NSW Department of Education

Review of Environmental Factors

Ulladulla Public School Upgrade

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NSW GOVERNMENT

Acknowledgement of Country

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

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 Urbis Ltd on behalf of the NSW Department of Education (department) and assesses the potential environmental impacts which could arise from upgrade works at the existing Ulladulla Public School located at 241 Green Street, Ulladulla.

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

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

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

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Abbreviations

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

Abbreviation	Description
FM Act	*Fisheries Management Act 1994*
FIRA	Flood Impact Risk Assessment
FERP	Flood Emergency Response Plan
GBCA	Green Building Council of Australia
Ha	Hectares
LEP	Local Environmental Plan
LGA	Local Government Area
MNES	Matters of National Environmental Significance
NCC	National Construction Code
NorBE	Neutral or Beneficial Effect on Water Quality Assessment Guideline (2022)
NPW Act	*National Parks and Wildlife Act 1974*
NPW Regulation	National Parks and Wildlife Regulation 2009
NPWS	National Parks and Wildlife Service (part of EES)
NSW RFS	NSW Rural Fire Service
NT Act (Cth)	*Commonwealth Native Title Act 1993*
OEH	(Former) Office of Environment and Heritage
Planning Systems SEPP	State Environmental Planning Policy (Planning Systems) 2021
PMF	Probable Maximum Flood
PTS	Permanent teaching spaces
POEO Act	*Protection of the Environment Operations Act 1997*
PBP	Planning for Bushfire Protection
Proponent	NSW Department of Education
REF	Review of Environmental Factors
RF Act	*Rural Fires Act 1997*
Resilience and Hazards SEPP	State Environmental Planning Policy (Resilience and Hazards) 2021
Roads Act	*Roads Act 1993*
SCPP DoE	*Stakeholder and community participation plan,* published by the NSW Department of Education October 2024
SCPP DPHI	*Stakeholder and community participation for new health services facilities and schools* published by the Department of Planning, Housing and Infrastructure October 2024
SDRP	School Design Review Panel
SEPP	State Environmental Planning Policy
SIS	Species Impact Statement
STS	Support teaching space
TI SEPP	State Environmental Planning Policy (Transport and Infrastructure) 2021
WM Act	*Water Management Act 2000*

Executive Summary

The Proposal

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

Specifically, the proposed activity comprises the following:

- Construction of a new two-storey home base building (Building M).
- Alterations to existing car park under new building.
- Construction of new stairs and covered walkways.
- Installation of new fencing.
- External landscape works.
- Installation of solar panels.
- Installation of new pedestrian gate and fire brigade booster.
- Tree removal.

Ulladulla PS is located at 241 Green Street, Ulladulla NSW 2539 (the **site**). The site has an approximate area of 3.5 ha. The site is comprised of three lots, legally referred to as Lot 1 in Deposited Plan (**DP**) 122514; Lot 1 in DP 529425; Lot 1 in Section 16 in DP 759018 in the Shoalhaven Local Government Area (**LGA**).

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

The site is irregular in shape with a triangular extension towards the northwest corner and a long frontage to Green Street to the south. The western portion of the site contains playing fields, sports courts and parking. Vegetation is interspersed throughout the site.

The broader school site is mapped as Bushfire Prone Land (**BPL**) however the proposed activity is located outside of this area. The site is flood affected by overland flows generated upstream of the site however the proposed activity meets relevant guidelines for educational site selection. The broader site also contains areas of high biodiversity value, however the proposed activity does not impact these areas.

Planning Pathway

The proposed activity involves the upgrade of an existing government school by the NSW Department of Education (the **department**) (a **public authority**) on land within the boundaries of an existing or proposed school. Accordingly, pursuant to Sections 3.37 of the *State Environmental Planning Policy (Transport and Infrastructure) 2021* (**TI SEPP**), the proposed works are classified as development which may be carried out without consent.

Therefore, the proposal is considered an 'activity' for the purposes of Part 5 of the *Environmental Planning and Assessment Act 1979* (**EP&A Act**) and is subject to an environmental assessment. For the purposes of this proposal, the department is the proponent and the determining authority, and the required environmental assessment is in the form of a Review of Environmental Factors (**REF**).

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

Consultation

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

Comments received will be carefully considered and responded to. In addition, as outlined in **Section 5.1** of this REF, non-statutory consultation has been undertaken with a range of community and government stakeholders throughout the design process.

Environmental Impacts

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

- **Flooding**: Overland flow paths form within the site in the 1% AEP event, including within the currently undeveloped land to the west of the site, and are primarily directed towards Millards Creek. The Flood Impact and Risk Assessment (**FIRA**) confirms that review of flood levels in existing versus post-development conditions shows that the development has no offsite impacts on adjacent properties or roads in both the 1% AEP and PMF events.
- The proposed building complies with the department's guidelines for educational site selection, meeting the following advisory guidelines:
    - Proposed building is located above the 1-in-200-year (0.5% AEP) flood level;
    - Proposed building has flood free access for pedestrians and vehicles;
    - Proposed building is located on land above the Flood Prone Land Contour (i.e., land susceptible to flooding in the PMF).
- The Flood Emergency Response Plan (**FERP**) confirms that the proposed building meets Shelter-in-place guidelines and can accommodate up to 470 people, exceeding the proposed student and staff capacity.
- **Bushfire**: The northern part of the school site is BPL. The proposed activity is located outside of the BPL area. An adequate asset protection zone (**APZ**) can be accommodated within the site. Proposed Building M can comply with Planning for Bushfire Protection (**PBP**) and will be constructed to Bushfire Attack Level (**BAL**) 19 standard.

Other impacts have been considered as detailed in this REF.

Justification and Conclusion

Based on the environmental assessment undertaken as part of this REF, it has been determined that the proposal will not result in any significant or long-term detrimental impacts. The potential

impacts identified can be reasonably mitigated and where necessary managed through the adoption of suitable site practices and adherence to accepted industry standards.

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

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

1. Introduction

The NSW Department of Education (**the department**) proposes to complete upgrade works to the existing Ulladulla Public School (**Ulladulla PS**) (the **activity**) located at 241 Green Street, Ulladulla (the **site**).

As part of the NSW Government's plan to rebuild essential services, the 2023-24 Budget sought to deliver $1.4 billion for new and upgraded schools in regional NSW. This targeted investment seeks to grow communities will ensure families get access to public education. This includes an upgrade Ulladulla PS to renew existing school assets, provide additional permanent teaching spaces and provide additional car parking.

This Review of Environmental Factors (**REF**) has been prepared by Urbis Ltd on behalf of the department to determine the environmental impacts of the proposed upgrade works at 241 Green Street, Ulladulla. For the purposes of these works, the department is the proponent and the determining authority under Division 5.1 of the *Environmental Planning and Assessment Act 1979* (**EP&A Act**).

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

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

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

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

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

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2. Proposed Activity

2.1 The Site

2.1.1 Site locality

Ulladulla PS is located at 241 Green Street, Ulladulla NSW 2539. The site is located within the Shoalhaven Local Government Area (LGA) and has an approximate area of 3.5 hectares. An aerial photograph of the site is provided at **Figure 1.** The site is comprised of three lots, legally referred to as follows:

- Lot 1 in Deposited Plan 122514
- Lot 1 in Deposited Plan 529425
- Lot 1 in Section 16 in Deposited Plan 759018

The site is owned by the Minister for Education and Early Learning. The site is located within the Shoalhaven Local Government Area (**LGA**) and has an approximate area of 3.5 hectares. An aerial photograph of the site is provided at **Figure 1**.

The site is zoned SP2 Educational Establishment and existing development comprises various buildings, a car park, landscaping, a sports field and sports courts associated with Ulladulla PS. Ulladulla PS currently comprises 22 Permanent Teaching Spaces (**PTS**) and 11 Demountable Teaching Spaces (**DTS**). The western portion of the site contains playing fields, sports courts and parking. Vegetation is interspersed throughout the site.

The site is irregularly shaped with a long frontage to Green Street to the south. Land to the north of the site is zoned RE1 which consists of natural bushland. Ulladulla Town Centre is located to the east of the site. The surrounding locality is primarily residential to the west and south. Ulladulla High School is located to the south of the site. Low density residential dwellings adjoin the site along the western boundary.

The location and configuration of the site is shown in **Figure 1** and **Figure 2**.

Table 1: Site characteristics

Site characteristics	Description
Site address	241 Green Street, Ulladulla 2359
Legal description	1/-/DP122514, 1/-/DP529425, 1/16/DP759018
Site area	The site is approximately 3.487 ha in area.
Local government area	Shoalhaven City Council
Site ownership	Minister for Education and Early Learning
Easements	There is an easement to drain water over Lot 1 DP529425. The status of this easement “proposed” and it is therefore currently inactive.
Existing use / structures	Ulladulla Public School, including various structures relating to the existing school on the site. The built form components of the school are located within the southern half of the site. A

Site characteristics	Description
	total of 22 PTS and 11 DTS.
Topography	The site slopes steeply towards the northwest corner of the site towards Millards Creek.
Vegetation	Dense vegetation occurs in the north western corner of the site which coincides with bushfire mapped land (category 2 vegetation and buffer zone).
Hydrology	The broader school site is impacted by local overland flooding. At the proposed activity area, runoff from Green Street overflows onto the site, forming a flow path across this area. In the 1% AEP event, depths in the region of the proposed activity area are typically below 100mm. In the PMF, the proposed activity area is impacted by flows between 200-350mm deep.
Acid Sulfate Soils	The site is located on land mapped as Class 5 Acid Sulfate Soils.
Costal Use and Environmental Area	The site is identified as being within a Coastal Management Area and is required to consider a range of measures identified in the Coastal Management Act 2016 and Chapter 2 of State Environmental Planning Policy (Resilience and Hazards) 2021. This is discussed further in this REF Report at **Section 4.3**.
Vehicle / site access	Vehicular access is from Green Street.

Figure 1: Site Aerial

Figure 2 Site Locality

Photo 1 Pedestrian entry into the school

Source: Google maps, 2024.

Photo 2 Heritage listed school buildings

Source: Google maps, 2024.

Photo 3 View looking east towards Green Street and the development site.

Source: Google Maps, 2025

Figure 3 Site Photos

2.1.2Site Constraints and Opportunities

Consideration of site constraints has been undertaken through a review of the three (3) Section 10.7 (2 & 5) Planning Certificates that apply to the site, (No. 2024/04099, No. 2024/04100, No. 2024/04102) dated 17 October 2024, mapping under relevant Environmental Planning Instruments (**EPIs**), and a review of specialist consultant reports and other desktop assessments. Key site constraints include:

- **Flooding**: The site is identified as land impacted by flood on the Section 10.7 Certificate and Shoalhaven City Council's mapping system and is partly within the flood planning area. The site is flood-liable land under the definitions of the Flood Risk Management Manual. Notification of the proposed activity will be provided to SES and Shoalhaven City Council (**Council**). As schools are regarded as a sensitive Category H development, the Finished Floor Levels (**FFL**s) must be built to the probable maximum flood (**PMF**) level. The **FFL** for Level 1 of Building M is set to 22.15m AHD, elevated over 3 metres above the peak PMF level of 19.02m AHD surrounding the building.

- **Bushfire**: The site is identified as Bushfire prone land on the Section 10.7 Certificate. The northern edge of the school site is identified as being within vegetation 2 category and vegetation buffer bushfire zone. The proposed activity area is not within the area mapped as Bushfire prone land.

- **Heritage**: 'Victorian Georgian style Sandstone School and School Master's Residence (Local 484)' is identified as local heritage item on the site. The proposed activity area is located more than 100m to the west of this item on a separate lot. There are no clear sightlines between the proposed activity site and the heritage item due to the obstruction of Block D (Hall and covered outdoor learning area - Cola) in between the two buildings.

- **Biodiversity:** A small portion on the eastern edge of the site is mapped under Shoalhaven LEP 2016 as contain significant vegetation. This is not in the area of the proposed activity. The site contains areas of high biodiversity value coinciding with the presence of three Plant Community Types (PCT). Two of the PCTs are associated with threatened

communities. The proposed activity is located within mapped areas PCT 4052 and PCT 3267 as shown in Figure 4 below. An ecological site assessment conducted as part of the Biodiversity Due Diligence Report (Water Technology 2023) concluded that PCT 4052 and PCT 3267 are present in this area, but are in a highly cleared and degraded condition.

Source: Water Technology, 2024.

Figure 4 Plant Community Types

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

Table 2: Review of Section 10.7 Planning Certificate

Affectation	Yes	No
Critical habitat	☐	☒
Conservation area	☐	☒
Item of environmental heritage	☐	☒
Affected by coastal hazards	☒	☐
Proclaimed to be in a mine subsidence district	☐	☒
Affected by a road widening or road realignment	☐	☒
Affected by a planning agreement	☐	☒
Affected by a policy that restricts development of land due to the likelihood of landslip*	☒	☐

Affectation	Yes	No
Affected by bushfire, tidal inundation, subsidence, acid sulfate or any other risk	☒	☐
Affected by any acquisition of land provision	☐	☒
Biodiversity certified land or subject to any biobanking agreement or property vegetation plan.	☐	☒
Significantly contaminated	☐	☒
Subject to flood related development controls	☒	☐

* The Section 10.7 Planning Certificate identifies:

> *The land IS affected by the following adopted policy or policies that restrict the development of the land because of the likelihood of land slip, bushfire, tidal inundation, subsidence, acid sulfate soils, contamination, aircraft noise, salinity, coastal hazards, sea level rise or any other risk (other than flooding).*
>
> - *Shoalhaven Development Control Plan 2014*
> - *Shoalhaven City Council - Contaminated Land Policy*
> - *Shoalhaven Coastal Zone Management Plan 2018*
> - *Planning for Bush Fire Protection 2019*
>
> *Note: The policies above apply across the City. If certain specific hazards are known to apply to the land, those hazards may be noted below.*
>
> *Note: In this section adopted policy means a policy adopted (a) by the council, or (b) by another public authority, if the public authority has notified the council that the policy will be included in a planning certificate issued by the council.*

The site is within the Coastal Zone, and the Shoalhaven Coastal Zone Management Plan applies, which is the reason for the notation on the Section 10.7 Planning Certificate. No specific hazards are identified in the Section 10.7 Planning Certificate. Consideration for the consistency of the proposed activity with coastal management policies is provided in **Section 4.3**.

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

- **Strategic Location**: The site is located within an existing school, located close to the Ulladulla town centre and will serve Ulladulla's growing population, supporting education needs and future residential growth.
- **Active Transport Connectivity:** The site is located along local bus routes and is well served by school bus operations. There are opportunities to encourage green travel options such as walking, cycling, and public transportation given its location close to the town centre and residential development to the immediate west and south.
- **Street connection:** The proposed activity area is positioned close to Green Street allowing integration with the public realm and good connections

- **Siting of building:** Proposed Building M is sited over an existing car park, resulting in minimal loss of existing vegetation and maintaining existing car parking spaces
- **Heritage:** The available land in the western portion of the site is located greater than 100m away from the Schoolmaster's Cottage item, resulting in no impacts to the heritage item.
- **Vegetation**: The proposed activity retains the established mature vegetation along the southern and western boundaries of the site, this protects biodiversity and mitigates potential amenity impacts by providing visual screening to the adjoining residential area
- **Sustainability**: The site's northern aspect will improve the sustainability outcomes for the site and provides an opportunity for the inclusion of sustainable design features such as solar panels. The building's north-facing long elevation maximises natural light and climate control, crucial for energy efficiency and comfort.
- **Orientation**: The site affords scenic views to the north and good northern aspect. Due to the site orientation, shadows cast by proposed Building M do not adversely impact the amenity of play space within the school, falling instead onto existing vegetation and to Green Street.
- **Future proofing**: The modular building designs allow for potential future expansion to accommodate changing community and educational needs.

2.2 Proposed Activity

Table 3 below provides a summary of key aspects of the proposed Ulladulla PS upgrade.

Table 3: Summary of the activity

Project Element	Description
Site Area	3.497 ha
Project Name	Ulladulla Public School Upgrade
Project Summary	The proposed activity will involve: ▪ Construction of a new two-storey home base building over the existing car park. ▪ Alterations to existing car park under new building. ▪ Construction of new stairs and covered walkways. ▪ Installation of new fencing. ▪ External landscape works. ▪ Installation of solar panels. ▪ Installation of new pedestrian gate and fire brigade booster. ▪ Tree removal.
Use	Educational establishment
Student and Staff Numbers	Proposed activity is not intended to increase student capacity
Car Parking and Bicycle Spaces	Car parking spaces: 27 (existing) In its existing arrangement the school has a single bike rack which can accommodate approximately 20-24 bikes, adjacent to Building A, accessible via the Green Street entrances to the public school

Project Element	Description
	As part of the proposed activity: Car parking spaces:+3 Bicycle spaces: + 40 Scooter spaces: +10
Height	Proposed Building M will be two storeys, and approximately 13.5m high.
Tree removal	9 trees are to be removed. 8 trees will be planted.
Off Site Works	The proposed activity will involve limited off-site works, including: ▪ Kiss 'n drop zone to be extended on Green Street north side along the entire frontage of the school.

The key features of the proposed activity are shown in **Figure 5** to **Figure 6**.

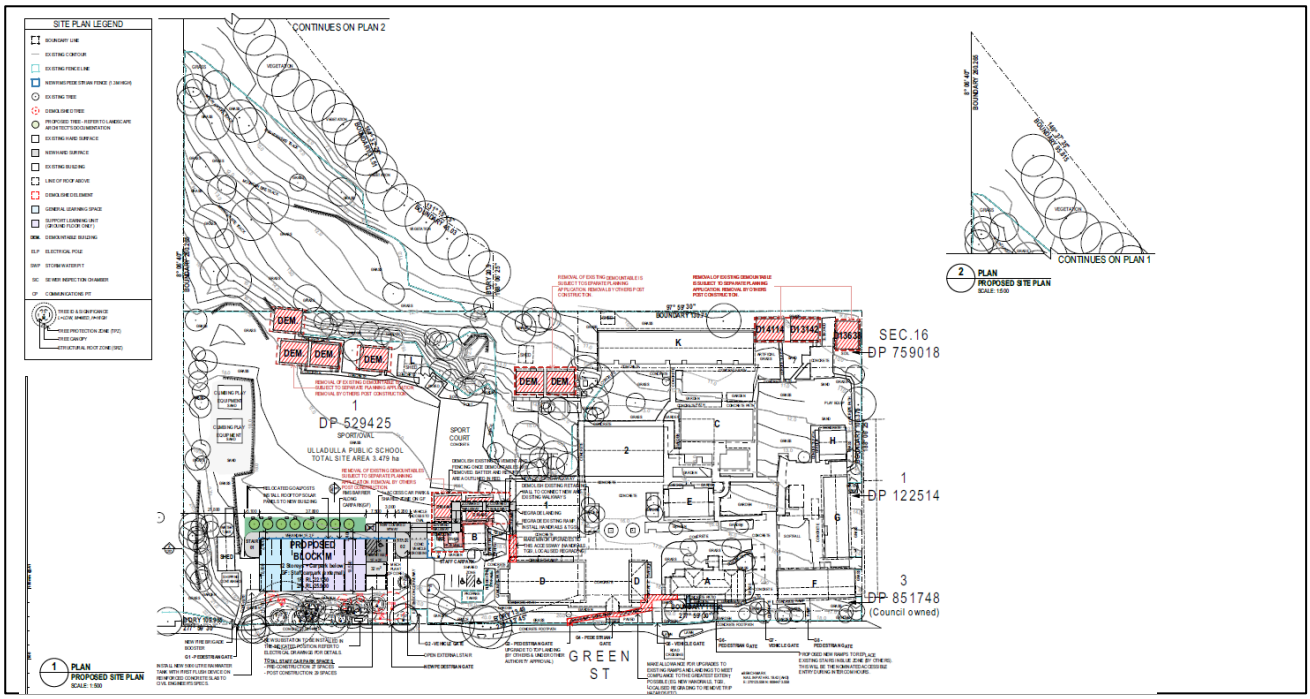

Figure 5: Proposed indicative site layout

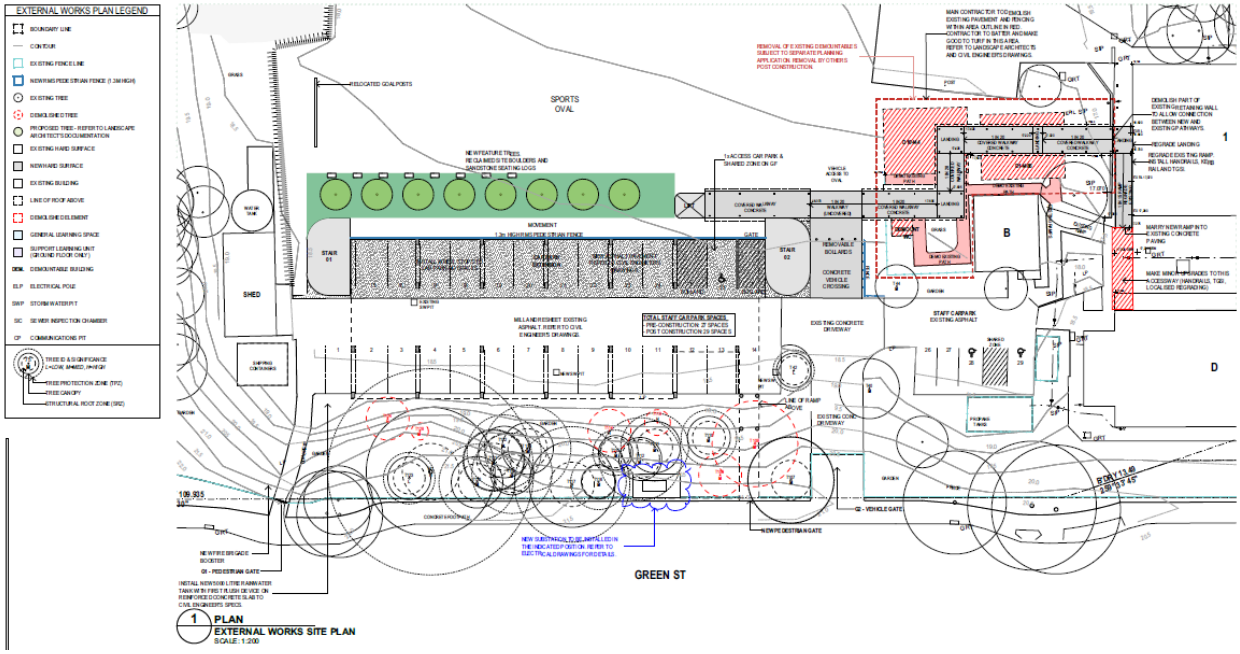

Figure 6: Proposed external works plan (carpark extension)

2.2.1Design Development

The proposed built form for the new homebase building at Ulladulla PS comprises a stand-alone two storey building designed to be sympathetic to the existing school environment and the surrounding low-density context (refer to **Figure 7** and **Figure 8** below). The proposed design uses the *SINSW Pattern Book and Educational Facilities Standards and Guidelines (EFSG) SINSW as a basis for the design.* The pattern book design template for the building planning has considered future adaptability of these learning spaces.

