NSW Department of Education

Review of Environmental Factors

Ulladulla High School Upgrade

Document version: Revision 4

Date: 16/06/2025

NSW GOVERNMENT

Acknowledgement of Country

The NSW Department of Education acknowledges the Yuin the traditional custodians of the land on which the Ulladulla High 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. OBJ

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 to the Ulladulla High School at 55 South 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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Document Control

Document version: Revision 4

Date: 16/06/2025

Version history

Version	Date	Description	Prepared by	Approved by
1	11/03/2025	Draft Version 1	Urbis Ltd	Alaine Roff
2	21/03/2025	Version 2	Urbis Ltd	Alaine Roff
3	25/03/2025	Version 3 - Final	Urbis Ltd	Alaine Roff
4	11/06/2025	Version 4 – Post Exhibition	Urbis Ltd	Alaine Roff

Table of Contents

Tables

Figures

Appendices

Appendix	Name
1	Mitigation Measures
2	Architectural Design Report prepared by Fulton Trotter Architects
3	Architectural Drawings prepared by Fulton Trotter Architects
4	Site Survey prepared by CMS
5	Civil Engineering Plans prepared by Meinhardt
6	Landscape Drawings prepared by Ground Ink
7	Public Domain Plan prepared by Fulton Trotter
8	Hydraulic Services Drawings prepared by ACOR
	Electrical Services Drawings prepared by NDY
9	BCA Report prepared by Group DLA
10	Section 10.7(2)(5) Planning Certificate issued by Shoalhaven City Council
11	Sustainable Development Plan (including Net Zero Statement) prepared by NDY
12	Accessibility Assessment prepared by Group DLA
13	Civil Engineering Design Report prepared by Meinhardt
14	Preliminary Construction Management Plan (**CMP**) prepared by RPI infrastructure
15	Construction Waste Management Plan (**CDWMP**) prepared by EcCell
16	Operational Waste Management Plan (**OWMP**) prepared by EcCell
17	Transport Access Impact Assessment (**TAIA**) (inclusive of School Transport Plan and Preliminary Construction Traffic Management Plan) prepared by SCT Consulting
18	Noise and Vibration Impact Assessment (**NVA**) prepared by NDY
19	Preliminary Indigenous Heritage Assessment and Impact Report prepared by Apex Archaeology
20	European Heritage Summary Report of Initial Site Investigations (**SRISI**) prepared by City Plan
21	Flora and Fauna Assessment (**FFA**) prepared by Water Technology
22	Arboricultural Impact Assessment prepared by Allied Tree Consultancy
23	Flood Impact and Risk Assessment (**FIRA**) prepared by TTW Consulting
24	Flood Emergency Response Plan (**FERP**) prepared by TTW Consulting
25	Detailed Site Investigation (**DSI**) prepared by JK Environments

Abbreviations

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

Abbreviation	Description
LEP	Local Environmental Plan
LGA	Local Government Area
MNES	Matters of National Environmental Significance
NCC	National Construction Code
NPfI	Noise Policy for Industry
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*
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 High School (Ulladulla HS) to provide new permanent teaching spaces including a new homebase building (Building U) and associated infrastructure (the **activity**).

Specifically, the proposed activity comprises the following:

- Construction of a new two-storey home base building (Building U).
- Construction of new stairs and covered walkways.
- Upgrade works to existing internal pedestrian pathways.
- Installation of solar panels.
- External landscape works.

Ulladulla HS is located at 55 South Street, Ulladulla, NSW, 2539 (the **site**). The site has an approximate area of 6.5ha and is legally referred to as Lot 1 in Deposited Plan (**DP**) 595313 within the Shoalhaven Local Government Area (**LGA**).

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

The site is largely rectangular in shape, however, is indented in the north east corner where an early learning centre is situated outside of the site boundary on the corner of Green Street and St Vincent Street. Dense vegetation is located in the central and eastern portion of the site, separating the school buildings from the early learning centre.

The site is not bushfire-prone but is flood affected.

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 approved 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 has been 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**).

No public submissions were received. Comments were received from four (4) agencies including State Emergency Services (SES), Endeavour Energy, Shoalhaven Water and Transport for New South Wales (TfNSW). Key comments provided by the SES concerning flooding and flood emergency response have been carefully considered and responded to. In addition, as outlined in Section 5 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**: The site is impacted by overland flows, particularly when the stormwater system on South Street exceeds its capacity. Runoff from the south overflows onto the site, moving in a north-north-eastern direction towards the natural gully. The Flood Impact and Risk Assessment (**FIRA**) indicates that the proposed development will not significantly affect offsite flood behaviour or hazard during a 1% AEP event.
- The proposed building complies with the NSW Department of Education'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).As the site is unaffected by mainstream flooding in all events, the site is above the flood prone land contour.
- The Flood Emergency Response Plan (**FERP**) confirms that the proposed building meets Shelter-in-place guidelines and can accommodate up to 447 people, exceeding the proposed student and staff capacity.

Other impacts have been considered as detailed in this REF.

Justification and Conclusion

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

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

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

1. Introduction

The NSW Department of Education (the **department**) proposes upgrade works to the existing Ulladulla High School (**Ulladulla HS**) (the **activity**) located at 55 South Street, Ulladulla NSW 2539 (the **site**).

As part of the NSW Government's plan to rebuild public education, 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 world class public education. This includes an upgrade to Ulladulla HS to renew existing school assets and provide additional permanent teaching spaces.

This Review of Environmental Factors (**REF**) has been prepared by Urbis Ltd on behalf of the department to determine the environmental impacts of the proposed activity at Ulladulla HS. 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.

2. Proposed Activity

2.1 The Site

2.1.1 Site locality

Ulladulla HS is located at 55 South Street, Ulladulla, NSW, 2539 and is legally referred to as Lot 1 in Deposited Plan 595313. The site is owned by the Department of Education.

The site is located within the Shoalhaven Local Government Area (**LGA**) and has an approximate area of 6.5ha. An aerial photograph of the site is provided at **Figure 1.**

The site is zoned SP2 Educational Establishment under the Shoalhaven Local Environmental Plan 2014 (SLEP). Existing development on the site comprises various buildings, a car park, landscaping, sports fields and sports courts associated with Ulladulla HS. Ulladulla HS currently comprises 61 Permanent Teaching Spaces (**PTS**) and 8 Demountable Teaching Spaces (**DTS**). Playing fields are located in the north western portion of the site.

The site is largely rectangular in shape, however, is indented in the north east corner where an early learning centre is situated outside of the site boundary on the corner of Green Street and St Vincent Street. The primary frontage to the school is along St Vincent Street to the east, with two vehicular access points to at-grade carparking areas.

Dense vegetation is located in the central and eastern portion of the site, separating the school buildings from the early learning centre. Vegetation is also concentrated along the site boundaries and around the playing fields. The surrounding locality is primarily residential to the west and south. Ulladulla Town Centre is located to the east of the site. Ulladulla Public School is located to the north of site on the opposite side of Green Street.

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

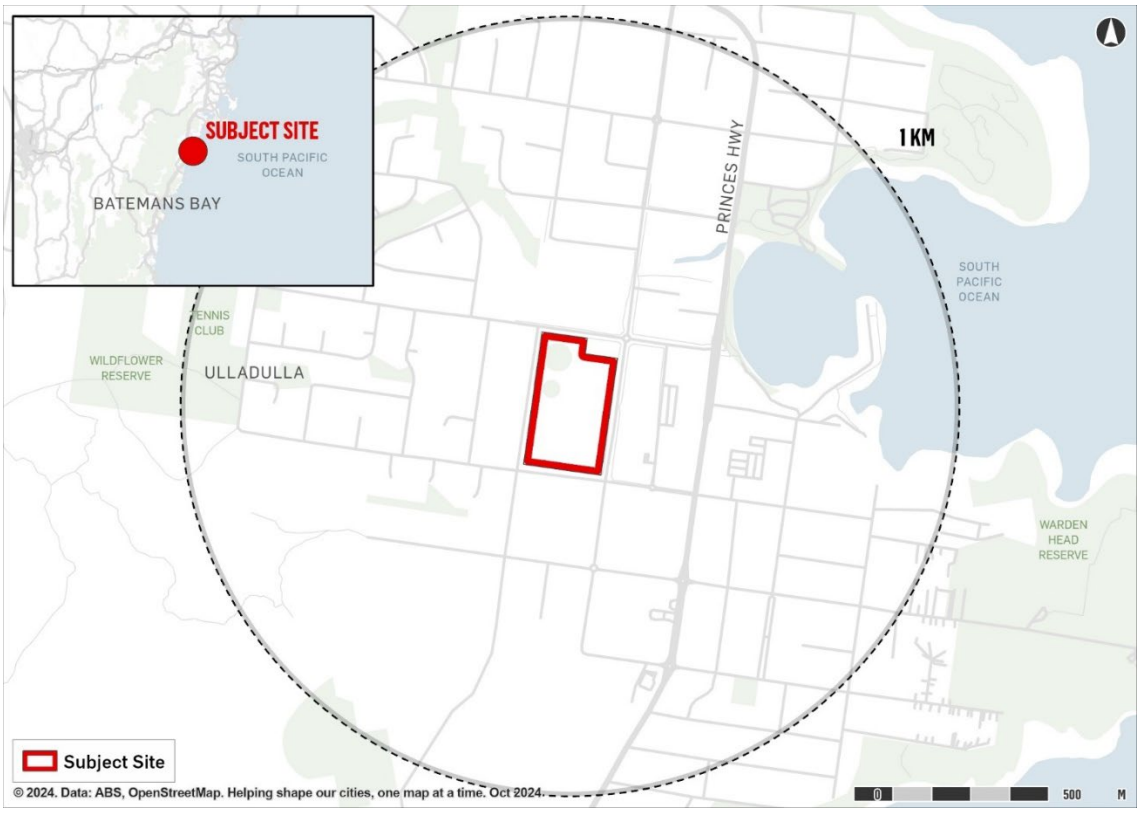
Table 1: Site Details

Site characteristics	Description
Site address	55 South Street, Ulladulla
Legal description	Lot 1 Deposited Plan 595313
Site area	65,416m^2 (6.5ha)
Local government area	Shoalhaven City Council
Site ownership	Minster for Education
Easements	There is an easement for a substation located at the southern boundary of the school adjacent to South Street. There is also an easement that restricts the use of the land surrounding that substation. Works to the substation do not form part of the proposed activity, therefore there are no works occurring in the vicinity of this easement.
Existing use / structures	Ulladulla HS, 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 total of 29 buildings are located on the site, including 8 demountable

Site characteristics	Description
	buildings.
Topography	The site slopes gently to the north.
Vegetation	A pocket of dense vegetation is located within the north eastern quadrant of the site and acts as a barrier between the high school and child care centre. Vegetation is also located around the boundaries of the site and around the playing fields.
Hydrology	The broader school site is impacted by local overland flooding as it is situated within a natural depression that forms a drainage path. When the external stormwater system reaches capacity, it overtops onto the site from South Street. ▪ The proposed activity area (northwest of the existing buildings) is largely unaffected by overland flows in the 1% AEP event, although there are some flows around the existing demountable buildings with a depth of 300m. ▪ In the PMF, the proposed activity area is impacted by flows generally less than 100m deep, although the flow path just south of the existing demountables reaches 370mm.
Acid Sulfate Soils	The site is located on land mapped as Class 5 Acid Sulfate Soils.
Coastal 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	There are two vehicular access points to the site, both from St Vincent Street, which provide access to at grade car parking areas.

Source: Urbis, 2024

Figure 1 Site Aerial



Source: Urbis, 2024

Figure 2 Locality Plan

Photo 1 View facing south showing proposed activity site with existing demountable classrooms.

Source: Fulton Trotter Architects, 2024.

Photo 2 View facing north within Ulladulla HS showing sports field

Source: Fulton Trotter Architects, 2024.

Photo 3 View into Ulladulla HS and the activity site from Camden Street

Source: Google Maps, 2025

Figure 3 Site Photos

2.1.2 Site Constraints and Opportunities

Consideration of site constraints has been undertaken through a review of the Section 10.7 (2 & 5) Planning Certificate (No. 2024/04105) 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**: Ulladulla HS is situated within a natural depression that forms a drainage path (refer **Figure 4** below) and is subject to overland flooding. Under existing conditions, the depth of the 1% AEP flooding within the proposed activity area is nil, and elsewhere on the broader school site is generally between 200-500mm. In the probable maximum flood (**PMF**) the extent of the overland flooding covers the majority of the southern portion of the

site. The level of flooding at the PMF in the proposed activity area is between 5 and 10 cm and Hazard level of H1, which is considered generally safe for people, vehicles and buildings. The site is flood-liable land under the definitions of the Flood Risk Management Manual. Notification of the proposed activity has been provided to SES and Shoalhaven City Council (**Council**).

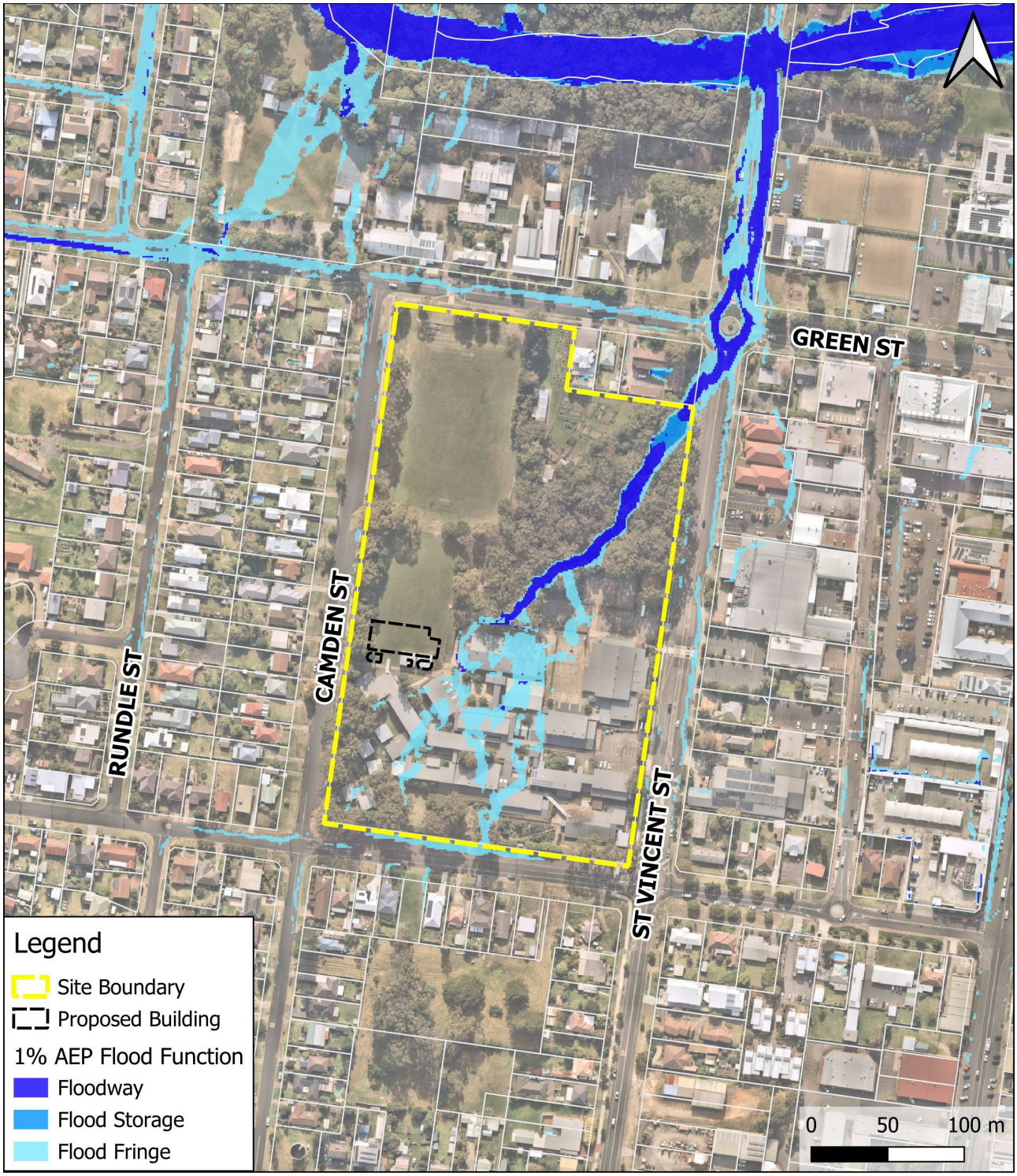


Figure 4: Flood function of flows during the 1% AEP Event

- **Vegetation and Biodiversity**: The western boundary of the site is heavily vegetated with a steep embankment. The proposed activity will be located within a previously cleared

section of the site. This location is appropriate as it will limit impacts to biodiversity and will not require the removal of mature trees or native vegetation.

- **Access**: The primary frontage to the school is along St Vincent Street to the east, with two vehicular access points to at-grade carparking areas. There is no formal vehicle access from Camden Street. There is a pedestrian pathway off Camden Street which will provide access to the new homebase building.
- **Groundwater**: The lower sports field is subject to waterlogging from groundwater. This limits its functionality during wetter seasons and often renders the sport field unusable. The proposed activity area is not impacted by these conditions.

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*	☒	☐
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.
- **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.
- **Spacious Site Area**: The site is approximately 6.5 hectares and has been designed to accommodate functional layouts of school buildings, sports facilities, and open play spaces. This allows for optimised use while maintaining significant green and landscaped areas.
- **Environmental Integration**: Retention of existing mature trees and the addition of native landscaping promotes biodiversity and creates a visually appealing transition between urban and natural areas.
- **Futureproofing**: The flexible site layout and modular building designs allow for potential future expansion to accommodate changing community and educational needs.

