: GLS building materials and finishes (Source: Pedavoli Architects)

Hall

The Hall building will follow contemporary school precedents, using a mix of face brickwork and sheet wall cladding with metal roofing.

Issue	Consideration
	The colour palette will be predominantly neutral, light to medium tones. Sunshade elements will provide accent colour. Stairs will include colour for wayfinding.  **Figure 67: Hall materials and finishes (Source: Pedavoli Architects)** *Library* The extension to the Library building will follow contemporary school precedents, using a mix of face brickwork and sheet wall cladding with metal roofing. The colour palette will be predominantly neutral, light to medium tones. Sunshade elements will provide accent colours. Stairs will include colour for wayfinding.  **Figure 68: Library materials and finishes (Source: Pedavoli Architects)**
Overshadowing	The proposed new building will not cause any overshadowing over adjacent land or dwellings as shown in the **Figure 69 – Figure 71** below. All shadowing impacts generated by the proposed works will be internal to the site. The impact internally

Issue	Consideration
	within the site is minor and will not impact the overall function and amenity of operations at the school. The south of the new three-storey Learning Hub and the north-western corner of the sports field will be subjected to overshadowing impacts at winter solstice. The part of the site most affected by overshadowing is landscaped with some new trees. The design of this space considers the overshadowing impact and the species of turf and vegetation.

Figure 69: Proposed and existing shadows at 21 June 9am (Source: Pedavoli Architects)

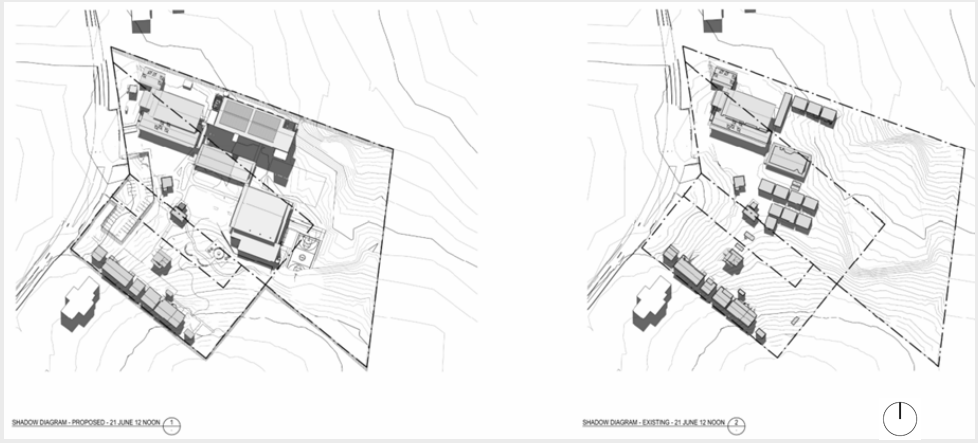


Figure 70: Proposed and existing shadows at 21 June 12pm (Source: Pedavoli Architects)

Issue	Consideration
	 **Figure 71: Proposed and existing shadows at 21 June 3pm (Source: Pedavoli Architects)**
Bushfire	The site is not on designated Bushfire Prone Land and as such, there is no requirement for the activity to comply with *Planning for Bushfire Protection*. Despite the land not being designated as BFPL, a Bushfire Hazard Assessment (in **Appendix 12** has been prepared to evaluate potential fire hazards and ensure proposed activity aligns with fire safety standards and mitigation strategies. The site is cleared and managed, with some remnant scattered trees. There is a small area of remnant vegetation, less than 1ha in size, of Category 2 vegetation to the northwest of the site. This area is approximately 140m from the site. On this basis, there will be no resultant impact or bushfire risk to the site as the Category 2 vegetation is adequately separated from the site by developed agricultural areas and Rickard Road. There is also no potential for a landscape scale bushfire to affect the site. Land to the west, east and south of the site has been developed for agricultural purposes and is not a risk. Land to the north is managed. The activity is categorised as a Special Fire Protection Purpose development in accordance with Section 100B of the *Rural Fires Act 1997* however as the site is not affected or designated BFPL, no Bushfire Safety Authority is required from the RFS. Considering the site's low bushfire risk, no bushfire construction is required however, BAL 12.5 will be provided to all buildings to enhance resilience, and services will be provided to comply with PBP 2019. The following mitigation measures are proposed: • The site is to be managed to Inner Protection Area Standards to the specifications detailed in Appendix 4 of PBP. • New buildings are to be designed and built to BAL 12.5. • Landscaping is to be designed and managed in accordance with Appendix 4 of PBP. • The external (within the site) and internal (within the buildings) fire hydrants are to be designed and installed in accordance with AS2419:2021 requirements. • Fire hydrants are to be designed and installed in accordance with AS2419:2021 requirements. • Electricity supply is to be located underground. • Gas services (if installed) are to be installed and maintained in accordance with AS/NZS 1596:2014. • Prior to occupation, a Bushfire Emergency Management and Evacuation Plan is to be prepared in accordance with the NSW Rural Fire Service document "A Guide to Developing a Bushfire Emergency Management and Evacuation Plan (RFS 2014).