The two-storey building aligns with the scale of existing structures on the site as well as ensuring it complements the surrounding single and two-storey residential area. The new building is positioned on the southern boundary of the existing school campus. The building sits above the existing car park and is orientated to the north to capture daylight and breeze and overlooks the adjacent sports fields. Views from the new building to the south are predominately into the tree canopy. The building is setback behind existing vegetation along the Green Street interface and the adjoining residential land to the west, which mitigates the visual impact from the public domain and sensitive uses. New landscaping aims to improve amenity, create attractive external spaces and support outdoor learning.

The façade design is based on a standard modular system which presents both internally to the school and to the surrounding context. Solar panels are proposed, taking advantage of the building orientation to the north.

The shaded walkway facade is oriented towards the school open play space to the north; the street facade with vertical fins and framing elements is oriented towards Green Street. Colours and textures are to be applied to the metal balustrades, stair metal screening, wall facade panels, framing elements and sunshades to present the unique identity of the school.

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

Source: Fulton Trotter, 2025

Figure 7: Perspective view from Green Street entry

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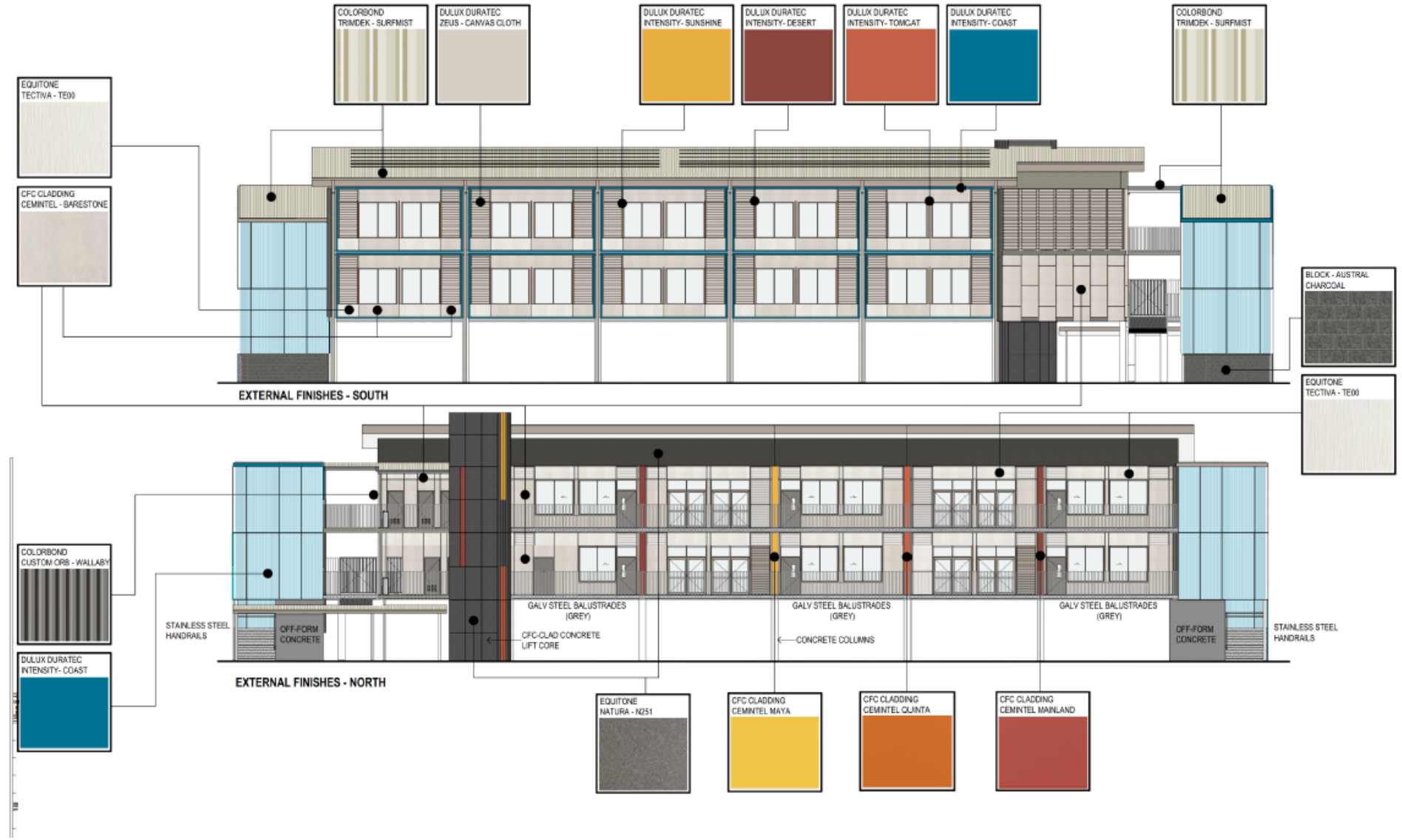
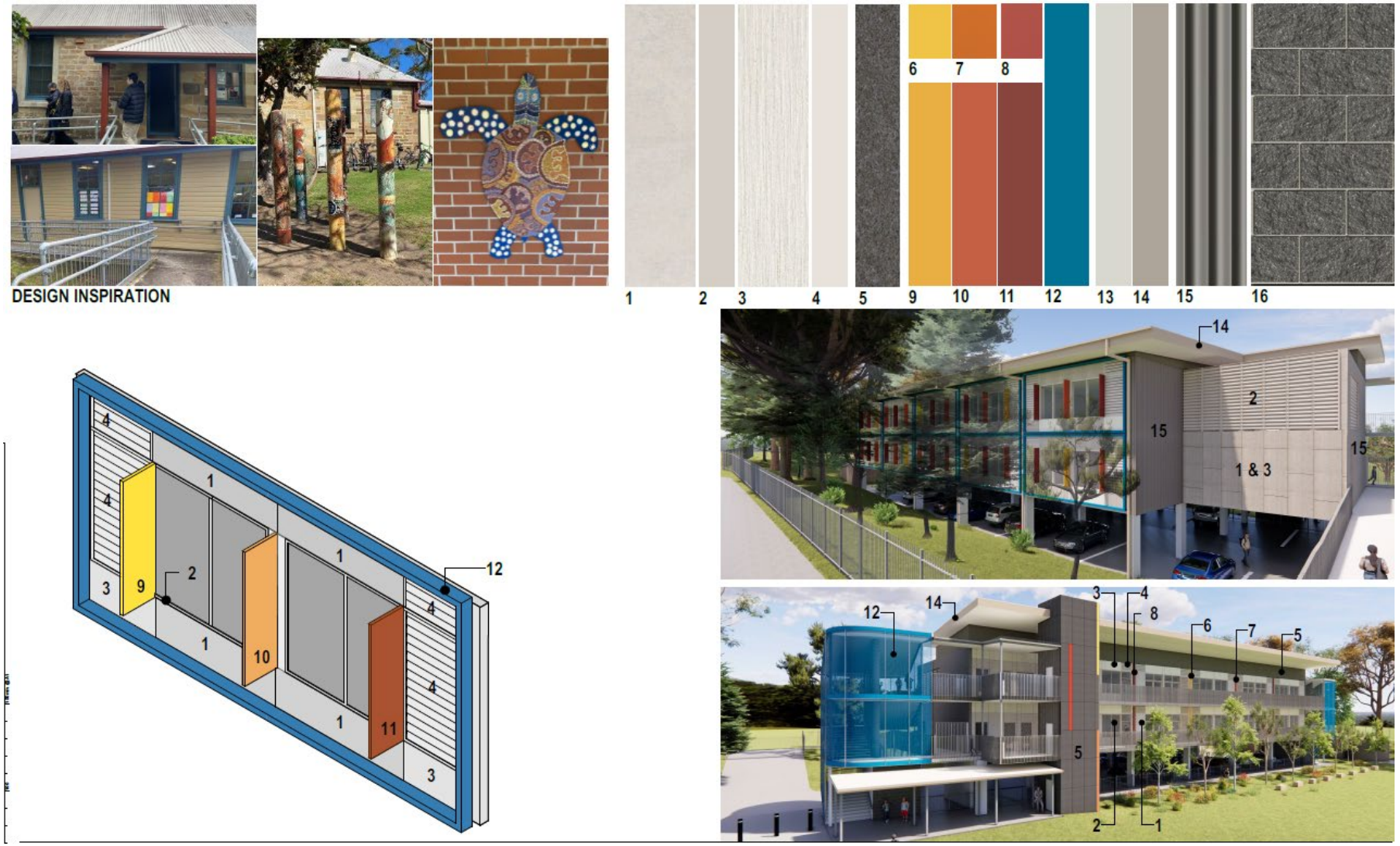
Source: Fulton Trotter, 2025

Figure 8: Perspective view from the oval



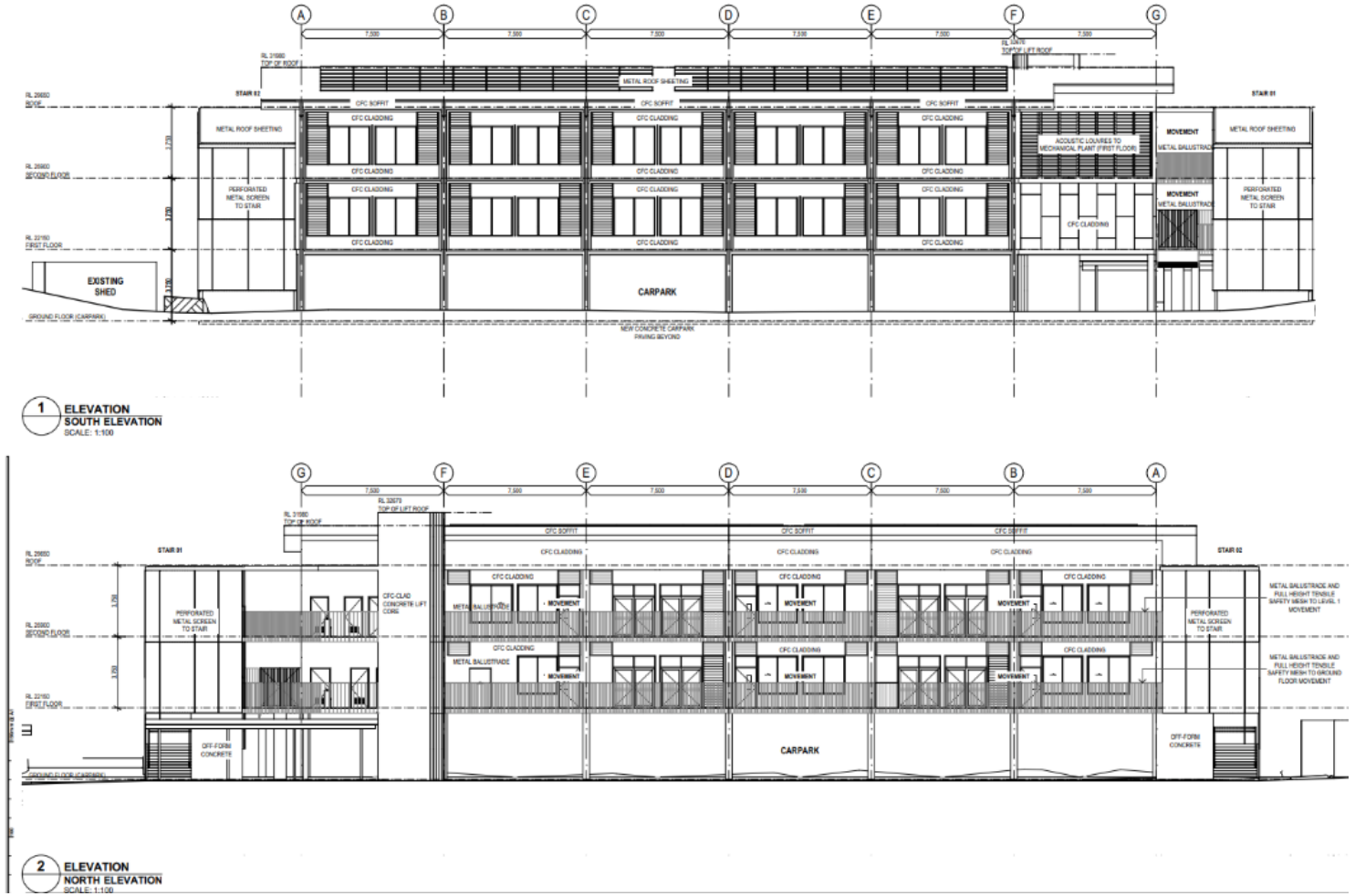
Source: Fulton Trotter, 2025

Figure 9: Materials and Finishes



Source: Fulton Trotter, 2025

Figure 10: Façade Strategy



Source: Fulton Trotter, 2025

Figure 11: Elevations

Landscaping

The approach to the Landscape Architectural design for the project is to minimise impact to the existing sports oval by introducing planting to soften the undercroft carpark. A small, landscaped area to the north of the new Building M is proposed to provide screening to the undercroft carpark and will contain a row of ornamental trees and reclaimed boulders and sandstone logs for seating. Nine (9) trees are required to be removed as part of the proposed activity. Eight (8) trees will be planted within the landscaping. The new trees are native species and include Tuckeroo, Turpentine and , Paperbark trees that will grow to be between 10m-15m height at maturity. As they are located within the APZ of the new building they have been selected to conform with the requirements of PFB.

The landscape design includes reclaimed site boulders and sandstone seating logs to enhance the usability of the area surrounding the building and integrate it with the existing school grounds. Areas of natural turf will be used to rehabilitate areas of the site previously occupied by demountables.

The landscape plan is provided at **Figure 12** below.

Source: Fulton Trotter and Ground Ink, 2025

Figure 12: Landscape Concept Drawing

Vehicle Access and Parking

Vehicle Access

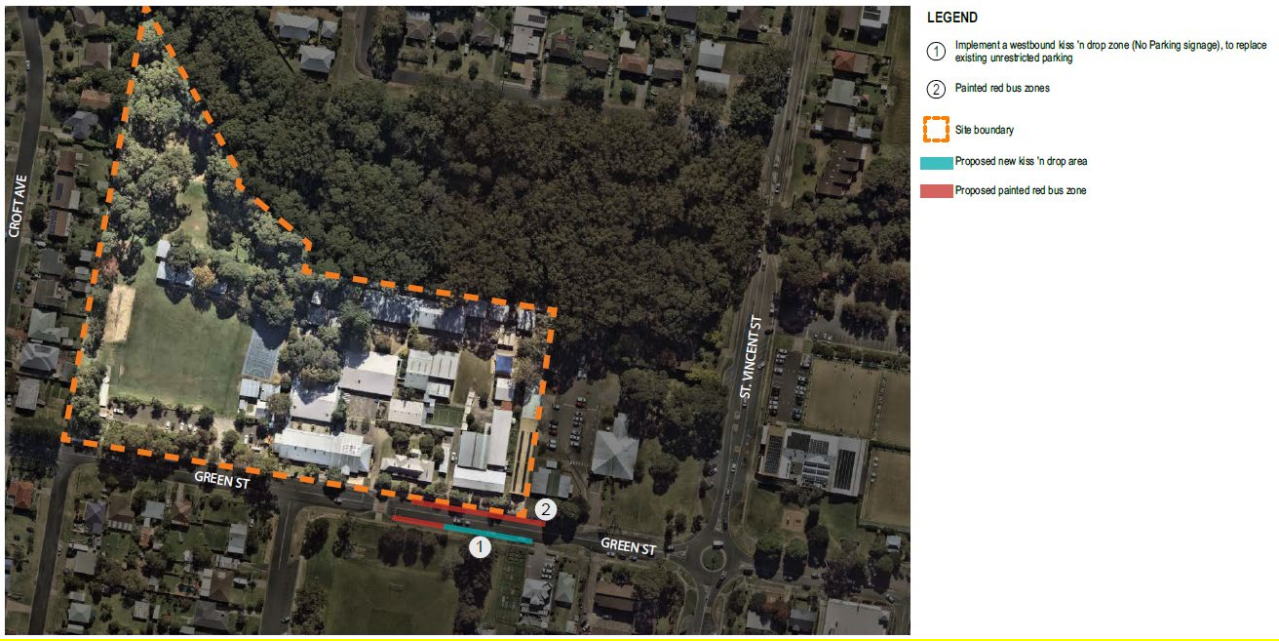
There will be no alteration to the existing vehicular access point from Green Street.

The existing car park will be slightly modified to accommodate the proposed new building, including the provision of three (3) additional car parking spaces.

The proposed activity will include racks for an additional 40 bicycles and 10 scooters.

The school has an existing Kiss n' drop area, located to the western side of the pedestrian zebra crossing at Green Street, situated between the western pedestrian and existing vehicle access points. The current on street no parking / kiss 'n drop location has capacity for approximately 15 vehicles.

As part of the proposed activity, the existing kiss 'n drop zone is to be extended on the northern side of Green Street along the entire frontage of the school. The proposed no parking zone would be restricted to pick up and drop off hours only. Painted red bus zones will be implemented to reduce illegal car parking within proximity to the school. There are no civil works proposed, only painting. Refer the **Figure 13** below for the location of these off site works.



Source: Fulton Trotter and Ground Ink, 2025

Figure 13: Proposed off -site works

Pedestrian Access

The proposed activity includes new pedestrian access into the school, to the east of the new building. The new pedestrian access point is adequately separated from the existing vehicular access point to minimise vehicle and pedestrian conflicts. Student circulation will be on the northern side of the new building to enable connections to existing circulation paths within the school. An accessible path of travel will be provided to the new building from the school's main entrance, via the existing path network.

All other existing pedestrian access points into the school remain unchanged.