2.2 Proposed Activity

The proposed Ulladulla HS upgrade specifically comprises the following:

- Construction of a new two-storey home base building.
- Construction of new stairs and covered walkways.
- Upgrade works to existing internal pedestrian pathways.
- Installation of solar panels.
- External landscape works.

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

Table 3: Summary of the activity

Project Element	Description
Site Area	65,416m^2
Project Name	Ulladulla High School Upgrade
Project Summary	▪ The proposed activity will involve upgrades to the existing Ulladulla HS. The intention of the activity is to provide new permanent teaching spaces and to enhance the teaching facilities available at the school. ▪ The works will involve the construction of a new homebase building (Building U) which is positioned on the western boundary of the existing school campus. The homebase building comprises a modular 2 storey building which respects the natural topography of the site. ▪ The homebase building will replace the existing demountable classrooms. The demountables will be removed from the site under a separate approval. ▪ Associated works include the construction of new covered accessways and stairs, upgrades to the existing internal pedestrian pathways, the installation of solar panels and external landscaping works.
Use	Educational establishment
Student and Staff Numbers	No change to student capacity or staff numbers
Car and Bicycle Parking Spaces	Car parking spaces: 42 (existing) Bicycle parking spaces: The school has a single bike rack which can accommodate approximately 20 bikes. An additional 10 skateboard spaces, 20 scooter spaces, and 20 bicycle spaces have been proposed as part of the project.
Height	Proposed Building U will be two-storeys
Tree Removal	No tree removal proposed.
Off Site Works	The proposed activity does not include any offsite works.

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

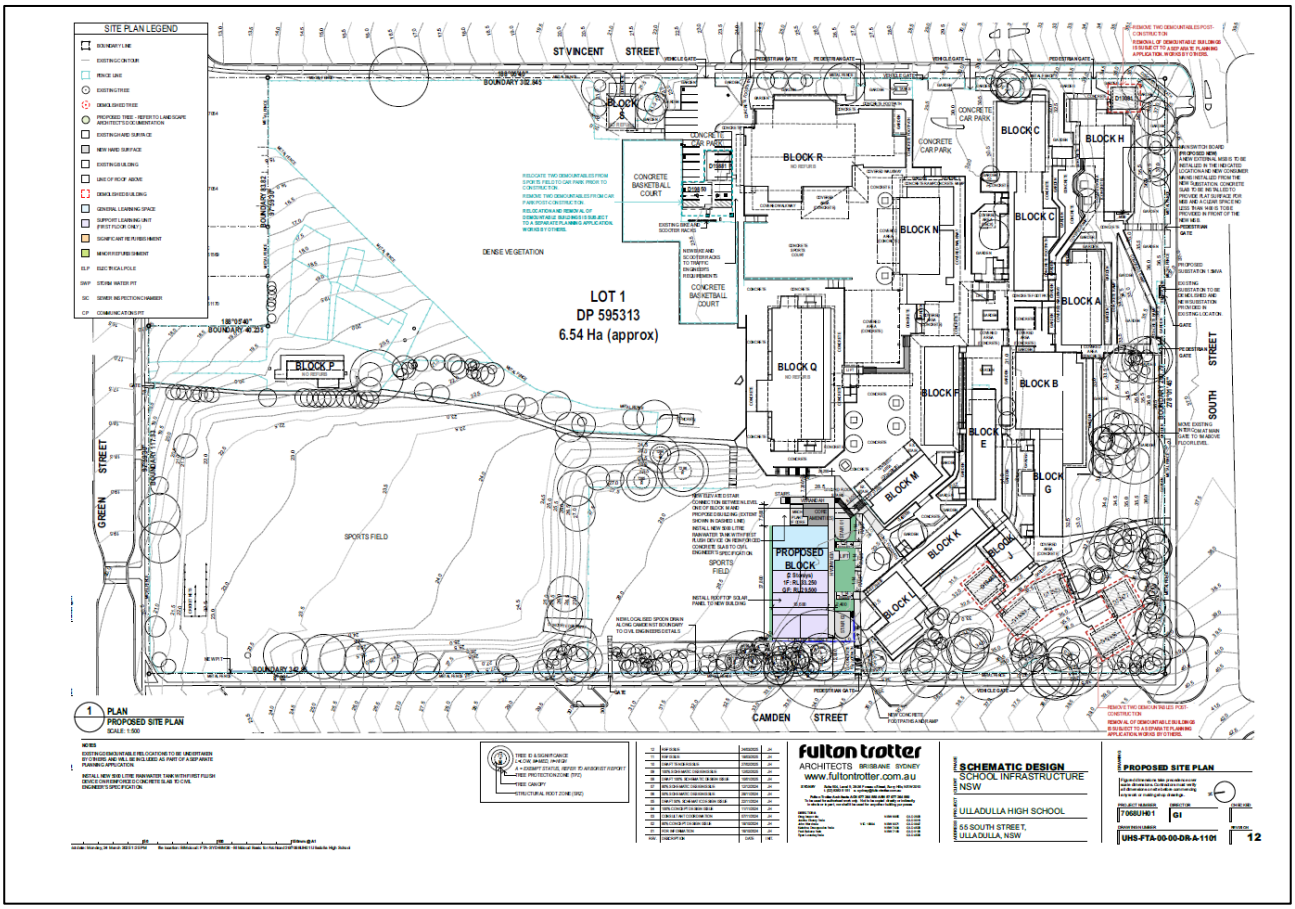


Figure 5 Proposed indicative site layout

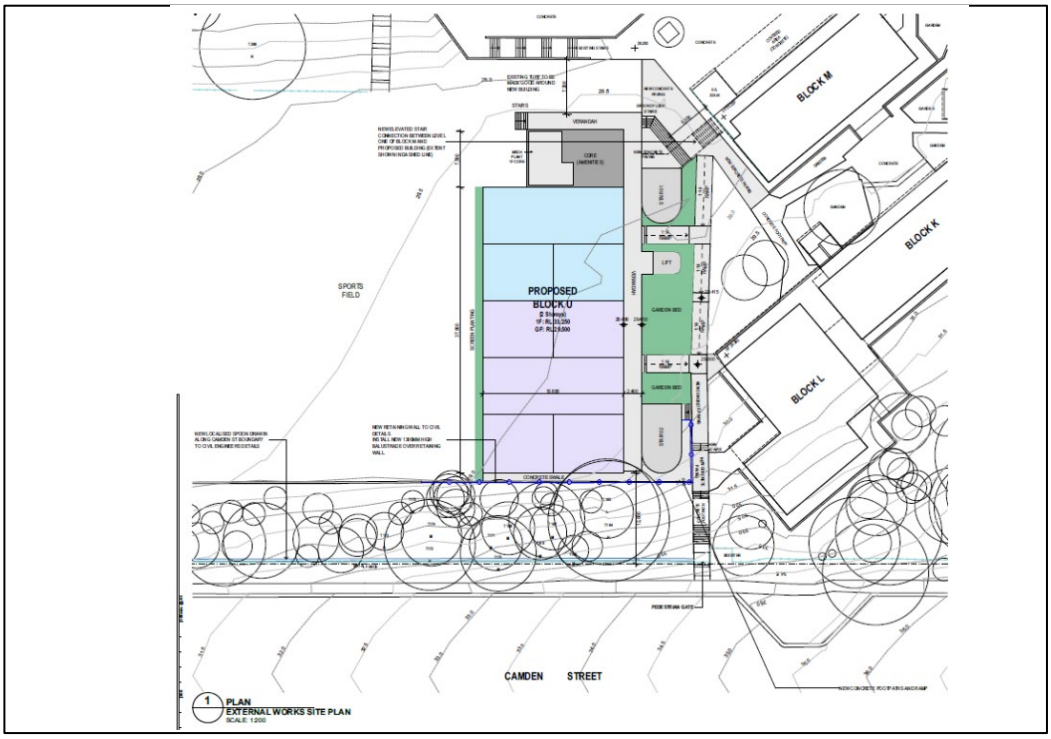


Figure 6 Proposed external works plan

2.2.1 Design Development

The proposed built form for the new homebase building at Ulladulla HS 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**) 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 and ensures it complements the surrounding single and two-storey residential area. The existing ground level of the activity area is set substantially lower than Camden Street. As such, the topography and existing vegetation will serve to largely shield the proposed new building from street view.

New stairs and accessible ramps connect the new building to the existing network of pathways. Access to the sports field is provided to the east of the building.

The building's north-facing long elevation maximises natural light and climate control, crucial for energy efficiency and comfort. The site’s northern aspect will improve the sustainability outcomes for the site and provide an opportunity for the inclusion of sustainable design features such as solar panels.

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, 2024

Figure 7 Render of new homebase building – from Sports Field

Source: Fulton Trotter, 2024

Figure 8 Render of new homebase building - from Block L

Figure 9 Materials and Finishes

Source: Fulton Trotter, 2025

Figure 10 Façade Strategy

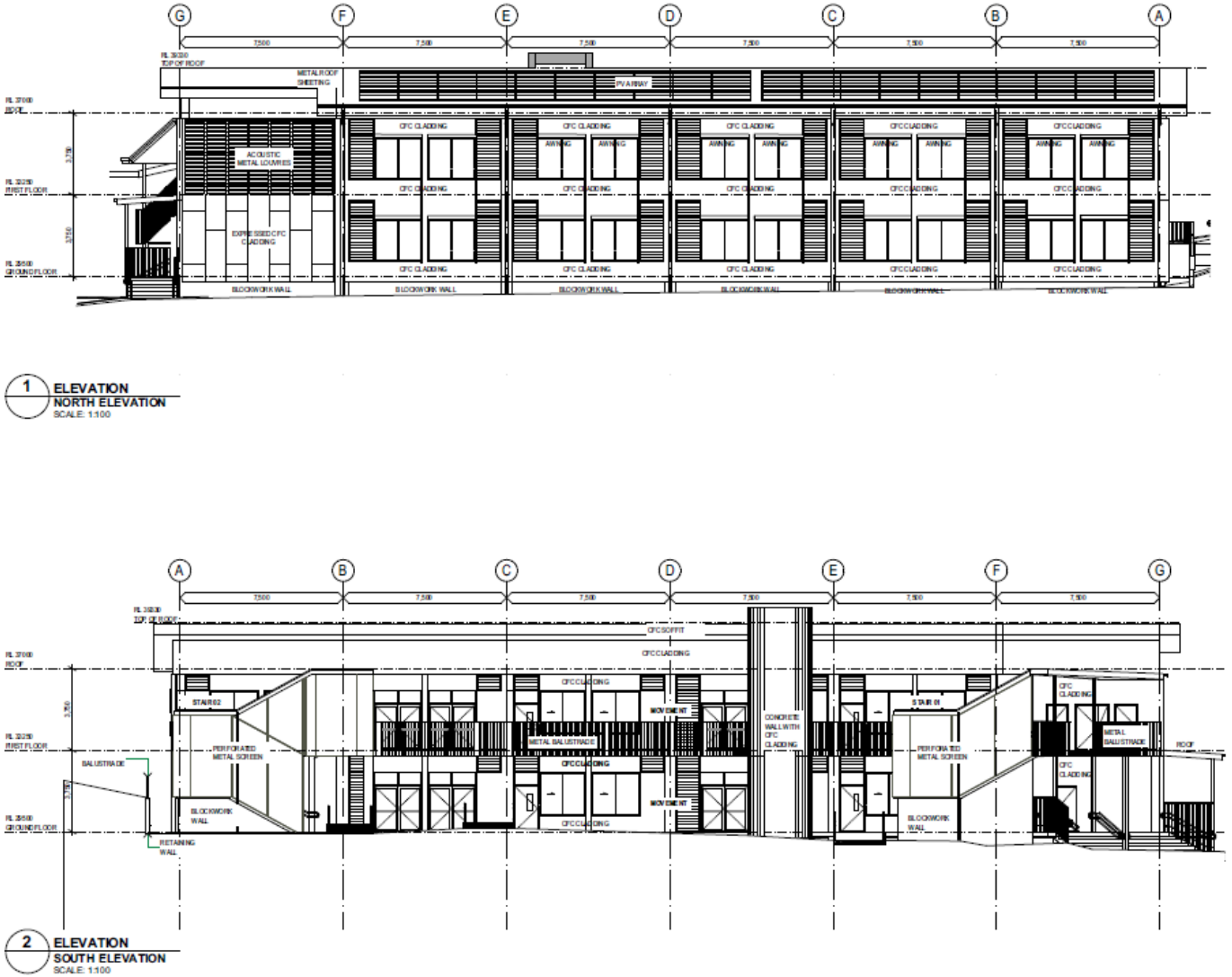


Figure 11 Site Elevations

Landscaping

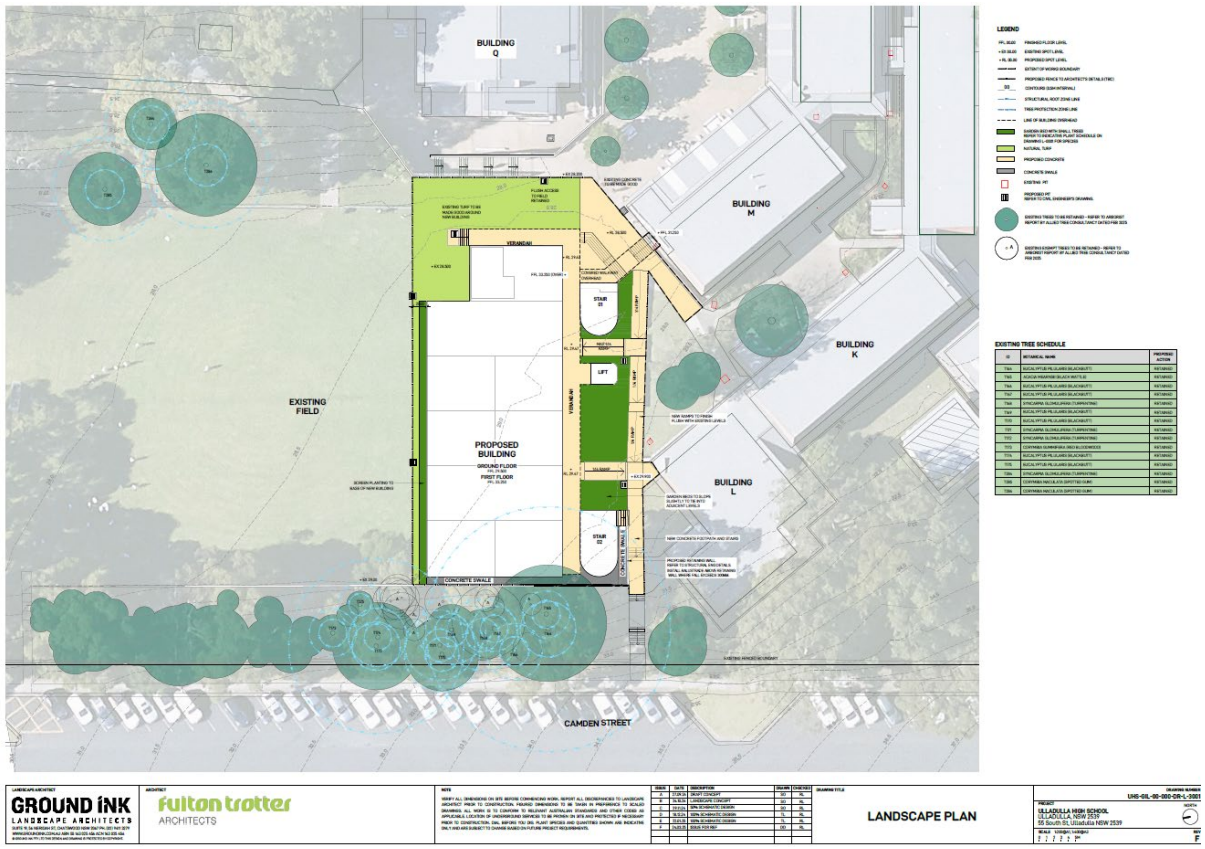
There is no tree removal required for the proposed activity. There will be minor turf and shrub removal to facilitate the proposed activity.

The approach to the landscape design for the project is guided by the existing landscaping on the school campus. The retention of all protected existing trees around the site's perimeter enhances the natural environment and preserves visual amenity. The proposed landscaping aims to improve amenity, create attractive external spaces and support outdoor learning. The additional landscape treatments complement the existing environment, further integrating the development into its context.

The landscape design for the scheme includes areas of turf and concrete intended to integrate the proposed building works with the existing school grounds. Garden beds have been utilised where appropriate to soften the building interface and facilitate drainage.

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

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



Source: Fulton Trotter and Ground Ink, 2025

Figure 12 Landscape Plan

Vehicle Access and Parking

Access and Parking

The current parking and access arrangements will be retained during construction and operation of the proposed activity. These arrangements are as follows:

- Main pedestrian entry on South Street with secondary entrance on St Vincent Street, Green Street and Camden Street.
- Two existing onsite car parks with access via St Vincent Street. The two existing staff car parks provide 43 spaces, along with on-street parking fronting the school.
- The school has two kiss n' drop off areas, one at St Vincent Street, between two of the pedestrian and vehicle access points. An additional kiss 'n drop is located at the southern end of Camden Street.

As part of the proposed activity, an additional three (3) kiss 'n drop spaces have been proposed on the eastern side of Camden Street. These spaces are to form part of a public domain plan approved by the Shoalhaven City Council local traffic committee.

