

Review of Environmental Factors

Willyama High School

Proposed Demolition Works

Document version: Version 3

Date: 11/03/2025

Acknowledgement of Country

The NSW Department of Education acknowledges the Wilyakali People as the traditional custodians of the land on which the Willyama High School project is proposed.

We pay our respects to their Elders past and present and celebrate the diversity of Aboriginal people and their ongoing cultures and connections to the lands and waters of Australia.

The NSW Department of Education is committed to honouring Aboriginal peoples' cultural and spiritual connections to the land, waters and seas and their rich contribution to society.

The NSW Department of Education recognises that by acknowledging our past, we are laying the groundwork for a future that embraces all Australians; a future based on mutual respect and shared responsibility.


Declaration

This Review of Environmental Factors (REF) has been prepared by Barker Ryan Stewart on behalf of the NSW Department of Education (the department) and assesses the potential environmental impacts which could arise from proposed demolition activities at Willyama High School located at 300 Murton Street, Broken Hill.

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

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

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

Author	William Clark (Barker Ryan Stewart)
Qualification	Bachelor of Planning
Position	Town Planner, Barker Ryan Stewart
Signature	
Date	11 March 2025

I certify that I have reviewed and endorsed the contents of this REF document and, to the best of my knowledge, it is in accordance with the EP&A Act, the EP&A Regulation and the Guidelines approved under clause 170 of the EP&A Regulation, and the information it contains is neither false nor misleading.

In reviewing 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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Date	24/03/2025

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1	13/02/2025	Draft	William Clark	Lisa Wrightson (Planning Manager, BRS)
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Table of Contents

1.	Introduction.....	9
2.	The Proposal	10
3.	Permissibility as a Division 5.1 Activity	18
4.	Statutory Planning Legislation and Strategic Plans.....	21
5.	Environmental Impact Assessment.....	26
5.1	Summary of Environmental Factors Reviewed	26
5.2	Contamination	34
5.3	Aboriginal Heritage.....	34
5.4	Non-Aboriginal Heritage	35
5.5	Ecology	36
5.6	Social Impact	36
5.7	Land Uses and Services	37
5.8	Noise and Vibration.....	37
5.9	Air Quality	39
5.10	Bushfire.....	41
5.11	Traffic, Access and Parking.....	42
5.12	Visual Impact	42
6.	Justification and Conclusion	43

Tables

Table 1: Description of the proposal.....	10
Table 2: Description of proposed activities under the TI SEPP.....	18
Table 3: Permissibility of proposal to be assessed as Division 5.1 Activity.....	18
Table 4: Consultation requirements.....	21
Table 5: Compliance with pre-conditions to the 'development without consent pathway'	23
Table 6: Compliance with pre-conditions to the 'development without consent pathway'	23
Table 7: Summary of environmental factors reviewed in relation to the activity	26

Appendices

Appendix	Name
1	Standard Conditions / Mitigation Measures for Review of Environmental Factors prepared by Barker Ryan Stewart dated 11/03/2025
2	Scope of Works for Hazmat Remediation and Demolition prepared by EnviroScience Solutions, Version 5, dated 27/02/2025
3	Demolition Plan P240504-A101-REV2 prepared by NSW Department of Education dated 22/01/2025
4	Asbestos Register (Hazardous Materials and Risk Assessment) prepared by EnviroScience Solutions dated 28/06/2024
5	Aboriginal Heritage— Preliminary Indigenous Heritage Assessment and Impact Report – V2 - prepared by GML Heritage dated 13/08/2024

Appendix	Name
6	Demolition Waste Management Plan prepared by Barker Ryan Stewart dated 13/2/2025
7	Noise and Vibration Impact Assessment – Muller Acoustic Consulting dated 5/3/2025
8	Air Quality and Dust Management Plan prepared by Enviroscience, Version 4, dated 28/02/2025
9	Owners Consent – Minister for Education & Early Learning

Abbreviation	Description
AHD	Australian Height Datum
AHIP	Aboriginal Heritage Impact Permit
AHIMS	Aboriginal Heritage Information Management System
BC Act 2016	<i>Biodiversity Conservation Act 2016</i>
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	<i>Coastal Management Act 2016</i>
DEMP	Demolition Environmental Management Plan
CWC	Connecting with Country
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	<i>Design Guide for Schools</i> published by the Government Architect in May 2018
EIS	Environmental Impact Statement
EMP	Environmental Management Plan
EPA	Environment Protection Authority
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2021</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EPI	Environmental Planning Instrument
EPL	Environment Protection License
ESD	Ecologically Sustainable Development
FM Act	<i>Fisheries Management Act 1994</i>
GBCA	Green Building Council of Australia
Ha	Hectares
LEP	Local Environmental Plan
LGA	Local Government Area

Abbreviation	Description
MNES	Matters of National Environmental Significance
NCC	National Construction Code
NorBE	Neutral or Beneficial Effect on Water Quality Assessment Guideline (2022)
NPW Act	<i>National Parks and Wildlife Act 1974</i>
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)	<i>Commonwealth Native Title Act 1993</i>
OEH	(Former) Office of Environment and Heritage
PDEMP	Preliminary Demolition Environmental Management Plan
Planning Systems SEPP	State Environmental Planning Policy (Planning Systems) 2021
POEO Act	<i>Protection of the Environment Operations Act 1997</i>
Proponent	Department of Education
REF	Review of Environmental Factors
RF Act	<i>Rural Fires Act 1997</i>
Resilience and Hazards SEPP	State Environmental Planning Policy (Resilience and Hazards) 2021
Roads Act	<i>Roads Act 1993</i>
SCPP DoE	<i>Stakeholder and community participation plan</i> , published by the NSW Department of Education October 2024
SCPP DPHI	<i>Stakeholder and community participation for new health services facilities and schools</i> 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
TI SEPP	State Environmental Planning Policy (Transport and Infrastructure) 2021
WM Act	<i>Water Management Act 2000</i>

1. Introduction

This Review of Environmental Factors (REF) has been prepared on behalf of the NSW Department of Education (the department) to determine the environmental impacts of the proposed activity described in Section 2. For the purposes of these works, the department is the proponent and the determining authority under Part 5 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

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

The description of the proposed activity and associated environmental impacts have been undertaken in 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 EIS to be prepared and approval to be sought from the Minister for Planning and Public Spaces under Part 5 of the EP&A Act; and
- The potential for the proposal to significantly impact *Matters of National Environmental Significance* (MNES) on Commonwealth land and the need to make a referral to the Australian Government Department of Environment and Energy for a decision by the commonwealth Minister for the Environment on whether assessment and approval is required under the EPBC Act.