Design Guide and Design Quality Principles

The built form of the proposed activity responds effectively to the design quality principles outlined in Schedule 8 of the TI SEPP and the associated Design Guide as follows:

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

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

Design quality principle	Response
	aspects of the design include: • Scale and Integration: The two-storey building aligns with the scale of existing structures on the site, ensuring it complements the surrounding single and two-storey residential area. The building is positioned above the existing car park area to maintain as much of the existing play space as possible. • Enhanced Landscaping: The building is set back considerably from the road frontage and maintaining the existing landscaping streetscape between the road and the building. New plantings are proposed to mitigate tree removal and screen views of the building from the sports oval. • Connectivity and Accessibility: The development maximises logical connections between the new building and existing adjacent structures, ensuring ease of access and movement across the site. • Overall, the design demonstrates a comprehensive response to the site context, enhancing the site's positive qualities while respecting its natural and cultural heritage.
2. Sustainable, Efficient, and Durable	The proposed school development has been designed to achieve sustainable, efficient, and resilient outcomes. Key elements of the design include: • Climate Control and Orientation: The building features a north-facing long elevation, maximising natural light and climate control. A high level of façade sun shading is proposed to minimise heat gain. • Renewable Energy: Solar panels are proposed to take advantage of the building's orientation • Flexible and Durable Design: The building employs a regular column grid and open floor plate design, allowing for maximum flexibility in future layout changes. This "long life, loose fit" approach ensures the building can adapt to evolving needs over time, promoting durability and resilience. • Passive Cooling and Natural Ventilation: The design features a high window area to facilitate natural ventilation, complemented by adjacent proposed trees that provide additional shading and cooling. This passive cooling strategy reduces reliance on mechanical systems, conserving energy. • Overall, the design demonstrates a strong commitment to sustainability, efficiency, and resilience, ensuring the school is well-equipped to thrive in an evolving climate while minimising its environmental footprint. • The design uses robust, low maintenance materials. The external materials themselves are the final finish - no need for painting.
3. Accessible and Inclusive	The proposed school development has been carefully designed to be accessible and inclusive, ensuring that the buildings and grounds are welcoming and easy to navigate for people with differing needs and abilities. Key aspects of the design include:

Design quality principle	Response
	• Comprehensive Accessibility Features: Lift access to all floors, new covered walkways connecting buildings and pathways designed for universal access. New ramp access direct from the street to the upper floor of the building is provided. • Community Integration: The development does not change the ability for the school facilities to be shared with the community. • Connected Spaces: Accessible path of travel provided to the new building M from the school's main entrance. • Overall, the design demonstrates a strong commitment to accessibility and inclusivity, catering to the diverse needs of the student body and community while fostering a welcoming and supportive environment for all.
4. Health and Safety	The proposed design ensures that the environment supports the wellbeing of all users. Key elements of the design include: • Part of design to provide safe and equitable access to the new building and to adjacent buildings on the site • Ramp, stair and lift access for full accessibility. • High Visibility: The layout incorporates clear sightlines, passive surveillance, and well-lit pathways to enhance safety. • Safe and Equitable Access: The design will provide safe and equitable access to the new building and adjacent buildings on the site. • Supervision and Visibility: The northern outlook allows for good supervision of the oval and visual connection to the wider school. • Wellbeing: The design minimises exposure to external hazards, and noise mitigation measures ensure a high level of internal acoustic comfort. • Overall, the design demonstrates a strong commitment to health and safety, creating a secure and supportive environment that promotes the wellbeing of all members of the school community.
5. Functional and Comfortable	The proposed activity has been designed to create functional and comfortable spaces that cater to a wide range of educational and community activities. Key aspects of the design include: • Natural Light and Ventilation: The building is designed to maximise natural light, creating bright and inviting spaces. Opportunities for both natural and mechanical ventilation are incorporated, ensuring a comfortable indoor environment. • Integration with Natural Surroundings: The new building is situated in an area with existing mature trees, and its scale is complementary to the surrounding area. This integration with the natural environment enhances the visual and acoustic privacy of the school, providing a serene and conducive setting for learning. • Designated Storage Areas: Adequate storage areas are provided to minimise clutter, ensuring that learning and activity spaces remain organised and functional.

Design quality principle	Response
	• Clear Circulation Paths: The design includes clear circulation paths, making it easy for students, staff, and visitors to navigate the school efficiently and comfortably. • Overall, the design demonstrates a strong commitment to creating functional and comfortable spaces that support a wide range of activities, while also considering the amenity of adjacent development and the natural environment.
6. Flexible and Adaptable	The proposed school development has been designed to be flexible and adaptable, ensuring that the spaces can evolve to meet changing educational and community needs and support a diverse range of educational and community activities now and in the future. Key aspects of the design include: • Open Floor Plates: The regular grid design and open floor plates allows for maximum flexibility, with spaces easily reconfigured to accommodate future needs. • Flexible Spaces: Sliding doors increase the flexibility of uses and spaces • The robust material palette ensures long-term durability to support ongoing efficiency and resilience. • Rational circulation. • Consolidation of services and wet areas. • Long life, loose fit. • Sliding doors to increase flexibility of uses and spaces. • Abundant natural light. • Natural as well as mechanical ventilation.
7. Visual Appeal	The proposed school development has been designed with a strong emphasis on visual appeal. Key aspects of the design include: • Scale and Proportion: The architectural design is in keeping with the scale of neighbouring buildings on the school site. The articulation of the structure, glazing and cladding to internal and external areas allows for a variety within a consistent grid approach. Façade Design: The long elevations are designed with a depth of façade and a variety of materials which breaks down the scale of the building. • Contemporary Aesthetic: The proposed building will have well-articulated elevations comprising a simple unobtrusive contemporary aesthetic with colours and materials relating to existing buildings that will sit comfortably in the setting. • Overall, the design demonstrates a strong commitment to visual appeal, ensuring that the school buildings and their landscape settings are not only functional but also enhance the aesthetic quality and character of the neighbourhood.

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

Sustainability and Climate Change

A Sustainable Development Plan Report dated 12 February 2025 was prepared by NDY (**Appendix 21**).

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

The proposed activity aims to go beyond minimum building requirements and provide a progressive sustainability outcome for the community. The sustainability principles adopted for the project will contribute to the conservation of resources and future resilience, across the whole life cycle of the project; from construction, through to the operational phase.

A range of key initiatives have been incorporated into the development, including:

- Passive design elements, such as high-performance façade, effective shading and natural ventilation to reduce the energy demand of the buildings and improve indoor environment quality for students and staff.
- Energy efficient building systems and on-site renewable energy to reduce greenhouse gas emissions.
- Consideration of the building design's resilience and adaptation to climate change impacts.
- High indoor air quality, acoustic design principles, visual amenity and thermal comfort to support the site functions as training and teaching spaces and private staff areas.
- Best practice waste management principles in operation, and construction and demolition waste diversion from landfill.
- Water efficient fixtures and fittings (high WELS ratings).
- Incorporation of stormwater management systems and water sensitive urban design (WSUD) to minimise peak stormwater flows and pollutants.
- Social sustainability initiatives such as incorporation of indigenous design elements, implementation of universal design principles and community benefits via community use of the school facilities.

The School Transport Plan (**STP**) prepared by SCT and attached at **Appendix 8** aligns with ESD principles by promoting sustainable transport options to reduce the carbon footprint of the school community. Measures include:

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

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

The proposed building has been designed to address exposure to extreme climate events, incorporating insights from historical data, environmental mapping, and NARCLiM climate projections. A climate change risk assessment has been undertaken as per AS 5334-2013 and Green Star Buildings v1 requirements. Expected impacts from climate change were identified with reference made to both CSIRO projects for the East Coast (South) sub-cluster and NSW Government's NSW and ACT Regional Climate Modelling (NARCLiM) projections. Key risks identified include heatwaves, intense rainfall, localised flooding, storms, and potential bushfire exposure.

The design mitigates heatwave impacts through high-performance insulation, reflective roofing, and passive cooling strategies, supported by tree planting and shaded outdoor spaces to reduce the urban heat island effect.

2.2.2Construction

The proposed construction hours will be as follows:

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

The construction of the proposed activity is anticipated to require 100 full time equivalent (**FTE**) construction workers, along with the use of excavators and cranes during construction.

Construction waste will be managed in accordance with a Construction Waste Management Plan (**CWMP**) (refer **Section 6.12**). The CWMP ensures compliance with all applicable regulatory requirements during the construction phase of the proposed activity and details measures to promote responsible waste separation, including recycling provisions and procedures.

The current approximate construction program milestones of the proposal are provided in the below table. A detailed construction program for the proposal will be developed by the Main Works Contractor.

Table 5: Construction Program

Milestone	Start
Construction contract award	May 2025
Site establishment works	August 2025
Anticipated construction completion and handover	September 2025
Main construction works	November 2025
Contract/ Construction completion demobilisation	December 2026

Demolition

The proposed activity will be constructed over the existing car park. No building is required to be demolished. The proposed activity includes the demolition of an area of existing pavement and fencing once the demountables are removed, refer **Figure 14** below.

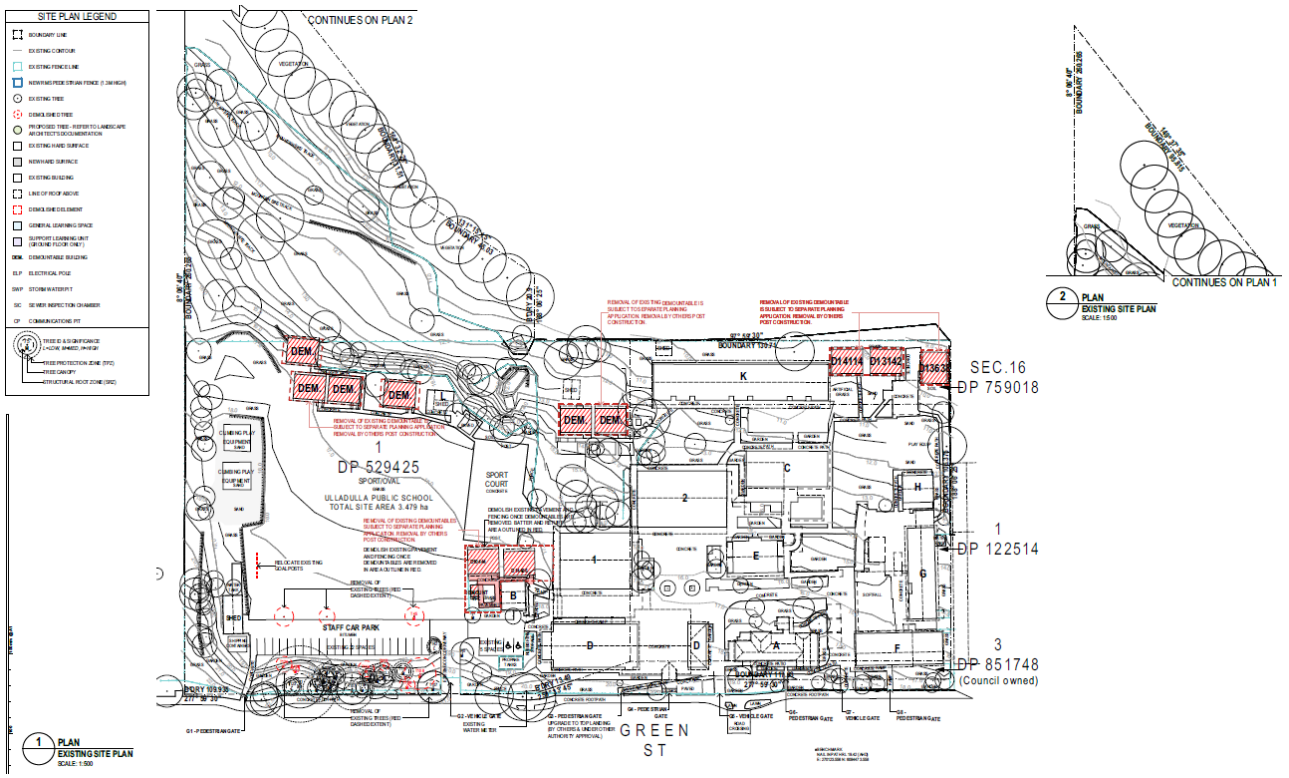


Figure 14: Existing and Demolition site plan

Earthworks

Bulk earthworks are not required to accommodate the proposed activity, as it will be built over the existing car park.

Tree and Vegetation Removal

The proposed activity includes removal of 9 trees, refer to **Figure 15** below.

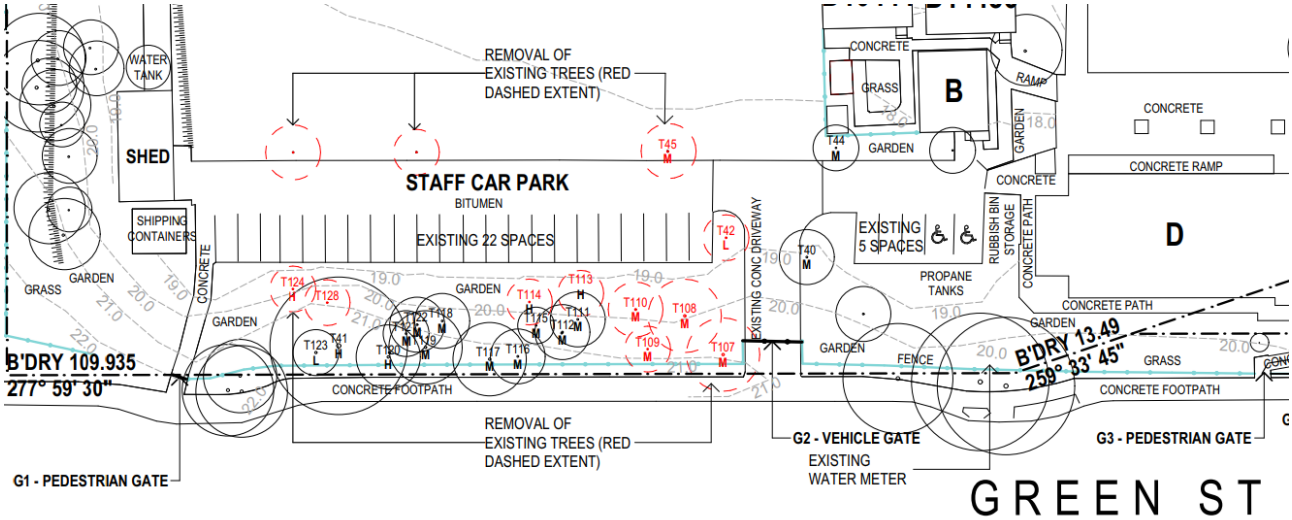


Figure 15: Extract of demolition site plan

The remaining trees on site will be retained and are to be managed and protected for the duration of the works. Exclusion zones around existing trees in proximity to the works will be demarcated by protection fencing, boarding and wraps, as per the Arboricultural Impact Assessment **(Appendix 20**) The Principal Contractor will protect trees and other identified vegetation in accordance with the Mitigation Measures at **Appendix 1**.

Utilities and Services

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

- New in ground sewer and water connections to the new building.
- Main switchboard.
- New distribution board.

2.2.3Operation

The proposed activity does not include any changes to the existing operating hours of the school.

The school is not proposed to be used for community use outside of school hours. The existing school hours are outlined in **Table 6**.

Table 6: School Hours of Operation

Activity	Hours of Operation
School Hours	8:30am – 3:30pm, Monday – Friday
Recess and Lunch	Staggered throughout the school day.
Administration	8:00am – 6:00pm
After School Hours	4:00pm – 6:00pm (Hall, Library, Lecture and Movement Studio), Monday – Friday
Cleaning	5:30am to 6:00pm, Monday to Friday

Waste Management

The proposed operational waste management procedures will involve the private collection of waste and recycling bins in accordance with the department's contracts with a private waste collection service.

On collection days, the appointed waste contractors will wheel the bins from the waste storage area to the back of the truck for collection on Green Street and then wheel back to the waste storage area.

2.2.4 Related Works/ Activities

The relocation of the existing demountable classrooms on the site do not form part of the scope of the proposed activity assessed in this REF. Similarly, works to demolish and replace the existing substation do not form part of the scope of this activity approval and will be subject to a separate planning pathway.

The below table outlines the approved and likely future developments which may be relevant to the cumulative impact assessment of the proposed activity.

Table 7: Nearby development activity

DA Reference	Development Description	Current Status	Distance from Site	Address
-	Ulladulla High School upgrade	Under assessment	Directly to the south	55 South Street Ulladulla

3. Proposal Need and Alternatives

3.1 Proposal Need

The proposed activity is part of the NSW Government's plan to rebuild public education with the 2024-25 Budget is delivering record education funding, including a historic $1.4 billion for new and upgraded schools in regional NSW. This targeted investment will ensure growing communities get access to a world class public education.

The proposed activity is part of this broader program and will provide much needed upgrades to Ulladulla PS thereby renewing an existing school asset and providing additional permanent teaching spaces.

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: Do Nothing	This option would retain the existing layout and facilities present on the site and would not support the construction of a new homebase building and additional car parking.	Option 1 is **not preferred** as it would continue an increased reliance on demountable classrooms at Ulladulla Public School, which would provide a sub-optimal learning environment for students and staff. This option is not considered to be in the best interests of students, staff and the broader Ulladulla community.
Option 2: New building on sports oval	Option 2 considered positioning the new building to the north of the car park on the south side of the sports oval.	Option 2 is **not preferred** as it significantly reduced the area of open space and was situated within the overland stormwater flow path.
Option 3: The Proposed Activity	Option 1 is the option detailed in this REF. The proposed activity will improve the quality of teaching spaces at Ulladulla Public School by removing demountable classroom and establishing a new two-level homebase building. Option two will also ensure the provision of car parking on the site is in line with that required by the Shoalhaven DCP. The proposed activity will ensure Ulladulla Public School is a suitable educational environment in the long-term future and is considered an optimal outcome for students, staff and the community.	Option 1 is the **preferred option** as it does not result in the loss of valuable open space, is well positioned in terms of visual separation to the adjoining residential interface and does not result in a loss of car parking.

4. Statutory and Strategic Framework

4.1 Permissibility and Planning Approval Pathway

State Environmental Planning Policy (Transport and Infrastructure) 2021 (**TI SEPP**) aims to facilitate the effective delivery of infrastructure and educational establishments across the state and provides that various developments for the purposes of a government school are permitted without consent. The proposed activity is development permitted without consent as outlined at **Table 9**.

Table 8: Description of Proposed Activities under the TI SEPP

Division and Section within TI SEPP	Description of Works
Section 3.37 – Existing or approved government schools— development permitted without consent	The proposed activity comprises development carried out on behalf of a public authority within the boundaries of an existing or approved government school. The scope of the proposed activity includes the construction, operation and maintenance of the following specific purposes specified in this section • Section 3.37(1)(iii) a permanent classroom, • Section 3.37(b) minor alterations or additions, such as— (i) internal fitouts, or (ii) alterations or additions to address work health and safety requirements or to provide access for people with a disability, or (iii) alterations or additions to the external facade of a building that do not increase the building envelope (for example, porticos, balcony enclosures or covered walkways), • Section 3.37 (e) demolition of structures or buildings (unless a State heritage item or local heritage item), • Section 3.37 (f) construction, operation or maintenance of a building associated with the operation of the school on land within a prescribed zone. Under Section 3.37(2)(a) building resulting from development carried out under subsection (1)(a) or (f) must not have a height of more than the greater of— • (a) the maximum height permitted for a building under an environmental planning instrument applying to the land on which the development is proposed to be carried out, or • (b) 4 storeys. The proposed activity involves the construction of building with a maximum height of two storeys. This is less than four storeys as stipulated in the TI SEPP. It is noted that there is no maximum height of building control for the site under the Shoalhaven Local Environmental Plan 2014. In accordance with Section 3.37(4) the proposed activity would not result in the contravention of any existing condition of the development consent currently operating (other than a complying development certificate) that applies to any part of the school, relating to hours of operation, noise, vehicular movement, traffic generation, loading, waste management or landscaping. In accordance with Section 3.37(5A) the Design Quality Principles set out in Schedule 8 of the TI SEPP and the Design Principles set out in the Design Guide for Schools have been considered as set out in **Section 2.2.1** of this REF.

Activities permissible without consent require environmental impact assessment in accordance with Division 5.1 of the EP&A Act and are assessed and determined by a public authority, referred to as the determining authority. The department is the proponent and determining authority for the proposed 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* (DPE June 2022) and the *Guidelines for Division 5.1 assessments Consideration of environmental factors for health services facilities and schools Addendum* (DPHI, October 2024) provide a list of environmental factors that must be taken into account for an environmental assessment of the activity under Division 5.1 of the EP&A Act. These factors are considered in detail at **Section 6**.