Design Guide and Design Quality Principles

The built form of the proposed high school 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, adhering to a Country-centred approach and considering site-specific conditions. Key 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 ground level of the proposed activity area is set substantially lower than Camden Street limiting any visual impact on the surrounding residential area. • Accessibility and Ground Levels: The building is designed to sit comfortably with existing ground levels, promoting accessibility. This approach ensures seamless integration with the site's topography. • Landscaping and Streetscape: The design maintains the existing landscaping between the road and the building, preserving the streetscape and visual amenity of the area. Existing trees around the site's perimeter are retained, contributing to the natural environment and enhancing the site's aesthetic appeal. • Climate Control and Orientation: The building features a north-facing long elevation, maximising natural light and climate control, which is crucial for energy efficiency and comfort. Solar panels are proposed to leverage the north-facing elevation and improve the sustainability outcomes of the activity. • Connectivity and Accessibility: The development maximises logical connections between the new building and existing adjacent buildings, ensuring ease of access and movement throughout the site.

Design quality principle	Response
	• Enhanced Landscaping: Simple landscape treatments including turf, native planting and concrete are incorporated to complement the existing environment, further integrating the development into its context and mitigating any potential negative impacts on the streetscape and neighbouring sites. • 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 meticulously designed to achieve sustainable, efficient, and resilient outcomes, aligning with the principles of caring for Country. Key elements of the design include: • Optimised Building Orientation: The building's main long elevation faces north, incorporating a high level of façade sun shading to minimise heat gain. This orientation maximises natural light while shade structures reduce the need for artificial cooling, enhancing energy efficiency. Solar panels are also proposed to take advantage of the north facing roof. • Passive Cooling and Natural Ventilation: The design features louvres within the window area to facilitate natural ventilation, increased eave width complemented by adjacent proposed trees that provide additional shading and cooling. This passive cooling strategy reduces reliance on mechanical systems, conserving energy. • 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. • Low Maintenance Materials: The use of robust, low maintenance materials ensures the building's longevity and reduces the need for frequent repairs or replacements. The external materials are designed to be the final finish, eliminating the need for painting and further reducing maintenance requirements. • Sustainable Landscaping: Landscaping to external areas is designed to enhance the natural environment and contribute to passive cooling, while also minimising water consumption through the use of native and drought-tolerant plants. • 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.
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: • Safe and Equitable Access: The design prioritises safe and equitable access to the new building and adjacent buildings on the site, ensuring that all individuals, regardless of their abilities, can move freely and comfortably throughout the school. • Comprehensive Accessibility Features: The development includes ramp, stair, and lift access, providing full accessibility to all areas of

Design quality principle	Response
	the building. These features ensure that students, staff, and visitors with mobility challenges can access the building with ease. New stairs and accessible ramps will connect the new building to the existing network of pathways within the school. • Community Integration: The design maintains the school's ability to share its facilities with the community, supporting activities outside of school hours. This approach fosters a sense of belonging and strengthens the school's role as a community hub. • Connected Spaces: The upper level of the new building is linked to the adjacent building, enhancing connectivity and ensuring that the school environment is cohesive and easy to navigate. 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 school development has been thoughtfully designed to prioritise health and safety, ensuring that the environment supports the wellbeing of all users. Key elements of the design include: • Safe and Equitable Access: The design ensures safe and equitable access to the new building and adjacent buildings on the site, promoting a secure and inclusive environment for all students, staff, and visitors. • Supervision and Visibility: The layout of the proposed building is designed to allow for effective supervision, with internal spaces that facilitate visual connections. The building includes windows looking out to the sports field that provide staff with the opportunity to easily monitor student activities, enhancing safety and security within the school boundaries. • High Visibility: The building features high visibility, both internally and externally, which contributes to a sense of security and allows for better oversight of the school grounds. • Welcoming and Accessible Environment: Despite the emphasis on safety and security, the design maintains a welcoming address and accessible environment, ensuring that the school remains inviting and open to the community. 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 school development has been designed to create functional and comfortable spaces that cater to a wide range of educational and community activities. Key aspects of the design include: • Flexible Learning Spaces: The layout features consistent learning spaces and learning commons, with opportunities for different levels of openness or insularity through the use of flexible furniture arrangements. Sliding doors between spaces further enhance the flexibility, allowing for various uses and configurations. • Designated Storage Areas: Adequate storage areas are provided to minimise clutter, ensuring that learning and activity spaces remain organised and functional. • Clear Circulation Paths: The design includes clear circulation paths, making it easy for students, staff, and visitors to navigate the school

Design quality principle	Response
	efficiently and comfortably. • Natural Light and Ventilation: The building is designed and orientated 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 which will be retained as part of the development, and its scale is complementary to the topography and buildings within 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. 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 thoughtfully designed to be flexible and adaptable, ensuring that the spaces can evolve to meet changing educational and community needs. Key aspects of the design include: • Flexible Learning Spaces: The layout features consistent learning spaces and learning commons that can be easily reconfigured. The use of sliding doors between spaces allows for varying levels of openness or insularity, accommodating different teaching styles and group sizes. • Adaptable Furniture: The design incorporates furniture that can be rearranged to support a wide range of activities, from formal instruction to informal group work, enhancing the adaptability of the learning environment. • Open Floor Plates: The building employs open floor plates, providing a versatile foundation that can be modified as needs change over time. This "long life, loose fit" approach ensures the school can adapt to future educational trends and requirements. • Designated Storage Areas: Adequate storage is provided to keep spaces organised and clutter-free, allowing for quick and easy reconfiguration of rooms as needed. • Clear Circulation Paths: The design includes clear circulation paths, facilitating smooth transitions between different areas and activities, and supporting the dynamic use of space. • Natural Light and Ventilation: Abundant natural light and opportunities for both natural and mechanical ventilation create a comfortable and adaptable indoor environment that can respond to varying conditions and uses. Overall, the design demonstrates a strong commitment to flexibility and adaptability, ensuring that the school can effectively support a diverse range of educational and community activities now and in the future.
7. Visual Appeal	The proposed school development has been designed with a strong emphasis on visual appeal, ensuring that the buildings and their landscape settings are aesthetically pleasing and contribute positively to the streetscape and neighbourhood character. Key aspects of the design include:

Design quality principle	Response
	• Scale and Proportion: The building is designed to be in keeping with the scale of neighbouring buildings on the school site, ensuring a harmonious integration with the existing built environment. The articulation of the structure, glazing, and cladding in both internal and external areas provides variety within a consistent grid approach, achieving good proportions and a balanced composition. • Façade Design: The long elevations feature a depth of façade and a variety of materials, which help to break down the scale of the building. This thoughtful design approach ensures that the building does not appear monolithic and instead presents a visually interesting and engaging appearance. • Contemporary Aesthetic: The proposed building will have well-articulated elevations with a simple, unobtrusive contemporary aesthetic. The colours and materials chosen relate to the existing buildings, allowing the new structure to sit comfortably within its setting while maintaining a cohesive visual identity. • Streetscape Amenity: The design responds to and enhances the streetscape amenity, contributing to the quality and character of the neighbourhood. The building's identity and street presence are carefully considered to reflect the existing or desired future character of the location. • Civic Role and Community Significance: The design reflects the school's civic role and community significance, creating a welcoming and visually appealing environment that underscores the importance of the school within the community. Overall, the design demonstrates a strong commitment to visual appeal, ensuring that the school buildings and their landscape settings are not only functional but also enhance the aesthetic quality and character of the neighbourhood.

This comprehensive response ensures the built form meets the TI SEPP's principles 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 11**).

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

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

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

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

To encourage active transport, the proposed activity includes racks or spaces to accommodate an additional 10 skateboards, 20 scooters and 20 bicycles.

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

- Appointment of a School Travel Coordinator (**STC**) to promote 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.

Climate Change

The proposed building has been designed to address exposure to extreme climate events, incorporating insights from historical data, environmental mapping, and NARCLiM climate 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 external eaves and shaded outdoor spaces to reduce the urban heat island effect.

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.

To manage flood risks, the proposed activity is designed to be above the flood planning level. The integrated stormwater systems captures flows from the development and directs these to the existing systems and reduce overland flow impacts.

A Flood Emergency Response Plan (**FERP**) has been prepared, ensuring the school is well-prepared to respond to its context.

These measures reflect a proactive, integrated approach to creating a climate-adaptive, resilient and sustainable educational facility.

2.2.2 Construction

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 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 6.10). The CWMP will 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.

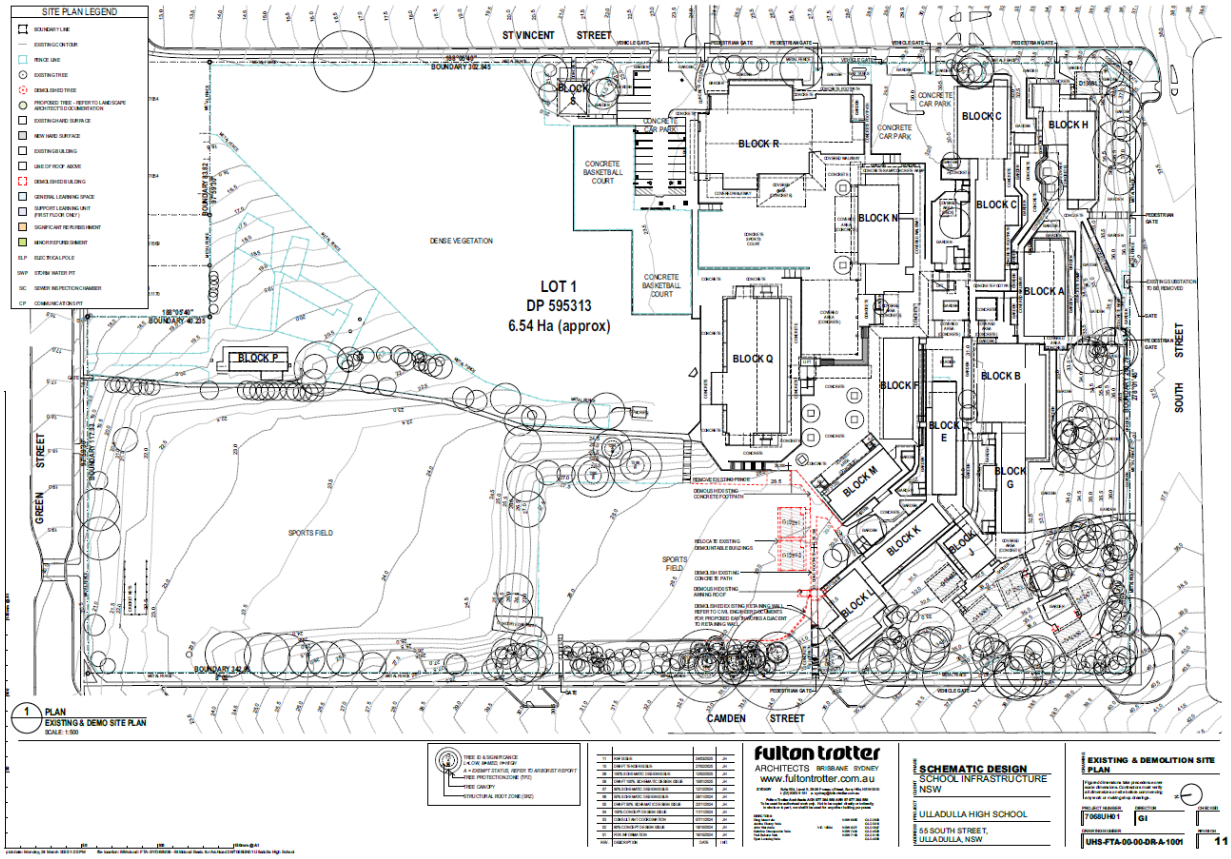
The current approximate construction program milestones of the proposal are provided in the below table. A detailed construction program for the proposal will be developed by the Main Works Contractor.

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 includes the demolition of a path and removal of an existing internal fence which is located around the sports oval. The extent of demolition is shown in **Figure 13.**



Source: Fulton Trotter, 2025

Figure 13 Demolition Plan

Earthworks

During bulk earthworks, 150mm topsoil will be removed from the site (except the area below the suspended slab) to provide a platform for the proposed ramp and footpath, stormwater pipes and pits. The total volume of earthworks is relatively reasonable with approximately 76.5cu.m cut required which is based on 118.5cu.m cut and 42.0cu.m fill respectively.

Tree and Vegetation Removal

The proposed activity does include removal of trees and only minor turf and vegetation removal.

The existing trees on site will be retained and are to be managed and protected for the duration of the works. Exclusion zones around existing trees located in proximity to the works will be demarcated by protection fencing, boarding and wraps, as per the Arboricultural Impact Assessment **(Appendix 22**). 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, and will be subject to the necessary approvals:

- New in-ground sewer and water connections to the new building.
- Provision of a new electrical meter in the renamed Main Distribution Board.
- Proposed new distribution board.

2.2.3 Operation

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

2.2.4 Related Works/ Applications

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 Public School upgrade	Under assessment	Directly to the north	241 Green Street Ulladulla
DA2022/1078	59 South Street, Ulladulla -four storey apartment building	Approved	150m east	59 South Street Ulladulla
	Mixed use development comprising demolition of existing buildings and construction of two retail spaces, restaurant and six residential units.	27/06/2022	350m east	127 Princes Highway, 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 High School 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	If the project was not to proceed, the following consequences are likely to occur: • The identified need to renew existing school assets and provide additional permanent teaching spaces would not be met. • A "Do nothing" approach would result in the failure of the department to deliver on the NSW Government's plan to rebuild public education, the 2024-25 Budget is delivering record education funding, including a historic $1.4 billion for new and upgraded schools in regional NSW.	Option 1 is **not preferred** as it would not achieve the intended outcomes of the NSW plan to rebuild public education.
Option 2: Alternative Location	Two architectural masterplan options were developed and an alternative location in the southwest corner of the site was briefly considered.	Option 2 is **not preferred** as it was located on a steep vegetated area that would be difficult to access.
Option 3: Alternative Design	At the western boundary adjacent the Sports Oval, the project team evaluated two design options which reviewed alternative finished floor levels and impacts on connections to adjacent buildings.	Option 3 was **not preferred** as the finished floor levels did not meet flood planning requirements.
Option 4: Proposed activity as described in	Flood modelling determined that a design with the higher floor level as the most suitable option, which has been developed into the proposed activity as	Option 4 is the **preferred option** as it will ensure that the necessary upgrade to Ulladulla HS is delivered, with a high level of amenity, and the

Option	Discussion	Preferred Option
this report	described in this report. The proposed activity has been informed by the shortcomings and opportunities identified in the options above. This ensured that the identified need for the upgrade to Ulladulla HS was met and achieved with negligible environmental impacts.	ambitions of the NSW government are achieved

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 9: 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 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 the four storeys stipulated under 3.37(2)(a). 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.

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 10: Previous development consents

DA Number	Description	Date Determined
DA84/2767	Demolition of 5 demountable buildings and the erection of 4 new buildings - for art, industrial arts, science, music and general learning, and a new agricultural shed	11/01/1988
DA89/2127	Additions and modifications to Ulladulla High School.	07/06/1990
DA99/3864	Signage	06/12/1999
DA02/1475	Regrading and levelling of existing fill located on site.	22/03/2002
DA01/4037	Signage.	30/12/2002
DA03/3670	Storage shed.	19/12/2003
DA05/3014	Removal and pruning of trees.	16/08/2005
DA05/3270	Alterations and additions to high school.	13/02/2006
DA08/2495	Alterations to gym, addition of two storey seminar room to classroom in Block G, additional classroom to Block H, extension of library office and new external stairs to visual arts building.	25/03/2009

The proposed activity would not contravene any existing condition of the consents currently operating that applies to any part of the school, relating to hours of operation, noise, vehicular movement, traffic generation, loading, waste management or landscaping.

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 11: 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

Consideration	Yes/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 12 identifies any additional approvals that may be required for the proposed activity. **Table 13** identifies the SEPPs that are applicable to the proposed activity.

Table 12: Consideration of State legislation and other approvals

Legislation	Relevant?	Approval Required?	Applicability
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 site is not bushfire prone land, and no approvals or licences are required for the activity in relation to the RF Act.
Water Management Act 2000	Yes	No	The project is being carried out within 40 metres of the former drainage line; however, the proposed works are more than 40 metres from the high bank of any watercourse. Therefore, a Controlled Activity Approval is not required. Additionally, during the site visit undertaken to support the Flora and Fauna Assessment (**Appendix 21**) it was observed that the drainage line is no longer present and is no longer classified as a watercourse. Following approval of the activity, DoE must apply to Shoalhaven Water for a certificate of compliance under Section 305 of Division 5 of Part 2 of the Water Management Act 2000.
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 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

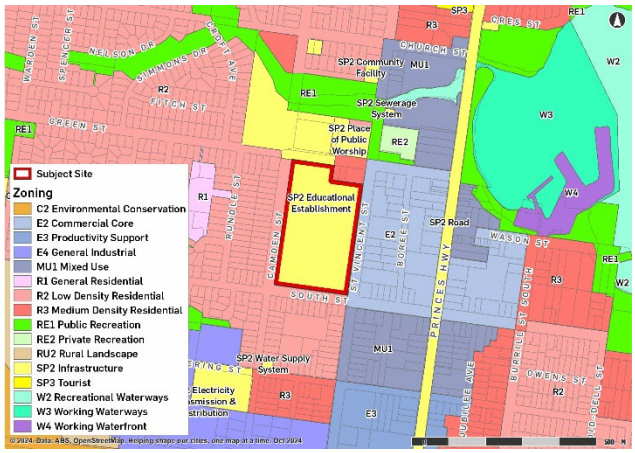
Legislation	Relevant?	Approval Required?	Applicability
			EIS (and therefore a SIS or a BDAR) is not required.
Pesticides Act 1999	No	No	The proposal will not require the use of large quantities of dangerous pesticides and therefore approval under the Pesticides Act is not required.
Heritage Act 1977	No	No	The site does not include any heritage items and is not located within a heritage conservation area. The Heritage Act is not relevant as the proposed activity does not materially affect any local or State heritage items.
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 (**Appendix 25**) prepared by JK Environments which confirms that the site is suitable for its intended use. Additionally, no approval is required under the CLM Act. Furthermore, the Section 10.7 Planning Certificate does not indicate that the site is significantly contaminated or that any approvals under the CLM Act are required.
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	Yes	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.
Crown Land Management Act 2016	No	No	The proposed activity is located on land currently owned by Department of Education. As the land is not owned by Council, the CLM Act is not relevant.
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. Nonetheless, as the activity is limited to upgrade works within an existing school, there will be no impact on the coastal area.
Environmental	Yes	No	The proposed activity is not located within a drinking water

Legislation	Relevant?	Approval Required?	Applicability
Planning and Assessment Regulation 2021 (Section 171A			catchment. Therefore, this section of the regulations do not apply.