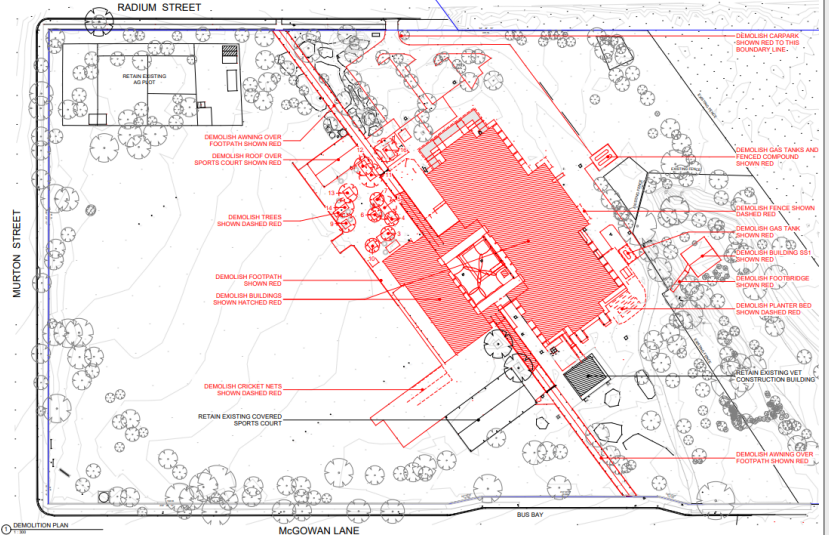
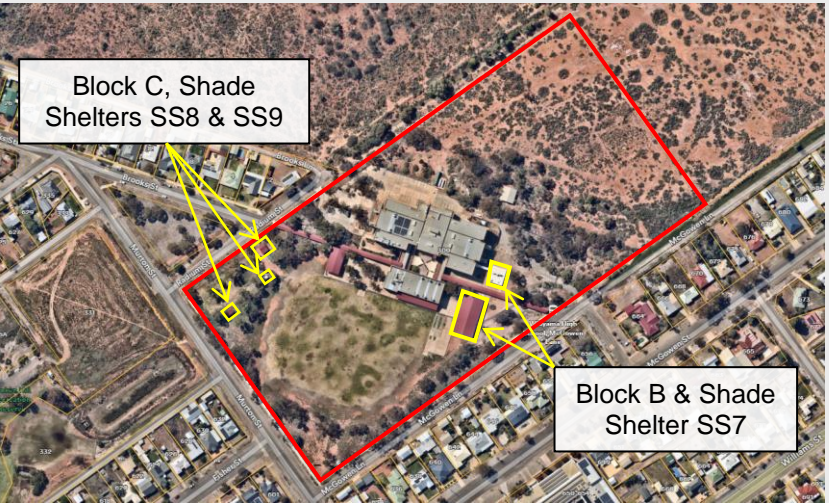
The REF addresses the requirements of Section 5.5 of the EP&A Act, which requires that the department examine, and take into account to the fullest extent possible, all matters affecting, or likely to affect, the environment by reason of the proposed activity.


2. The Proposal


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


Table 1: Description of the proposal

Project Element	Description
Proponent	NSW Department of Education (DoE)
Site Owner	NSW Minister for Education
Proposal	Demolition activities at Willyama High School
Description	<p>The proposed remediation works include (but are not limited to):</p> <ul style="list-style-type: none"> • Mould and Fungal Remediation from internal of the property. • Removal of all internal soft furnishings affected by mould. • Removal of hazardous materials located within the science lab storage. • Removal of asbestos materials identified on the premises. <p>Refer to the Scope of Works for Hazmat Remediation and Demolition in Appendix 2 for further details.</p> <p>The proposed demolition works incorporate the safe demolition, removal and responsible disposal of all existing infrastructure on the Willyama High School site, excluding Block B, Block C, and Shade Shelters SS7, SS8, and SS9, but including the following:</p> <ul style="list-style-type: none"> • Buildings - Block A, • All covered walkways (CW1 to CW3 inclusive), • Shade shelters SS1 to SS6 inclusive, • All carpark and pavement slabs excluding the slabs under Shade Shelters SS7, SS8, and SS9, • All fencing (other than the site perimeter fence), • All underground services (excluding any town services*), • All contents, equipment, and sundry items (loose and/or fixed) with-in the buildings and/or on the site. <p>*There are existing active town sewer mains crossing the site.</p> <p>An extract from the Demolition Plan is provided in Figure 1 below and the Demolition Plan is attached to this REF as Appendix 3.</p>

Project Element	Description
	 <p>Figure 1 – Extract from Demolition Plan (Source: NSW DoE, 22/01/2025)</p> <p>At the completion of the aforementioned demolition works, the site is to be remediated, including the supply, installation and compaction of all necessary clean fill (VENM or ENM) to achieve a clean, free draining site ready for the future building of a new school on the site.</p> <p>An aerial image of the school site is provided in Figure 2 below, outlining the site in red. Block B, Block C, and Shade Shelters SS7, SS8, and SS9 to be retained are also indicated in yellow. A broader locality plan is provided in Figure 3, with the site still outlined in red.</p>  <p>Figure 2 – Aerial photo of site (Source: Nearmap, dated 27/09/2024)</p>

Project Element	Description
	 <p>Figure 3 – Aerial photo of locality (Source: Nearmap, dated 27/09/2024)</p>
Location	300 Murton Street, Broken Hill (Lot 5858 DP757298)
Owner Details	NSW Department of Education (DoE)
Local Government Area	Broken Hill City Council
Site Description	<p>The fenced site has a total area of approximately 8.1 ha / 81,039.62m². The site has frontage to Murton Street, Radium Street and McGowen Lane.</p> <p>Pedestrian access is provided to each frontage. Gated vehicle access to the on-site carpark is provided from Radium Street to the west and secondary gated vehicle access is provided from Murton Street and McGowen Lane. A bus stop is located adjoining the school on McGowen Lane to the south-east.</p> <p>The site contains three (3) school buildings, three (3) covered walkways and nine (9) shade shelters. Block A is the main three-storey school building. Block B and Shade Shelter SS7 which are to be retained comprise a single-storey workshop building and a covered sports court respectively. Block C is a farm shed containing agricultural facilities and is to be also retained along with Shade Shelters SS8 and SS9 within the school agricultural plot.</p> <p>School development occupies the southern half of the site; the site is bisected by an internal school fence. Trees on the site are largely clustered around the school buildings, oval and site boundaries. The south of the site has been largely disturbed for school development, whereas the northern rear of the site beyond the internal fence and adjacent to conservation lands is less urbanised and is more characterised by desert grasses and shrubs.</p> <p>The rear of the site is adjacent to two (2) external parallel watercourses which both drain to the north-east.</p> <p>It is understood that Willyama High School has experienced severe mould contamination and contains other hazardous materials including asbestos and lead based paint.</p>

Project Element	Description
	<p>A markup of the demolition and remediation works footprint within the subject site is provided in Figure 4 below.</p> <p>The limitations of proposed vegetation removal are constrained, see a markup in Figure 5 below – all trees and vegetation outside of the area bounded by the red line are to be retained and protected from damage for the duration of the project. Note Broken Hill City Council have confirmed that tree / vegetation removal within the bounded area in Figure 4 does not require Council consent and is therefore deemed to be outside the scope of this REF.</p>  <p>The image is an aerial photograph of the Willyama High School campus. A red line is drawn on the photo to outline a specific area labeled 'Demolition Area'. This area includes a large, open grassy field in the center and several buildings to its north and east. The surrounding area includes residential streets with houses and other vegetation. The text 'Willyama High' is visible on one of the buildings within the red boundary.</p> <p>Figure 4 – Footprint markup (Source: NSW DoE, 2024)</p>

Project Element	Description
	 <p>Figure 5 – Vegetation clearing area markup (Source: NSW DoE, 2024)</p>
Environment of the Activity	<p>As described above, an internal fence effectively divides the site into two (2) zones: a southern, disturbed zone containing school development, the agricultural plot and sports field, and a northern area that has remained largely undisturbed or developed throughout the site's modern land use history. The southern school area contains clusters of trees whereas the northern area is more representative of adjacent conservation lands to the north of the site.</p> <p>The locality of Broken Hill surrounding the site is primarily characterised by a mixture of low density residential, small commercial, public park and community development, as well as extensive undeveloped desert to the north of the town.</p> <p>As above, nearby watercourses running parallel to the site follow the natural slope of the land and drain north-east, forming part of a broad catchment connected to the Stephen's Creek reservoir 10km from the site.</p>
Need for the proposal	<p>Willyama High School has experienced a severe mould contamination event which has impacted all levels of the main school building, Block A. After extensive consideration and advice from hygienists, health experts and building professionals, the NSW DoE has resolved to decontaminate the site and demolish affected school buildings to facilitate the construction of a new school on the site.</p> <p>The existing school premises has also been identified by environmental consultants as containing a variety of hazardous building materials, including asbestos, in varying conditions with low to high priorities of remediation.</p>