Issue	Consideration
	These mitigation measures are included at **Appendix 1**. With regard to the consideration of cumulative impact, the assessment provides that the planned growth in Leppington Town Centre serves to further reduce bushfire risk and enhance infrastructure, so the activity is not considered to negatively impact the surrounding area from a bushfire perspective. The report has found that the activity is able to meet the requirements of PBP 2019 through the implementation of mitigation measures. Again, compliance with PBP 2019 is not strictly required, but has been addressed as a way to ensure the proposed activity is resilient and responsive to potential bushfire risk, despite that risk being minimal.
Waste	Waste Management Plans relating to Construction & Demolition and Operation have been prepared by a waste consultant and are provided at **Appendix 22** & **23.** **Construction & Demolition** The demolition of the various buildings and structures will produce approximately 578 tonnes of waste, comprising plasterboard, metal, green waste, timber, general rubbish, brick and concrete. The construction of the proposed works is likely to generate 962.13 tonnes of waste, including metal cladding/roof sheeting, vinyl, carpet, timber framing, paint, plasterboard, green waste, floor finishes (general residue), concreate, excavation, soil and imported fill. The management plan for this waste involves the following principles: • Avoid and reduce • Reuse • Recycle • Disposal. The waste will be sorted within the confines of the site to enable more efficient recycling and disposal and processing at an appropriate offsite facility. Designated waste storage areas will be established for the collection of all waste and recyclables. The waste storage areas will have appropriate signage to clearly identify the area to construction workers and to prevent unauthorised access to the area. Stockpile size or bin numbers will be minimised by regular removal of waste from site. The waste storage areas will be covered where possible to prevent transmission of dust and fine particles, odour, wind impacts, vermin and vandalism or theft. Any hazardous waste will be disposed of in accordance with the EPA guidelines to protect the environment and personnel. This includes the discovery of any asbestos. **Operational** The main forms of waste generated by the school are and will be: • General waste (60%) • Mixed recycling (plastics, glass, aluminium, steel) (20%) • Paper and cardboard (20%) • Other smaller waste streams. The existing waste management systems are adequate to handle the future projected increase on waste generated at the school. The waste storage area for the activity is currently adjacent to Rickard Road, on the western side of the car park. Future waste storage will and can be accommodated within this area. It is likely that four bins will be required with the school population increase, and this can fit within the existing bin storage area. Bulky waste storage also occurs at this central location. General waste and recycling are currently serviced by Camden Council, and the intention is to continue with Council's service at the completion of the activity. The Council waste contractor will be able to access the site off Rickard Road, into the parking lot and conduct collection. Overall, it is demonstrated that waste generated by the demolition, construction and

<table>
<tr><th>Issue</th><th>Consideration</th></tr>
<tr><td></td><td>operational phases of the activity has been adequately considered and can be managed so as to not cause any adverse impact on the environment. Any potential impacts can be appropriately mitigated or managed to ensure that there are minimal environmental impacts. Mitigation measures are provided in Appendix 1.</td></tr>
<tr><td>Air Quality</td><td>Generation of dust during construction will be the main potential (temporary) air pollutant of concern. Construction and operation of the activity will not involve odour or significant other potential air pollutant generating activities.
Dust and other minor pollutants could be generated during earthworks and on-site vehicle/equipment use. However, ground disturbance/construction will be limited in extent and duration and will be managed by implementing the following mitigation measures.
Table 29: Mitigation Measures for Air Quality
<table>
<tr><th>Mitigation number/ name</th><th>Aspect/Section</th><th>Mitigation measure</th><th>Reason for mitigation measure</th></tr>
<tr><td>General</td><td>Construction</td><td>Construction activities are to be assessed during adverse weather conditions and modified as required (e.g. cease activity where reasonable levels of dust cannot be maintained using the available means).</td><td>To prevent windblown dust</td></tr>
<tr><td></td><td></td><td>The weather forecast is to be checked prior to material handling and excavation.</td><td>To prevent windblown dust</td></tr>
<tr><td></td><td></td><td>Engines of on site vehicles and plant are to be switched off when not in use.</td><td>To reduce engine emissions</td></tr>
<tr><td></td><td></td><td>Vehicles and plant are to be fitted with pollution reduction devices where practicable.</td><td>To reduce engine emissions</td></tr>
<tr><td></td><td></td><td>Vehicles are to be maintained and serviced according to manufacturer’s specifications.</td><td>To reduce engine emissions</td></tr>
<tr><td></td><td></td><td>Visual monitoring of activities is to be undertaken to identify dust generation.</td><td>To prevent dust generation</td></tr>
<tr><td>Exposed areas/ stockpiles</td><td></td><td>The extent of exposed surfaces and stockpiles is to be kept to a minimum.</td><td>To prevent dust generation</td></tr>
<tr><td></td><td></td><td>Exposed areas and stockpiles are either to be covered or are to be dampened with water as far as is practicable if dust emissions are visible, or there is potential for dust emissions outside operating hours.</td><td>To prevent dust generation</td></tr>
<tr><td>Material handling</td><td></td><td>Drop heights from loading and handling equipment are to be minimised, where practical.</td><td>To prevent dust generation</td></tr>
<tr><td></td><td></td><td>Material is to be dampened when excessively dusty during</td><td>To prevent dust generation</td></tr>
</table></td></tr>
</table>