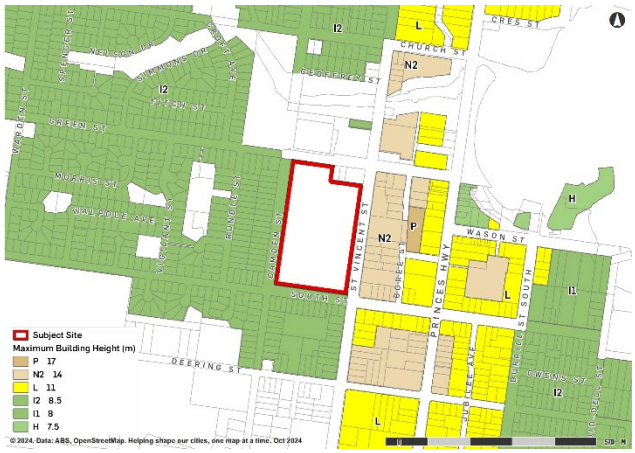
Table 13: Consideration of relevant SEPPs

Legislation	Relevant?	Applicability
State Environmental Planning Policy (Planning Systems) 2021	Yes	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 Sustainable Development Report and Net Zero Statement **(Appendix 11**) prepared by NDY 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 UPS, 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 Environmental (**DSI, Appendix 25**) completed for the proposed activity concludes that the site is not contaminated and is suitable for the proposed development.
State Environmental Planning Policy (Industry and Employment) 2021	No	The proposed school signage is ancillary to the proposed activity for the construction of a school. Therefore, the signage provisions of the IE SEPP are not required to be assessed.
Shoalhaven Local Environmental Plan 2014	Yes	Zoning 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.

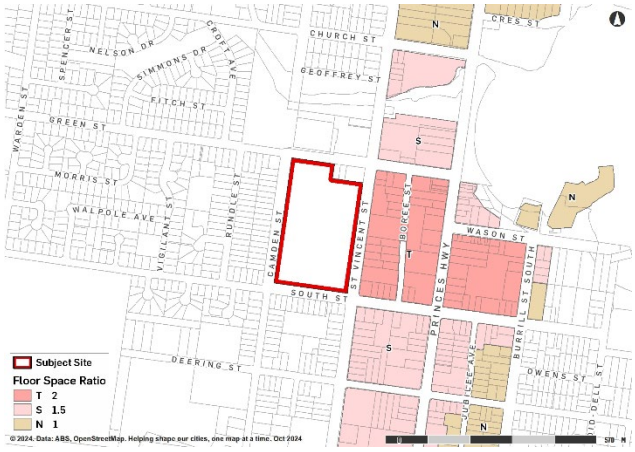
Legislation	Relevant?	Applicability	
		• To prevent development that is not compatible with or that may detract from the provision of infrastructure.	
		Height of Buildings	Not subject to a height of building control.
		Floor Space Ratio	Not subject to a floor space ratio control.
		Heritage	Not a heritage item
		Flood Planning	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 life 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.
		Shoalhaven LEP mapping is included **Figure 14** below**.**	



Picture 4 Land Zoning Map

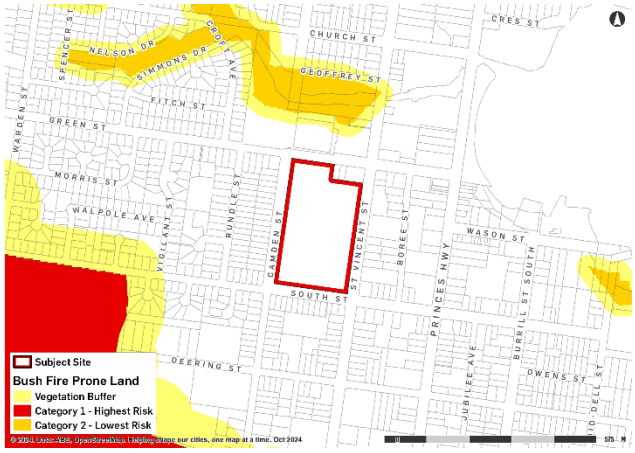


Picture 5 Height of Buildings Map

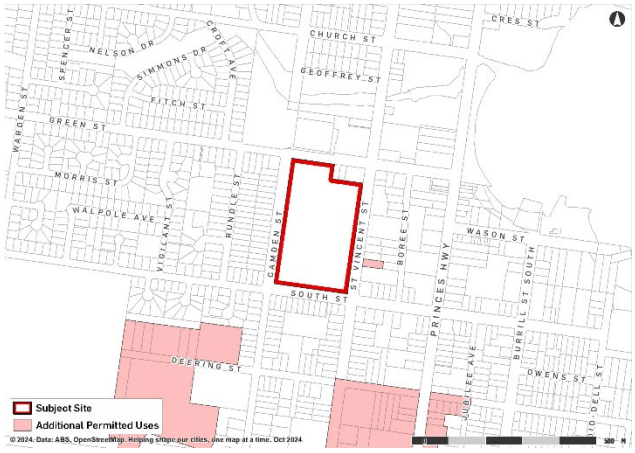


Picture 6 Floor Space Ratio Map

Picture 7 Lot Size Map



Picture 8 Bushfire Prone Land Map



Picture 9 Additional Permitted Uses Map

Source: Urbis, 2024

Figure 14 Shoalhaven LEP Maps

4.4 Strategic Plans

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

Table 14: Consideration of applicable Strategic Plans

Strategic Plan	Assessment
Illawarra Shoalhaven Regional Plan 2041	The Illawarra Shoalhaven Regional Plan (Regional Plan) provides the overarching strategic plan for growth and change in Wollongong, Shellharbour, Kiama and Shoalhaven. It is a 20-year plan to inform land use planning and inform the work of agencies to plan for growth and change and create an innovated, connected, diverse and resilient Shoalhaven. It identifies key challenges facing 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 Ulladulla HS 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 HS 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.*
Shoalhaven Delivery Program and Operational Plan & Budget 2024/25 (Draft)	Shoalhaven City Council received funding through the Federal and State Government's Road Safety Program to implement pedestrian safety improvements around Ulladulla High School. The capital works Draft for Delivery Program Operational Plan and Budget 2024-2025 (available at the time of preparing this report) has allocated funding in response to a recent student fatality on St Vincent Street. The planned improvements include: • Installation of traffic signals at the South Street and St Vincent Street intersection, • Construction of a raised pedestrian crossing on Camden Street, to north of South Street • A shared user path link will be constructed along the northern side of South Street. The proposed activity does not preclude the future implementation of these improvements.

5. Consultation

5.1 Early Stakeholder Engagement

Table 15 provides a summary of early stakeholder (non-statutory) consultation undertaken to inform project development and preparation of the REF.

Table 15: 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 future planned additional crossing on Camden Street between South Street and Green Street as a possible initiative. **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. **Email Correspondence October 2024**: Between Council and the project flood consultant (TTW) concerning flood studies, flood planning levels. TTW provided Council with the development options and Council provided guidance on relevant flooding considerations. TTW requested a flood certificate for the site of the proposed activity. To address on site flooding impacts, Council confirmed the finished floor level (FFL) for the proposed homebase building should be raised 300mm from the ground surface. This has been incorporated in the proposed design.
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. **28th October 2024** – Project update **4th November 2024** – Concept Design presented and endorsed

Stakeholder	Engagement
	26th November 2024 – Project update **9th December 2024** – Project update **13th February 2025** – Project update
Community Updates	**1st July 2022** – A flyer on the project website providing a planning update on government funding and commencement of early planning. **19th September 2023** – A flyer on the project website notifying planning commencement and geotechnical investigations to occur 20-21 Sep 2023 **19th March 2024** – An overview flyer on the project website indicating 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.
Endeavour Energy	**26th July 2024** – Preliminary Enquiry Submitted in Connections Portal – electrical engineer requested information regarding capacity of existing substation supply; supply was confirmed. **11th November 2024** - Load Application Lodged for establishing a new substation; Permission to Connect offer was received shortly after.

5.2 Statutory Consultation

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

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

Comments received have be carefully considered and responded to.

Table 16 provides an overview of the comments received during the consultation period and how these comments have been responded to.

Table 16: Response to considerations raised during consultation

Consideration Raised	Response	Mitigation Measure
Shoalhaven Water received 8 May 2025		
Following approval of the proposed activity, the applicant is to apply for a Certificate of Compliance under Section 305 of Division 5 of Part 2	All required regulatory approvals will be obtained in relation to water supply works.	N/A

Consideration Raised	Response	Mitigation Measure
of the Water Management Act 2000.		
Transport for NSW received 23 April 2025		
TfNSW has no objections to the proposed redevelopment of Ulladulla High School. TfNSW does not consider the development will have an impact on the state road network.	Noted.	N/A
Endeavour Energy received 16 April 2025		
Endeavour Energy provided advice and recommended conditions, including that to ensure an adequate connection, the applicant will need to engage an Accredited Service Provider (ASP) of an appropriate level and class of accreditation to assess the electricity load and the proposed method of supply for the development.	It is noted that the conditions proposed are addressed by the standard mitigation measures. All required assessments and regulatory approvals will be obtained in relation to electricity supply works. No further action is required.	N/A
Shoalhaven Water received 8 May 2025		
The proponent/applicant is to apply under Section 305 of Division 5 of Part 2 of Chapter 6 of the Water Management Act 2000 for a Certificate of Compliance from Shoalhaven Water. A Water Development Notice (pursuant to Section 306) issued by Shoalhaven Water will outline all conditions/requirements to be adhered to.	Noted. The proposed activity will obtain the certificate of compliance.	N/A
SES received 29 April 2025		
It is understood that the site is not affected by mainstream flooding from Millards Creek, however, it is impacted by overland flooding. There is a gully onsite from a first-order stream, which is conveyed under St Vincent Street into Millards Creek via a culverted pipe system at its downstream extent.	Millards Creek Flood Study Model adopts a “direct rainfall” or “rainfall on grid” (ROG) hydrology approach, in which rainfall is applied to each active cell in the 2D mesh. Hydrologic losses and runoff are therefore calculated for each cell and routed through downstream cells to evaluate flood depths and velocities. As a result, the ROG method is typically associated with substantial shallow sheet flow, a large portion of which is generated within the site itself, as opposed to offsite.	N/A
The site is affected by overland flows when South Street’s stormwater system exceeds capacity, as frequently as the 10% Annual Exceedance Probability (AEP) events. Flows within the gully, that crosses the northeastern part of the site, are regarded as a	The majority of flows in the 10% and 1% AEP event are generated within the site itself and are not sourced from offsite – as shown in Figure 9 and Appendix C1 of TTW’s FIRA report, flows within both Camden Street and St Vincent Street do not overtop into the site. Minor overflows from South Street are below 50mm in the 10% AEP event and are considered shallow sheet flows. In this instance, this	N/A

Consideration Raised	Response	Mitigation Measure
floodway and can reach up to 1.1 metres depth in the 1% AEP event, and 1.65 metres in a Probable Maximum Flood (PMF).	is an internal stormwater management issue rather than a flood concern. It should also be noted that TTW's flood modelling did not involve incorporating any additional internal stormwater network across the site, nor any proposed stormwater infrastructure from Meinhardt's design. It consequently represents a conservative estimation of overland flows and ponding onsite.	
"The existing buildings obstruct a notable portion of flows from reaching the gully, resulting in ponding between the structures, particularly to the south of the existing buildings", with a flood hazard level up to H5 around the existing buildings in events as frequent as the 10% AEP. A H5 hazard level is unsafe for vehicles and people, and all buildings are vulnerable to structural damage. Some less robust building types are vulnerable to failure. We note however, that the proposed new building itself is outside the 1% AEP flood extent.	This statement has been clarified in the updated FIRA report. As presented in Appendix B3 of TTW's FIRA report, the majority of flows across the site in the 10% AEP event are low hazard (H1-H2). The isolated areas of H5 hazard flows can be attributed to the rainfall on grid methodology and the ponding around the buildings, which would be managed by the internal stormwater network in the 10% AEP event.	N/A
It is understood that the proposed activity includes terracing, with a sunken landscaped area immediately south of the building, and a wall surrounding the southwest of the proposed building. Between the wall and the building, a swale has been incorporated into the civil design along the western border of the building to limit ponding and direct any flows from the southwest of the sunken landscaped area to the north of the building.	Noted, this summary is correct.	N/A
The new building's ground floor levels are set at 29.5 m AHD, with flood levels along the verandah (at the southern side of the building) close to 29.6m AHD in a PMF, which could result in minor over-floor flooding. In post-development conditions, "the extent of overland flows surrounding the proposed building footprint has increased, owing to the sunken landscaped garden. Depths within this sunken garden reaches a maximum of 350mm in the 1% AEP event, and 500mm in the PMF event." While site grading directs flows away from the proposed building, preventing	This summary is correct – site grading prevents excess runoff reaching building openings. Flows over the ramps are low hazard (H1-H2), which are regarded as safe for people and children. However, the emergency response strategy for the proposed building is either to pre-emptively close the school, or to shelter in place with no outdoor access, ensuring staff and students are away from any floodwaters. Section 4.3 of the FERP provides an assessment of the maximum period of isolation.	N/A

Consideration Raised	Response	Mitigation Measure
flood water from reaching the building openings in the 1% AEP event, we note that the areas at the entry to the stairways and ramps leading up to the building are at a lower level (for example the ground level for the stairs and ramp in the southeastern corner of the building is at 28.65m AHD), which could result in people getting isolated within the new building during flooding events.		
We also note there is an increase in the extent of the H5 hazard level impacted area between the proposed building (southeastern corner) and building M in a post-development PMF scenario. Also, the flood assessment considered flooding impacts on the surrounding buildings (limited to buildings L, M and Q) and notes that existing floor levels of these blocks are already prone to inundation during the 1% and/or PMF events, with modelling showing increases up to 75mm at building Q, which even in existing conditions is subject to over 1 metre of over floor flooding in a PMF event.	As identified in the submission, the H5 hazard already existed at Building M, and so the minor increase in high hazard flows does not change the existing emergency response for that building.	N/A
The proposed new building (located at the western part of the site) appears to be cut from vehicular access even in fairly frequent events (such as the 10% AEP) due to flooding within the site (between the buildings) of H2 – H5 hazard level, and the vehicular access points being on the opposite side (eastern part of the site), on St Vincent Street. In a 10% AEP event there is also flooding up to 0.5 metres in areas around the base of the proposed stairs, ramps and lift of the proposed building.	“Flooding” between the buildings in the 10% AEP event can be attributed to the rainfall on grid modelling approach adopted, which applies rainfall to every active cell. Excess runoff generated within the site would be managed via the internal stormwater infrastructure. There is flood free access to the vehicular entry from the proposed building in the 10% AEP event. In the 10% AEP event, flows reach a maximum depth of 220mm in the sunken gardens (not 500mm). However, this is a conservative estimation of depths given that the proposed stormwater infrastructure has not been modelled.	N/A
“Flows typically inundate the surrounding access roads rapidly, cutting off portions of St Vincent Street (at the crossing over MillardsCreek) and the western extent of Green Street within 15–45 minutes.” In a PMF event, the entire site appears to be isolated with flooding on surrounding roads peaking at H5 hazard level and a duration of isolation up to 5 hours and 15	As discussed in Section 4.3 of the FERP report, the maximum period of isolation is 1 hour 45 minutes. Access via St Vincent Street may be cut off for up to 5 hours 15 minutes in longer duration events, but alternative access to the site is possible via Camden Street. Pre-emptive closure of the school is the preferred flood emergency strategy for the school site where advanced warning of a major storm event is forecast. However, shelter-in-place (SIP) guidance published by the NSW Department of Planning, Housing and	N/A

Consideration Raised	Response	Mitigation Measure
minutes for the longer duration events, however noting that isolation time would be reduced for shorter duration events.	Infrastructure (DPHI) in January 2025 states that SIP is an appropriate emergency management response when the flood warning time and flood duration are both less than six hours.	
We would like to emphasise that development proposals should not rely on emergency management strategies that would put emergency services personnel at risk (e.g. to traverse high hazard flows) to respond to such events.	As detailed within the FERP, the proposed development does not require private flood evacuation plans. Where there is enough warning prior to school opening hours, the school should be closed in advance of the flood event so children and staff can remain safe at home and parents do not have to drive through roads that could become hazardous due to flooding (outlined in Section 5.1 of the FERP). This approach is supported by NSW SES. Where there is not enough warning time, the secondary response is to shelter-in- place. The route presented in Section 5.3 of the FERP is for use in secondary emergencies only (e.g. a medical emergency or a coincident event, including a fire).	N/A
In summary, we note that movement within the site, even in existing conditions, is significantly constrained during flooding events due to the existing buildings obstructing overland flows, resulting in flooding H2 – H5 flood hazard level between the buildings at the site in events as frequent as 10% AEP, which impacts on people's ability to evacuate. We recommend considering the suitability to further develop this site in its current flood risk context, particularly considering the sensitive uses of the site.	Flooding between the buildings in the 10% AEP event can be attributed to the rainfall on grid modelling approach adopted, which applies rainfall to every active cell. Excess runoff generated within the site would be managed via the internal stormwater infrastructure. There is flood free access to the vehicular entry from the proposed building in the 10% AEP event. TTW emphasise that the site is not subject to major flooding. The primary risk to the site is excess stormwater runoff.	N/A
We would like to emphasise that pedestrian evacuation is not appropriate primary flood risk management strategy. However, while noting the flooding constrains within the site, we recommend investigating site design and stormwater management options that could enable safe evacuation off-site, such as considering vehicular access via the proposed flood-free access onto Camden Road and mitigation measures to provide a safe access/egress route within the site. Also, consideration of the impact of flooding on the roadways should go beyond the area immediately adjacent to the site to fully understand the isolation risks and evacuation constraints.	As detailed in Section 5.1 of TTW's FERP, pre-emptive closure of the school is the preferred flood emergency strategy for the school site where advanced warning of a major storm event is forecast. Where there is not enough warning time, the secondary response is to shelter-in-place (Section 5.2).	N/A
We request further information on the expected population increase (if any) at the site (students and staff) following the upgrades, and	There is no proposed increase in student population following the upgrades. The proposed building is situated within a lower risk area within the overall site, and ultimately provides a safer space than the	N/A