Project Element	Description
	<p>The primary objective of the proposal is to safely undertake the remediation and demolition of required components of the school, facilitating future school development and preventing and mitigating environmental impacts and potential health risks to students, staff, and the community.</p>
Alternatives	<p>1. Do nothing - do not provide the works to the school. The existing school is severely contaminated and is not safe for continued operation. The site requires remediation/demolition works to meet NSW DoE standards and facilitate construction of a new school and Option 1 is inconsistent with the determined project objectives.</p> <p>2. Undertake works as described in this REF. This REF is limited to remediation and demolition works proposed within the existing school site. These works, as described in this REF, are the preferred option, being generally in accordance with NSW DoE project objectives, the advice of consulting health, environmental, heritage, and building professionals. This scope of works includes the retention of Block B, Block C, and Shade Shelters SS7, SS8, and SS9, and on-site crushing and processing of building materials for recycling during demolition.</p> <p>3. Undertake works, with variations to the proposal. This would include variations to the proposed remediation and demolition work described in this REF. Qualified environmental, health, heritage, and building consultants engaged by the NSW DoE have provided qualified assessments of existing site conditions and demolition impacts and have provided recommendations and mitigation measures. The preferred option (Option 2), which includes the proposed remediation and demolition works described in this REF, was based on the outcomes of that analysis.</p> <p>Given the works are necessary for the school to be rebuilt and the works are to be carried out in accordance with the recommendations of qualified professionals in order to mitigate health and environmental risks, a different option was not considered to be necessary or appropriate.</p> <p>NSW DoE Project Managers confirmed that the Option 2 program is consistent with project and strategic objectives, and an alternate scope of works in accordance with Option 3 was not preferred in this instance.</p>
Justification	<p>Option 2 was considered the preferred option, as it provides for the proposed works in addition to the following benefits:</p> <ul style="list-style-type: none"> • Will improve safety for students, staff, and the community through remediation of the site and demolition of contaminated structures; • Will contain impacts and reduce costs through on-site crushing and processing of building materials for recycling; • Will retain select structures (Block B, Block C, and Shade Shelters SS7, SS8, and SS9) for reuse during and after the demolition and remediation period;

Project Element	Description
	<ul style="list-style-type: none"> Will facilitate the redesign and reconstruction of Willyama High School to meet the needs of the local community and current standards; and Designed in conjunction with relevant stakeholders and will meet NSW DoE's specific requirements.
Demolition Activities	<p>Demolition activities are expected to take approximately 20 weeks, with a start date to be defined by AMU representatives.</p> <p>Remedial works expected to comprise contaminant specific decontamination, remediation, removal and demolition are required to be undertaken under specified conditions and in compliance with SafeWork NSW and NSW EPA guidelines (refer to the Scope of Works for Hazmat Remediation and Demolition in Appendix 2).</p> <p>Site demolition will involve the removal of existing buildings, structures, site specific servicing, paving and landscape elements (excluding Block B, Block C, and Shade Shelters SS7, SS8, and SS9) by a licensed demolition contractor under dust, noise and vibration control monitoring.</p> <p>Noting that the demolition contractor will confirm site activities upon engagement, the methodology for demolition works is proposed generally as follows:</p> <ol style="list-style-type: none"> Internal strip out of structure to separate materials such as loose furniture. Removal of Asbestos Containing Materials (ACM) including vinyl tiles, cement sheeting, stormwater pipes, bituminous membrane, blackjack adhesive, boiler lagging and gaskets. Removal of mould impacted materials. Removal of PCB ballasts and Lead Containing Paints . Mechanical demolition including use of excavators to transport masonry, brick and concrete materials to a mobile crushing system located within the demolition works area. Crusher 1 will crush the waste down to approximately D50 50mm aggregate. The exit conveyor from the crusher will directly lead into the intake conveyor on Crusher 2. Crusher 2 will then process the waste down to ~20mm D50 aggregate. The waste will then be disposed of at an EPA licensed facility to be recycled for road base etc as "Recycled Aggregate". <p>The proposal will include the following general demolition / remediation activities:</p> <ul style="list-style-type: none"> Establishment of compound areas for demolition equipment and materials; Fencing and controlled access; Safety and wayfinding / directional signage during demolition; and Decommission / demolition and removal of specified items: <ul style="list-style-type: none"> Identification of any structures, inventory, materials or possessions that are required to be kept or discarded. Mould and Fungal Remediation from internal of the property. Removal of all internal soft furnishings affected by mould. Removal of hazardous materials located within the

Project Element	Description
	<p>science lab storage.</p> <ul style="list-style-type: none"> ○ Removal of asbestos materials identified on the premises. <p>The majority of works would be conducted during standard working hours between 7am and 5pm Monday to Friday, and 8am to 1pm on Saturdays as stipulated by the mitigation measures.</p> <p>All services excluding town services are to be removed within the demolition activities. There is the potential for some utilities to be disturbed during remediation and demolition. Enquiries should be undertaken prior to the works to identify utilities with the potential to occur within the works area, including:</p> <ul style="list-style-type: none"> • Electricity; • Telecommunications; • Water and sewerage; • Stormwater; and • CCTV. <p>A specific work methodology and program, including traffic, access and safety arrangements, is to be developed further in consultation with the demolition contractor.</p> <p>The site office and amenities and the location for crushing/processing activities are to be located on the site within the existing developed school footprint.</p> <p>Large vehicles, trucks and loaders bringing plant and equipment to site and transporting loads of demolition waste from the site will access the site via the short perpendicular street linking McGowan Lane and McGown Street to the east. Access from Radium Street to the west is not suitable for large vehicles and may be utilised by smaller vehicles and trucks.</p>
Operation Activities	The school is not currently operational. The proposal does not incorporate any operational activities and will not result in the accommodation of any additional staff or students.
Other relevant projects, programs and plans	<p>The reconstruction of the school after the proposed demolition and remediation works will be subject to separate future planning pathway assessment.</p> <p>The proposed remediation and demolition works described in this REF are to otherwise be undertaken in isolation and are not likely to generate any cumulative impacts in combination with other works or projects outside the described scope.</p>

3. Permissibility as a Division 5.1 Activity

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

Table 2: Description of proposed activities under the TI SEPP

Division and Section within TI SEPP	Description of Works
3.37	<p>The proposed activity comprises development within the boundaries of an existing government school on behalf of a public authority. The site is zoned R1 General Residential under the Broken Hill LEP 2013, which is a prescribed zone under the TI SEPP.</p> <p>The proposed activity involves the demolition of buildings and structures which do not comprise nor are contained within the curtilage of any State or local heritage item.</p> <p>The NSW DoE's heritage team have provided advice regarding the proposal's impact on the City of Broken Hill's national heritage listing under the EPBC Act, and the proposal will generate no 'significant impacts' to those values.</p>

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

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

Reference	Assessment		Comment
For works under Chapter 3			
EP&A Act Part 5.1 TI SEPP section 3.37(1)	Is the proposal to be carried out by or on behalf of the department?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	The proponent is the NSW Department of Education.

Reference	Assessment		Comment
TI SEPP section 3.37(1)	Is the proposal within the boundaries of an existing or approved government school site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	The proposal is to be undertaken within the existing boundaries of Willyama High School.
TI SEPP section 3.37(1)	Is the development specified in section 3.37(1)(a)-(f) of the T&I SEPP as being development which can be carried out without consent?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>The works are proposed in accordance with Clause 3.37(1)(e) as:</p> <p><i>(e) demolition of structures or buildings (unless a State heritage item or local heritage item),</i></p> <p>Refer to Table 1 for details of the proposal.</p>
TI SEPP section 3.37(2)	<p>If the development involves the construction of a building, do the building(s) have a height less than the greater of:</p> <p>(a) the maximum height limit for a building under the environmental planning instrument applying to the land; or,</p> <p>(b) four storeys?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	N/A – The proposal is for remediation and demolition works and no new buildings are proposed.