Existing Development Consents

A request for all development consents applying to the site was submitted to Council under the *Government Information (Public Access) Act 2009* (**GIPA Act**). The GIPA request was responded to on 16 December 2024 and the development consents listed and summarised in **Table 10** were identified.

Table 9: Development consents applying to the site

Development Application #	Description	Date Determined
DA95/3038	New COLAs, hall, library, admin and storage areas and 30 space car park. Condition 4c of this consent requires tree planting along the carpark to screen the carpark from the dwellings along Croft Street. The proposed activity proposes planting along the carpark and therefore is consistent with the condition.	14/06/1995
DA97/0293	Covered outdoor learning area (COLA) covered walkways and pergola.	27/08/1997
DA00/3469	School signage	06/12/2000
DA04/1617	Storage shed	28/04/2004

The proposed activity would not contravene any existing condition of the consent(s) 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.

4.2 Environmental Protection and Biodiversity Conservation Act 1999

The provisions of the EPBC Act do not apply to the proposed activity as it is not development that takes place on or affects Commonwealth land or waters. Further, it is not development carried out by a Commonwealth agency or development on Commonwealth land, nor does the proposed activity affect any matters of national significance. An assessment against the EPBC Act checklist is provided at **Table 11.**

Table 10: EPBC Act Checklist

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

4.3 Other Approvals and Legislation

Table 6 identifies any additional approvals that may be required for the proposed activity. **Table 12** identifies any additional approvals that may be required for the proposed activity. **Table 12** identifies the SEPPs that are applicable to the proposed activity.

Table 11: Consideration of other approvals and legislation

Legislation	Relevant?	Approval Required?	Applicability
State Legislation			
National Parks and Wildlife Act 1974	Yes	No	The aim of the NPW Act is to ensure the conservation of the natural environment including any objects, places or features identified as having high cultural value or significance. Section 90 of the NPW Act facilitates the issuance of Aboriginal Heritage Impact Permits (**AHIP**) in the instance there are any potential aboriginal heritage impacts. There are no Aboriginal sites within 200m, nor is the site assessed as likely to contain Aboriginal cultural heritage values. The NPW Act is not relevant as the proposed activity does not require a Section 90 approval.
Rural Fires Act 1997	No	No	The report identifies that the northern section of the school is mapped as Bushfire Prone Land, however the proposed activity is located outside of this area and no approvals or licences are required for the activity in relation to the RF Act.
Water Management Act 2000	No	No	The proposed activity is not being carried out within 40m of a waterway. No approvals are required.
Biodiversity Conservation Act 2016	Yes	No	Part 7 of the Biodiversity Conservation Act 2016 (the **BC Act**) outlines biodiversity assessment and approval requirements and states that an activity under Part 5 of the EP&A Act is to be regarded as an activity likely to significantly affect the environment if it is likely to

Legislation	Relevant?	Approval Required?	Applicability
			significantly affect threatened species as defined by the test of significance criteria in Section 7.3 of the BC Act, which may then lead to a Species Impact Statement (**SIS**) or Biodiversity Assessment Report (**BDAR**). The Flora and Fauna assessment completed for the proposed activity (**Appendix 21**) includes the test of significance and concludes that the proposed activity does not significantly affect any threatened species or ecological communities as per the BC Act. As a result, an EIS (and therefore a SIS or a BDAR) is not required.
Pesticides Act 1999	No	No	The proposal will not require the use of large quantities of dangerous pesticides and therefore approval under the Pesticides Act is not required.
Heritage Act 1977	Yes	No	No approval is required under the Heritage Act as the proposed activity does not materially affect any State heritage items. The school site contains a 'Victorian Georgian style Sandstone School and School Master's Residence (Local 484)' that is identified as local heritage item. The site is also listed on the Department of Education Section 170 Conservation Register as 'Ulladulla PS - Building B00A'. The proposed activity is located more than 100m from the School Master's Residence and not impact this building, refer **Section 6.7** and **Appendix 20** for the Heritage Impact Statement prepared by City Plan.
Fisheries Management Act 1994	No	No	The FM Act applies in relation to all waters that are within the limits of the State and needs to be addressed for development in proximity to or which could have impact on any aquatic flora and fauna. The FM Act is not relevant as the works activity will not impact aquatic flora or fauna.
Contaminated Lands Management Act 1997	No	No	This REF is supported by a DSI prepared by JK Environments and attached at **Appendix 25**. This confirms that the site is suitable for its intended use. Additionally, no approval is required under the CLM Act. Furthermore, the Section 10.7 Planning Certificate does not indicate that the site is significantly contaminated or that any approvals under the CLM Act are required.
Protection of the Environment Operations Act 1997	No	No	The proposed activity will not result in significant air, noise, water or waste pollution and therefore an approval under the POEO Act is not required. The proposed activity relates to the alterations and additions to an existing school and therefore a licence under Sections 47, 48, 49 or 122 of the POEO Act is not required.
Roads Act 1993	No	No	No works are proposed outside the site boundary for the purposes of the Roads Act 1993
Local Government Act 1993	No	Yes	An approval under Section 68 of the LG Act will be required as the proposed activity includes the carrying out of sewerage work and stormwater drainage work that connects to Council's systems.
Mine Subsidence Compensation Act 1961	No	No	The site is not located within a mine subsidence district and therefore this Act does not apply.

Legislation	Relevant?	Approval Required?	Applicability
Coastal Management Act 2016	Yes	Yes	The primary aim of the CM Act 2016 is to manage the coastal environment of NSW in a manner consistent with the principles of ecologically sustainable development and to protect and enhance natural coastal processes and coastal environmental values. The site is mapped under the CM Act 2016 as being within a coastal use area and a coastal environment area. The provisions of the CM Act 2016 are enforced through Chapter 2 of the *State Environmental Planning Policy (Resilience and Hazards)*. Refer to discussion in Table 13 below.
Environmental Planning and Assessment Regulation 2021 (Section 171A	No	No	The proposed activity is not located within a drinking water catchment. Therefore, this section of the regulations do not apply.

Table 12: Consideration of relevant SEPPs

Legislation	Relevant?	Applicability
State Environmental Planning Policy (Planning Systems) 2021	No	The proposed activity is being carried out under Section 3.37 of the TI SEPP as development without consent.
State Environmental Planning Policy (Sustainable Buildings) 2022	Yes	The provisions of Chapter 3 of the SB SEPP apply to the proposed activity as it involves the erection of a new building with an EDC greater than $5 million. This REF is accompanied by a Net Zero Statement and Sustainable Development Plan prepared by NDY (**Appendix 21**) which outline the strategies to resolve operational and construction emissions as well as committing to Net Zero operational emissions by 2050.
State Environmental Planning Policy (Resilience and Hazards) 2021	Yes	State Environmental Planning Policy (Resilience and Hazards) 2021 (Resilience and Hazards SEPP) contains planning provisions relating to: • Chapter 2- Land use planning within a coastal zone • Chapter 3- Management of hazardous and offensive development • Chapter 4- Remediation of contaminated land and to minimise risk of harm Chapter 2 is relevant as the site is partially mapped as being a coastal use and coastal environment area. However, the proposed activity consists of upgrade works to the existing Ulladulla PS, and there will be no impact on the coastal area. Chapter 4 of the Resilience and Hazards SEPP provides a state-wide planning approach for the remediation of land to reduce the risk of harm to human health or the environment. Under Chapter 4, a consent authority must consider whether the land is suitable for a proposed development from a contamination perspective. The detailed site investigation prepared by JK Environments (**DSI, Appendix 10**) for proposed activity concludes that the site is not contaminated and is suitable for the proposed development.
State Environmental Planning Policy	No	The proposed school signage is ancillary to the proposed activity for the construction of a school. Therefore, the signage provisions

<table>
<tr><th>Legislation</th><th>Relevant?</th><th>Applicability</th></tr>
<tr><td>(Industry and Employment) 2021</td><td></td><td>of the IE SEPP are not required to be assessed.</td></tr>
<tr><td>Shoalhaven Local Environmental Plan 2014</td><td>Yes</td><td>The site is zoned SP2 Educational Establishment. While the T&I SEPP removes the requirement to seek consent under the provisions of the Shoalhaven LEP 2014, the proposal is consistent with the relevant objective of the SP2 zone which are to:
To provide for infrastructure and related uses.
To prevent development that is not compatible with or that may detract from the provision of infrastructure.
<table><tr><td>Height of Buildings</td><td>Not subject to a height of building control.</td></tr><tr><td>Floor Space Ratio</td><td>Not subject to a floor space ratio control.</td></tr><tr><td>Heritage</td><td>Ulladulla PS is partially identified as locally listed heritage item no 484 ‘Victorian Georgian style Sandstone School and Schoolmasters Residence’ under the Shoalhaven LEP. Refer Section 6.7.</td></tr><tr><td>Flood Planning</td><td>The site is within the flood planning area. The objective of this clause is to ensure that development in flood-prone areas is carefully managed to minimise risks to li and property, ensure compatibility with flood behaviour avoid negative impacts on the environment, and facilitate safe evacuation.

A consent authority is to consider these matters when determining an application.</td></tr><tr><td>Terrestrial Biodiversity</td><td>The eastern edge of the school site is mapped as Biodiversity – Significant Vegetation. Land adjoining the school to the north Is mapped as Biodiversity – Corridor. When determining an application authorities must consider potential adverse impacts on biodiversity including the condition and significance of fauna and flora, the importance of vegetation for native fauna, and habitat connectivity. Measures to avoid, minimise, or mitigate these impacts must be evaluated. .</td></tr></table>Shoalhaven LEP mapping is included Figure 14 below.</td></tr>
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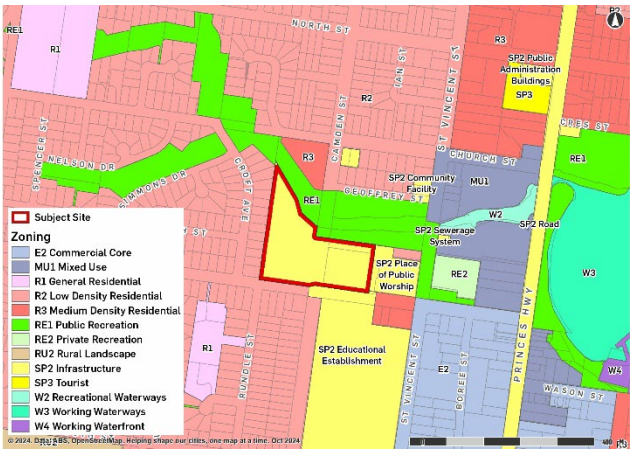
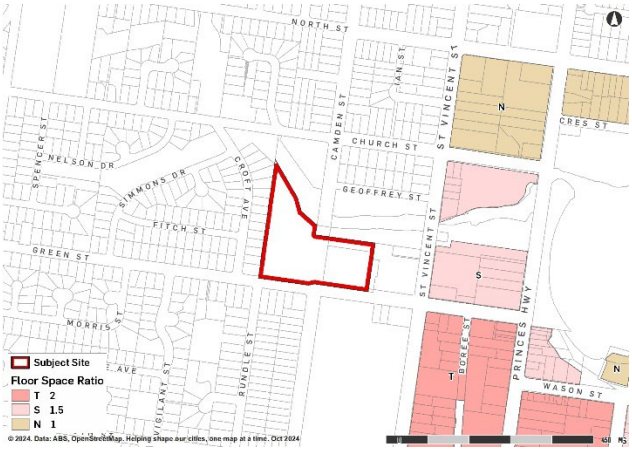


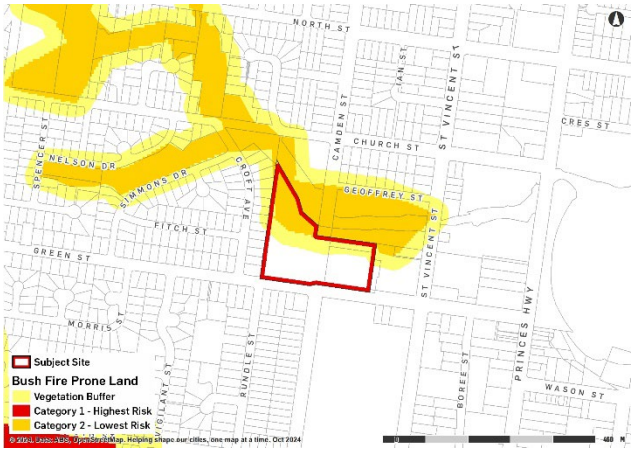
Picture 1 Land Zoning Map

Picture 2 Height of Buildings Map



Picture 3 Floor Space Ratio Map

Picture 4 Lot Size Map



Picture 5 Bushfire Prone Land Map

Picture 6 Heritage Map

Source: Urbis, 2024

Figure 16 Shoalhaven LEP Maps

4.4 Strategic Plans

Table 14 considers strategic plans that are relevant to the proposed activity.

Table 13: Consideration of applicable Strategic Plans

Strategic Plan	Assessment
Illawarra Shoalhaven Regional Plan 2041	The Illawarra Shoalhaven Regional Plan (Regional Plan) provides the overarching strategic plan for growth and change in Wollongong, Shellharbour, Kiama and Shoalhaven. It is a 20-year plan to inform land use planning and inform the work of agencies to plan for growth and change and create an innovated and connected diverse and resilient Shoalhaven. It identifies key challenges facing Sydney including increasing the population to eight million by 2056, 817,000 new jobs and a requirement of 725,000 new homes by 2036. The Illawarra Shoalhaven Region Plan includes the following objectives of relevance to the proposed activity: • Objective 11 of the Plan aims to protect important environmental assets. The proposed activity contributes to the improvement of educational facilities within its existing site and does not impact the adjacent environmental assets. Objective 15 of the Plan targets a Net Zero region by 2050. The proposed activity achieves a 4-Star Green Star rating demonstrating its contribution to achieving Net Zero in accordance with this objective.
Illawarra-Shoalhaven Regional Transport Plan	The Illawarra-Shoalhaven Regional Transport Plan (RTP) was developed by Transport for NSW in collaboration with the Department of Planning, as a supporting plan of the Future Transport 2056 Strategy. This plan outlines key actions to meet future transport needs, responding to changes in population, land use, and travel demand. For the Milton-Ulladulla area the key actions include: • Planning for the Princes Highway Upgrade and the Milton-Ulladulla Bypass. • Investigating 30-minute public transport catchments for Shellharbour City Centre, Kiama, and Milton-Ulladulla. • Department of Education c/o School Infrastructure • Ulladulla High School Upgrade | Transport Access Impact Assessment 9 • Investigating improved bus services between Milton-Ulladulla and Nowra City Centre. Action on the above initiatives will directly benefit UHS and the wider community.
Shoalhaven Local Strategic Planning Statement	The Shoalhaven Local Strategic Planning Statement 2020 (**LSPS**) identifies a long term direction for future land-use planning work and to plan for and deliver homes, jobs, services, and infrastructure. The LSPS highlights the construction of the Milton - Ulladulla Bypass as a city-shaping opportunity. The bypass will provide more pedestrian friendly environments and increase the amenity and attractiveness of the centres. The LSPS sets out two key directions, Direction 1 Managing Economic Growth includes delivering infrastructure (including schools). The proposed activity supports Direction 1 by delivering

Strategic Plan	Assessment
	adequate and appropriate education infrastructure. The proposed activity will upgrade Ulladulla PS which directly addresses Collaboration Activity CA2.5 of Planning Priority 2: *Work with the NSW Department of Education to identify and deliver new and upgraded schools and identify opportunities for community use of facilities.*

5. Consultation

5.1 Early Stakeholder Engagement

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

Table 14: Summary of Early Stakeholder Engagement

Stakeholder	Engagement
Shoalhaven City Council	**19th August 2024**: An introductory meeting with transport context. The project team provided a project overview and preliminary transport assessment to Council and Transport for NSW (**TfNSW**) stakeholders. The meeting also provided a list of proposed transport initiatives. **18th November 2024:** The project team provided a project overview and responded to the previously listed transport initiatives to Council and TfNSW stakeholders. Responses included proposed actions and funding of initiatives. Some of the initiatives were discussed and agreed upon. Council noted the proposed west bound kiss n' drop on southern side of Green Street was not recommended. Kiss 'n drop to be extended on Green Street north side along the entire frontage of the school. **9th December 2024:** An advisory meeting where the project team provided site context, planning consideration and architectural plans. Council provided high-level feedback on the plans. **6th February 2025**: Meeting held to provide further feedback specific to Council's previous queries and advise project's final position on public domain and transport initiatives. There were no concerns raised by Council.
Transport for NSW	**19th August 2024**: An introductory meeting with transport context. The project team provided a project overview and preliminary transport assessment to Council and TfNSW stakeholders. The meeting also provided a list of proposed transport initiatives. **18th November 2024:** The project team provided a project overview and responded to the previously listed transport initiatives to Council and TfNSW stakeholders. Responses included proposed actions and funding of initiatives.
School Community, including School Principal, Assistant Principal, Director of Education and Leadership, School Infrastructure NSW, and Fulton Trotter Architects	**21st February 2023** - A start up meeting with a presentation of the project governance, proposed upgrades and next steps. Final Business Case was completed and submitted to Treasury for funding. **24th July 2024** - An introductory meeting with the project team providing an overview of the project and governance arrangements. **26th August 2024** - Masterplan options were presented to the school and Option 1 was agreed upon.3 **30th October 2024** – Project update **5th November 2024** – Concept Design presented and endorsed **26th November 2024** – Project update on Schematic Design **9th December 2024** – Project update- Schematic Design presented. **14th February 2025** – Project update
Community Updates	**19th September 2023** – A flyer on the project website notifying planning commencement and geotechnical investigations to occur 18-19 Sep 2023 **19th March 2024** – An overview flyer on the project website indicating

Stakeholder	Engagement
	the project started its early planning phase **3rd April 2024** – A flyer on the project website providing update on project commencement and next steps and links for consultation surveys. Community feedback received. **September 2024** – A document on the project website which summaries key concerns the community raised in the April 2024 surveys and providing the next steps where the project will finalise concept design. **December 2024** – A flyer on the project website providing update on project progress. An information session is informed for Term 1 2025. **March 2025**- Community Information session.
Endeavour Energy	**26th July 2024** – Preliminary Enquiry Submitted in Connections Portal – electrical engineer requested information regarding capacity of existing substation supply; supply was confirmed.

5.2 Statutory Consultation

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

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

6. Environmental Impact Assessment

6.1 Traffic, Access and Parking

A Transport Access Impact Assessment (**TAIA**) has been prepared by a STC and is included at **Appendix 17**. The TAIA has been prepared to address the traffic and transport impacts during the operational and construction stages of the proposed activity. The report also outlines the proposed mitigation measures for the development to minimise any adverse impacts, where required.

Methodology

The TAIA provides a comprehensive analysis of both existing and predicted traffic conditions resulting from the proposed activity. The assessment was conducted using the following methods:

- Analysis of the local and regional planning policies and frameworks to ensure alignment with strategic goals.
- Evaluation of the existing transport network, including walking, cycling, public transport, and road infrastructure.
- Travel mode share for students was obtained from a hands up survey.
- A detailed assessment was conducted using the accessibility-propensity method, which estimates future student travel mode shares by considering factors such as proximity to the school, availability of transport infrastructure, and expected travel behaviour.
- Future mode share targets were developed based on existing student travel mode share obtained from the hands-up survey, existing student locations, future population growth, proposed infrastructure upgrades and transport encouragement programs.
- Development of strategies to achieve future mode share targets, including infrastructure upgrades and operational adjustments.
- Engagement with local stakeholders, including Council and TfNSW, through transport working group (**TWG**) meetings to refine and agree on measures.

Existing Environment

Ulladulla PS is bordered to the south by Green Street. Other key streets surrounding the development include St Vincent Street to the east and Coff Avenue to the west. The surrounding road network includes:

- **Princes Highway:** Classified State Road and provides access to Ulladulla Public School and Ulladulla town centre. Running north-south, it is a two-way road with one lane in each direction. A shared path is either located on or proposed along the west side. Princes Highway provides access to Ulladulla primary school for students living within the catchment area outside of Ulladulla.
- **Green Street:** A local street that runs along the southern boundary of the school. It has a posted speed limit of 50km/h. It has one lane each way and footpaths on at least one side, providing access to Princes Highway and Ulladulla town centre.
- **St Vincent Street:** A local road running north-south with one lane each way, speed limit 50km/h. It also provides direct access to Ulladulla HS and Ulladulla town centre, including footpaths and pedestrian crossings.