Issue	Consideration			
			handling.	
		Hauling	Spills in trafficked areas are to be cleaned immediately.	To prevent dust generation
			Vehicle traffic is to be restricted to designated routes.	To prevent dust generation
			The Principal Contractor is to coordinate the delivery schedule to avoid a queue of incoming or outgoing trucks that will be idling for extended periods of time.	To reduce engine emissions
			Vehicle loads are to be covered when travelling off-site.	To prevent dust generation
Wind	The proposed activity, specifically the new three-storey school building, has a height that would not significantly affect wind patterns or create strong ground-level winds. Its size and design, with open spaces and landscaping surrounding the building, prevent wind from being channelled or amplified. Therefore, there no noticeable impact on pedestrians or the environment is anticipated.			
Aviation	**Obstacle Limitation Surface:** The site lies in the final radial ring (level 230.5) of the Obstacle Limitation Surface Map. However, the proposed activity is not considered a controlled activity within the meaning of Part 12, Division 4 of the *Airports Act 1996* of the Commonwealth (penetrating the airspace). As such, this does not apply. **Aircraft Noise:** The site is not within the ANEF zone of the Western Sydney Airport or any other airports in the vicinity of the site.			
Accessibility and BCA	Reports have been prepared for the activity to address BCA compliance (**Appendix 24**) and accessibility requirements (**Appendix 25**). Both reports identify that the proposed activity is capable of complying with the relevant requirements and standards subject to detailed design, and where appropriate, performance solutions. Compliance with the mitigation measures in the reports has been included in the mitigation measures at **Appendix 1**, to be addressed in detailed design, prior to construction.			

6.10 Cumulative Impact

Gyde has undertaken a detailed review of Council's DA tracker, DPHI major projects register, and the Sydney and Regional Planning Panels register. We note the following:

Table 30: Cumulative impacts of surrounding developments

Address	Description	Application Number	Determination Date	Current Status
History of Neighbouring Sites				
96 Rickard Road, Leppington	Demolition of existing structures, tree removal, concept approval for a mixed use development comprising a service station, a McDonald's restaurant, a 120 place centre-based child care facility, health services facilities, office premises, business premises, a hotel and three food and drink premises, display of signage,	DA/2021/1697/1 and two associated modifications	Approved – 19 December 2022	Construction commenced.

Address	Description	Application Number	Determination Date	Current Status
	construction of public roads, subdivision and associated site works.			
218 Byron Road, Leppington	Remediation of contaminated land, demolition of existing structures and construction of a centre based child care centre for 296 children aged 0 to five years and a commercial/ business premises, with car parking, landscaping, stormwater drainage, servicing and associated site works	DA/2023/154/1	Approved by SWCPP – 26 October 2023	Modification application submitted in January 2025.
142 Byron Road, Leppington	Torrens Title subdivision of land into two (2) superlots and one (1) SP2 infrastructure (local road) lot, construction and dedication of public roads, tree removal, stormwater and associated site works	S96/2022/636/2	Approved by LEC – 14 June 2023	Construction not yet commenced (November 2024)

Leppington Town Centre Planning Proposal

The Leppington Town Centre PP is part of a broader initiative to develop the SWGA in Sydney. This PP will significantly transform the area around LPS, providing improved road infrastructure, public transport links and community facilities. In the immediate school locality, high density residential zones and mixed use zones are proposed.