Reference	Assessment	Comment	
TI SEPP section 3.37(4)	Is the proposal consistent with (i.e. would not result in a contravention of) any existing condition of the development consent currently operating that applies to any part of the school, relating to hours of operation, noise, vehicular movement, traffic generation, loading, waste management or landscaping.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>A GIPA request was submitted to Broken Hill City Council on 24/01/2025 to review active consent conditions applying to the site.</p> <p>A search of active consents in Council's database identified only DA2022/151 for the installation of a new digital LED school sign panel and pylon sign structure. The proposal described by this REF will not contravene any conditions of that consent.</p> <p>This REF does not include tree removal, which can be achieved without approvals as confirmed by Broken Hill City Council.</p> <p>The proposal will not contravene any known conditions of consent applying to the site.</p>

4. Statutory Planning Legislation and Strategic Plans

Table 4 provides an assessment of the proposed activity against relevant legislative requirements and strategic policy provisions.

Table 4: Consultation requirements

Consultation Requirement	Applies?	Comment
<p>DoE is of the opinion the activity:</p> <ul style="list-style-type: none"> <i>will have a substantial impact on stormwater management services provided by a council, or</i> <i>is likely to generate traffic to an extent that will strain the capacity of the road system in a local government area, or</i> <i>involves connection to, and a substantial impact on the capacity of, any part of a sewerage system owned by a council, or</i> <i>involves connection to, and use of a substantial volume of water from, any part of a water supply system owned by a council, or</i> <i>involves the installation of a temporary structure on, or the enclosing of, a public place that is under a council's management or control that is likely to cause a disruption to pedestrian or vehicular traffic that is not minor or inconsequential, or</i> <i>involves excavation that is not minor or inconsequential of the surface of, or a footpath adjacent to, a road for which a council is the roads authority under the Roads Act 1993 (if the public authority that is carrying out the development, or on whose behalf it is being carried out, is not responsible for the maintenance of the road or footpath).</i> <p>Section 3.8 of TI SEPP</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The works are to be limited to the subject site. No works are proposed within the road reserve or a public place.</p> <p>The proposed works will demolish existing school infrastructure but will not impact town utilities crossing the site. Services supplying the site and retained structures will be capped.</p> <p>No new service connections are proposed.</p> <p>The proposal will not generate traffic to an extent that will impact the capacity of the local road network.</p> <p>The proposal will not generate substantial impact on any Council-related infrastructure or services.</p> <p>Consultation is not required.</p>
<p>Is the development: likely to affect the heritage significance of a local heritage item, or of a heritage conservation area, that is not also a State heritage item in a way that is more than minimal?</p> <p>Section 3.9 of TI SEPP</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The site does not contain nor adjoin any State or local heritage items or heritage conservation areas. The proposal will not impact the heritage significance of any State or local heritage items or heritage conservation areas.</p> <p>Consultation is not required.</p>
<p>Is the activity (other than demolition of buildings or structures, or internal works to existing buildings) on flood liable land?</p> <p>Section 3.10 of TI SEPP</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The proposal is for demolition works and this section is not applicable.</p> <p>Consultation is not required.</p>
<p>Is the development adjacent to land reserved under the <i>National Parks and Wildlife Act 1974</i> or acquired under Part 11 of that Act?</p> <p>Section 3.12 of TI SEPP</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The site does not adjoin land reserved under the <i>National Parks and Wildlife Act 1974</i>.</p> <p>The works are to be located wholly within the school site</p>

Consultation Requirement	Applies?	Comment
		and no impact will be generated to a National Park. Consultation is not required.
Is the development on land immediately adjacent to a rail corridor that— is likely to have an adverse effect on rail safety, or if the rail corridor concerned is used by electric trains, involves the placing of a metal finish on a structure, or involves the use of a crane in air space above any rail corridor. Section 3.12 of TI SEPP	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The subject site does not adjoin a rail corridor. Consultation is not required.
May the development increase the amount of artificial light in the night sky and that is on land within the dark sky region as identified on the dark sky region map? Section 3.12 of TI SEPP	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The proposal will not increase the amount of artificial light in the night sky and is not within the dark sky region. Consultation is not required.
Does the proposal involve any of the following? <i>the site has access to a road and the development will result in the school being able to accommodate 50 or more additional students, or</i> <i>the site has access to -</i> <i>a classified road, or</i> <i>a road (the connecting road) that connects, within 90 metres (measured along the alignment of the connecting road) of the access point, to a classified road,</i> <i>and the development will result in the provision of an additional 50 or more car parking spaces, or</i> <i>no road to which the site has access is classified and the development will result in the provision of an additional 200 or more car parking spaces, or</i> <i>the development will result in -</i> <i>a new vehicular or pedestrian access point to the school from a public road, or</i> <i>a change in location of an existing vehicular or pedestrian access point to the school from a public road, or</i> <i>the development will involve excavation to a depth of 3 or more metres below ground level (existing) on land within or immediately adjacent to a classified road within the meaning of the Roads Act 1993.</i> Section 3.12(3) of TI SEPP	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The proposal does not adjoin a classified road, will not facilitate additional enrolments or staff, will not increase parking capacity, and no changes to pedestrian or vehicle access are proposed. Consultation is not required.
Is the development being pursued as an REF under section 3.37(1)(a) of the TI SEPP? Section 3.38 of TI SEPP	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The proposal is being pursued under section 3.37(1)(e). Consultation is not required.

Table 5 provides an assessment of the proposal against the applicable pre-conditions set out in the TI SEPP.

Table 5: Compliance with pre-conditions to the 'development without consent pathway'

Exception	Applies?	Comment
(a) they would require notice of the intention to carry out the development to be given to a council or public authority from whom an approval is required in order for the development to be carried out lawfully, or	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not applicable.
(b) they would require notice to be given to a council or public authority with whom the public authority that is carrying out the development, or on whose behalf it is being carried out, has an agreed consultation protocol that applies to the development, or	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not applicable.
(c) they would require notice to be given to a council or public authority that is carrying out the development or on whose behalf it is being carried out, or	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not applicable.
(d) the development is exempt development under any environmental planning instrument (including this Chapter), or	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not applicable.
(e) the development comprises emergency works that— (i) involve no greater disturbance to soil or vegetation than necessary, and (ii) are carried out in accordance with all applicable requirements of the Blue Book.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not applicable.

Table 6 provides an assessment of the proposal against relevant statutory legislation.