- **Coff Avenue:** is a local street located directly east of the school. Footpaths are not provided, as the street is lined with residential dwellings on both sides. At its intersection with Green Street, Coff Avenue operates as a give-way intersection with no formalised crossing.

Ulladulla PS has a high bus and active transport mode share. The site is serviced by a bus stop on Green Street located at the school's entrance. The existing buses service both Ulladulla PS and Ulladulla High School and approximately 661 students are within 400m of a designated school bus route. Ulladulla Buslines operates eleven AM and twelve PM services. The existing public bus routes and their timetables for stops close to the site around school peak hours (8am to 9am and 3pm to 4pm) are highlighted in **Figure 17** below**.**

Travel mode share is illustrated in **Figure 18.** This demonstrates that the large number of bus services is a key strength of the transport network to the school, with surveys indicating that 37% per cent of student journeys from school are by bus.

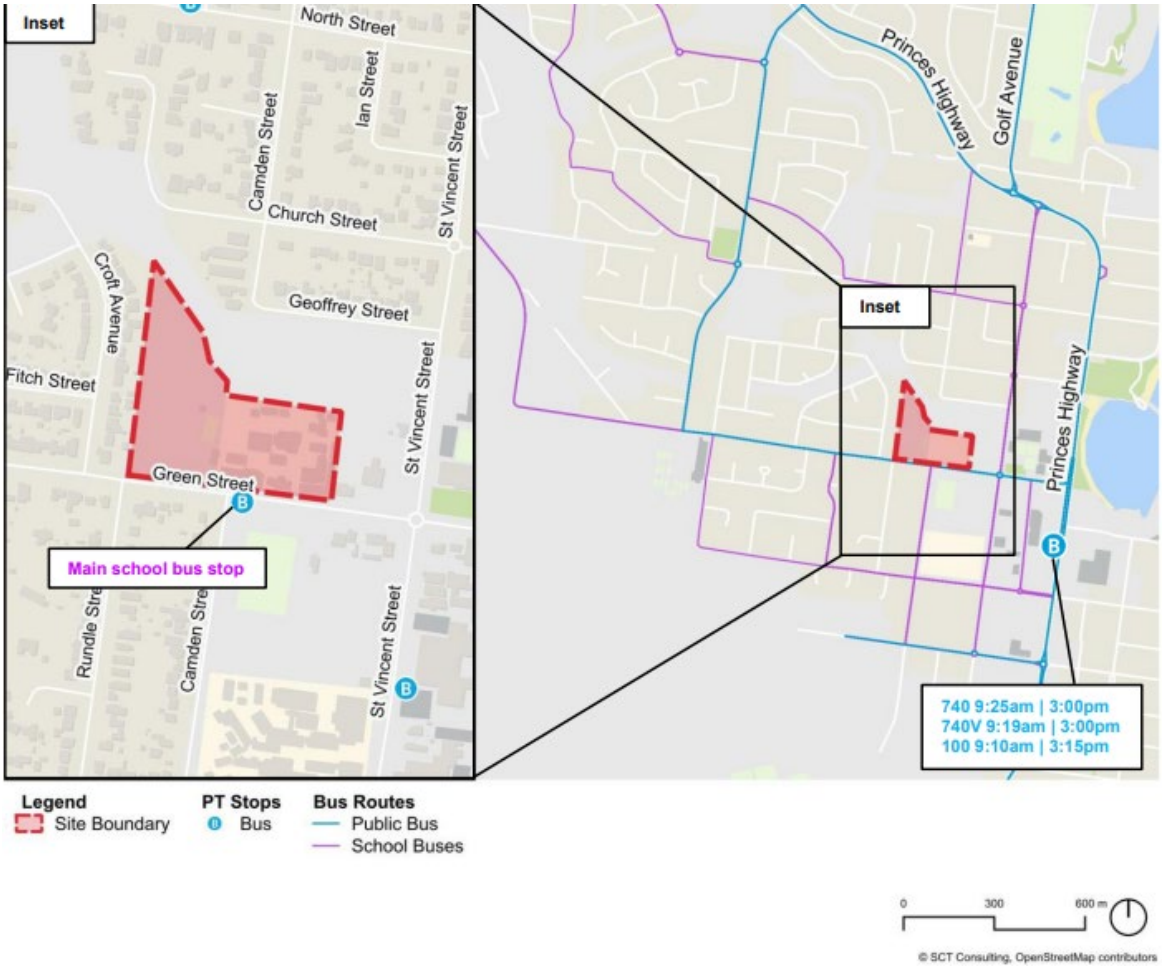


Figure 17: Primary Bus routes servicing the school site

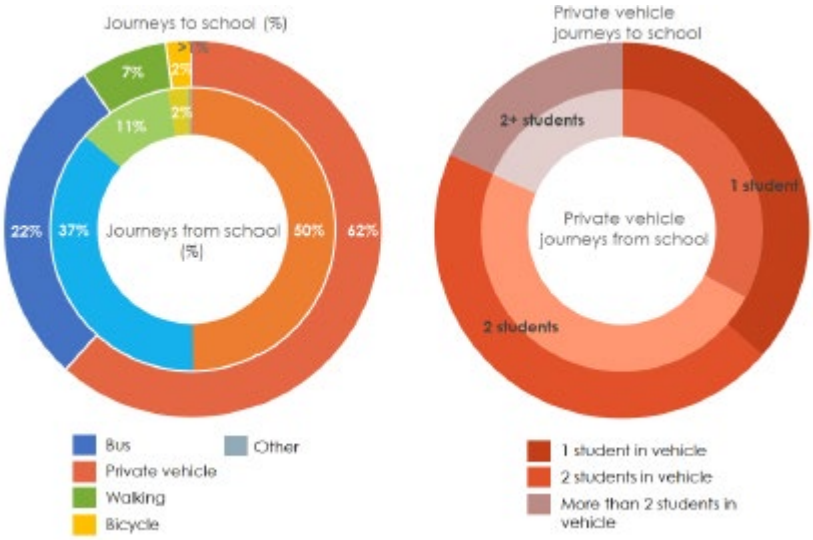


Figure 18:Travel Mode Share

Cycling infrastructure within the school intake area is limited. There is a shared path along Princes Highway and Green Street providing direct access to Ulladulla PS. Some of the proposed and current cycleways are inhospitable, in particular along Princes Highway. However, other surrounding cycle infrastructure within the cycle catchment offers more suitable facilities, providing access directly to the school.

Existing footpath connectivity directly servicing the site is good with footpaths on at least one side of the road providing access on all bordering streets. Other local streets within residential areas 1,200m of the site have limited pedestrian facilities including footpaths and crossings. The 1,200m walking catchment of the school is good, with strong connectivity, however it is poorer to the south-west due to a lack of infrastructure.

Assessment

Mode Share Targets / Trip Generation

Future mode share targets were developed based on existing patterns and adjusted for expected enrolment. Two future scenarios modelled within the TAIA:

- Base Case: No additional offsite upgrades beyond the current infrastructure (note this includes the new pedestrian crossing north of the intersection of Camden and South Streets already delivered by the Council)
- Moderate Case: Includes an additional 10 scooters and 40 bicycle racks to support active transport, painting bus zones red to prevent illegal parking and extending the existing kiss and drop off zone for the entirety of the school frontage.

The school has an existing Kiss n' drop off area, located on the western side of the pedestrian zebra crossing at Green Street, situated between the western pedestrian and existing vehicle access points. The current on street no parking / kiss 'n drop location has capacity for approximately 15 vehicles.

Subject to Shoalhaven City Council Traffic Committee approval, it is proposed to change the parking signage for seven existing unrestricted parking spaces on Green Street (southern side) to No Parking 8.00 – 9.30 am and 2.30 – 4.00 pm SCHOOL DAYS to create 5 additional kiss 'n drop spaces. This change will help to manage traffic flow during peak drop off and pick up times and

support the existing operation of the school. It is noted that there are no civil works proposed to deliver the spaces, only line painting and updates to signage.

The modelling shows that the Moderate Case interventions will result in the following:

- Decrease in car trip mode share by 4% (-31 trips).
- No change to walking mode share.
- Increase in cycling mode share by 5% (+40 trips)
- Decrease in bus trip mode share by 1% (-9 trips).

In order to deliver the above outcomes, the Moderate Case interventions have been included within the mitigation measures at **Appendix 1**.

The proposed initiatives are shown in the public domain plan at **Appendix 7** and **Figure 18** below.

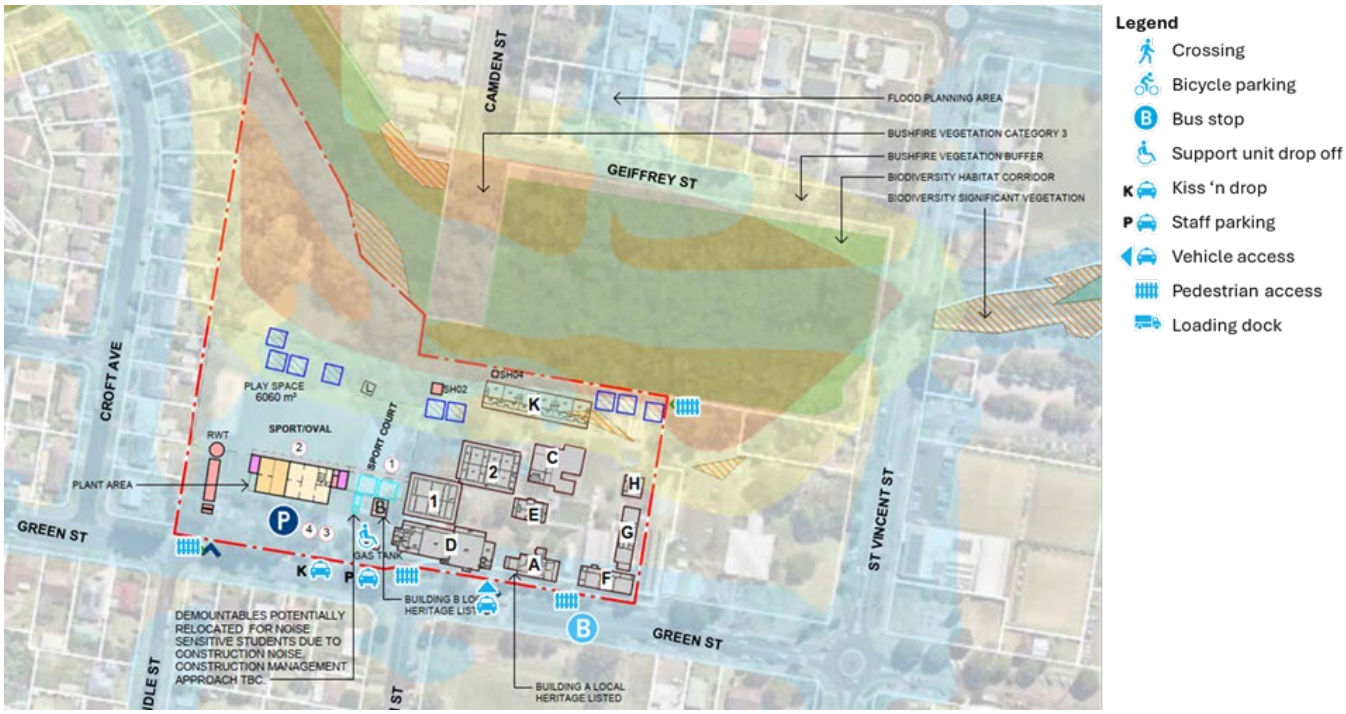


Figure 19 Proposed Supporting Transport Infrastructure

Construction Phase

The construction of the new homebase building will generate temporary traffic impacts on the local road network due to the movement of heavy vehicles, material deliveries and workforce commuting.

The estimated peak workforce is approximately up to 100 full-time equivalent (FTE) workers. Due to the limited public transport to the site, it is estimated that:

- 100 per cent would take private vehicle transport to the site, with a vehicle occupancy of 2.0 assumed (typical of construction sites).
- Based on an estimated 100 full-time site workers, the maximum number of cars during the peak hours generated by the site is 50 light vehicles per day.
- It has been assumed that approximately 10 heavy vehicles will enter and exit the site for construction purposes throughout the day.

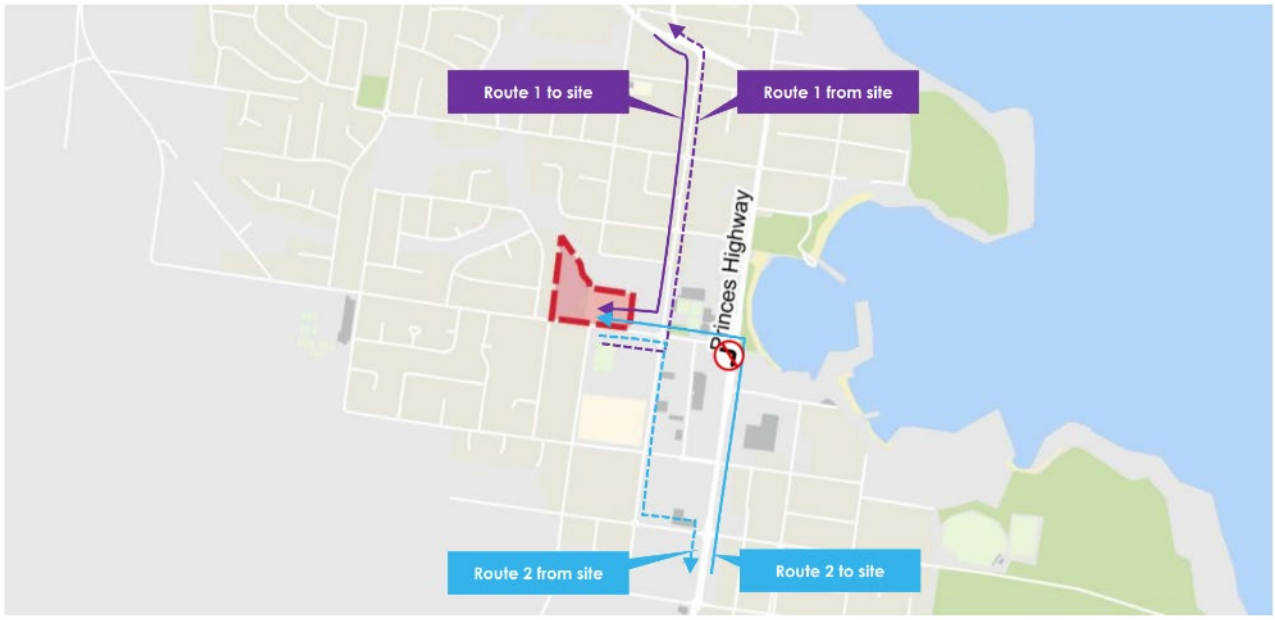
It is assumed that the 50 light vehicles generated could park on site (outside of school operating hours), or on-street on the surrounding road networks. The contractors will confirm the maximum number of car parking can be provided on site to minimise the impacts of on-street parking on the surrounding local residential streets. Workers would generally start earlier and end earlier than the commuter peak periods and would likely not coincide with the school or road network periods. Final construction vehicle numbers are still being confirmed. At the submission of this draft, a preliminary estimate of 10 heavy vehicle truck movements is anticipated on a typical day.

As oversized vehicles may be used for transporting building parts and modules, deliveries will need to be scheduled outside of peak travel hours. This will minimise disruptions to the broader traffic network and reduce the risk of damage to the components.

Workers with heavy tools can drop them off at a work zone/loading zone before parking longer term on Green Street.

There are two potential haulage routes from the state road network to the site (refer **Figure 16)**

- Route 1:
    - From the North: Princes Highway > Green Street
    - To the North: Green Street > Princes Highway
- Route 2:
    - From the South: Princes Highway > Green Street
    - To the South: Green Street > St Vincent Street > Deering Street > Princes Highway



Source: SCT, 2025

Figure 20 Haulage Routes

Oversized deliveries will be scheduled outside peak hours to minimise disruption to the broader traffic network. Traffic controllers will be deployed to manage interactions between construction vehicles and general traffic, ensuring vehicles enter and exit the site in a forward direction wherever possible. Temporary diversions will be implemented for footpaths or walking paths to maintain safe pedestrian crossings and reduce vehicle-pedestrian conflicts.

Additional road safety measures, such as temporary signage and clear sightlines, will be adopted to ensure safe and efficient operations. Ongoing consultation with Council and TfNSW will ensure that adopted traffic management measures align with broader transport and infrastructure planning.

The combined light vehicle trips and heavy vehicle movements are a relatively small demand in the context of the typical road demands and hence this level of traffic increase during the peak construction periods is expected to have negligible impacts on the surrounding street network. There is also the potential for cumulative traffic impacts associated with the concurrent upgrade works to the Ulladulla High School, which are addressed in **Section 6.14**. To mitigate temporary construction impacts, mitigation measures including the preparation of a detailed Construction Traffic Management Plan (**CTMP**) have been recommended.

Mitigation Measures

ID	Reason for mitigation measure	Mitigation measure	Timing	Significance after mitigation
CTMM1	To provide adequate facilities for active transport, promoting sustainable travel options.	Construction of racks or spaces to accommodate an additional 10 scooters and 40 bicycles.	Construction	Not significant
CTMM2	To ensure that the carpark meets new safety and operational standards.	Deliver the upgraded car park in accordance with AS2890.1	Construction	Not significant
CTMM3	To manage traffic flow and ensure availability of parking spaces for kiss-n-drop during peak period	Subject to Traffic Committee approval, change parking signage for five existing restricted parking spaces on Green Street (northern side) to No Parking 8.00 – 9.30 am and 2.30 – 4.00 pm SCHOOL DAYS.	Construction	Not significant
CTMM4	To minimise traffic disruptions and manage construction-related movement safely.	Prepare a Construction Traffic Management Plan (**CTMP**) to inform construction workers and heavy vehicle movements on safe traffic flow and minimise disruption to the school and surrounding areas. The CTMP must include a Construction Worker Access Management Plan (**CWAMP**) to outline strategies and measures to manage how construction workers access a construction site including carpooling initiatives	Construction	Not significant
CTMM4	To prevent disruption to residential streets and	Workers will be required to avoid parking on	Construction	Not significant

ID	Reason for mitigation measure	Mitigation measure	Timing	Significance after mitigation
	maintain safety and amenity.	residential streets and instead use the existing parking spaces on the Green Street and St Vincent Street. Construction worker parking can impact the safety and amenity of surrounding areas. This provision will be included as a clause in the CTMP following consultation with the construction team.		
CTMM5	To enhance the operational efficiency of the buses which may be interrupted by illegally parked vehicles and ensure that students being dropped off at the school are separated from bus movements.	Painted red bus zones to reduce illegal parking	Construction	Not significant
OPTMM1	To ensure the plan's ongoing effectiveness and responsiveness to changing conditions.	Update the School Travel Plan annually for the first two years.	Operation	Not significant
OPTMM2	To reduce congestion caused by private vehicle use and improve overall traffic management.	Appoint a School Travel Coordinator (within 12 months of operation), establish a School Transport Committee, and prepare a Travel Access Guide to address the fact that students prefer arriving by private vehicle, resulting in congestion and delays to other road users. Update the School Travel Plan annually for the first two years.	Operation	Not significant

6.2 Noise and Vibration

A Noise and Vibration Impact Assessment (**NVA**) has been prepared by NDY and included in **Appendix 18**, has been conducted in accordance with NSW EPA guidelines. The report evaluates the potential noise and vibration impacts associated with the proposed activity, covering both the construction and operational phases of the educational establishment.

Methodology

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

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

Existing Environment

The existing environment around the site is recognised as a quiet area with low background noise levels reflecting the low-density residential setting.

As shown in **Figure 17**, the most sensitive receivers for the project have been identified as residential properties adjoining the site to the west, on the opposite side of Green Street, and the adjoining place of worship to the east. Short-term attended noise monitoring was conducted, reflecting the main noise source was traffic from the surrounding roads.

The sensitive receivers are identified in **Table 17** below.