Consideration Raised	Response	Mitigation Measure
recommend considering cumulative impacts of this proposal on risk to life, the existing and future community, and emergency service resources in the future, particularly noting that the high school is adjacent to other sensitive uses sites - Ulladulla Public School and an early education centre.	existing buildings, reducing risk to life.	
Recommend considering that if the new building is not intended to be evacuated, the building must be located with floor levels above the PMF level, noting that the proposed design levels are below the PMF.	Note that the adopted emergency response strategy is pre-emptive closure of the site before the onset of the storm. Where this is not possible, the secondary response is to shelter-in-place. As discussed in Section 8.3.2 of TTW's FIRA report, the model limitations (including the 2m x 2m grid size) result in an underestimation of flood storage and provides a conservative indication of flood levels. The proposed building is believed to have very low risk of any above-floor flows, including during the PMF.	N/A
Recommend investigating site design and stormwater management options to reduce risk to life at the site, particularly considering the flash flooding risk and sensitive uses of the site. Any improvements that can be made will benefit the community.	The scope of works for this project did not involve upgrades to the entire school. The risk to life has been reduced by providing additional space above the PMF – the existing buildings onsite are not all suitable for shelter-in-place.	N/A
Recommend consulting with the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) regarding the impact of the proposed development on flood behaviour at the site and adjacent areas, particularly considering the flash flooding environment and obstructed overland flows.	TTW have consulted with Council on their requirements. As discussed in Section 12 of TTW's FIRA report, the proposed activity has no notable offsite impact on overland flows. In addition, the potential impact of climate change has been considered, with the CC2100 scenario including 850mm of sea level rise, and a 66% increase in rainfall. In the 1% AEP event, flood levels to the south of the proposed building increase by 111mm under the CC2100 scenario, equating to a level of 29.33m AHD, 170mm below the proposed FFL. As such, there is no need for consultation with DCCEEW. Further to this, the proposed building is situated at the optimum location within the site, outside of any major overland flow paths and within in a largely flood-free area. As a result, the proposed building does not obstruct flows in events up to and including the 0.2% AEP event.	N/A
Recommend ensuring people at the site (including staff, students, parents/carers and workers - during the construction phase) are made aware and kept updated in relation to the flood risk for the lifespan of the development.	This is included in this FERP – see Section 8.0.	N/A
Recommend reviewing and updating the school's Emergency Management and Evacuation Plan	This has been included in Section 12.0 of TTW's updated FERP report.	N/A

Consideration Raised	Response	Mitigation Measure
specific to a flood emergency event and align with the above considerations / advice provided herein.		
Support, as the primary flood emergency management strategy, pre-emptive closure of the school site prior to the start of the school day if there is an expectation of flooding. The most appropriate form of advice for flash flooding environments are Severe Weather/Severe Thunderstorm Warnings.	The NSW SES severe weather warnings are included in Section 6.2 of the FERP.	N/A
We note flood warnings are not issued for Ulladulla by BoM and therefore flood warnings are not likely to be issued by the NSW SES. In addition, there are no formal flash flooding warning systems available for this area, therefore it is unlikely to have any prediction of “flood heights and timings” or any confirmation of “flooding event being anticipated/not anticipated” (page 23) at the site. Neither the NSW SES nor the Bureau of Meteorology can undertake to provide special individual flood warning or advice services for each business site, particularly during operational events when resources are in high demand.	Noted.	N/A
We note that the Flood Warning products currently available under the AWS being issued by the NSW SES are for riverine flooding events.	The NSW SES severe weather warnings are included in Section 6.2 of this FERP.	N/A
We note that “flash flooding is reported in the media / via visual observation” is an indication that flooding has already occurred, and dangerous conditions could already be present at the site and surrounding roads, which is too late to implement as a trigger for taking protective action. The aim of warning triggers is to enable people to take action and move to safety prior to the onset of flooding, before they are exposed to hazardous conditions	Visual observation intended as a last resort where there is no pre-warning. In some cases this will represent the earliest opportunity to trigger SIP actions. Note that this refers to visual observation of flows over adjacent roads or across the wider site before they reach the new building. Flows at proposed building are only ever low H1-H2 hazard, which are not regarded as dangerous conditions.	N/A

6. Environmental Impact Assessment

6.1 Traffic, Access and Parking

A Transport and Accessibility Impact Assessment (**TAIA**) has been prepared by SCT Consulting 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 Transport for NSW, through technical working group (**TWG**) meetings to refine and agree on measures.

Existing Environment

The school is bound by South Street, Camden Street, St Vincent Street and Green Street. The main school entrance is located on South Street. The primary frontage to the school is along St Vincent Street to the east, with two vehicular access points to at-grade carparking areas. Existing footpath connectivity on streets directly servicing the site is good with footpaths on at least one side of the road providing access on all bordering streets.

The surrounding road network includes:

- **Princes Highway**: A State Road running north-south with one lane each way, speed limit 50-70km/h. It provides access to Ulladulla HS and Ulladulla town centre, with a shared path on the west side.
- **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.

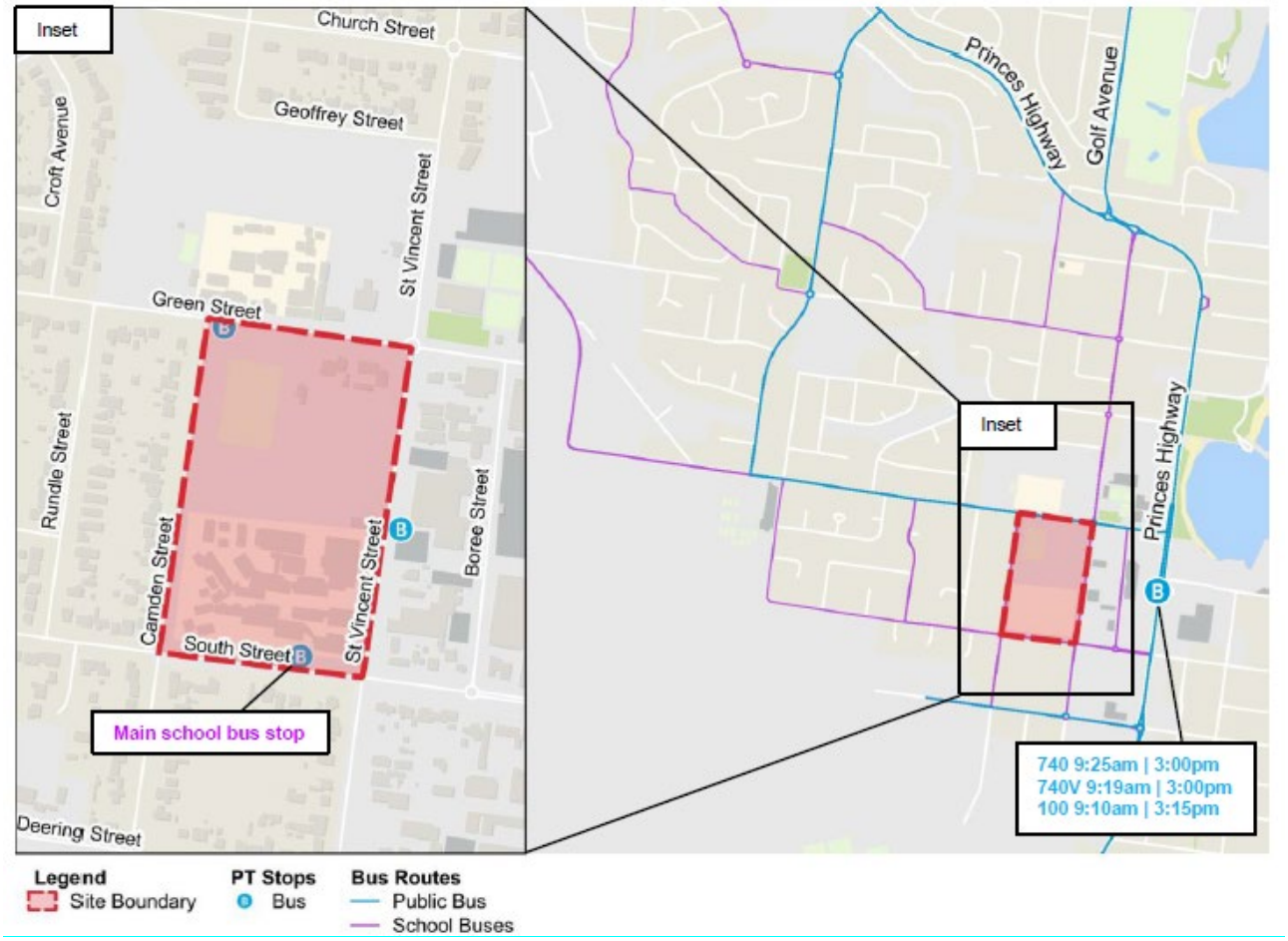
- **South Street**: A local street along the south boundary of the school, speed limit 50km/h. It serves as the primary entrance to Ulladulla HS, with footpaths and signalised crossings near the school. It connects to Princes Highway and Ulladulla town centre.
- **Green Street**: A local street along the north boundary of the school, speed limit 50km/h. It has one lane each way and footpaths on at least one side, providing access to Princes Highway and Ulladulla town centre.

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 15.** The existing buses service both Ulladulla HS and Ulladulla Primary School, and approximately 1040 high school students are within 400m of a designated school bus route. The public bus stops are equipped with shelters, seating and signage, clearly identifying the stop.

Cycling infrastructure within the school intake area is limited. There is a shared path along Princes Highway and St Vincent Street providing direct access to Ulladulla HS. The Shoalhaven Council 2023 Pedestrian Access and Mobility Plan (PAMP) outlines future proposed cycling infrastructure within the LGA.

Some of the proposed and current cycleways are inhospitable, in particular along Princes Highway for school students supporting the observed 2 per cent mode share. As there is limited cycle infrastructure, children 16 and under can choose to cycle on footpaths. However, as the surrounding footpath network connecting to the school is also limited, it is expected that the cycle mode shares will continue to be low if no improvements are made to the existing cycle infrastructure.

Travel mode share is illustrated in **Figure 16** below. This demonstrates that the large number of bus services is a key strength of the transport network to the school, with surveys indicating that 43-46 per cent of student journeys to and from school are by bus.



Source: SCT Consulting, 2025

Figure 15 Bus Routes

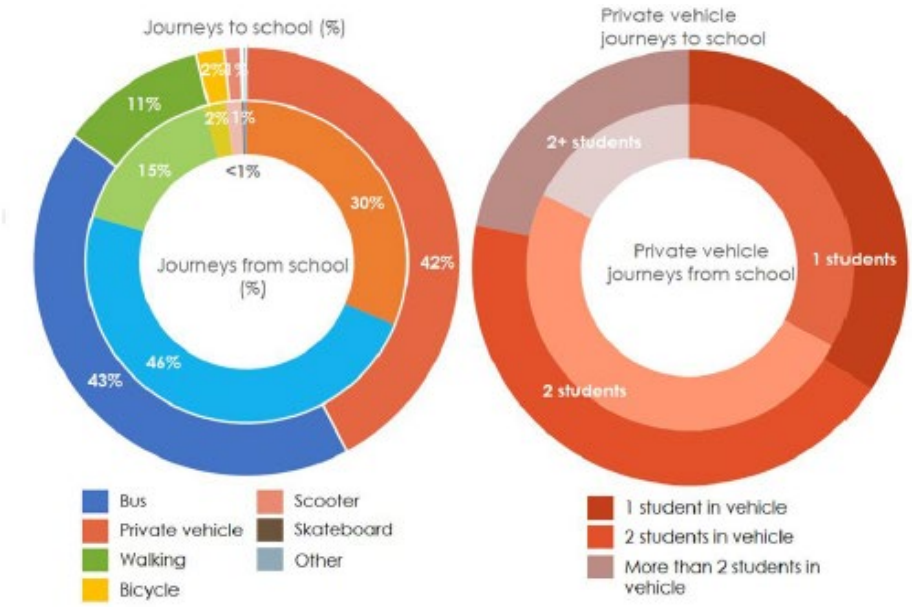


Figure 16 Travel Mode Share

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 skateboards, 20 scooters and 20 bicycle racks to support active transport, and line marking to identify an additional three kiss ‘n drop spaces to improve operational efficiency of existing kiss and drop off zone.

Subject to Shoalhaven City Council Traffic Committee approval, it is proposed to change the parking signage for three existing unrestricted parking spaces on Camden Street (eastern side) to No Parking 8.00 – 9.30 am and 2.30 – 4.00 pm SCHOOL DAYS to create 3 additional kiss ‘n drop spaces and 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 painting.

The modelling shows that the Moderate Case interventions resulted in the following:

- Decrease in car trip mode share by 1% (10 trips).
- Increase in walking mode share by 1%.
- No change to cycling or bus trip mode share.

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 **Figure 17** and in the public domain plan at **Appendix 7.**

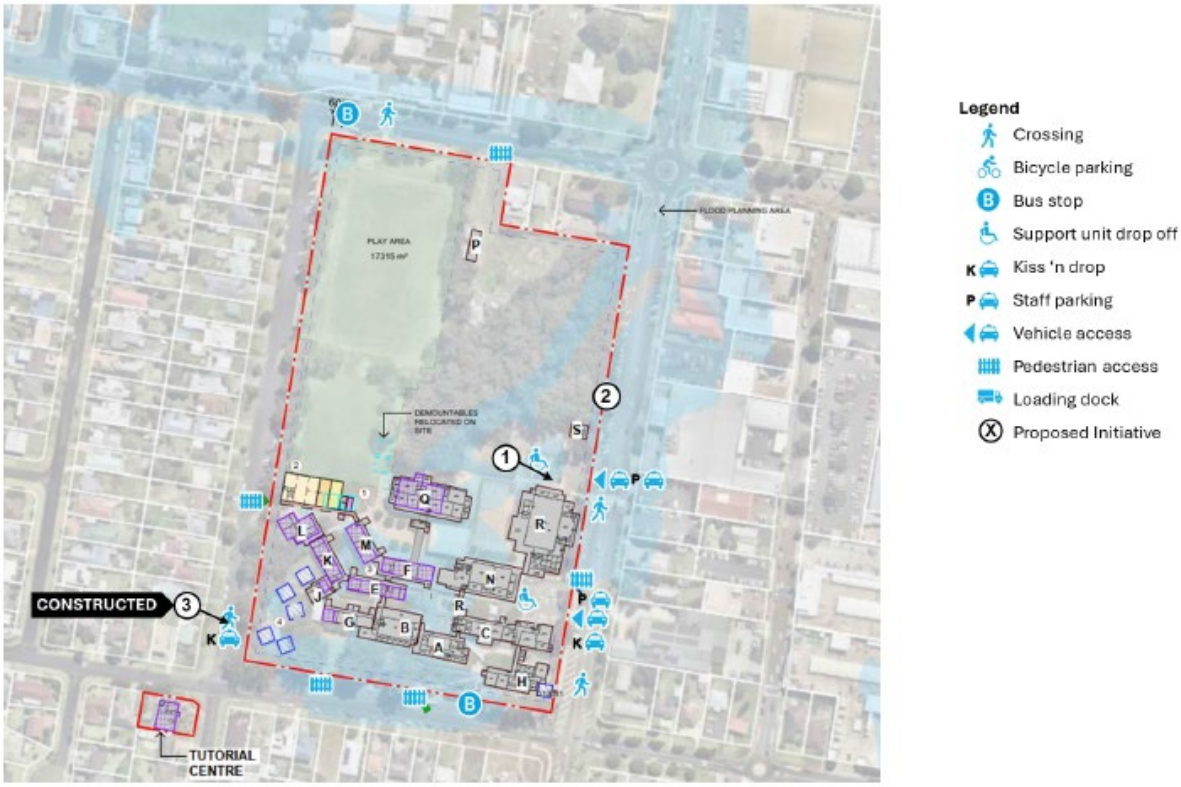


Figure 17 Proposed Supporting Transport Infrastructure

Construction Traffic

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.

Most work will occur outside of commuter or school peak periods to further reduce potential conflicts. Workers will park on-site or on the immediately adjoining street and the wider surrounding road network.

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

There are two potential haulage routes from the state road network to the site (refer to **Figure 18**, one from the south and one from the north:

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

Source: SCT Consulting, 2025

Figure 18 Haulage Routes

The Princes Highway is an approved B-double route under both the General Mass Limit (**GML**) and Concessional Mass Limit (**CML**) regulations. Within the vicinity of the school, St Vincent Street and Deering Street are “approved with conditions” B-double routes and therefore, making them preferable to other local roads for access.

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.

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 Public School, which are addressed in Section 6.14. To mitigate temporary construction impacts, a detailed Construction Traffic Management Plan (**CTMP**) will be implemented to minimise disruptions, manage construction worker parking, maintain safety for all road users, and ensure construction activities proceed efficiently and safely.