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

Legislation	Relevant?	Approval Required?	Applicability
State Legislation			
National Parks and Wildlife Act 1974	Yes	No	The proposed demolition will not impact a National Park. An Aboriginal Due Diligence Assessment prepared by GML Heritage (see Appendix 5) confirmed that the majority of the works footprint possessed low to nil archaeological sensitivity. Based on desktop assessment and site inspection, the demolition of existing buildings was assessed as not having potential to cause harm to Aboriginal objects and may proceed with caution. Refer to Section 5.4 of this REF for further assessment details.
Rural Fires Act 1997	Yes	No	The site contains bushfire prone land however the works scope includes demolition only. The activity will not give rise to any bushfire risk to life or property and a Bush Fire Safety Authority under Section 100B of the Rural Fires Act 1997 will not be required.
Water Management Act 2000	Yes	No	The car park in the north west of the site proposed for demolition is located approximately 48m from a mapped watercourse to the north. Erosion and sediment control measures provided in Appendix 1 will be implemented in accordance with legislative requirements to manage the demolition works. Further consideration is therefore not required.
Biodiversity Conservation Act 2016	Yes	No	Broken Hill City Council confirmed in writing that consent for the removal of trees within the demolition works footprint is

Legislation	Relevant?	Approval Required?	Applicability
			not required. The site does not contain mapped NSW Biodiversity Values and further consideration is not required on the basis that consent is not sought for tree removal within the REF activity.
Heritage Act 1977	Yes	No	<p>The site is not LEP or State heritage listed, nor is it identified on the Section 170 register.</p> <p>The City of Broken Hill is listed as a heritage item of National Significance under the EPBC Act. The NSW DoE Heritage team confirmed that the proposed works will generate no impact to the significance of the town as follows:</p> <p><i>Willyama High School was constructed in the 1970s and does not demonstrate any of these significance values in a recognisable way. The removal of the existing structures at the school would not result in any impacts to these heritage values, let alone 'significant impacts' (i.e. impacts which would noticeably diminish any identified heritage values for the whole town). As no 'significant impacts' to the national heritage values of the 'City of Broken Hill' are likely to occur from the Willyama HS redevelopment project, no referral to the Minister under the EPBC Act is required.</i></p> <p>No further consideration of the Act is required.</p>
Contaminated Lands Management Act 1997	Yes	No	<p>A search of the EPA Contaminated land record of notice was undertaken on 13/2/2025 which confirmed Willyama High School is not identified on the contamination register.</p> <p>A search of the EPA Contaminated list of notified sites was undertaken on 13/2/2025 which confirmed that Willyama High School was not identified as a notified site. Twelve (12) sites were identified in Broken Hill with no sites immediately surrounding.</p> <p>No significant excavation will be undertaken within the demolition package and a requirement to undertake soil testing upon completion of the works package is stipulated in the mitigation measures (see Appendix 1).</p>
Protection of the Environment Operations Act 1997	Yes	No	<p>The proposal will not result in significant air, noise, water or waste pollution as confirmed by technical acoustic and air quality assessment attached in Appendix 7 and 8 respectively.</p> <p>Written advice was issued by NSW EPA on 29/01/2025 confirming that an EPL will not be required for the crushing, grinding and separating activity as follows:</p> <p><i>The thresholds for activities that require an environment protection licence are found in Schedule 1 of the Protection of the Environment Operations Act 1997. The activity of crushing, grinding or separating does not apply to waste; and the activities relating to waste processing and waste storage refers to waste received from off</i></p>

Legislation	Relevant?	Approval Required?	Applicability
			<i>site. Consequently, in the circumstances you describe, a licence would not be required for processing the waste onsite. However, if the waste is transported off site, the receiving site may need to be licensed if it meets the licensing thresholds in Schedule 1.</i>
Environmental Planning and Assessment Regulation 2021 (Section 171A)	No	No	The site is not located within a regulated catchment. No further consideration is required.
State Legislation – State Environmental Planning Policies			
State Environmental Planning Policy (Biodiversity and Conservation) 2021	No	No	Broken Hill City Council have confirmed in writing that tree removal associated with the development works does not require Council approval. Accordingly the works have not been assessed in this REF and further consideration of the Biodiversity and Conservation SEPP is not required.
State Environmental Planning Policy (Resilience and Hazards) 2021	Yes	No	<p>The site is not located within a coastal zone and consideration of Chapter 2, Coastal management, is not required.</p> <p>The development is not considered to be hazardous or offensive development and consideration of Chapter 3 is not required.</p> <p>Chapter 4 provide for a Statewide planning approach to the remediation of contaminated land. The site has been impacted by a mould infestation which is not considered to be contamination of land. Notwithstanding, a review of Section 4.8 which stipulates those remediation works requiring consent confirmed that the site/ development does not trigger any of the environmental controls (a – e) which would require development consent. Accordingly, if the mould remediation/ decontamination works were considered to be remediation for the purpose of this SEPP, the works would be identified as Category 2 remediation works which do not require consent.</p>
State Environmental Planning Policy (Industry and Employment) 2021	No	No	No signage proposed.

5. Environmental Impact Assessment

5.1 Summary of Environmental Factors Reviewed

Section 171(1) of the EP&A Regulation notes that when considering the likely impact of an activity on the environment, the determining authority must take into account the environmental factors specified in the guidelines that apply to the activity. These factors are assessed in Table 7 below. Additional and/or key impacts identified are addressed in subsections below.

Note: Section 171A of the EP&A Regulation is assessed through Section 4 of this report.

Table 7: Summary of environmental factors reviewed in relation to the activity

Environmental Factor	Response/Assessment	Mitigation Measure Reference
Any environmental impact on a community?	<p>The school will not be operational until a new school is constructed outside the scope of this REF. Given the school has been identified as posing a health risk to staff and students in its current condition, the proposed works are necessary for the site to be redeveloped.</p> <p>Surveys have identified hazardous materials throughout Willyama HS; refer to Appendices 2 and 4 for details. Supervised, timely and controlled removal of these materials will prevent potential cross-contamination and further impacts to the environment and community, as recommended by the Scope of Works for Hazmat Remediation and Demolition (Appendix 2).</p> <p>Tree / vegetation impacts will be required to facilitate the demolition and remediation works, however these are outside the scope of this REF and do not require assessment. Notwithstanding, this is unlikely to directly impact any threatened flora or fauna or critical habitat and is unlikely to result in any significant ecological impacts.</p> <p>NSW DoE's heritage team have advised that the existing school does not demonstrate any non-Aboriginal heritage values, and the removal of existing structures would not result in any impacts to Broken Hill's heritage values.</p> <p>An Aboriginal Due Diligence Assessment prepared by GML Heritage</p>	<p>The following mitigation measures have been recommended to address environmental impact on a community:</p> <ul style="list-style-type: none"> • Demolition Environmental Management Plan • Demolition hours • Demolition noise limits • Demolition vehicles entering the site. • Site specific acoustic

Environmental Factor	Response/Assessment	Mitigation Measure Reference
	<p>(see Appendix 5) confirmed that the majority of the works footprint possessed low to nil archaeological sensitivity. Based on desktop assessment and site inspection, the demolition of existing buildings was assessed as not having potential to cause harm to Aboriginal objects and may proceed with caution. Ancillary geotechnical borehole drilling was found unlikely to cause harm to Aboriginal objects and could also proceed with caution. Recommendations were provided and have been incorporated as mitigation measures (see Appendix 1).</p> <p>Demolition works and associated vehicle movements will generate acoustic noise above the existing noise levels. The Noise and Vibration Assessment (see Appendix 7) confirmed that works would not generate vibration levels to cause human annoyance or cosmetic damage to structures and residential receivers. The assessment identified that whilst the results of the predictive modelling demonstrate that construction noise levels are anticipated to exceed the Noise Management Levels (NML) for residences surrounding the project site, noise levels are not expected to exceed the highly affected noise level of 75dB during any of the proposed work stages.</p> <p>Where noise levels are predicted to exceed the NMLs, all reasonable and feasible management/mitigation measures are required to be implemented. Project Acoustic Engineers (MAC Acoustic) confirmed that the standard mitigation measures, as per the Interim Construction Noise Guide, can achieve a reduction in noise levels of more than 20dB in the right circumstances (employing good work practices, noise suppression kits and local barriers). A 10dB reduction is achievable through good work practices. Mitigation measures have been prescribed to ensure that contractors adhere to noise mitigation strategies throughout the demolition program which will maximise the acoustic amenity of surrounding residents. Refer to Section 5.8 of this REF for additional assessment details on noise and vibration.</p> <p>Mitigation measures implemented during the works period will prevent potential impacts on the local community and environment including those associated with potential air and dust impacts to surrounding</p>	<p>mitigation measures prepared by MAC Acoustic</p> <ul style="list-style-type: none"> • Site specific air and dust impact measures identified in the Air and Dust Quality Management Plan.