Table 15: Sensitive Receivers

Receiver	Address	Approximate distance	Type
R1	28 Croft Avenue, Ulladulla NSW 2539	30	Residential
R2	228 Green Street, Ulladulla NSW 2539	30	Residential
R3	65 St Vincent Street,	200	Place of worship

Receiver	Address	Approximate distance	Type
	Ulladulla NSW 2539		

The project noise trigger levels (**PNTL**) are the most stringent noise levels of the NSW Noise Policy for Industry 2017(**NPfI**) project intrusiveness and project amenity noise levels for day, evening and night-time periods and are project-specific, as shown in **Table 18** below:

Table 16: Project Noise Trigger Levels

Location	Time	Descriptor	External PNTL
R1	0700 to 1800	LAeq, Day	
	1800 to 2200	LAeq, Evening	
	2200 to 0700	LAeq, Night	
R2	0700 to 1800	LAeq, Day	53dBA (Day)
	1800 to 2200	LAeq, Evening	43 dBA (Evening)
	2200 to 0700	LAeq, Night	38 dBA (Night)
R3	0700 to 1800	LAeq, Day	
	1800 to 2200	LAeq, Evening	
	2200 to 0700	LAeq, Night	

Construction noise criteria for the areas surrounding the project are noise management levels (**NML**) (between 55 dBA and max. 75 dBA) for standard construction hours.

Source: NDY, 2024

Figure 21 Sensitive Receivers

Assessment

Construction Noise and Vibration

Noise during construction will be generated by machinery and equipment such as excavators, trucks, and compactors. Activities with the highest noise levels include earthworks, concrete pouring, and material deliveries.

Based on modelling, noise levels at nearby sensitive receivers, such as residential properties on Croft Street and Green Street are estimated to be below 75 dBA meaning it is not necessary to prepare a Construction Noise and Vibration Management Plan.

To meet recommended noise levels inside the nearest school building a perimeter hoarding will be required to be installed during excavation and piling phases. This has been included as a Mitigation Measure – refer **Appendix 1**.

Vibrations will primarily result from activities such as piling, earthworks, reinstatement works for roads pavement construction and earth compaction. Approximate vibration levels at the closest residential receiver are expected to be around 0.06 mm/s which is below all the maximum vibration level recommendations (2.5 mm/s for sensitive structures).

Construction noise and vibration impacts are expected to be minimal under the proposed schedule of works and do not require mitigation measures as per the current standards. Noise levels may exceed thresholds at times, but scheduling, equipment selection, and engagement with the community will minimise disruptions.

Operational Noise and Vibration

Noise emissions from PA systems, School Bells and Carparking will remain at the current existing levels, therefore no increased impacts are expected from these sources.

The assessment of operational noise associated with the proposed new mechanical services (including air conditioning units and fans) concluded that the noise levels are expected to meet the NPfI criteria at all operational times.

The assessment of operational noise associated with the proposed new mechanical services (including air conditioning units and fans) concluded that the noise levels are expected to meet the NPfI criteria at all operational times. To avoid noise impacts from the mechanical plant room in the evening acoustic louvers are to be installed surrounding the mechanical plant, and fans are to have internally lined ducts with acoustic insulation. There will be no operation of mechanical plant after 10pm.

To meet recommended noise levels inside the nearest school building a perimeter hoarding will be required to be installed during excavation and piling phases. This measure has been included as a Mitigation Measure – refer **Appendix 1**.

The proposed activity will increase the number of car parking spaces from 27 to 30. This addition is negligible and is not expected to affect the existing carpark noise impact on surrounding properties.

Mitigation Measures

The following mitigation measures are to be implemented to manage noise and vibration impacts during construction and operation.

ID	Reason for mitigation measure	Mitigation measure	Timing	Significance after mitigation
CMM17	To manage noise and vibration impacts during construction.	Construction noise for excavation and piling will require a perimeter hoarding as indicated to meet recommended noise levels inside nearest school building.	Pre-construction / construction	Not significant
OPMM4	To avoid impacts resulting from the plant room operation.	Acoustic louvers installed surrounding mechanical plant and fans to have internally lined ducts with acoustic insulation.	Operation	Not significant
OPMM5	To meet the PNTL levels at night time.	Mechanical plant room to not operate during night time periods (after 10 pm).	Operation	Not significant

6.3 Contamination and Hazardous Materials

A Detailed Site Investigation (**DSI**) has been prepared by JK Environments (**JKE**) and is included in **Appendix 25**. The DSI assesses and quantifies any soil and groundwater contamination at the site and confirms that the site is suitable from a contamination perspective to accommodate the proposed upgrade works.

Methodology

JKE previously completed a preliminary site investigation (**PSI**) and preliminary intrusive investigation of the entire school site. The sampling and data analysis completed in the preliminary DSI of the broader site have been used to prepare the current DSI.

The methodology to complete this DSI included the following:

- Completion of an intrusive investigation program comprising:
    - Advancement of 10 boreholes (refer **Figure 22**) and collection of representative soil samples.
- Laboratory analysis of selected samples for a range of contaminants of potential concern (**CoPC**).
- Comparison of collected data against EPA published and / or relevant endorsed criteria to confirm land use suitability.
- Preparation of a DSI report in accordance with the relevant guidelines.

Source: JKE, 2025

Figure 22 DSI Sample Locations

Assessment

The DSI concludes the following:

- The boreholes generally encountered fill material to depths of between 0.1m to 0.6mBGL, underlain by residual clayey and sandy soils to the maximum termination depth of the investigation at 1.0mBGL.
- The following potential contamination sources were identified, including fill material, historic agricultural (grazing) land use, use of pesticides and hazardous building materials.
- There is a known area of in-ground asbestos impacts to the north-west of the site. From a contamination viewpoint, due to the known buried asbestos it is recommended that a robust unexpected finds protocol (UFP) be prepared by a suitably qualified environmental consultant and that this protocol be implemented during the development/construction phase of the project.
- Elevated concentrations of the CoPC were not encountered above the adopted site assessment criteria (**SAC**).
- Potential risks associated with CoPCs at the site are low and are considered to pose a low risk to the receptors.
- Unacceptable risks, warranting remediation, were not identified.

While the findings of the DSI concluded that the site is suitable for the proposed activity, several Mitigation Measures have been proposed in order to manage the risk of unidentified contamination, as well as the classification and disposal of waste.

Mitigation Measures

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

ID	Reason for mitigation measure	Mitigation measure	Timing	Significance after mitigation
LCMM4	Due to the potential occurrence of unexpected finds during construction phase.	To manage unidentified contamination risks, develop an unexpected finds protocol for unidentified asbestos or other contamination.	Pre-Construction	Not significant
CMM6	To comply with relevant NSW EPA requirements.	Prior to any off-site disposal of waste undertake additional testing	Pre-construction	Not significant

ID	Reason for mitigation measure	Mitigation measure	Timing	Significance after mitigation
		to confirm the waste classification.		
CMM6	To comply with relevant NSW EPA requirements.	Waste fill to be disposed of to a facility that is appropriately licensed by the NSW EPA to receive the waste stream. The facility should be contacted to obtain the required approvals prior to commencement of excavation.	Construction	Not significant

6.4 Flooding

A Flood Impact and Risk Assessment (**FIRA**) has been prepared by TTW and is included at **Appendix 23**. The report outlines the existing flooding constraints on the site and provides an assessment into the likely impacts of the proposed activity in post-development conditions. Design solutions and operation procedures required to mitigate flood risk have also been identified and are provided as Mitigation Measures at **Appendix 1**.

Methodology

Council provided its DRAINS and TUFLOW model files for the Millards Creek Flood Study for the purpose of undertaking the FIRA. In the study, DRAINS software was utilised to conceptually model rainfall concentration (including runoff from roof drainage systems, gutters, etc.). These runoff hydrographs then provided hydrological input for the TUFLOW model. Both models are based on the Australian Rainfall and Runoff 1987 (ARR1987). Minor updates were made to Council's model (summarised in Section 7.3 of the FIRA), with all other inputs and parameters kept consistent.

The assessment included consideration of two combined climate change scenarios:

- Projected 2050 (CC2050): Sea-level rise of 230 mm and rainfall increase of 29%
- Projected 2100 (CC2100): Sea-level rise of 850 mm and rainfall increase of 66%

These climate change factors were applied to the 1% AEP, 0.5% AEP and 0.2% AEP event rainfall.

Existing Environment

The Section 10.7 Certificate identifies that the site is flood affected and is partly located within the flood planning area. The Millards Creek Flood Study is the relevant flood study pertaining to the site. Millards Creek runs parallel to Ulladulla PS to the north and flows eastwards to the Ulladulla Harbour.

The broader Ulladulla PS site is impacted by overland flows in all modelled design events, including the 10% AEP event. There is potential for flooding at the school to be exacerbated should the St Vincent bridge, to the east of the site, become blocked with debris during a flood event. The shallow overland flooding that occurs at the site is a result of run off from Green Street that occurs during a 1% AEP flood event, not from creek flooding. At the proposed activity area, runoff from Green Street overflows onto the site, forming a flow path across this area. In the 1% AEP event, depths in the region of the proposed activity area are typically below 100mm (refer **Figure 23** below).

Source: TTW, 2025

Figure 23 Existing scenario - peak flood levels and depths at the site in the 1% AEP

In the PMF event, depths exceed 200mm and reach 350mm to the northwest of the existing car park area with a Hazard level of H1 and H2, considered generally safe for people, vehicles and buildings (refer **Figure 24**).

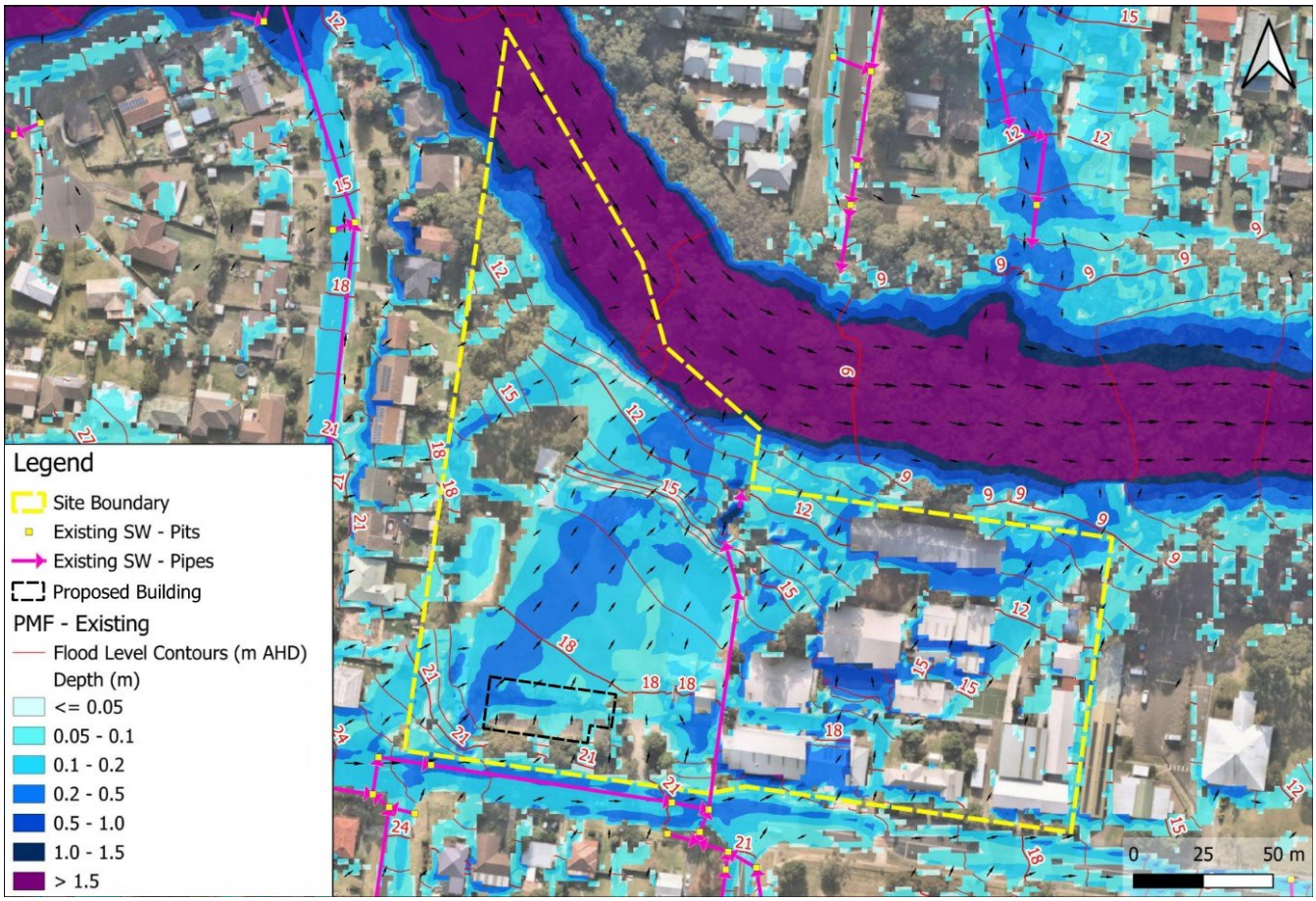


Figure 24 Existing scenario – flood levels and depths in the PMF event

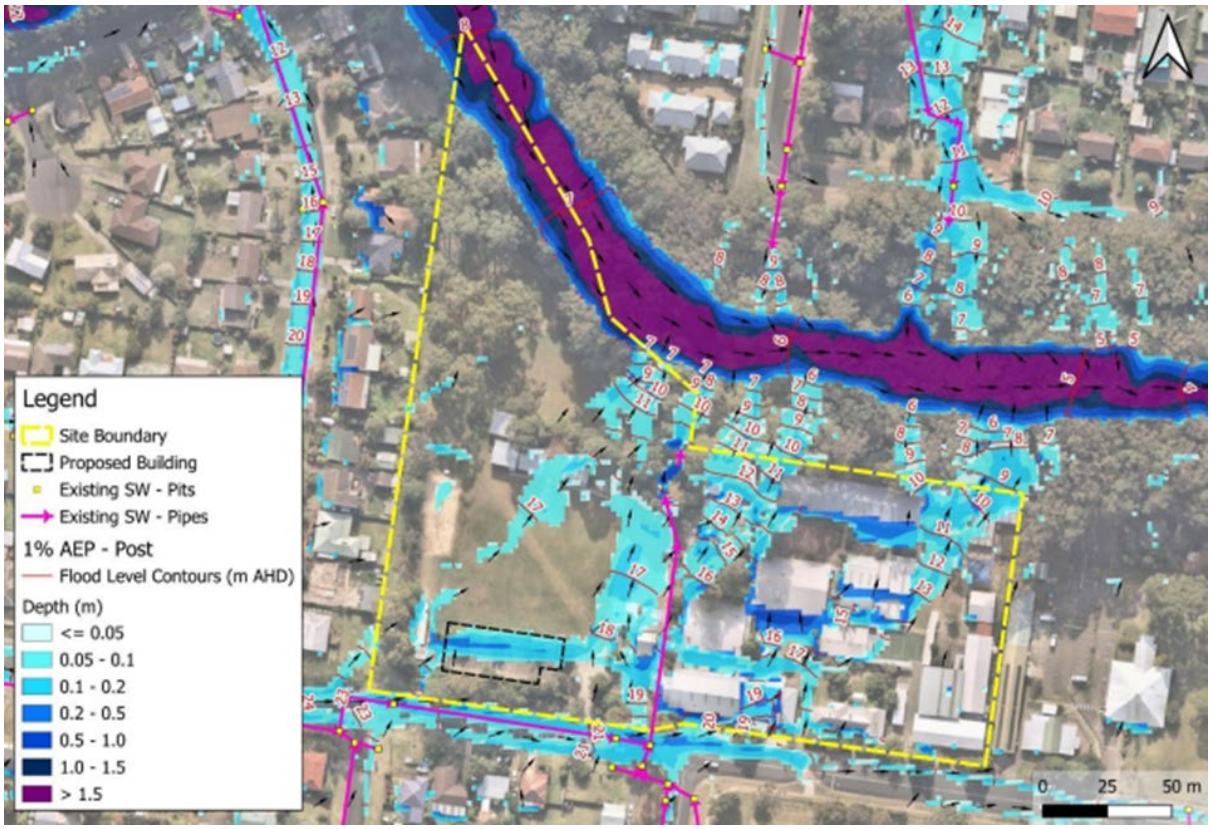
Assessment

The site is unaffected by mainstream flooding, with flow contained within the channel banks up to and including in the PMF event. Although the site is unaffected by mainstream flooding, it is impacted by overland flows generated upstream of the site.

A post construction flood model was developed based on the schematic design and the following observations have been made:

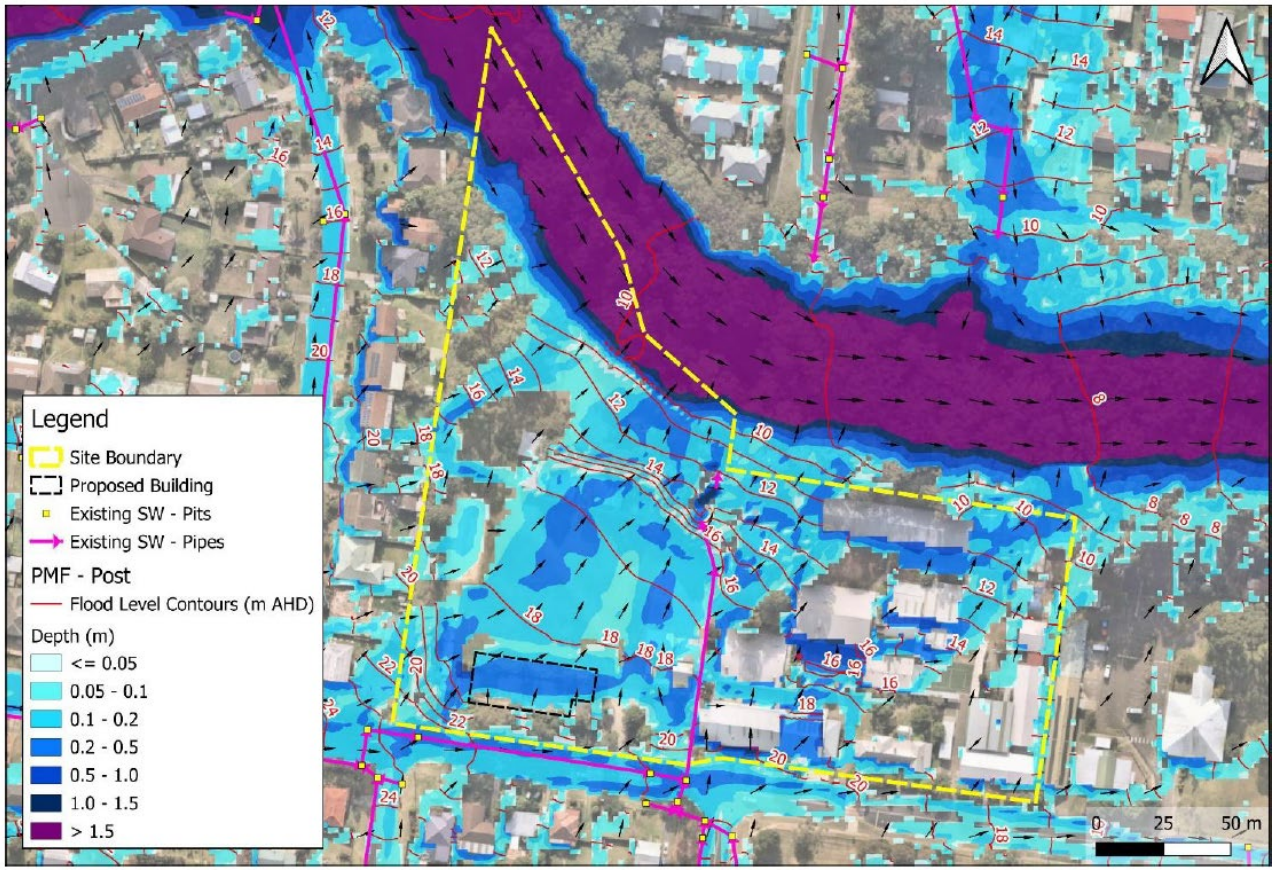
- The extent of the overland flow path across the grassy open space (north of the existing car park) has reduced in post-construction conditions, with flows redirected east, across the redeveloped staff car park. Flood extents and depths over this car park have increased, with depths of up to 300mm in the 1% AEP event, and 470mm in the PMF.
- In order to maintain overland flow across this proposed activity area, the proposed building is elevated on piers, allowing unobstructed flow across the redeveloped staff car park.
- In the post development scenario, carpark flows in the 1% AEP event are of low hazard with a depth x velocity product of less than 0.3m2 /s, compliant with the controls set out in Shoalhaven DCP.
- In terms of flood hazard, flows beneath and surrounding the new building are categorised as H1 hazard level, regarded as safe for people and children. In the PMF, flows to the west of the proposed building are regarded as high hazard, due to flow velocity exceeding 2.0m/s in this region.