Mitigation Measures

Subject to the implementation of the following mitigation measures proposed by SCT, it is considered that the activity will have a negligible impact on the acoustic amenity of the surrounding area.

#	Reason for Mitigation Measure	Mitigation measure	Timing	Significance after mitigation
CTMM1	To minimise traffic disruptions and manage construction-related movement safely.	Prepare a CTMP to inform construction workers and heavy vehicle operators 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
CTMM2	To prevent disruption to residential streets and maintain safety and amenity.	Workers will be required to avoid parking on residential streets and instead be encouraged to park in the streets immediately surrounding the school. 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	Construction	Not significant
CTMM3	To provide adequate facilities for active transport, promoting sustainable travel options.	Construction of racks or spaces to accommodate an additional 10 skateboards, 20 scooters and 20 bicycles.	Construction Operation	Not significant
CTMM4	To manage traffic flow and ensure availability of parking spaces for kiss-n-drop during peak	Subject to Shoalhaven Council Traffic Committee approval, change parking signage for three existing unrestricted parking spaces on Camden Street (eastern side) to	Construction Operation	Not significant

#	Reason for Mitigation Measure	Mitigation measure	Timing	Significance after mitigation
	period	No Parking 8.00 – 9.30 am and 2.30 – 4.00 pm SCHOOL DAYS to create 3 additional kiss ‘n drop spaces and manage traffic flow during peak drop off and pick up times.		
OPTMM2	To reduce congestion caused by private vehicle use and improve overall traffic management.	Appoint a School Travel Coordinator, 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.	Within 12 months of the commencement of operation.	Not significant

6.2 Noise and Vibration

A Noise and Vibration Assessment (**NVA**) has been prepared by NDY (refer **Appendix 18)** 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 noise environment around the high school site is relatively quiet, reflecting suburban conditions.

As shown in **Figure 19**, residential properties along Camden Street (west of the site) and South Street (south of the site) are identified as the most affected receivers. The sensitive receivers are identified in **Table 17** below.

Table 17: Sensitive Receivers

Receiver	Address	Approximate distance	Type
R1	38 South St, Ulladulla NSW 2539	50	Residential
R2	145 Camden St, Ulladulla NSW 2539	80	Residential
R3	137 Camden St, Ulladulla NSW 2539	37	Residential

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 18: Project Noise Trigger Levels

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

Source: NDY, 2024

Figure 19 Sensitive Receivers

Assessment

Construction Noise and Vibration

Noise during construction will be generated by machinery and equipment such as excavators, trucks, and compactors. The entire construction period is programmed to be 18 months duration. Activities with the highest noise levels include earthworks, concrete pouring, and material deliveries.

Based on modelling, noise levels at nearby sensitive receivers, will remain under 75 dBA at all stages; under the ICNG, this is an acceptable threshold for noise levels and there is no requirement for construction noise to be mitigated. Predicted vibration levels during construction (0.04 mm/s) are well below the established sensitive criteria (2.5 mm/s) during standard construction hours and, therefore, there is no requirement for vibration to be mitigated.

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. To meet recommended noise levels inside the nearest school building during the construction stage 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**.

Operational Noise - Summary

The activity is within an existing school and operation times will remain unchanged. 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 (without the application of the mitigation measures) are expected to meet the NPfI criteria at all operational times.

Mitigation Measures

Subject to the implement of the following mitigation measures proposed by NDY, it is considered that the activity will have a negligible impact on the acoustic amenity of the surrounding area.

ID	Reason for Mitigation Measure	Mitigation measure	Timing	Significance after mitigation
CMM17	To shield the existing closest school buildings that will conduct classes during the excavation and piling phases.	Construction noise for excavation and piling will require a perimeter hoarding as indicated to meet recommended noise levels inside nearest school building.	Construction	Not significant
OPMM4	To avoid impacts resulting from	Acoustic louvers are to be installed	During	Not significant

ID	Reason for Mitigation Measure	Mitigation measure	Timing	Significance after mitigation
	the plant room operation.	surrounding mechanical plant and fans are to have internally lined ducts with acoustic insulation.	operations	
OPMM5	To meet the PNTL levels at night time.	Mechanical plant room not to be operated during night time periods (after 10 pm).	Operation	Not significant

6.3 Contamination and Hazardous Materials

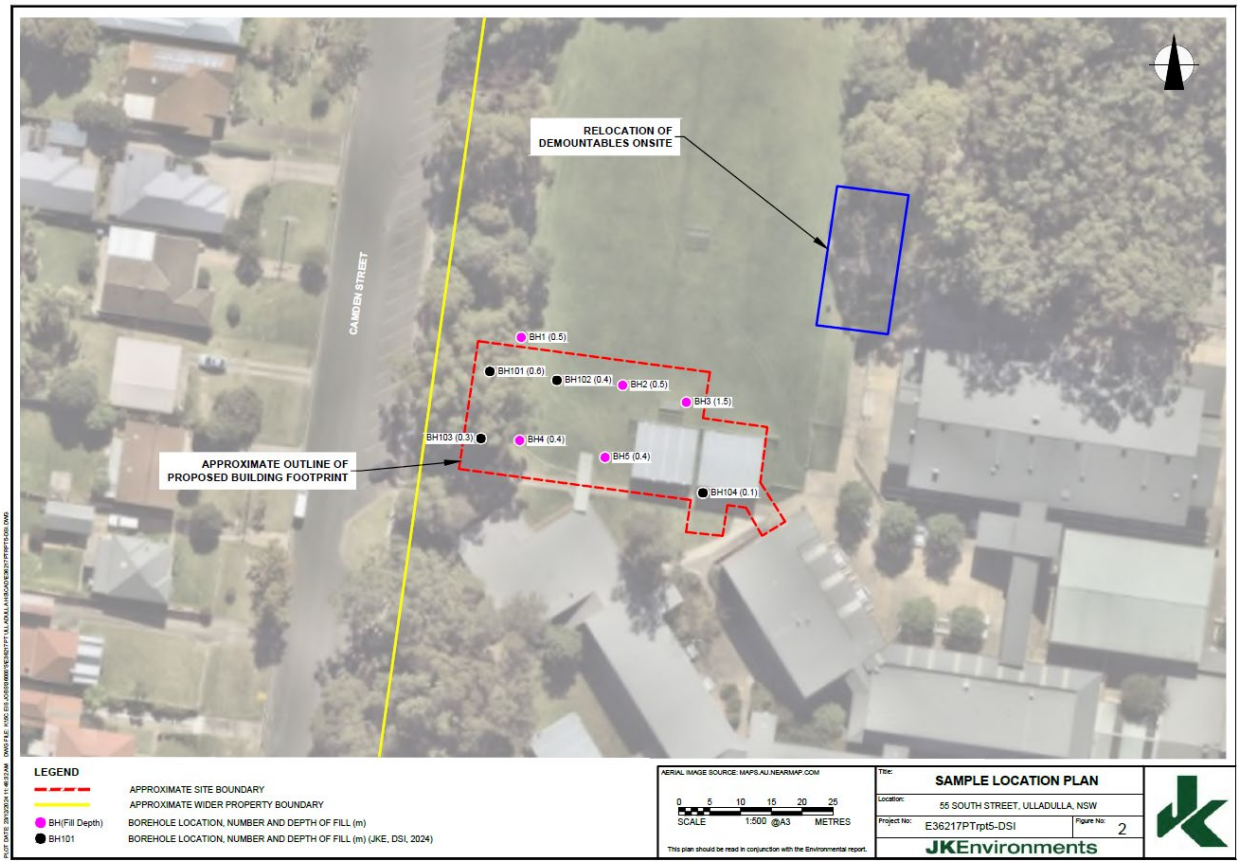
A DSI has been prepared by JK Environmental (JKE) and is included in **Appendix 25**. The DSI assesses and quantifies any soil and groundwater contamination at the site and confirms that the site is suitable from a contamination perspective to accommodate the proposed upgrade works.

Methodology

JK Environmental (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 investigations of the broader site have been used to prepare the current DSI for the proposed activity.

The methodology to complete this DSI included the following:

- Completion of an intrusive investigation program comprising:
    - Advancement of 4 boreholes and collection of representative soil samples. The boreholes are shown in **Figure 20** .
- 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 20 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 fill contained inclusions of igneous sandstone and ironstone cobbles, ironstone gravel, sand, ash, roots and root fibres. Minor traces of plastic were found in a few locations.
- Elevated concentrations of CoPCs 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 to manage the risk of unidentified contamination, as well as the classification and disposal of waste.

Mitigation Measures

Subject to the implementation of standard mitigation measures, the activity will have a negligible environmental risk due to contamination and complies with all relevant NSW EPA requirements.

6.4 Flooding

A Flood Impact and Risk Assessment (**FIRA**) has been prepared by TTW and is included in **Appendix 23**. The report outlines the existing flooding constraints on the site and provides an assessment of 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 in **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 used 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 Millard's Creek Flood Study is the relevant flood study pertaining to the site. Millard's Creek runs parallel to Ulladulla Public School, to the north of the site, and flows eastwards to Ulladulla Harbour.

The flood study confirms that the broader Ulladulla HS site is subject to overland flooding during the PMF, as it is situated within a natural depression that forms a drainage path. Runoff overflows onto the site from South Street to the south, and generally travels in a north-north eastern direction toward the natural gully onsite. There are also minor impacts in the 1 % AEP throughout the broader school site.

The site of the proposed activity area is above the level of the 1% AEP, although there are some flows around the existing demountable buildings with a depth of 300mm (refer **Figure 21**).

Source: TTW, 2025

Figure 21 Existing scenario - peak flood levels and depths at the site in the 1% AEP event

In the PMF, the proposed development area is impacted by flows generally less than 100mm deep and Hazard level of H1, considered generally safe for people, vehicles and buildings (refer **Figure 22**).

Source: TTW, 2025

Figure 22 Existing scenario – flood levels and depths in the PMF event

Assessment

To mitigate impacts from overland flows several measures have been incorporated into the design, including a wall surrounding the southwest of the proposed building. Between the wall and the building, a swale has been incorporated into the civil design along the western border of the building. This will limit ponding and direct any flows from the southwest of the sunken landscaped area to the north of the building, away from any openings.

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

- The extent of overland flows surrounding the proposed building footprint will increase, owing to the proposed sunken landscaped garden, with isolated ponding in this area. Depths within this sunken garden reaches a maximum of 350mm in the 1% AEP event, and 500mm in the PMF event.
- The site grading directs flows away from the proposed building, and flows do not reach the openings in the 1% AEP event. Flows over the ramps are low hazard (H1-H2), which are regarded as safe for people and children.
- The site's stormwater pits and pipes are not included in the flood model, which shows conservative ponding in the sunken garden that would not occur with the installation of the proposed stormwater management measures.
- Flows to the south of the new building are categorised as H1 hazard level in the 1% AEP event (generally safe for people and children) (refer **Figure 23)** and H1-H2 hazard level in the PMF (refer **Figure 24**). To the south east of the new building there are pockets of high

hazard flows (up to H5), however the proposed activity does not worsen the existing flood risk or change the flood emergency management strategy for the existing school.

- Flood-free access is available to the west, onto Camden Street via the pedestrian access point, allowing safe egress from the site.
- Results for the assessed climate change scenarios show that flood levels are expected to increase by 20-56mm in the 1% AEP event under the CC2050 scenario, and 41-112mm in the CC2100 scenario.

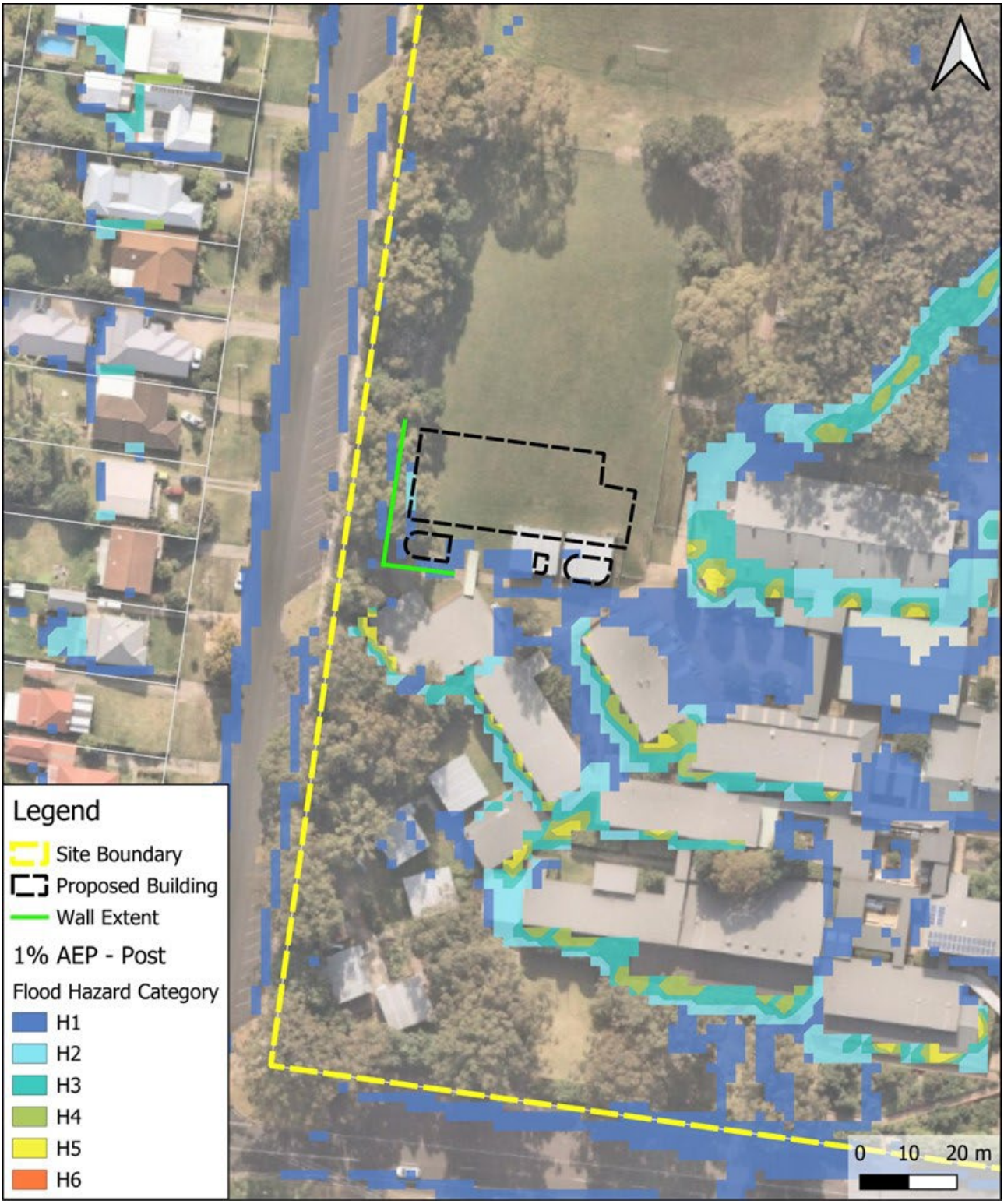
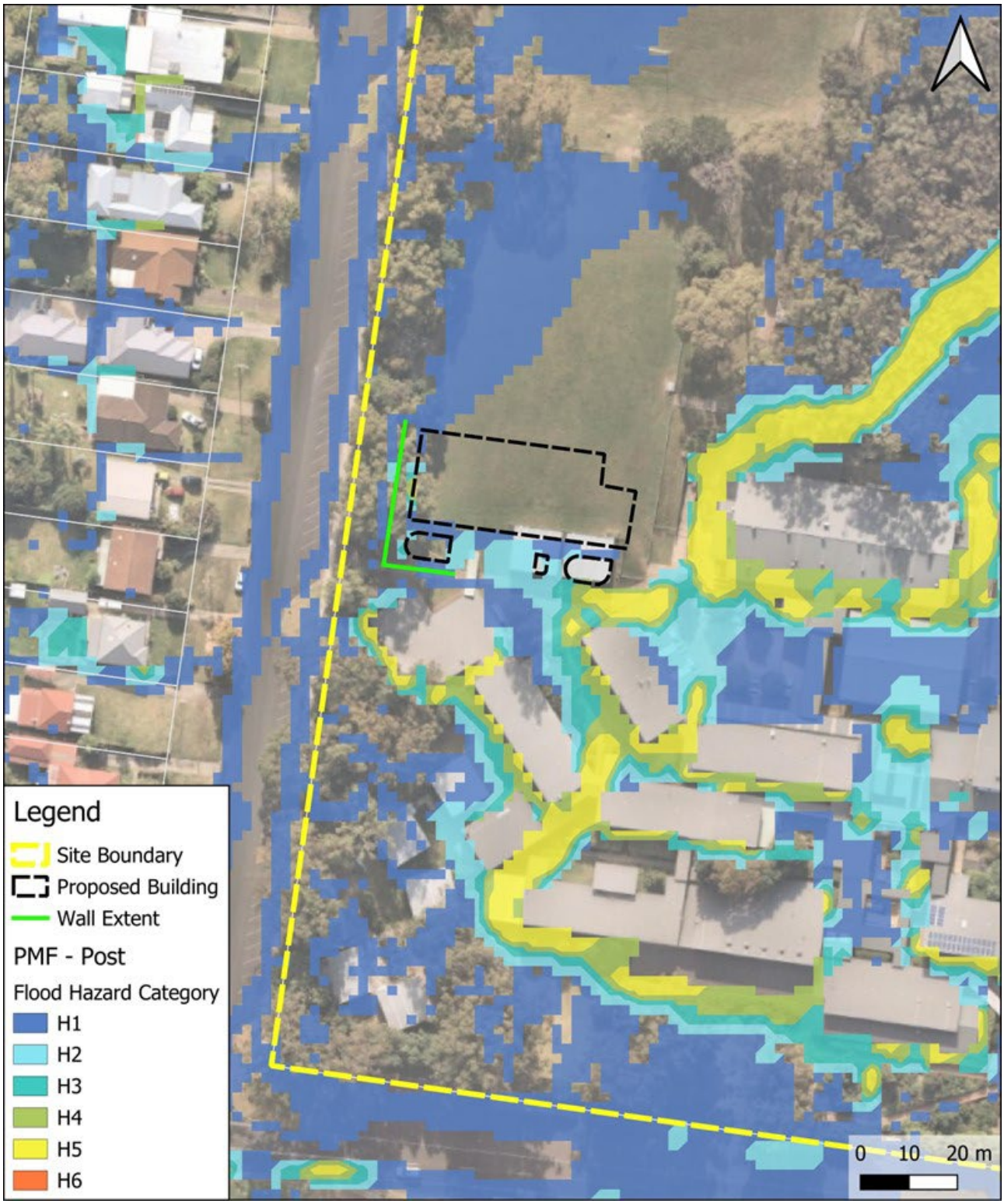


Figure 23 Post-development scenario - 1% AEP Hazard levels at the site



Source: TTW, 2025

Figure 24 Post development scenario - PMF hazard levels at the site

The FIRA identifies that the proposed activity has no significant offsite impact on flood behaviour or flood hazard in the 1% AEP event. 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.