Rickard Road is set to have upgrades including road widening, to facilitate increased traffic expected as part of the PP. No timeframes have been given in relation to when these upgrades will commence, however it is likely to have impacts on LPS in the future.

The PP has not yet been approved and subsequently there are only a few recent approved development applications within 500m of the site. It is considered that construction impacts from other development approved or currently under construction near the site will not result in significant (or cumulative) impacts to the locality.

In December 2024, the PP became a State-led rezoning process. No update on the timing of finalisation has been made by DPHI.

Education Precinct

As identified in the PP, the two properties directly south of LPS have been identified to be rezoned to SP2 Infrastructure (Educational Establishment). This rezoning will create an educational precinct in the Leppington Town Centre, providing educational opportunities for children from Year K to Year 12.

The REF for the new high school in Leppington and Denham Court has recently been submitted to the department, under the Part 5 provisions and Section 3.37A of the TI SEPP, for assessment and determination.

Both the REF (and supporting reports) for the proposed high school and this REF for the upgrade of LPS consider the potential cumulative impacts of the education precinct. The cumulative visual impact will be positive, as it will deliver a high quality, cohesive educational precinct in alignment with the desired future character for the sites. There will be a cumulative increase in operational

noise, commensurate with the intended educational uses identified for the sites. Measures outlined in the acoustic reports for both REFs include recommendations to manage operational noise, which have been included as mitigation measures. However, any increase in noise from the site needs to be considered in the context of the transition of the entire town centre and a broader increase in environmental noise due to increased construction, population and traffic movements. Traffic remains the key matter for consideration when evaluating potential cumulative impacts across both school projects. The same traffic consultant has been involved in the assessment of transport related impacts for both schools, to ensure a holistic and integrated transport strategy is developed for the broader precinct. In particular, staggering of bell times between the schools has been included as a mitigation measure, to manage traffic flow along Rickard Road. These are outlined in **Section 6.1** above. The department will continue to engage with Council and TfNSW on the Rickard Road widening and any other relevant improvements, to ensure a coordinated cross-government approach to addressing traffic issues associated with the education precinct.

6.11 Consideration of Environmental Factors

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

Section 171A of the EP&A Regulation sets out additional matters to take into account when considering the likely impact of an activity on the environment in a regulated catchment.

In considering the likely impact of the activity on water quality and quantity, aquatic ecology, flooding, recreation and public access, the impact has been adequately considered within the Environmental Impact Assessment of this REF.

The activity is shown to have a neutral or beneficial effect on water quality through compliance with Council's requirements for pollutant reduction and provision of water quality treatment measures as part of the water-sensitive urban design. Compliance with the civil/stormwater design, as reflected in the relevant plans and the Stormwater Management Report, prepared by Stantec, will ensure a neutral or positive outcome for the broader regulated catchment.

The assessment provided in the sections above has been prepared to provide a detailed consideration of the factors that must be taken into account for an assessment under Division 5.1 of the EP&A Act. These factors are summarised at **Table 31** and where mitigation measures have been proposed in response to the factor, these have been identified.

Table 31: Environmental Factors considered

Environmental Factor	Consideration	Mitigation Measure Reference
Any environmental impact on a community?	Short term impacts may arise during the demolition and construction process including traffic, noise, access and dust. However, suitable mitigation measures have been included to ensure potential impacts are minimised during the demolition and construction process. Environmental impacts have been assessed as part of this REF and subject to the implementation of the proposed mitigation measures, the activity will not result in unacceptable environmental impacts. Long-term, the proposed activity will have a beneficial impact for the community by providing additional modern and fit for purpose school facilities to assist with the anticipated population growth of the locality.	G4-G7, G12, G13, G14, G16 NV1-NV39 TT5-TT10 CON4, CON5, CON7, CON8 ECO5, ECO12 WAS1, WAS4, WAS6, WAS7 SER1 AQ1-AQ14
Any transformation of a locality?	The proposed activity includes the construction of new school building and facilities. There will be short term impacts during construction which are subject to suitable mitigation measures. The proposed activity in itself will not significantly change the locality, but the revitalised school will complement the changing nature of the locality as a result of the Leppington Town Centre PP.	G5-G20
Any environmental impact on the ecosystems of the locality?	The proposed activity will not result in significant impacts on the ecosystems of the locality. The activity is unlikely to affect any threatened species, populations or ecological communities. The site is also biodiversity certified, which allows development in certified areas to proceed without further biodiversity assessment. Mitigation measures have been identified to minimise any indirect or potential impacts arising from sediment, dust and vegetation removal.	ECO1-ECO20
Any reduction of the aesthetic, recreational, scientific or other environmental quality or value of a locality?	There will be a short-term impact on the aesthetic qualities of the site during the construction work. Mitigation measures have been identified to address construction noise, vibration and traffic impacts. In addition, measures are in place to mitigate environmental impacts of the school's operations. Accordingly, the proposed activity will not reduce aesthetic, recreational, scientific or other qualities of the locality.	NV1-NV39 TT5