Environmental Factor	Response/Assessment	Mitigation Measure Reference
	<p>receivers. Real time air and dust monitoring will be implemented to ensure that demolition processes do not exceed any legislative air and dust management levels. Should works exceed management levels, actions are stipulated for contractors to stop work and review the measures being implemented.</p> <p>It is not expected that the proposed works will have a lasting effect on the local community and following completion (20 week program anticipated), there will be a positive impact on the community through the decontamination and remediation of the site which can facilitate the future delivery of a new school (under separate development package).</p>	
Any transformation of a locality?	<p>The works will remove the majority of existing structures from the school site to facilitate a future new school development.</p> <p>No significant transformation to the locality will occur in the long term, however short term minor alterations will be experienced.</p> <p>It is acknowledged that the local community may experience some concerns owing to the demolition and transformation of an established school which may be sentimental to the community. As the contaminated structures are a danger to community health the proposed works are considered to be a required action and it is intended for the school to be rebuilt accordingly.</p>	No mitigation measures required.
Any environmental impact on the ecosystems of the locality?	<p>The development is unlikely to significantly impact existing ecosystems within the urban locality. The proposal footprint has been previously disturbed for school development and, historically, agricultural development and significant earthworks prior to that. Whilst some impacts can be anticipated through any necessary earthworks or required tree removal outside the scope of this REF, the proposal will result in an improved environmental outcome for the site and locality through the decontamination and remediation of the site.</p> <p>Erosion and sedimentation control measures will be employed to ensure ecosystems in the area are not adversely affected by runoff.</p>	<p>The following mitigation measures have been recommended to address environmental impact on the ecosystem:</p> <ul style="list-style-type: none"> • Demolition Environmental Management Plan
Any reduction of the aesthetic, recreational, scientific or other	Minor impacts to aesthetic value will be generated by machinery and plant equipment during demolition. Upon completion of demolition	The following mitigation measures

Environmental Factor	Response/Assessment	Mitigation Measure Reference
environmental quality or value of a locality?	<p>works, the site will be largely cleared of existing structures in the interim until future development occurs. Vegetation removal is not included in this REF and does not require Council approval as confirmed by Broken Hill City Council.</p> <p>Impacts on aesthetic, recreational, or scientific values will be therefore temporary and low in impact.</p>	<p>have been recommended to address potential value reduction:</p> <ul style="list-style-type: none"> • Demolition Environmental Management Plan • Demolition hours • Demolition noise limits • Demolition vehicles entering the site
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?	<p>A Preliminary Aboriginal Heritage Impact Assessment (PIHA) has been undertaken (see Appendix 5 for details) and the proposal footprint generally contains low to nil archaeological sensitivity. It was advised that the demolition works have no potential to cause harm to Aboriginal objects and ancillary borehole drilling is unlikely to cause any harm to Aboriginal objects. It was confirmed that the works could proceed with caution, subject to mitigation measures.</p> <p>The City of Broken Hill is listed as a heritage item of National Significance under the EPBC Act. The NSW DoE Heritage team confirmed that the proposed works will generate no impact to the significance of the town as follows:</p> <p><i>Willyama High School was constructed in the 1970s and does not demonstrate any of these significance values in a recognisable way. The removal of the existing structures at the school would not result in any impacts to these heritage values, let alone 'significant impacts' (i.e. impacts which would noticeably diminish any identified heritage values for the whole town). As no 'significant impacts' to the national heritage values of the 'City of Broken Hill' are likely to occur from the Willyama HS redevelopment project, no referral to the Minister</i></p>	<p>The following mitigation measures have been recommended to address this clause:</p> <ul style="list-style-type: none"> • Demolition Environmental Management Plan • Site specific measures in the PIHA including unexpected finds protocol and fencing of the sensitive area to the north of the established building footprint.

Environmental Factor	Response/Assessment	Mitigation Measure Reference
	<i>under the EPBC Act is required.</i>	
Any impact on the habitat of protected animals, within the meaning of the <i>Biodiversity Conservation Act 2016</i> ?	<p>The proposal does not include tree or vegetation clearing. Any required vegetation removal does not require consent as confirmed by Broken Hill City Council.</p> <p>The site does not contain any identified mapped biodiversity or critical habitat significance and the proposal is not expected to generate any impact on the habitat of protected fauna.</p>	<p>The following mitigation measures have been recommended to address potential impact to fauna from construction and vehicles:</p> <ul style="list-style-type: none"> • Demolition Environmental Management Plan
Any endangering of any species of animal, plant or other form of life, whether living on land, in water or in the air?	<p>The proposal is in response to a hazardous mould contamination of school buildings.</p> <p>The proposal does not include any tree or vegetation clearing – whilst this may be required for the demolition, this is subject to a separate application and is outside the scope of this REF. The proposed works are to be contained within the existing disturbed school footprint and no endangering of any species of animal, plant, or other form of life would occur as a result of the proposed development.</p>	<p>The following mitigation measures have been recommended to address potential impact to animals or plants:</p> <ul style="list-style-type: none"> • Demolition Environmental Management Plan
Any long-term effects on the environment?	<p>The proposed development seeks to facilitate demolition of structures impacted by mould events, resulting in a positive long term effect on the natural and man-made environments.</p> <p>Accordingly the development is not expected to generate any long term effects on the environment.</p>	<p>The following mitigation measures have been recommended to address this clause:</p> <ul style="list-style-type: none"> • Demolition Environmental Management Plan
Any degradation of the quality of the environment?	It is not expected that any degradation of the environment will be	The following

Environmental Factor	Response/Assessment	Mitigation Measure Reference
	generated by the proposed development subject to the implementation of relevant mitigation measures.	<p>mitigation measures in Appendix 1 are included to mitigate any risk to the degradation of the environment:</p> <ul style="list-style-type: none"> • Demolition Environmental Management Plan • Protection of public infrastructure • Demolition hours • Demolition noise limits • Demolition vehicles entering the site
Any risk to the safety of the environment?	Subject to the implementation of mitigation measures, it is not expected that any significant or unacceptable risk to the safety of the environment will be generated by the proposed development.	<p>The following mitigation measures in Appendix 1 are included to mitigate any risk to the safety of the environment:</p> <ul style="list-style-type: none"> • Demolition Environmental Management Plan • Demolition hours • Demolition noise limits • Demolition vehicles entering

Environmental Factor	Response/Assessment	Mitigation Measure Reference
		the site
Any reduction in the range of beneficial uses of the environment?	Other than continued impacts to the operation of the school during demolition and reconstruction outside the scope of this proposal, the proposed development will not reduce opportunity for beneficial uses of the environment.	No mitigation measures required.
Any pollution of the environment?	Erosion and sediment control measures will be implemented to contain demolition or excavation materials. Site specific air and dust quality management measures must also be implemented to ensure the works do not generate any pollutants within and outside of the site.	The following mitigation measures have been recommended to address this clause: <ul style="list-style-type: none"> • Demolition Environmental Management Plan • Site specific air and dust impact measures identified in the Air and Dust Quality Management Plan.
Any environmental problems associated with the disposal of waste?	All waste will be collected, stored and disposed of in accordance with the Demolition Waste Management Plan to be implemented in conjunction with the DEMP. Refer to the WMP in Appendix 6.	The following mitigation measure has been recommended to address this clause: <ul style="list-style-type: none"> • Demolition Environmental Management Plan
Any increased demands on resources (natural or otherwise) that are, or are likely to become, in short supply?	The proposed development will not increase demand on any resources that are or are likely to be in short supply.	No mitigation measures required.