Within the site, localised flood level increases can be attributed to changes in site grading, which alter the existing overland flow paths. It is noted that existing floor levels of some existing blocks are already prone to inundation during the 1% and PMF events and that the proposed building does not change these levels significantly. Where there is a minor increase in high hazard flows this does not change the existing emergency response for that building.

Although not affected by mainstream flooding and, thus, not subject to specific requirements of the Shoalhaven DCP 2014, Council has advised that the finished floor level (FFL) is to be set 300mm above the surrounding ground. This is to ensure surface runoff, and minor overland flow paths are directed away from building entrances in accordance with stormwater standards.

Review of the civil design levels from Meinhardt shows the current design is compliant with this requirement. In addition, the proposed building complies with the NSW Department of Education'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). As the site is unaffected by mainstream flooding in all events, the site is above the flood prone land contour.

The FIRA therefore confirms:

- that the FFL of the proposed building complies with Council's FFL requirement.
- the extent and nature of potential impacts are low and will not have significant impact on the locality, community and/or the environment.

Flood Emergency Response Plan

A FERP has been prepared by TTW and is provided at **Appendix 24** of this REF.

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

- Within 15 minutes the surrounding roads of 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 (or 5 hours and 15 minutes in a long storm event of 6 hours).
- After 45 minutes of the on-set of the storm event, evacuation is possible via the flood-free Camden Street using the proposed pedestrian access.

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

- pre-emptive closure of the school is the preferred flood emergency strategy for the school site where advanced warning of a major storm event is forecast, or a severe event is forecasted several hours in advance. This is consistent with SES advice received during the notification of the proposed activity.
- 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) that states that SIP is an appropriate emergency management response when the flood warning time and flood duration are both less than six hours. The site can accommodate shelter-in-place for up to 447 people. This is well above the

proposed student and staff capacity 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 identified 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

Subject to the implementation of the following mitigation measures proposed by TTW, it is considered that the activity will have a negligible environmental risk due to flooding.

ID	Reason for mitigation measure	Mitigation measure	Timing	Significance after mitigation
SWMM7	To ensure surface runoff and minor overland flow paths are directed away from building entrances	The proposed activity must be constructed in accordance with the civil plans prepared by Meinhardt, dated 5 December 2024, including a 300mm fall away from the proposed building.	Construction	Not significant
OPFMM2	To identify the most appropriate flood emergency response strategy for the site based on an assessment of the time to inundation and recession	The Preliminary Flood Emergency Response Plan (FERP) is to be reviewed following the detailed design stage, prior to the site becoming operational. Prior to the commencement of operation, the Flood Emergency Response Plan (FERP) is to be	Prior to Operation	Not significant

ID	Reason for mitigation measure	Mitigation measure	Timing	Significance after mitigation
		incorporated with the Emergency Management Plan and include the following: (a) A Flood Emergency Kit must be prepared. (b) Prioritise evacuation and avoid shelter-in-place by closing the school before the school day if flood events are forecasted and SES advises. (c) School administration must undertake annual evacuation preparations and an evacuation drill prior to the commencement of the wet season (typically November to April); (d) School administration to undertake responsibilities as set out in the FERP; and (e) Ensure that the Flood Warning Notice is maintained and permanently visible.		

6.5 Integrated Water Management

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

Existing Environment

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

Assessment

The proposed stormwater design is summarised below:

- The proposed stormwater system to support the proposed activity comprises a pit and pipe system 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 Meinhardt (**Appendix 5**)
- 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 total catchment area across the proposed building footprint is approximately 0.1474 hectares comprised of grassed zone, footpath, and roof zone. 100% of the total proposed activity site area drains into the new proposed pits.
- Onsite detention and water quality measures are not required under the Shoalhaven DCP 2014.
- Overland flow from South Street is conveyed along the proposed footpath zone to allow bypass flow and diversion at the proposed site towards the Creek and the overland flow across Camden Street is captured through the proposed spoon drain to mitigate the water flow during major storm events.
- 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 provide additional water quality measures.
- During construction a sediment fence, inlet trap and filters will be installed 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 to ensure stormwater runoff from the proposed activity does not have significant adverse effects on the adjoining school buildings.
- The nature and extent of any 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

Subject to the implementation of the following mitigation measures proposed by Meinhardt, it is considered that the activity will have a negligible impact on the environment.

ID	Reason for mitigation measure	Mitigation measure	Timing	Significance after mitigation
SWMM8	To ensure stormwater runoff is safely diverted and does not impact the building material.	Sufficient drainage provisions should be provided around the proposed building with retaining walls, localised trench drain and diversions around the building.	Construction	Not significant

6.6 Aboriginal Heritage

A Preliminary Indigenous Heritage Assessment and Impact Report has been prepared by Apex Archaeology and is included in **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.

Assessment

The report conducted comprehensive background research and a site visit to the proposed study area. Key findings from the research include:

- The site is considered disturbed and is situated within an existing school / semi-rural residential environment.
- 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 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**.

6.7 Environmental Heritage

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

Existing Environment

Ulladulla High School is not listed as a heritage item under Part 1 of Schedule 5 of the Shoalhaven LEP 2014, nor under the Department of Education Section 170 Conservation Register. It is located in proximity to the heritage item 'Victorian Georgian style Sandstone School and Schoolmaster's Residence' (item no. 484 on the Shoalhaven LEP 2014) which is on the northern side of Green Street across from Ulladulla HS. No buildings within Ulladulla HS, nor the school site itself, have been assessed in this desktop SRISI as having potential for heritage significance. The site and surrounding heritage context is illustrated in **Figure 25** below.

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

Figure 25 Heritage Map

Assessment

The subject site does not have any identifiable heritage significance that satisfies the threshold for heritage listing. The site formerly consisted of public reserves and some residences; however, these were replaced with the current school on the site in the 1970s. Ulladulla HS opened in 1976, and though it has provided education to the local community for almost 50 years, this is not deemed significant to satisfy the criterion for historical significance. Likewise, the school is not architecturally distinctive nor representative of any specific trend that contributes to the aesthetics of Ulladulla.

Overall, the site does not meet the threshold for having local historic heritage significance.

This SRISI has further identified that the proposed activity is not likely to have any physical or visual impacts to the Victorian Georgian style Sandstone School and Schoolmaster's Residence heritage item that is in proximity to the school site. This is because of the physical distance between the proposed location of the new school building / works and the heritage item itself. Any significant views of the Victorian Georgian style Sandstone School and Schoolmaster's Residence are well away from the proposed activity, so none of these views and vistas will be impacted. The historical and aesthetic significance of the heritage item will not be compromised as a result of the proposed activity. There is no environmental impact from a heritage perspective and no requirement for mitigation measures.

6.8 Ecology

A Flora and Fauna Assessment (**FFA**) has been prepared by Water Technology and is included at **Appendix 21**. The purpose of the assessment was to identify potential constraints under the BC Act, the EPBC Act, and the FM Act.

Existing Environment

A review of the vegetation mapping databases was undertaken to identify Plant Community Types (PCTs) present within the area. Two PCTs were mapped as being present within the school site, as shown in **Figure 26** . No mapped biodiversity value areas are present within the footprint of the proposed activity and it is not considered that the identified PTC will be affected during the proposed activities.

The DCCEEW BioNet Atlas mapping identified three threatened species near the site, including the:

- Grey-headed Flying-fox (*Pteropus poliocephalus*), is listed as Vulnerable under both the BC Act and the EPBC Act;
- Powerful Masked Owl (*Tyto novaehollandiae*), listed as Vulnerable under the BC Act; and
- Pied Oystercatcher (*Haematopus longirostris*), listed as Vulnerable under the BC Act.

The subject site was not mapped as containing any Key Fish Habitat, nor is it in proximity to significant waterways or waterfront land. There are no further provisions within the FM Act and WM Act required to be considered for the proposed activity.

Source: Water Technology, 2024

Figure 26 Existing habitat features of the site

Assessment

There is no tree removal proposed as part of the activity and only minor turf and vegetation removal. No other natural values of the area will be impacted as a result of the activity, although the tree protection zones (TPZs) of some trees may be affected at times during construction. However, this will be managed through Mitigation Measures contained in **Appendix 1**.

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

Subject to the implementation of the following mitigation measures proposed by Water Technology, it is considered that the activity will have a negligible impact on the environment. All tree protection mitigation measures are listed in Section 6.9 below.

#	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	Pre-construction	Not significant

#	Reason for mitigation measure	Mitigation measure	Timing	Significance after mitigation
		(1999) and AS 4419 (1998).		
BMM2	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 Tree Consultancy and is included in **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 tree retention values:

- 5 High Retention Value trees
- 9 Medium Retention Value trees
- 1 Low Retention Value trees

All trees are within the site boundary. None of the trees are proposed to be removed, however some Tree Protection Zones (**TPZ**) may be encroached upon. The proposed building will not adversely affect any protected tree onsite and will only include minor vegetation removal. Trees will be retained and protected subject to the proposed mitigation measures outlined in **Appendix 1**.

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	Construction	Not significant

#	Reason for mitigation measure	Mitigation measure	Timing	Significance after mitigation
		of protection employed.		
TMM3	Protection of trees	Installation of tree protection measures as per Tree Management Plan (Arboricultural Method Statement)	Construction	Not significant
TMM4	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
TMM5	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
TMM6	Protection of Tree 164	Trees subject to a major encroachment – Tree 164 1. Any branch pruning shall be conducted by a tertiary level (minimum Certificate-level 3) qualified and experienced (minimum five years) arboriculturist. This shall conform to the Australian Standard – AS4373; Pruning of Amenity Trees. See Section 2.4. 2. Any pruning must be determined by the project arborist. 3. In addition, an aerial assessment should be undertaken to determine any risk related to wounding identified within the branch structure. This shall be conducted by a Level 5 arborist before work initiates.	Construction	Not significant
TMM7	The proposed spoon drain extends across the western sides of the	Proposed spoon drain The following conditions are required to protect these trees for the installation of	Construction	Not significant

#	Reason for mitigation measure	Mitigation measure	Timing	Significance after mitigation
	SRZ/TPZ and the extent of work required (see Assumption 1, Section 7.1), may pose some impact pending the depth of excavation and vicinity to each tree.	the spoon drain. 4. Excavation shall be limited to 100mm depth within the SRZ of any tree, 5. The design shall allow for minimal excavation and can allow for grade increases to establish required grades, 6. No root greater than 30mm in diameter shall be cut unless consent by the project arborist is issued. Consent will be based on a site assessment. 7. Significant 1st-order roots that offer support shall be retained and not wounded.		
TMM8	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
TMM9	Tree protection	Trees not approved to be pruned or removed are to be protected and maintained in accordance with AS 4970-2009 Protection of Trees on Development Sites and are to remain in place until the completion of all construction work in the vicinity of the protected trees. No activities are to take place within the Structural Root Zones (SRZs) of mature trees. No pedestrian or plant access is permissible to the TPZ.	Construction	Not significant

#	Reason for mitigation measure	Mitigation measure	Timing	Significance after mitigation
		Avoid tying ropes, cables, or similar items to trees. Chemicals and contaminants must be stored properly in an enclosed area with a spill bund to prevent runoff in case of accidents. No works, stockpiling of materials, excavation, parking or any other potentially harmful activities will be undertaken within TPZs unless a Level 5 Arborist has provided confirmation that the works will not impact the tree. Tree protection signage must be attached to tree protection zones before works begin. Signs should be displayed prominently and repeated at 10m intervals or closer when the fence changes direction. Signs must include information about the tree protection zone, access restrictions, developer's contact details, and Site Arborist information.		
TMM10	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
TMM11	To optimise success of landscaping.	Contractors are to ensure new landscaping is watered. Apply water at an appropriate rate	Construction	Not significant

#	Reason for mitigation measure	Mitigation measure	Timing	Significance after mitigation
		suitable for the plant species during periods of little or no rainfall.		

6.10 Waste Generation

Operational Waste

An Operational Waste Management Plan (**OWMP**) prepared by EcCell is included at **Appendix 16**). The OWMP details the appropriate collection, separation and storage of waste to maximise recovery of recyclables, ensure adequate waste storage provision and to outline compliance with all relevant regulatory requirements during the operational phase of the school.

The estimated total waste generated by the school during operations is outlined in **Table 19** below.

Table 19: Operational Waste Generation Rates

Waste Stream	Litres / Week
General Waste	4,810
Recycling	4,321
Organic Waste	386

Based on the expected generation and collection frequency, the number of bins required are outlined in **Table 20.**

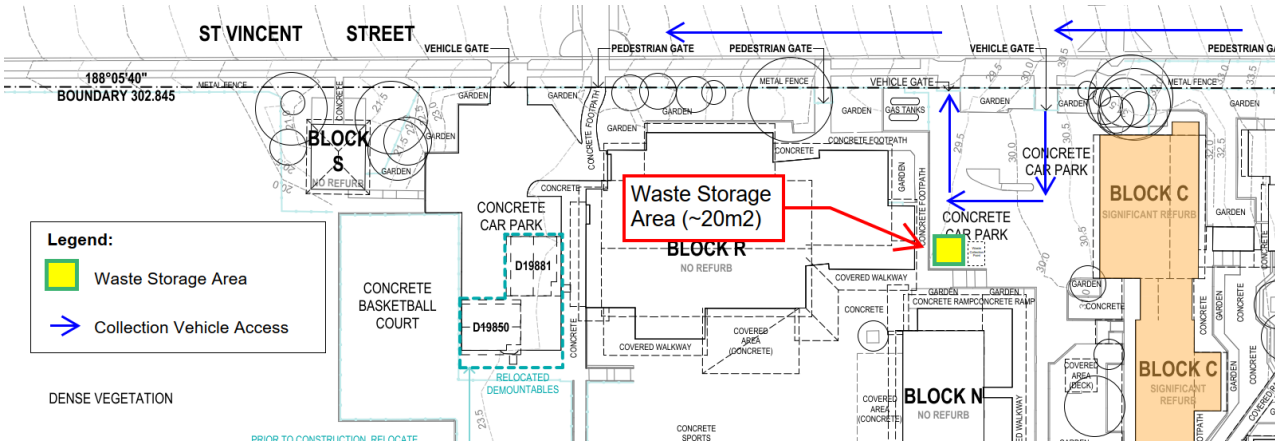
Table 20: Required Bins

Waste Stream	Bins Required
General Waste	1 x 3000L
Recycling	1 x 3000L
Organic Waste	1 x 660L

The OWMP identifies that a 20sqm waste storage area is required for the bins. It confirms that the proposed waste storage area adjacent to Block R (which is the existing Waste Management Area for the school) is of sufficient size and type to accommodate the bins.

The storage area for waste and collection pathway is identified in **Figure 27.** The appointed waste contractors will wheel the Mobile Garbage Bins (**MGB**) for each waste stream from their resting position to the back of the truck on St Vincent Street for collection and then wheel the MGBs back at nominated times in accordance with the relevant waste contract.

Ultimately, the proposed operational waste management procedures and allocated space will ensure the suitable disposal of waste generated by the proposed activity.



Source: EcCell Environmental Management, 2025

Figure 27 Proposed Waste Storage Area

Construction Waste

A Construction Waste Management Plan (**CWMP**) prepared by EcCell is included at **Appendix 15**. The CWMP details estimated waste volumes for construction materials establishes waste management methods to promote recycling and ensures compliance with all applicable regulatory requirements during the construction phase of the proposed activity.

The estimated total construction waste volumes are outlined in **Table 21** below.

Table 21 Construction Waste Volumes

Type of Material	Volume (m^3)	Proposed Management
Concrete, brick, blockwork, render, tiles, stonework	72	Recycle
Metals	41	Recycle
Timber off cuts	57	Recycle
Cardboard	46	Recycle
Plasterboard	67	Recycle
Containers, plastics, plastic packaging	45	Recycle
Pallets and reels	28 units	Reuse
Liquid waste	12	Landfill
General waste	57	Landfill
Floor finished, off cuts, carpet, vinyl, rubber, timber	10	Landfill
Paint tins	4	Recycle
Total	411	

Type of Material	Volume (m^3)	Proposed Management
	Plus 28 pallets and reels	

All waste will be removed by a licensed waste contractor using $10m^3$ to $15m^3$ bins on-site, supplemented by $2m^3$ transfer bins. The construction and demolition waste will be moved off-site for recycling when bins are full. 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.