Environmental Factor	Consideration	Mitigation Measure Reference
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 4**) confirms that the activity will have a minor to moderate impact on the heritage items in the southern part of the site. There will be no impact on Aboriginal heritage items (including cultural significance and archaeology) noting that the site does not comprise any and is not in proximity to any other such items. The Architectural Design Statement (**Appendix 19**) supports this activity, integrating the CWC Framework into the design of the school. Further opportunities have been identified to enable Country to be incorporated into the design, in consultation with the local Aboriginal community, with respect to educational opportunities, the development of signage and selection of landscaping for the site.	HH1-HH2 ABH1-ABH4
Any impact on the habitat of protected animals, within the meaning of the *Biodiversity Conservation Act 2016*?	The works do not impact on the habitat of any protected animals, within the meaning of the BC Act 2016. Mitigation measures have been identified in the Biodiversity Summary to mitigate any indirect impacts.	ECO1-ECO20
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 has been designed so that it does not have detrimental impacts on protected species. The site is also biodiversity certified, which allows development in certified areas to proceed without further biodiversity assessment.	ECO1-ECO20
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. The works will upgrade an existing public educational facility, which has positive social and economic benefits.	G0-G20
Any degradation of the quality of the environment?	Appropriate mitigation measures have been incorporated to ensure that the activity will not reduce the quality of the natural environment, including ecology, landscape, stormwater management, noise and waste management.	ECO1-ECO20 HYD1 NV1-NV39 WAS1-WAS15
Any risk to the safety of the environment?	The proposed activity has been designed in accordance with the environmental constraints of the site.	G0-G20
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

Environmental Factor	Consideration	Mitigation Measure Reference
Any pollution of the environment?	The activity will not result in pollution of the environment. Stormwater and sewage management has been considered in the assessment of potential polluting impacts of the activity and appropriate mitigation measures have been provided to protect the environment.	HYD1 SER1 CON5, CON6
Any environmental problems associated with the disposal of waste?	Waste management plans (**Appendix 21** & **23**) have been prepared of the activity which set out all management practices required to reduce, minimise or avoid adverse impacts arising from the disposal of waste during both the construction/demolition phase as well as the ongoing operation of the school. All outcomes and recommendations of these reports have been captured in the mitigation measures for the activity.	G13, G15, NV39, WAS1-WAS15
Any increased demands on resources (natural or otherwise) that are, or are likely to become, in short supply?	The activity is unlikely to result in increased demands on resources that are, or are likely to become, in short supply. Measures to reduce the consumption of materials, energy and water over the lifetime of the building have been incorporated into the building's design and so will be implemented through the terms of the activity, once approved.	TT1-TT10
Any cumulative environmental effects with other existing or likely future activities?	Cumulative impacts from the activity predominantly relate to the broader Leppington Town Centre PP and its implementation, with the primary consideration relating to traffic congestion on Rickard Road, which will be addressed by Council's finalised design to duplicate Rickard Road and provide two lanes in each direction. Measures have been included in the TIA and STP for the activity to minimise congestion associated with the school.	TT1-TT5
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
Applicable local strategic planning statement, regional strategic plan or district strategic plan made under Division 3.1 of the Act?	The proposed activity is consistent with the aims, objectives, planning priorities of the relevant strategic plans, as set out in **Section 4.5** of this REF.	N/A
Any other relevant environmental factors?	There are no other relevant factors to consider.	N/A

7. Justification and Conclusion

The proposed upgrade of LPS at 144 Rickard Road, Leppington is subject to assessment under Division 5.1 of the EP&A Act. The REF has examined and taken into account to the fullest extent possible all matters affecting, or likely to affect, the environment by reason of the proposed activity.

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

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

The activity is not likely to significantly affect threatened species, populations, ecological communities or their habitats, and therefore it is not necessary for a Species Impact Statement and/or a BDAR to be prepared. The environmental impacts of the activity are not likely to be significant. Therefore, it is not necessary for an EIS to be prepared and approval to be sought for the activity from the Minister for Planning and Public Spaces under Division 5.2 of the EP&A Act.

On this basis, it is recommended that the department determine the proposed activity in accordance with Division 5.1 of the EP&A Act subject to the implementation of mitigation measures identified within this report.