Environmental Factor	Response/Assessment	Mitigation Measure Reference
Any cumulative environmental effects with other existing or likely future activities?	There are currently no major projects in the vicinity of the site that would require further assessment of cumulative effects. Therefore, any cumulative impacts associated with the proposed development are considered to be minor, temporary and acceptable, subject to the implementation of mitigation measures.	No mitigation measures required.
Any impact on coastal processes and coastal hazards, including those under projected climate change conditions?	The site is not located within the coastal zone and the proposed works will not directly contribute to nor be impacted by climate change. The site is not identified as being flood liable land.	No mitigation measures required.
Applicable local strategic planning statement, regional strategic plan or district strategic plan made under Division 3.1 of the Act?	Applicable plans include the Far West Regional Plan 2036, Draft Far West Regional Plan 2041, and Broken Hill Local Strategic Planning Statement 2020-2040. The proposed development will facilitate the redevelopment of the school site to deliver adequate access to education and training in an established location. Broken Hill is the largest centre in the region and is a hub providing services and facilities for smaller, remote communities – the decontamination of the established school site and facilitating delivery of a new school is of utmost importance to the region. This is in line with a number of strategic objectives and directions. Broken Hill is a regional education hub and Willyama High School is noted to be a core part of its education sector.	The works are proposed in accordance with relevant strategic policies and mitigation measures are not required.
Any other relevant environmental factors?	No other environmental factors are relevant to the proposed works.	No mitigation measures required.

5.2 Contamination

The proposal incorporates the removal of hazardous substances, including mould and asbestos containing materials in varying conditions.

A Scope of Works for Hazmat Remediation and Demolition is attached as Appendix 2 to this REF and an Asbestos Register for the school premises is attached as Appendix 4. These documents were prepared by EnviroScience Solutions on behalf of the NSW DoE. The Scope of Works report identified various hazardous materials throughout Willyama High School for removal and it was concluded that remedial works expected to comprise contaminant specific decontamination, remediation, removal and demolition are required to be undertaken under specified conditions and in compliance with SafeWork NSW and NSW EPA guidelines and other legislation and guidelines as outlined in the report. Recommendations and an unexpected finds protocol were provided and have been incorporated as mitigation measures in Appendix 1.

Environmental hygienist clearances will be necessary to determine that demolition has been undertaken as per legislative requirements and the site is suitable for redevelopment. Refer to the mitigation measures in Appendix 1 for further details.

5.3 Aboriginal Heritage

As described above in this REF, the proposal will disturb the ground surface and therefore an Aboriginal Due Diligence Assessment was prepared by GML Heritage in regard to the proposed works. Refer to Appendix 5 for further details.

The proposal footprint was generally identified as having low to nil archaeological sensitivity and it was confirmed that demolition does not have potential to cause harm to Aboriginal objects and ancillary borehole drilling is unlikely to cause harm to Aboriginal objects. The works were confirmed as being able to proceed with caution, subject to mitigation measures.

No access will be available to the northern portion of the site which has been identified as containing potential Aboriginal archaeology (one potential archaeological deposit identified – refer to mapping in Figure 6 which clearly delineates sensitive areas north of the existing building footprint). A mitigation measure has been included to ensure that fencing will be erected to limit any access to this area.

Please note that tree / vegetation removal is not included within the scope of this REF given Broken Hill City Council provided written confirmation that any required clearing to facilitate the works does not require Council approvals.



Figure 6 – Extract from Aboriginal Archaeology Risk Map (Source: Preliminary Indigenous Heritage and Impact Report, GML dated 6/12/2024)

5.4 Non-Aboriginal Heritage

Relevant heritage searches have been undertaken and the site does not possess any local or State heritage significance and the proposal will not adversely impact the heritage significance of

any State or local heritage items or heritage conservation areas, as assessed above. Willyama HS is not listed on the NSW DoE's Section 170 heritage register. The site is not in proximity to any State or local heritage items or heritage conservation areas.

The City of Broken Hill is listed as a heritage item of National Significance under the EPBC Act. The NSW DoE's heritage team provided the following advice in relation to this listing:

Willyama High School was constructed in the 1970s and does not demonstrate any of these significance values in a recognisable way. The removal of the existing structures at the school would not result in any impacts to these heritage values, let alone 'significant impacts' (i.e. impacts which would noticeably diminish any identified heritage values for the whole town). As no 'significant impacts' to the national heritage values of the 'City of Broken Hill' are likely to occur from the Willyama HS redevelopment project, no referral to the Minister under the EPBC Act is required.

No further assessment of non-Aboriginal heritage is required.

5.5 Ecology

The proposed footprint does not contain any identified mapped biodiversity significance or protected habitat for threatened species (LEP or NSW level).

The proposed demolition and remediation works will be subject to mitigation measures preventing potential erosion, sedimentation or pollution from occurring. The proposal will be carried out within an existing disturbed footprint and will be unlikely to generate any significant adverse impacts upon the natural environment.

Please note that tree / vegetation removal is not included within the scope of this REF given Broken Hill City Council provided written determination that any required clearing to facilitate the works does not require Council approvals.

5.6 Social Impact

Given the established nature of Willyama High School within the locality it is likely that the proposed demolition may result in some community concern owing to the site's sentimentality for those who may have attended the school or formed associated memories.

Notwithstanding the above, the site has been assessed by hygienists, health and building professionals as unsuitable for continued operation and the proposed demolition and remediation works are necessary for the site to be redeveloped to an operational condition.

Mitigation measures include appropriate notification of adjoining owners of the works and standard working hours during the demolition period have been implemented to mitigate social impacts to the community.

The school is not currently operational. Future staff and student numbers and potential for joint / shared use infrastructure will be subject to the site's future redevelopment outside the scope of this REF.

5.7 Land Uses and Services

The majority of the school is proposed for demolition however the land use will not change, and the demolition activities will facilitate the redevelopment of Willyama High School within existing site boundaries.

The works include the removal of non-Council services infrastructure on the site as part of the demolition and existing connections will be capped. Block B and Block C to be retained will be disconnected from services.

Town services owned and operated by Broken Hill City Council will not be impacted by the proposal.

5.8 Noise and Vibration

A Noise and Vibration Impact Assessment (NVIA, see Appendix 7) has been prepared to quantify potential environmental noise emissions associated with the project and provide recommendations for potential noise mitigation and management measures where impacts are identified.

The nearest residential receivers are located on Brooks Street (Noise Catchment Area (NCA) 1), McGowan Street (NCA 2) and Fisher Street (NCA 3), about 30m to west, east and south of the project boundary respectively. The nearest non-residential receivers are identified as the Broken Hill IGA, about 120m to the southeast of the project site, and the Broken Hill Regional Aquatic Centre, about 200m to the west of the project site. These Noise Catchment Areas can be identified in the Receiver Map extracted below in Figure 7.



Figure 7 – Extract from Receiver MAP (Source: Noise and Vibration Assessment, MAC Acoustic dated 6/02/2025)

Vibration Assessment

In relation to impact associated with construction vibration the NVIA demonstrated expected compliance with regulatory controls and expected amenity maintenance as follows:

A review of aerial imagery indicates that the nearest residential receiver is located more than 150m from the proposed location of the mobile crusher. Hence, it is anticipated that the works would not generate vibration levels to cause human annoyance or cosmetic damage to structures to residential receivers.

Notwithstanding, where the demolition works require the use of vibration intensive equipment, a review of safe working distances should be undertaken.

Acoustic Assessment

To quantify the existing acoustic environment and determine construction noise management levels (NMLs), a series of short term (15 minute) operator attended noise measurements were conducted at the nearest potentially affected receivers. The attended noise monitoring was conducted using one Svantek 971 noise analyser at the site on Wednesday 22 January 2025 to quantify ambient background noise levels.