Mitigation Measures

The implementation of DoE's standard mitigation measures is appropriate to manage construction and operational waste impacts. These are included at **Appendix 1**.

6.11 Social Impact

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

Table 22 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 in surrounding streets during construction. However there is sufficient parking available that this temporary impact can be appropriately managed.	A CTMP will be prepared addressing the management of worker parking during construction. The CTMP must include CWAMP to outline strategies and measures to manage how construction workers access a construction site including carpooling initiatives.

Type of Impact	Describe the impacts on the community and how they might be experienced, either positively or negatively	Discussion
	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 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 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

Type of Impact	Describe the impacts on the community and how they might be experienced, either positively or negatively	Discussion
		maintenance and upkeep discouraging vandalism and anti social behaviour.

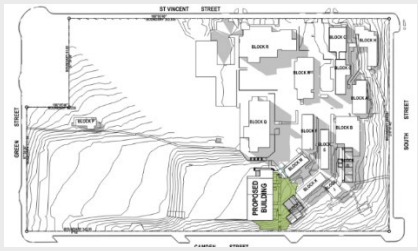
6.12 Other issues

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

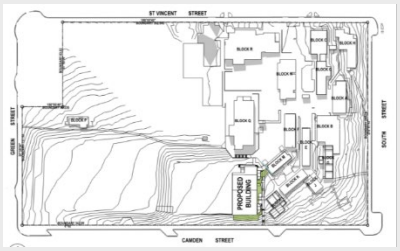
Table 23 Other issues

Issue	Consideration
Visual Amenity	The proposed activity has been designed to minimise its visual appearance and limit privacy impacts on adjoining properties and site occupants. The ground floor of the proposed building is substantially lower than street level and is only partially visible from the street, being shielded by existing mature trees. This is demonstrated in the figure below of the view from Camden Street looking east, showing that there is minimal impact on the view to the school from the street frontage. Due to the topography of the site and the dense vegetation there is negligible impact of the activity on the public and private domain views 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 28 Visual Impact**

Issue	Consideration
Overshadowing	Shadow studies were conducted for both Summer and Winter. The shadows of the new building sit entirely within the school precinct adjacent to existing school buildings. They do not impact play space or impact any neighbours as demonstrated in **Figure 29** below**.** The proposal will not result in any overshadowing impacts and no mitigation measures are required.



June 21 9am



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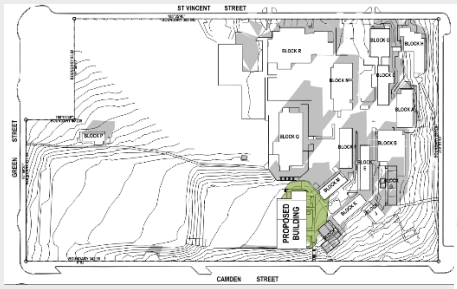

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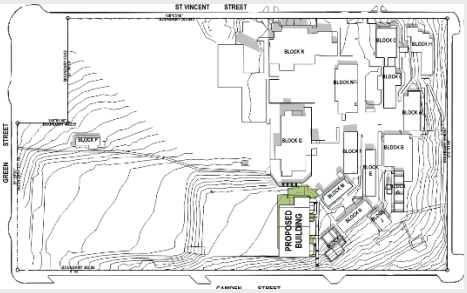

Dec 21 3pm

Source: Fulton Trotter Architects, 2025

Figure 28 Shadow Diagrams

Issue	Consideration
Soils and Geology	A review of regional geological information was undertaken by JK Environments (refer to the DSI included at **Appendix 25**). The DSI provided an assessment of the existing subsurface ground conditions and other geological conditions at the site. The key findings and recommendations are summarised below: • The previous geotechnical investigations included a site inspection and soil sampling from five boreholes. The boreholes encountered fill materials (i.e. historically imported soil) to depths of approximately 0.4m below ground level (BGL) to 1.5Mbgl. The fill contained inclusions of igneous and ironstone gravel and root fibres. • Natural clayey soils were encountered beneath the fill material in all boreholes and extended to depths of approximately 0.8m to 4.0mBGL. Siltstone or sandstone bedrock was encountered beneath the natural soils in all locations. • 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 disposal or re-use purposes. • 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**). These reports confirm the proposed activity will comply with all applicable regulatory requirements. Notably, the design of the proposed new homebase building promotes and improves accessibility at the site by integrating the new building with existing ground levels, minimising elevation above the existing ground, and ensuring seamless integration with the site's topography. The proposed activity includes logical connections between the new building and existing adjacent structures ensures ease of access and movement across the site. An accessible path of travel is achieved between the proposed activity and the main school entrance on South Street.
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. NDY has submitted a load application for connection to Endeavour Energy. Endeavour Energy have not indicated that there would be difficulty in providing the required power provisions to the proposed activity and a permission to connect offer was received. The proposed activity will be provided with a 1000kVA kiosk transformer to satisfy the anticipated maximum demand.

6.13 Construction Impacts

A preliminary Construction Management Plan (**CMP**) has been developed by the project managers (RPI Infrastructure) and is included at **Appendix 14**. The PCMP 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
CMM18	To ensure separation of construction vehicles from staff vehicles and reduce truck movements at busy school times.	All construction vehicles will travel along Camden Street to enter and exit at the south boundary of the site.	Construction	Not significant
CMM19	To ensure separation of construction vehicles from staff vehicles and reduce truck movements at busy school times.	Heavy vehicle movements are 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,** there are several projects approved and proposed within 500 metres of the site. The cumulative impact from the proposed activity and the following nearby known and relevant future projects (those that are approved and to be constructed) have been considered in this REF:

- DA2022/1078 - 59 South Street, Ulladulla -four storey apartment building, approved, 150m east of the site.
- Ulladulla Primary School upgrade

Cumulative Traffic Assessment

Operational Impacts

The TAIA has assessed the traffic impacts of proposed activity and confirmed that the operational traffic impacts would be negligible. The development at 59 South Street provides 14 car spaces and therefore operational traffic impacts were assessed as low, resulting in no cumulative operational traffic impacts.

Construction Impacts

Ulladulla Primary School is located immediately north of the high school, with both schools having boundaries along Green Street. Construction works at the primary school may overlap with those at the high school. The cumulative construction impacts of both sites are expected to be manageable through coordinated traffic management measures.

The simultaneous construction of the proposed activity with the Ulladulla Public School upgrade and the development at 59 South Street 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 Public School. 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 24** and where mitigation measures have been proposed in response to the factor, these have been identified.

Table 24 Environmental Factors considered

Environmental Factor	Guidelines for Division 5.1 assessments Consideration of environmental factors for health services facilities and schools	Consideration	Mitigation Measure Reference
Any environmental impact on a community?	(a1) Impact during construction – such as noise, vibration, traffic, construction vehicle routes, access and parking, pollution/dust, water and stormwater flow, sediment and run-off, waste removal, servicing arrangements, bushfire, flooding, contamination, other construction occurring in the area. (a2) impact post-construction (including from any development, activity, public-address systems and sirens, signage, events, hours of operation, or out of hours use of facilities, helicopter facilities, emergency facilities) which may include: (i) water flow/water quality, downstream impacts (ii) flooding impact, flood evacuation routes, changes to flood risk and patterns (iii) bushfire impact, bushfire evacuation routes, changes to bushfire risk and patterns (iv) impact, during a flood or bushfire event, on existing infrastructure such as roads, etc (v) impact on emergency response to existing Communities (vi) waste and servicing arrangements (vii) traffic and parking impacts, pedestrian and road safety (including pedestrian and cyclist conflict and safety), operation of the surrounding road network, impact on road capacity, including peak hour, intersection performance and any cumulative impact from surrounding approved developments, impacts of potential queuing in drop-off/pick- up zones and bus bays during peak periods, emergency drop-offs, servicing and loading/unloading areas, large vehicles and height clearances, parking arrangements and rates. Consider in the context of availability, frequency, location and convenience of public transport and consequences of parking overflowing into adjoining	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 no tree removal and only minor 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 as the building has been thoughtfully designed with a materials palette that will harmonise with the existing school 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.	CTTM1. Prepare a Construction Traffic Management Plan CMM2. Prepare a Construction Environmental Management Plan OPFMM2. Prepare a FERP

Environmental Factor	Guidelines for Division 5.1 assessments Consideration of environmental factors for health services facilities and schools	Consideration	Mitigation Measure Reference
	streets. (viii) existing utility infrastructure and service provider assets (a3) impact on flight paths of nearby airport, airfield, or helicopter landing sites (a4) other environmental impacts (social, economic or cultural) on the community not mentioned above (a5) cumulative impacts from the development and other surrounding approved developments		
Any transformation of a locality?	(b1) impact on the existing and future character of the neighbourhood, streetscape and local area (b2) impact on the operation of existing and future surrounding uses, including industrial or agricultural land uses (b3) visual impact from key viewpoints and views to key viewpoints (b4) cumulative impacts from the development, and other approved developments, on the locality	The proposed activity will have a positive impact on the locality. Once operational, the upgrades to Ulladulla HS will provide a positive benefit to the school community through providing necessary educational facilities for students and staff.	N/A
Any environmental impact on the ecosystems of the locality?	(c1) impact on the existing and future ecosystem (flora, fauna, habitats, biodiversity, ecological integrity, biological diversity, connectivity/fragmentation, air, water including hydrology, soil) (c2) long- and short-term impact of: (i) loss or harm to trees or other vegetation (ii) removed canopy cover (iii) landscape setting in respect of the site and streetscape (iv)impacts of the above on urban heat island effect and urban and internal comfort levels on and off-site (c3) impact from introducing new trees and vegetation species (c4) cumulative impacts on the ecosystem	The proposed activity does not involve environmental impacts on local ecosystems. The site does not contain Aboriginal cultural material. There are no threatened ecological species nor does it contain habitat for threatened species. There is no tree removal planned.	TMM2. A Tree Management Plan is prepared. TMM3: Tree protection measures are installed.
Any reduction of the aesthetic, recreational, scientific or	(d1) impacts onto adjoining properties and public spaces (particularly in residential areas) such as lighting impacts and light spill, acoustic, visual privacy, noise and vibration (including from helicopters and	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	N/A

Environmental Factor	Guidelines for Division 5.1 assessments Consideration of environmental factors for health services facilities and schools	Consideration	Mitigation Measure Reference
other environmental quality or value of a locality?	ambulances), visual amenity, solar access, view loss and view sharing, vistas, overshadowing, local character, streetscape, weather factors such as wind impacts (i) the above should be considered from any proposed development or activity on the development site, public-address system, ambulance siren, flashing signage, event, hours of operation, or out of hours use of school facility, helicopter facility, emergency facility, research centre where hazardous material is being used or stored and any potential incident, etc. (d2) impacts on connectivity, permeability and accessibility of public spaces and areas surrounding the development, this includes impacts on arterial and other thoroughfares and green corridors and wayfinding (d3) impacts on other aesthetic, recreational, scientific or other environmental quality or value of the locality not mentioned above or in (a) and the cumulative impacts	harmonious colour palette further reduces visibility of the building and maintains compatibility with the surrounding built environment. By integrating these design elements, the proposed activity ensures that it does not detract from the aesthetic, recreational, scientific, or other environmental qualities of the locality. Instead, the development complements the existing character of the area, resulting in a project that is both contextually appropriate and environmentally considerate.	
Any effect on locality, place or building having aesthetic, anthropological, archaeological, architectural, cultural, historical, scientific or social significance or other special value for present or future generations?	(e1) impacts on heritage items (local, state and commonwealth), conservation areas and Aboriginal heritage (including intangible cultural significance), draft and interim items. Both at / or near the site (e2) impacts on Aboriginal cultural heritage values on the land and connection to Country (e3) direct or indirect impacts on the heritage significance of environmental heritage, impacts to archaeological resources (e4) impacts on aesthetic, anthropological, architectural, cultural, historical, community values and identity, scenic values, scientific or social significant items, or items of other special value for present or future generations	The site of the proposed activity is not identified as having aesthetic, anthropological, archaeological, architectural, cultural, historical, scientific, social significance or any other special value. An unexpected finds protocol will ensure that any impacts can be appropriately managed should they arise. Accordingly, the proposed activity will not affect these values for present or future generations.	HMM2: Unexpected finds protocol

Environmental Factor	Guidelines for Division 5.1 assessments Consideration of environmental factors for health services facilities and schools	Consideration	Mitigation Measure Reference
Any impact on the habitat of protected animals, within the meaning of the *Biodiversity Conservation Act 2016*?	(f1) impacts on listed protected fauna at and in the vicinity of the site, and their habitat.	The proposed activity does not impact any existing habitat of protected fauna as it does not involve the removal of any trees and only minor removal of turf and vegetation.	TMM2. A Tree Management Plan is prepared. TMM3: Tree protection measures are installed.
Any endangering of any species of animal, plant or other form of life, whether living on land, in water or in the air?	(g1) potential endangering of any species or vegetation (g2) protected and threatened flora, terrestrial, fauna species, populations, ecological communities and their habitats	The proposed activity does not involve the removal of any trees and only minor removal of turf and vegetation. It will not endanger any species of animal, plant or other form of life on land, water or the air.	TMM2. A Tree Management Plan is prepared. TMM3: Tree protection measures are installed.
Any long-term effects on the environment?	(h1) Long-term effects on: (i) flood and bushfire behaviour, flooding and the flood plain, bushfire prone land (ii) natural environment, flora and fauna species and their habitats (iii) agricultural productivity (iv) industrial land supply (v) housing supply. (vi) climate change (vii) cumulative impacts (h2) meet industry recognised building sustainability and environmental performance standards, integrate environmental design, minimise greenhouse gas emissions, minimise energy and water consumption (recycled water) and material resources, renewable energy generation and storage, fossil fuel-free, sustainable travel choices, manage, reuse, recycle and safely dispose of waste (h3) long term ecological, social and economic effects	The activity will have a long-term positive effect on the local environment by providing the local community with a modern educational facility. The proposed activity is not considered likely to have long-term effects on the environment.	All mitigation measures
Any	No specific factors – to be assessed by the determining	No degradation of the quality of the environment will	All mitigation measures.

Environmental Factor	Guidelines for Division 5.1 assessments Consideration of environmental factors for health services facilities and schools	Consideration	Mitigation Measure Reference
degradation of the quality of the environment?	authority if relevant	occur from the proposed activity. Construction activities will be managed in accordance with a Construction Management Plan (CMP) and mitigation measures contained in this REF to ensure any potential impact on the environment are appropriately mitigated.	
Any risk to the safety of the environment?	(j1) whether the development will have adverse environmental impacts (flood or stormwater runoff, storm surge, bushfire, ongoing maintenance of landscaping within the Asset Protection Zone, contamination leak, wind speeds, extreme heat, urban heat, climate change adaptation) on the surrounding area, particularly in sensitive environmental, cultural areas or residential neighbourhoods. (j2) impacts on soil resources and related infrastructure and riparian lands on and near the site, soil erosion, salinity and acid sulfate soils, surface water resources (quality and quantity), hydrology, dependent ecosystems, drainage lines, downstream assets and watercourses, groundwater resources.	The proposed activity has been designed with careful consideration of the site's existing risks, particularly flooding. According to the FIRA, the proposed activity will have a negligible impact on the flood characteristics of the surrounding area, with the floor of new building 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 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.	OPFMM2. Prepare a FERP
Any reduction in the range of beneficial uses of the environment?	No specific factors – to be assessed by the determining authority if relevant	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?	(l1) any pollution during construction and post construction e.g. air (including odours and greenhouse gases); water (including runoff patterns, flooding/tidal regimes, water quality health); soil (including contamination, erosion, instability risks); noise and vibration (including consideration of sensitive	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 and CEMP.	CMM2. Prepare a Construction Environmental Management Plan

Environmental Factor	Guidelines for Division 5.1 assessments Consideration of environmental factors for health services facilities and schools	Consideration	Mitigation Measure Reference
	receptors); light pollution; waste, including hazardous waste (l2) impact of contamination spill, movement or disturbance during and post construction, and into the long term (l3) impact of a potential rainfall or flood event during construction (e.g. storage of fuel for construction vehicles, stock piles of soil, etc) (l4) dangerous goods and hazardous materials associated with the development (i.e. labs)		
Any environmental problems associated with the disposal of waste?	(m1) environmental problems of waste during and after construction (left over construction materials, and personnel waste), transport and disposal of waste, ongoing use and eventual decommission of the development (m2) cumulative impacts from 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	OPMM1: Prepare an Operational Waste Management Plan
Any increased demands on resources (natural or otherwise) that are, or are likely to become, in short supply?	No specific factors – to be assessed by the determining authority if relevant	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?	(o1) The cumulative effects of noise and impacts to the road network from surrounding existing and approved developments	As outlined in **Section 6.13** of this REF, there will be negligible cumulative environmental impacts. All construction works associated with the proposal will be undertaken in accordance with the CTMP and CEMP.	CTMM1. Prepare a Construction Traffic Management Plan CMM2. Prepare a Construction Environmental Management Plan (including construction waste)

Environmental Factor	Guidelines for Division 5.1 assessments Consideration of environmental factors for health services facilities and schools	Consideration	Mitigation Measure Reference
Any impact on coastal processes and coastal hazards, including those under projected climate change conditions?	(p1) coastal processes and hazards (impacts arising from the proposed activity on coastal processes and hazards and impacts on the proposed activity from coastal processes and hazards), climate scenarios	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?	(q1) relevant issues, objectives, policies and actions identified in local, district and regional plans and compliance of the proposal, and policies that identify community priorities that may be impacted (q2) relevant legislation, environmental planning instruments (including drafts, policies and guidelines). (q3) requirements of any approvals applying to the site, including concept approval or recommendation from any Gateway determination	The activity is consistent with the strategic policies identified in **Section 4.4** of this REF	N/A

7. Justification and Conclusion

The proposed Ulladulla HS upgrade at 55 South 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.