- Flood free access in the 1% AEP event is available via the Green Street access point, with onward travel possible via the largely flood-free Camden Street, leading onto Deering Street.
- Additional sensitivity testing of pit blockages and the joint probability of catchment flooding and storm surge have also been assessed, with negligible onsite impacts.
- Given that schools are regarded as a sensitive Category H development, the Finished Floor Levels (FFLs) must be built to the PMF level. Based on current site plans, the FFL for Level 1 is set to 22.15m AHD, elevated over 3 metres above the peak PMF level of 19.02m AHD surrounding the building.
- Car parks are classified as Category B developments in Shoalhaven DCP. Floor levels for Category B developments must be high enough to ensure a depth x velocity product of less than 0.3 m2/s in the 1% AEP flood event. The entire car park area receives flows of less than 0.3 m2/s.
- The potential impact of climate change has been considered, in the 1% AEP event, flood levels to the west of the proposed building increase by 135mm under the CC2100 scenario, equating to a level of 18.71m AHD. Level 1 of the Building M is over 3m above this.
- The proposed activity complies with the relevant flood-related standards and requirements of Shoalhaven City Council and the NSW Floodplain Risk Management Manual.



Source: TTW, 2025

Figure 25 Proposed scenario - peak flood levels and depths at the site in the 1% AEP



Source: TTW, 2025

Figure 26 Proposed scenario - peak flood levels and depths at the site in the PMF

The FIRA identifies that the proposed activity has no offsite impacts on adjacent properties or roads in both the 1% AEP and PMF events. Within the site, localised flood level increases can be attributed to changes in site grading, which alter the existing overland flow paths.

In addition, the proposed building complies with the department's guidelines for educational site selection, meeting the following advisory guidelines:

- Proposed building is located above the 1-in-200-year (0.5% AEP) flood level;
- Proposed building has flood free access for pedestrians and vehicles;
- Proposed building is located on land above the Flood Prone Land Contour (i.e., land susceptible to flooding in the PMF).

Flood Emergency Response Plan

A FERP has been prepared by TTW and is submitted in **Appendix 24** this REF.

The FERP identified that in the critical duration of a PMF event (30 minutes):

- Within 15 minutes St Vincent and Green Streets would be inundated, so all routes out of the site would be cut off.
- On Camden Street hazardous flows are contained within the gutter.
- The site would be isolated for up to 1 hour 45 minutes.
- After 1 hour 15 minutes of the on-site of the storm event, evacuation is possible using free St Vincent Street.

The FERP includes the following strategies to respond in a flood emergency:

- Preference to close the school before the start of the school day where advanced warning can be received, or a severe event is forecasted several hours in advance.
- Where there is not enough time for pre-emptive closure of the school, shelter-in-place is proposed.

The FERP states that the proposed building complies with the Shelter-in-place guideline (Department of Planning and Environment 2025) and that the site can accommodate shelter-in-place for up to 470 people. This is well above the proposed student capacity and staff for the proposed building. It should be noted that this strategy only applies to the proposed activity and that nomination of the new building as a shelter in place refuge will be implemented in conjunction with the current emergency response plan for the existing school.

The FERP also identifies that flood warnings from the Bureau of Meteorology and NSW SES will guide response actions, supported by communication systems such as PA announcements and SMS alerts. Designated staff roles and responsibilities, regular drills, and a maintained Flood Emergency Kit ensure preparedness. Long-term measures, including periodic plan reviews and community education, support safety and compliance with flood risk management guidelines. The FERP prioritises the safety of students and staff while mitigating operational disruptions during flood events.

Mitigation Measures

The following mitigation measures are to be implemented to manage risk from flooding.

ID	Reason for mitigation measure	Mitigation measure	Timing	Significance after mitigation
OPF MM1	To reduce the flood risk to people on site during a flood event. A preliminary FERP has been produced within the Flood Risk Emergency Assessment (TTW, 2025) and is submitted at **Appendix 24** this REF.	The Flood Emergency Response Plan (**FERP**) is to be reviewed following the detailed design stage, prior to the site becoming operational.	Pre-operation	Not significant
OPF MM2	To ensure all staff are aware of their specific roles and associated flood response actions.	Staff must be delegated responsibilities as per the FERP.	Operation	Not significant
OPF MM2	To ensure that supplies within the kit are sufficient and in working condition.	A Flood Emergency Kit must be prepared.	Pre-operation	Not significant
OPF MM2	To enhance preparedness for a flood event.	Flood drills are to be held by staff annually.	Operation	Not significant
OPF MM2	To ensure that information is up to date and procedures are updated regularly.	The FERP must be reviewed and updated regularly.	Operation	Not significant

6.5 Integrated Water Management

A Civil Engineering Design Report has been prepared by Meinhardt (refer to **Appendix 13**) which sets out the proposed drainage design for the site.

Existing Environment

The proposed activity site is adjacent to existing school buildings and there is an existing network of stormwater pits and pipes. As noted above in **Section 6.4**. the site is impacted by surface runoff and overland flow coming across the school site from Green Street.

Assessment

The proposed stormwater design is summarised below:

- The proposed stormwater system to support the proposed activity comprises a pit and pipe system within the site area to convey minor flows (in accordance with the Major/Minor stormwater strategy approach defined in Australian Rainfall and Runoff). A roof drainage system has been designed, and documented by Acor (refer drawings at **Appendix 24**).
- The total catchment area across the proposed site is approximately 0.1103 hectares comprised of a roof zone. 100% of the total site area is proposed to drain into the proposed pits. Flows coming from the roof will be conveyed through downpipes which will all discharge into the proposed pits at the rear of the proposed new building. The rest of the area is conveyed along kerb line and footpath zone to allow bypass flow and diversion at the proposed site towards Millards Creek.
- Onsite detention and water quality measures are not required under the Shoalhaven DCP 2014.
- Overland flow paths are provided to cater for upstream catchments to bypass the development site, and to convey major storm flows within the development area along proposed dish drain underneath the proposed building.
- As the proposed activity constitutes less than 10% of the existing development footprint at the site, there are no significant environmental impacts and pollutant issues to be anticipated in comparison to existing conditions. Therefore, it is unnecessary to implement additional water quality protection measures.
- During construction the site is to be provided with a sediment fence, inlet trap and filters to provide an area of sediment storage that will reduce the likelihood of sediment runoff. This has been included as a Mitigation Measure at **Appendix 1**.

The stormwater report confirms -

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

Mitigation Measures

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

ID	Reason for mitigation measure	Mitigation measure	Timing	Significance after mitigation
SWMM1	To mitigate sediment and erosion during constructions and early work stage.	Install sediment basin, straw bales, inlet traps and filters.	Pre – construction Construction	Not significant
SWMM7	To ensure protection of downstream drainage lines, assets, ecosystems, or existing hydrological systems from silt, waste and sediment from the site.	Flood Mitigation- Sufficient drainage provisions should be provided around the proposed building with retaining walls, localized trench drain and diversions around the building during PMF events.	Construction Operation	Not significant

6.6 Aboriginal Heritage

A preliminary Indigenous Heritage Assessment and Impact Report (**IHA**) has been prepared by Apex Archaeology and is included at **Appendix 19**. The report has been produced in accordance with the DECCW 2010 *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (the Due Diligence Code of Practice) and examines the potential Aboriginal archaeological values of the site.

The purpose of the report is to identify, assess, and manage potential impacts on the site, ensuring compliance with cultural heritage protection laws. The report includes a review of background research and a field investigation.

Assessment

Apex Archaeology conducted comprehensive background research and a site visit to the proposed study area. Key findings from the research as detailed in the report include:

- The site is considered disturbed and is situated within an existing school / semi-rural residential environment. The report acknowledges the presence of a water course in close proximity to the northern boundary of the site.
- There are no registered Aboriginal sites within 200m, nor are there any previously identified landforms in proximity to the school that may contain sub-surface Aboriginal archaeological deposits.
- The study area is not likely to contain Aboriginal cultural heritage values and that no further assessment is required.

The results of this assessment conclude that no further archaeological assessment is required for the site and no application for an Aboriginal Heritage Impact Permit is necessary. A mitigation measure to address discovery of unanticipated archaeological material has been included in the project mitigation measures at **Appendix 1.**

Mitigation Measures

The following mitigation measures are to be implemented to manage potential impacts to Aboriginal cultural heritage.

#	Reason for mitigation measure	Mitigation measure	Timing	Significance after mitigation
HMM2	To ensure protection of unanticipated historical relics.	Prepare an Unexpected find protocol. If unanticipated archaeological material be encountered during site works, all work must cease and an archaeologist contacted to make an assessment of the find. Further archaeological assessment and Aboriginal community consultation may be required prior to the recommencement of works. Any objects confirmed to be Aboriginal in origin must be reported to Heritage NSW.	Pre-construction	Not significant
HMM4	To ensure protection of Aboriginal objects and Places.	The Aboriginal due diligence assessment must be kept by School Infrastructure NSW so that it can be presented, if needed, as a defence from prosecution under Section 86(2) of the *National Parks and Wildlife Act 1974.*	Construction	Not significant

6.7 Environmental Heritage

A European Heritage Summary Report of Initial Site Investigations (**SRISI**) prepared by City Plan is attached at **Appendix 20**.

Existing Environment

Ulladulla PS is partially identified as locally listed heritage item no 484 ‘Victorian Georgian style Sandstone School and Schoolmasters Residence’ under the Shoalhaven LEP (refer **Figure 23** below). The site is also listed on the Department of Education Section 170 Conservation Register as ‘Ulladulla Public School- Building B00A’.

Source: City Plan, 2025 and Shoalhaven LEP Heritage Map – Sheet HER_016D.

Figure 27 Heritage Map

Assessment

The proposed activity is located on the western side of the school site on a separate lot from the heritage listed Schoolmaster's residence. The physical distance between it and the heritage-listed Block A building (approximately 100m) means that there will be no physical impacts to the heritage item's fabric or appearance.

The construction of the two storey homebase building above the existing carparking within the schoolgrounds is acceptable from a heritage perspective. There are no clear sightlines between the activity site and the heritage item due to the obstruction of Block D (Hall and covered outdoor learning area - COLA) in between the two buildings.

The design of the new homebase building is standard in accordance with the School Infrastructure Pattern Book, with no architectural features or detailing proposed that attempts to mimic the significant aesthetic values of the heritage item. The scale of the proposed building is appropriate for the context of the school and the surrounding neighbourhood, is not visually dominating or overwhelming to the amenity and visual qualities of the heritage item.

City Plan Heritage concludes:

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

The proposal has no physical impacts to the 'Victorian Georgian style Sandstone School and Schoolmaster's Residence' (item no. 484 on the Shoalhaven LEP 2014), with the proposed location for the new school building sufficiently distanced away from the heritage listed building. There are also no visual impacts on the heritage item as there exists no sightlines between the item and the proposed location due to the school's existing building stock. As a result, the new

homebase building was assessed as having no visual or physical impact on the school's heritage item.

The development will also have no visual impacts on any heritage items in the vicinity of the school due to the distance away and lack of clear sightlines to the heritage item.

6.8 Ecology

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

Existing Environment

Vegetation communities

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

- PCT 4019 - Coastal Alluvial Bangalay Forest
- PCT 4052 - South Coast Low Hills Red Gum Grassy Forest
- PCT 3267 - Shoalhaven Foothills Turpentine Forest

The proposed activity is located within mapped areas PCT 4052 and PCT 3267 as shown in **Figure 28.**

Source: Water Technology, 2024.

Figure 28 Plant Community Types

Threatened species

Three threatened species were identified near the site (flying fox, Pied Oystercatcher, Sooty Oystercatcher); however, it was observed that they were unlikely to have suitable habitat on the site.

Fauna habitat

The fauna survey included searches for proxy evidence of fauna activity such as tree scratches, scat, and bird nests. As many faunal species likely to occur are cryptic and/or nocturnal, they are unlikely to be detected during a short survey. The fauna assessment was therefore largely an assessment of the potential of the site as habitat for various fauna species. Apart from species definitely recorded on the site, there is no certainty as to the presence or absence of the species discussed.

Assessment

The assessment concludes the following:

- The location of the proposed homebase building will have limited impact on the site's biodiversity given that the building is to be constructed above an existing car park.
- As there were no threatened species found and no impact on threatened ecological communities is anticipated, a Test of Significance is not required.
- The proposed homebase building will be constructed over an existing car park which retains open space (the sports oval), and the majority of existing mature vegetation on the site.
- The potential impacts of the proposed activity on biodiversity are likely to be at the construction stage and are low to moderate.
- While some impact on biodiversity and vegetation is unavoidable, on balance the proposed activity will have limited impact on biodiversity.
- No operational impacts to fauna are anticipated as a result of the proposal.

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

Mitigation Measures

The following mitigation measures are to be implemented to manage potential impacts to flora and fauna and biodiversity. Mitigation measures recommended to address tree removal in **Section 6.9** will also protect biodiversity.

#	Reason for mitigation measure	Mitigation measure	Timing	Significance after mitigation
BMM1	To prevent spread of weeds and optimise landscaping outcomes.	Use AS 4454 leaf mulch with 90% recycled content for tree protection fencing. Chip trees marked for removal and use mulch 100mm deep. Avoid soil, weeds, sticks, and stones. Comply with AS 4454 (1999) and AS 4419 (1998).	Pre-construction	Not significant

#	Reason for mitigation measure	Mitigation measure	Timing	Significance after mitigation
BMM2	To avoid spread of weeds and pests.	Basic hygiene protocols would be implemented for construction personnel and machinery on site to reduce the potential for invasion by plant pathogens including Phytophthora cinnamomi, the fungus myrtle rust Uredo rangelli and amphibian chytrid fungus.	Construction	Not significant
BMM3	Potential disruption of habitat sites identified for possums, including dreys and scratching marks on trees, may impact species activity.	Limit construction activities in areas identified as sensitive to fauna foraging, especially near trees observed to host roosting individuals.	Construction	Not significant

6.9 Tree Removal

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

Assessment

The assessment identified the following:

- Nine (9) trees (No. 45, 108, 109, 113, 114, 124 and 128, where tree No. 45 represents three trees) are nominated for removal based on the design conflict.
- Tree 114 is of High Retention value, however it is situated in the construction buffer of the new building and cannot be retained.
- The remainder of the trees to be removed are of medium (7) or low (1) retention value.

Sixteen (16) trees within the site are designated for retention and will be protected throughout the construction process.

In addition, 8 new trees are proposed as per the landscape plan, incorporating native species from the locality. These are native species and include tuckeroo, paperbark and turpentine trees. As the trees will be located within the APZ of the new building they have been selected to conform with the requirements of BFP.

Mitigation measures to ensure the protection of the existing trees and viability during and after construction are provided in **Appendix 1** and include engaging a project arborist, installing tree protection fencing and signage, implementing sensitive construction techniques, restricting activities within Tree Protection Zones (**TPZ**), and conducting regular compliance inspections.

Mitigation Measures

The following mitigation measures are to be implemented to ensure tree protection.

#	Reason for mitigation measure	Mitigation measure	Timing	Significance after mitigation
TMM1	Protection of trees	A project arborist (conforms to the AS 4970) is required to be nominated before works start, and they are to be provided with all related site documents.	Pre construction	Not significant
TMM2	Protection of trees	Protection of trees as identified in Section 7.1 of the Arboricultural Impact Assessment Report prepared by Allied Tree Consultancy, dated March 2025, during any site works, a Tree Management Plan (Arboricultural Method Statement) is issued before work starts and measures of protection employed.	Pre-construction	Not significant
TMM3	Protection of trees	Installation of tree protection measures as per Tree Management Plan (Arboricultural Method Statement)	Pre-construction	Not significant
TMM4	To physically protect trees and TPZs from construction activities.	Protective fencing around existing trees and within TPZs must be installed before any site work begins. The fence must be 1800mm high chain wire mesh fixed to galvanised steel posts, enclosing an area to prevent damage as defined in the Tree Protection Plan. No storage inside fenced area.	Pre-construction	Not significant
TMM6	To physically protect trees and TPZs from construction activities.	Do not fill or compact soil above tree roots enclosed by protection fencing during construction near trees. Guidelines must be followed to prevent soil compaction in these areas. Protection includes using elevated planks attached to scaffolding to prevent ground compression.	Construction	Not significant
TMM7	To avoid incorrect tree removal.	Trees are identified and marked for removal as identified in Section 7.1 of the Arboricultural Impact Assessment Report prepared by Allied Tree Consultancy, dated March 2025	Pre-construction	Not significant
TMM8	To reduce harm to fauna and preserve habitat	Inspect all trees to be removed for hollows, nests	Pre-	Not significant

#	Reason for mitigation measure	Mitigation measure	Timing	Significance after mitigation
	elements when removing trees with important ecological features.	and other signs of fauna habitat. If fauna is discovered, an ecologist will be required to remove and relocate any fauna if the tree or vegetation is to be removed.	construction	
TMM9	Protection of trees	Site induction; All workers must be briefed about the conditions outlined in Tree Management Plan before the initiation of work. This is required as part of the site induction process.	Pre-construction	Not significant
TMM10	Protection of trees Subsurface utilities	Trenching shall avoid the TPZ's. Proposed routes shall be re-routed outside of the TPZ. Underboring required if unable reroute. Any excavation in the area of a TPZ must be authorised and conditioned by the project arborist.	Construction	Not significant
TMM11 TMM12	Protection of trees	Construction conditions Trees No. 116, 117, Tree 120: Conditions 1-2. Tree No. 41: Conditions 3-4.	Construction	Not significant
TMM9	Protection of trees	Work-related to demolition/construction, e.g. stockpiling, site sheds, and scaffolding, shall avoid the TPZs. Any activity within a TPZ must be authorised and conditioned by the project arborist.	Construction	Not significant
TMM13	Compensation for the loss of amenity value.	Plant advanced specimens of the same species in areas that offer visual/noise screening.	Construction	Not significant
TMM14	To optimise success of landscaping.	Contractors are to ensure new landscaping is watered. Apply water at an appropriate rate suitable for the plant species during periods of little or no rainfall.	Construction	Not significant

6.10 Bushfire

A Bushfire Assessment Report (**BAR**) has been prepared by EcoLogical and is included at **Appendix 26**. As shown in **Figure 29**, the northern section of the school site is mapped as BPL.

Figure 29 Bushfire Prone Land Mapping

Assessment

The proposed activity is located outside of BPL and adjoining land is not classified as BPL. In all directions there are managed lands within the school grounds, surrounding existing residential development and public road infrastructure.

School buildings are generally classified as special fire protection purpose (**SFPP**) under the Rural Fires Act 1997 and are assessed against the Bushfire Protection Measures (**BPM**) of the Planning for PBP. The effective slope of the site under PBP is category '>0-5 downslope'. An APZ of >79m is required, and the BAR confirms that the APZ complies with the relevant provisions of PBP.

The BAR identifies performance criteria that when complied with will ensure that the proposed activity meets the relevant specifications and requirements under PBP.

The BAR also identifies that proposed Building M shall be designated as the new shelter-in-place option and existing Building D as the secondary/overflow shelter-in-place option if offsite evacuation is unsafe. The existing Emergency Management Plan and associated Bushfire and Grassfire Response Plan for the school will be updated to reflect this. The recommendations within the BAR have been included as mitigation measures in **Appendix 1**.

Mitigation Measures

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

#	Reason for mitigation measure	Mitigation measure	Timing	Significance after mitigation
BFMM1	To ensure landscaping meets PBP requirements.	Prior to occupation, DoE must ensure new landscaping within the site is designed to meet the requirements of PBP.	Design Construction Operation	Not significant
BFMM2	The proposed building can withstand bushfire attack in the form of wind, embers, radiant heat and flame contact.	DoE are to ensure the proposed building designed and constructed to the relevant NCC requirements including BAL-19 based on the construction specifications detailed in AS 3959-2018 and additional ember provisions detailed in Section 7.5 of PBP as required.	Design Construction Operation	Not significant
BFMM3	Afford buildings and their occupants protection from exposure to a bushfire. Provide appropriate separation between a hazard and buildings which, in combination with other measures, prevent the likely fire spread to buildings.	The identified APZs are to be established and maintained in perpetuity or until surrounding land is developed to specifications detailed in Appendix 2 of the BAR.	Throughout the life of the project	Not significant
BFMM4	To ensure that utility services are adequate to meet the needs of firefighters.	DoE to ensure fire hydrants are provided in accordance with AS2419:2021.	Design Construction Operation	Not significant
BFMM5	To ensure compliance with relevant regulations.	Prior to construction, DoE to ensure gas services (if installed) are installed and maintained in accordance with AS/NZS 1596:2014.	Design Construction Operation	Not significant
BFMM6	To ensure emergency evacuation procedures and management measures are in place.	DoE to update Bushfire and Grassfire Response Plan including: 1. Designating the new building as primary shelter-in-place	Occupation	Not significant
BFMM7	Better Bushfire Outcome	Prior to operation, DoE to: 1. Install signage to designate Building M (new building) as the shelter-in-place.	Design Construction Operation	Not significant

6.11 Social Impact

Social impacts relating to the proposed activity are addressed in the table below.

Table 17 Social Impacts

Type of Impact	Describe the impacts on the community and how they might be experienced, either positively or negatively	Discussion
Impacts on access – will there be an improvement to the quality of provision and a response to emerging and changing needs?	There will be a high (positive) impact due to the improvement to the existing school.	The proposed activity will deliver a new building which will enhance the delivery of education for future students and their families.
Impacts on privacy, overshadowing, peace and quiet, and visual amenity (views / vistas) - will there be significant change for neighbours and the local area during both construction and operation?	There will be short term medium (negative) impact associated with disruption to the locality during the construction. There will be no negative visual amenity or overshadowing impacts (refer **Section 6.12**).	This may be caused by construction traffic, noise, dust, and vibration. These will be managed by a Construction Management Plan.
Impacts on sense of place - will there be effects on community cohesion or how people feel connected to the place and its character?	There will be no impact on community cohesion. There may be minor positive impacts on community perception of the school and increased pride in the facility for students and staff.	The proposed activity does not change the existing use of the site as an educational facility, therefore impacts will be low.
Impacts on the way people get around – will there be changes associated with traffic or parking in the area?	There will be minor negative impacts on parking availability during construction	A construction traffic management plan will be prepared addressing the management of worker parking during construction.
	There will be no operational impact on traffic and parking in the area.	The proposed activity does not change existing operational parking or traffic arrangements, other than the provision of additional kiss ‘n drop spaces and scooter and bicycle parking racks, which will have a positive impact on transport management
Impacts on wellbeing - will there be benefits for students and the community associated with better school facilities, sporting facilities and grounds, and active transport options?	There may be minor positive impacts on community perception of the school and pride in the facility.	The proposed activity will improve the quality of the existing educational facility by providing a new, fit for purpose home base building, landscaping and pathways.
Impacts on safety and security	There will be positive impacts on safety and surveillance within the school. An integral part of the design approach was to provide safe and equitable access to the new building and to adjacent buildings on the site.	The proposed activity accords with the principles of Crime Prevention Through Environmental Design (CPTED) as set out below: **Territorial enforcement** The new building includes signage clearly identifying the building as part of the existing

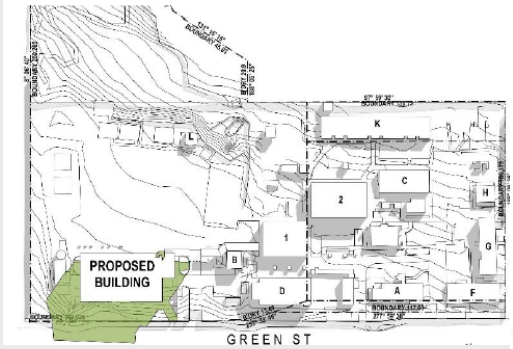
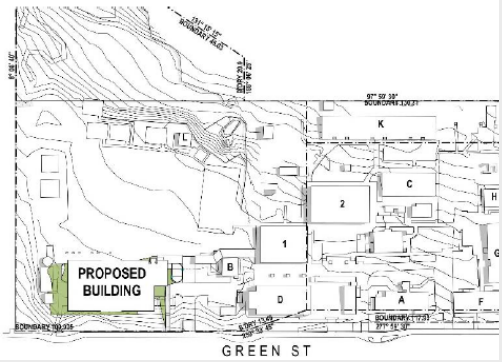
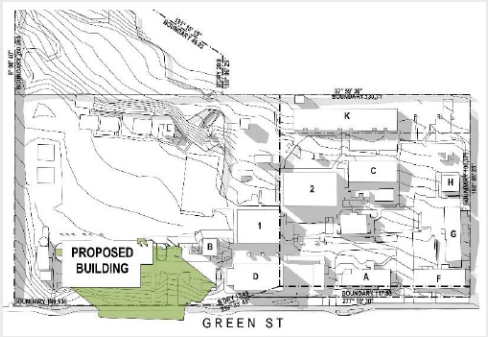
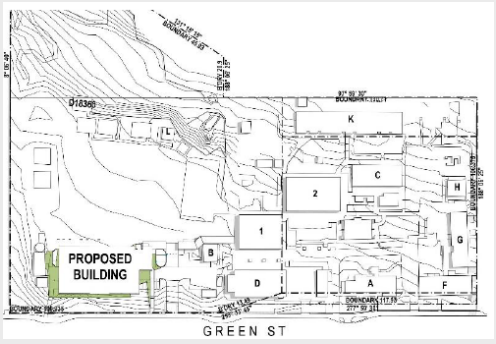
Type of Impact	Describe the impacts on the community and how they might be experienced, either positively or negatively	Discussion
		school. This building definition confirms the use and ownership of the building, which is important in encouraging community responsibility and appropriate behaviour around the building. **Access control** The proposed activity includes external paths, fencing and connections to the existing school that clearly identify entrance points and clarify wayfinding through the site. **Surveillance** The new building has windows facing the school entrance path, increasing casual surveillance of this site entrance. The building also looks out to the oval, allowing teachers to supervise students. The proposed homebase building has a functional layout that allows for good supervision. The internal spaces allow for supervision and visual connection. **Maintenance** Once operational, the new building and landscaping will be supported by ongoing maintenance and upkeep discouraging vandalism and anti-social behaviour.

6.12 Other issues

Other environmental issues relating to the proposed activity are addressed in the table below.

Table 18 Other issues

Issue	Consideration
Visual Amenity and Privacy	The proposed activity has been designed to minimise visual impacts and limit the opportunity for privacy impacts on adjoining properties and site occupants. Views of the proposed building are shielded from Green Street by existing mature trees, which are to be retained as part of the proposal. This is demonstrated in **Figure 30** below of the view from Green Street looking west, showing that there is minimal impact on the view to the school from the street frontage. Due to the dense vegetation there is negligible impact of the proposal on the public and private domain views the activity and no further assessment and no mitigation measures are required. Materials and finishes follow the SINSW Pattern Book Materials & Finishes principles to be contextual, durable, local & economical. The proposed colour combination will complement the existing site character and building forms.  *Source: Fulton Trotter Architects, 2025* **Figure 30 View from Green Street looking towards site**
Overshadowing	The proposal has been designed to minimise overshadowing impacts. The two storey homebase building has been sited and orientated to ensure that shadows primarily fall within the site boundary, with the exception of limited overshadowing to the nature strip to the south along Green Street. They do not impact play space or impact any neighbours -refer to **Figure 31** below**.** No further assessment and no mitigation measures are required.

Issue	Consideration
	 *June 21 9am*  *Dec 21 9am*  *June 21 3pm*  *Dec 21 3pm* *Source: Fulton Trotter Architects, 2025* **Figure 31 Shadow Diagrams**
Soils and Geology	A review of regional geological information was undertaken in 2023 by JK Environments (refer summary provided within the DSI at **Appendix 10**). This provided an assessment of the existing subsurface ground conditions and other geological conditions at the site. The key findings and recommendations of the previous assessment are summarised below: • The previous geotechnical investigations included a site inspection and soil sampling from 7 boreholes. The boreholes encountered fill materials (i.e. historically imported soil) to depths of approximately 0.4m below ground level (BGL) to 1.8Mbgl. The fill typically comprised silty clay with inclusions of igneous gravel and root fibres. No odours or staining were recorded in the fill material during field work. No FCF/suspected asbestos containing material (ACM) was encountered in the fill material during fieldwork. • Natural alluvial clayey soils were encountered beneath the fill material in all boreholes and extended to depths of approximately 2.4m to 4.5mBGL. • Groundwater seepage was not encountered in the boreholes during drilling. All boreholes remained dry on completion of drilling and for a short time after. • The site is located in a Class 5 Acid Sulfate Soil Risk area. There is relatively low potential for ASS materials to be disturbed during the activity • Based on the scope of work undertaken for this assessment, and at the time of reporting, JKE is of the opinion that the natural soil and bedrock at the site meets the definition of Virgin Excavated Natural Material (**VENM**) for off-site

Issue	Consideration
	disposal or reuse at another site as fill material. • Based on this assessment and the geotechnical conditions encountered during the site investigation, there are not considered to be any significant geotechnical concerns that would preclude the construction of the proposed activity.
BCA and Access	The proposed activity is supported by a BCA Design Compliance Report (**Appendix 9**) and Accessibility Report (**Appendix 12**) prepared by Group DLA. These reports confirm the proposed activity will comply with all applicable regulatory requirements. The proposed activity includes logical connections between the new building and existing adjacent structures ensure ease of access and movement across the site. Dur to topography, steps lead down to the building from Green Street. An accessible path of travel is achieved between the proposed activity and the main school entrance on Green Street.
Waste	<u>Operational Waste</u> An Operational Waste Management Plan (**OWMP**) has been prepared by EcCell (refer to **Appendix 16**) to promote responsible source separation, ensure adequate waste provisions and robust procedures, and to outline compliance with all relevant regulatory requirements during the operational phase of the school. The OWMP confirms that the existing waste storage area and bin capacity are of sufficient size and type to accommodate the estimates waste generated by the proposed activity. Waste will be collected by a private waste collection service. The appointed waste contractors will wheel the bins from the waste storage area to the back of the truck for collection on Green Street and then wheel back to the waste storage area. Small quantities of hazardous wastes may be generated through the ongoing operation and maintenance of the school (e.g. light bulbs, e-waste, batteries, oil, chemicals or paint). These materials will be stored by the cleaners in appropriate locations as they are generated and removed by the waste contractor. Ultimately, the proposed operational waste management procedures and allocated space will ensure the suitable disposal of waste generated by the proposed activity. <u>Construction Waste</u> A Construction Waste Management Plan (**CWMP**) has been prepared by EcCell (refer to **Appendix 15**) to encourage responsible waste separation, establish sufficient waste management provisions and procedures, and ensure compliance with all applicable regulatory requirements during the construction phase of the proposed activity. The frequency of waste removal from site will be determined by the volume of materials deposited into the dedicated skip bins. Skip bins will be monitored on a daily basis by the Site Manager to ensure they do not overflow. All waste collection for construction works will be conducted between approved hours as per Council requirements (typically between 7am and 6pm Monday to Friday, and between 8am and 1pm on Saturdays). All waste generated on site will be transported to an approved and appropriately licensed resource recovery facility and/or landfill site. Standard mitigation measures for the management of waste have been included at **Appendix 1**.
Site Services	Hydraulic Services drawings have been prepared by Acor (refer **Appendix 8**) which identifies the existing utility mains that surround the site and proposed connections within the site to the proposed activity. An Electrical services design has been prepared by NDY (refer **Appendix 8**) to identify the electrical infrastructure upgrades required to service the site.

6.13 Construction Impacts

A preliminary Construction Management Plan (**CMP**) has been developed by the project managers (RPI Infrastructure) and is provided at **Appendix 14**. The CMP serves as a critical document to guide the construction phase of the project, ensuring that environmental, safety, and community impacts are effectively managed,

Assessment

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

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

Mitigation Measures

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

#	Reason for mitigation measure	Mitigation measure	Timing	Significance after mitigation
CMM3	To maintain a separation between school occupants and construction activities	Site to be secured and made safe from the public throughout the Works via the erection of a perimeter fence, including shade cloth hoarding attached to prevent unauthorised entry to the site.	Construction	Not significant
CMM18	To ensure separation of construction vehicles from staff vehicles and reduce truck movements at busy school times.	All construction vehicles will travel along Green Street to enter and exit at the south boundary of the site.	Construction	Not significant

#	Reason for mitigation measure	Mitigation measure	Timing	Significance after mitigation
CMM19	To ensure separation of construction vehicles from staff vehicles and reduce truck movements at busy school times.	Heavy vehicle movement is also required to avoid school drop off and pick up times	Construction	Not significant

6.14 Cumulative Impact

As described in Section 2.2.4, the Ulladulla High School upgrade of the site is proposed in proximity to the site. The cumulative impact from the proposed activity and this project have been considered in this REF.

Cumulative Traffic Assessment

Operational Impacts

The TAIA has assessed the traffic impacts of the proposed activity and confirmed that the operational traffic impacts of both activities would be negligible, therefore there are no cumulative operational traffic impacts.

Construction Impacts

Ulladulla High School is located immediately south of the primary school, with both schools having boundaries along Green Street. Construction works at Ulladulla PS may overlap with those at the High School. The cumulative construction impacts of both sites are expected to be manageable through co-ordinated traffic management measures.

The simultaneous construction of the proposed activity with the Ulladulla High School upgrade would increase the volume and frequency of HRVs and LRVs on the local and regional road network. However, the preliminary CTMP confirms that the road network has capacity to accommodate the construction traffic associated with the proposed activity and the construction of the Ulladulla PS. Construction workers will be encouraged to park in the streets bounding the schools, to reduce impacts on the wider surrounding area. However, there is sufficient capacity in the surrounding residential streets to absorb temporary construction worker parking and there will be no negative impacts cumulatively to the surrounding residential streets.

The final CTMP should review whether there are any other significant construction activities in the locality to ensure that this remains the case at the time of construction.

6.15 Consideration of Environmental Factors

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

The assessment provided in the sections above has been prepared to provide a detailed consideration of the factors that must be taken into account for an assessment under Division 5.1

of the EP&A Act. These factors are summarised at **Table 19** and where mitigation measures have been proposed in response to the factor, these have been identified.

Table 19: Environmental Factors considered

Environmental Factor	Consideration	Mitigation Measure Reference
Any environmental impact on a community?	The proposed activity involves an upgrade to an existing educational facility. The new building is situated close to existing buildings on a cleared area of the site with minor tree removal or vegetation clearance required. The building will integrate into the existing school infrastructure with minimal external impacts. The site will not be highly visible from the street and the building been thoughtfully designed with a materials palette that will harmonise with the existing environment. The proposed activity does not include any changes to operational arrangements. The existing school activities will not change therefore there is not anticipated to be any impact or disruption to the surrounding community during the operation of the building. During the construction phase, temporary environmental impacts such as increased traffic, noise, and dust may arise. These impacts, however, are expected to be minor and will be effectively mitigated through the implementation of management strategies outlined in this REF.	CTMM4. Prepare a Construction Traffic Management Plan CMM2. Prepare a Construction Environmental Management Plan OPFMM1. Prepare a FERP
Any transformation of a locality?	The proposed activity will have a positive impact on the locality. Once operational, the upgrades to UHS will provide a positive benefit to the school community through providing necessary educational facilities for students and employment for staff.	N/A
Any environmental impact on the ecosystems of the locality?	The proposed activity does involve environmental impacts on local ecosystems. The site does not contain Aboriginal cultural material. There are no threatened ecological species nor does it contain habitat for threatened species.	TMM2: Protection of trees as identified in Section 7.1 of the Arboricultural Impact Assessment Report. TMM3. Installation of tree protection measures as per Tree Management Plan (Arboricultural Method Statement).
Any reduction of the aesthetic, recreational, scientific or other environmental quality or value of a locality?	The proposed activity is situated within the existing school site and due to topography and intervening vegetation will not be highly visible from the surrounding streets. The design incorporating a harmonious colour palette further reduce visibility of the building and maintain compatibility with the surrounding built environment. By integrating these design elements, the proposed activity ensures that it does not detract from the aesthetic, recreational, scientific, or other environmental qualities of the locality. Instead, the development complements the existing character of the area, resulting in a project that is both contextually appropriate and environmentally considerate.	N/A
Any effect on locality, place or building having	The site of the proposed activity is not identified as having aesthetic, anthropological, archaeological, architectural, cultural, historical, scientific, social significance or any	HMM1:U unexpected finds protocol

Environmental Factor	Consideration	Mitigation Measure Reference
aesthetic, anthropological, archaeological, architectural, cultural, historical, scientific or social significance or other special value for present or future generations?	other special value. Accordingly, the proposed activity will not affect these values for present or future generations.	
Any impact on the habitat of protected animals, within the meaning of the *Biodiversity Conservation Act 2016*?	The proposed activity does not impact any existing habitat of protected fauna. Trees to be removed will be inspected for hollows.	TMM2: Protection of trees as identified in Section 7.1 of the Arboricultural Impact Assessment Report. TMM3. Installation of tree protection measures as per Tree Management Plan (Arboricultural Method Statement). TMM8
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 involves the removal of trees however it will not endanger any species of animal, plant or other form of life on land, water or the air.	All ecology mitigation measures. TMM3. Installation of tree protection measures as per Tree Management Plan (Arboricultural Method Statement).
Any long-term effects on the environment?	The proposed activity is not considered likely to have long-term effects on the environment.	All mitigation measures
Any degradation of the quality of the environment?	No degradation of the quality of the environment will occur from the proposed activity. Construction activities will be managed in accordance with a Construction Environmental Management Plan and mitigation measures contained in this REF to ensure any potential impact on the environment are appropriately mitigated.	All mitigation measures.
Any risk to the safety of the environment?	The proposed activity has been designed with careful consideration of the site's existing risks, particularly flooding. According to the Flood Assessment Report, the proposed activity will have a negligible impact on the flood characteristics of the surrounding area, with the new building strategically positioned above the PMF level. The construction of the proposed building reduces flood risk to site users by providing additional safe space above the PMF level for temporary shelter. This ensures that the project is resilient to potential flood events and does not exacerbate flood risks in the	OPFMM1. Prepare a FERP OPFMM2. Flood drills are to be held by staff annually. OPFMM2. The FERP must be reviewed and updated regularly.

Environmental Factor	Consideration	Mitigation Measure Reference
	locality. As a consequence, the proposed activity is not expected to pose any significant risk to the safety of the environment or the surrounding community, with robust strategies in place to manage and mitigate the identified risks effectively.	
Any reduction in the range of beneficial uses of the environment?	The proposed activity relates to upgrades to an existing school and will not limit or reduce the range of beneficial uses of the environment.	N/A
Any pollution of the environment?	The risk of noise and vibration, air, water, soil and light pollution arising from carrying out the works will be mitigated by the implementation of the CMP.	CMM2. Prepare a Construction Environmental Management Plan
Any environmental problems associated with the disposal of waste?	Waste generated by the proposed activity will be managed in compliance with the provisions outlined in the OWMP and CWMP. These plans ensure that all waste is handled, recycled, and disposed of responsibly, preventing any environmental issues associated with waste disposal.	WMM1 – WMM12 OPMM1
Any increased demands on resources (natural or otherwise) that are, or are likely to become, in short supply?	The activity will not increase the demand for resources that are or are likely to become in short supply.	N/A
Any cumulative environmental effects with other existing or likely future activities?	As outlined in **Section 6.15** of this REF, there will be negligible cumulative environmental impacts. All construction works associated with the proposal will be undertaken in accordance with the CMP.	CMM2. Prepare a Construction Environmental Management Plan
Any impact on coastal processes and coastal hazards, including those under projected climate change conditions?	The site is identified as being within a Coastal Management Area however the proposed activity will not have any impact on coastal processes or hazards. It has been designed in accordance with the flood risk assessment which also addresses climate change scenario.	OPFMM2. Prepare a FERP.
Applicable local strategic planning statement, regional strategic plan or district strategic plan made under Division 3.1 of the Act?	The activity is consistent with the strategic policies identified in **Section 4.5** of this REF	N/A

7. Justification and Conclusion

The proposed Ulladulla PS upgrade at 241 Green Street, Ulladulla 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 SIS and/or a BDAR to be prepared. The environmental impacts of the proposal are not likely to be significant.

Therefore, it is not necessary for an EIS to be prepared and approval to be sought for the proposal from the Minister for Planning and Public Spaces under Division 5.2 of the EP&A Act. On this basis, it is recommended that the department determine the proposed activity in accordance with Division 5.1 of the EP&A Act subject to the implementation of mitigation measures identified within this report.