Noise emission data and assumptions for each construction scenario modelled in the NVIA were typically sourced from the Transport for NSW Construction and Maintenance Noise Estimator Tool (CMNET). An extract from the Predicted Noise Level Range assessment is provided below in Figure 8 which demonstrates the following:

- The range associated with the four demolition stages exceeds the noise management level of 45Db LA however this relates to the upper range only, with many activities likely to generate acoustic impacts that do not exceed the NML's.
- Noise levels are not expected to exceed the NMLs for non-residential receivers or the highly affected noise level of 75dB LAeq(15min) during any of the proposed work stages.

MAC Acoustic confirmed that the NMLs are not intended as a statutory limit, but rather represent the level above which there may be some community reaction or interest in the project and its construction acoustic timeframes. Where noise levels are predicted to exceed the NMLs, all reasonable and feasible management/mitigation measures are to be implemented. Project Acoustic Engineers confirmed that, in their experience, the standard mitigation measures, as per the Interim Construction Noise Guidelines, can achieve a reduction in noise levels of more than 20dB in the right circumstances (employing good work practices, noise suppression kits and local barriers). A 10dB reduction is simply achievable through good work practices.

Noting the predicted noise ranges in Figure 7 and the anticipated reductions (up to 20dB) that can be achieved through mitigation measures and good work practices, it is considered that the demolition works can largely achieve the NML of 45dB or more conservatively, acoustics can be contained significantly closer to the 45Db NML than tabled in Figure 7.

Noting that all stages of the demolition do not exceed the 'Highly Noise Affected' control of 75Db, and mitigation measures have been implemented within Appendix 1 to include hoarding and attenuation of areas proposed for on site waste processing, the acoustic impacts are not considered to be significant or unacceptable in the context of the demolition works scope which will be limited to a program of approximately 20 weeks. Further, standard construction hours will be enforced to mitigate any noise impacts during the morning and evening periods

Receiver	Predicted Noise Level Range, dB LAeq(15min) ¹				NML dB LAeq(15min)
	Site Establishment	Soft Demo	Structure Demo	Structural Demo with Crushing	
Residential – NCA 1	<30 – 53	31 – 56	33 – 63	34 – 64	45
Residential – NCA 2	<30 – 51	34 – 51	32 – 58	37 – 58	45
Residential – NCA 3	<30 – 53	<30 – 48	32 – 54	33 – 54	45
Active Recreation	≤42	≤42	≤48	≤48	65
Commercial	≤44	≤45	≤48	≤49	70

Note: Predicted construction noise levels above the NMLs are highlighted and shown in **bold**.

Note 1: Noise levels from construction activities vary due to their position across the project site with respect to surrounding receivers.

Figure 8 – Extract from Receiver MAP (Source: Noise and Vibration Assessment, MAC Acoustic dated 6/02/2025)

5.9 Air Quality

EnviroScience Solutions prepared an Air Quality and Dust Management Plan (AQDMP) for the works (refer to Appendix 8) which also considered the onsite crushing of waste materials (particularly concrete and blockwork). The objective of the report is to identify, assess and manage the air quality and dust impacts expected from the proposed demolition works.

Key aspects of the project that could result in dust emissions include:

- Demolition of existing structures
- General Earthworks
- Vegetation clearing
- Bulk Earthworks
- Material handling including stockpiling, material loading and material haulage.
- Vehicle movements over unpaved surfaces
- Wind erosion of exposed areas and temporary stockpiles
- Uncovered vehicle loads
- Onsite crushing of waste materials (particularly concrete and blockwork)

Air emissions, other than dust, which may be generated by demolition activities include:

- Vehicle and plant exhaust emissions, which may be excessive if vehicles and plant are poorly maintained.

The ADQMP confirmed the following in relation to surrounding receivers for air quality impacts and dust:

The sensitive receivers are the local residents in the area. Typically, wind direction is from the south and the closest residential buildings north of the site are approximately 600m from the project site which is generally considered outside the impact zone of 500m. There

are residential buildings within 100m of the project site to the west, south and east, which are all considered sensitive receivers, although they are typically upwind of crushing activities. Broken Hill Public School is situated approximately 900m south of the project site which is considered outside of the impact zone.

The AQDMP stipulates that the air quality and dust impacts on the nearest sensitive receptors, local community and site personnel are to be carefully managed and monitored during demolition works with recommendations provided to minimise and/or reduce the impacts to sensitive receptors in order to achieve legislative requirements.

The ADQMP includes a mapped guideline for airborne environmental air and dust monitoring for the community, the environment and site personnel during the demolition works, refer to the extract in Figure 9 below. Three (3) real time particulate samplers will assist with the proactive management of dust. Located to the east, south and west of the proposed work locations adjacent to the nearest sensitive receptors, alert values have been developed to trigger the reduction or cessation of works. The ADQMP provides clear and concise actions which relate to the particulate control levels as follows:

- Achievement of the level identified as green allows contractors to continue works with the current controls.
- An increase in particulate levels that trigger the 'Amber' control level would require contractors to review, investigate and implement additional control measures; and
- An increase in particulate levels that trigger the 'Red' control level would require contractors to stop works, review, investigate and implement additional control measures.

Mandatory air and dust monitoring in the locations identified in Figure 9 have been included as a mitigation measure in Appendix 1.

Subject to the implementation of mitigation measures derived from the ADQMP, including real time air and dust monitoring and cessation points where particulate levels reach certain levels, the proposed demolition, including on site processing of concrete and blockwork, is unlikely to generate a significant or unacceptable impact to air and dust quality or residential amenity.



-  AM – Asbestos Air Monitoring Locations/Respirable Crystalline Silica (RCS)
-  DM – Real Time Particulate Dust Monitors (PM_{2.5} and PM₁₀)
-  Real Time Wind Speed Anemometer

Figure 9 – Extract from Environmental Air Monitoring Locations Map (Source: Air Quality and Dust Management Plan, Enviroscience dated 13/02/2025)

5.10 Bushfire

Whilst the site is partially mapped as bushfire prone land, the proposed development is for the demolition of the school which will have no adverse impact on bushfire risk within the site or locality.

Notwithstanding, an emergency response plan is to be required as part of the Demolition Environmental Management Plan (DEMP) and this has been included as a mitigation measure in Appendix 1.

No further consideration of bushfire risk or impact is deemed necessary.

5.11 Traffic, Access and Parking

The proposal will alter existing parking arrangements within the site given the existing carpark will be demolished. The school is not operational therefore no established demand for parking currently exists.

The proposed footprint is contained within a securely fenced portion of the site and external traffic and pedestrian safety impacts do not require assessment. The footprint will be fenced off during demolition and remediation and as the school is not operational, pedestrian permeability and within the site does not require consideration.

The proposed works will not impact parking within the local road network and road closures will not be required. No impact to public transport will be generated by the proposal. It is understood that contractors will be required to park within a designated work zone to be determined at demolition programming stage.

Large vehicles, trucks and loaders bringing plant and equipment to site and transporting loads of demolition waste from the site will access the site via the short perpendicular street linking McGowan Lane and McGown Street to the east. Access from Radium Street to the west is not suitable for large vehicles and may be utilised by smaller vehicles and trucks.

Should works require the closure of the local road network to facilitate any activities, a Road Occupancy Licence will need to be obtained from Broken Hill City Council under the Roads Act 1993.

Subject to the implementation of construction traffic management measures which will be addressed within the Demolition Environmental Management Plan, the development is not expected to generate a significant impact to traffic, access or parking in the locality.

5.12 Visual Impact

The proposed works are contained wholly within the school site and will be generally screened from view from the streetscape by fencing throughout the works period. No views will be impacted by the proposed demolition works.

The proposed works will not generate any adverse solar impacts to any surrounding developments. The proposal will not generate any additional privacy concerns for neighbouring properties.

The proposed demolition of the existing school will temporarily introduce some new elements to the grounds through site fencing, stockpiles, and equipment, however plant and materials will be screened to ensure that no significant adverse impact to any views nor the character of the landscape will be generated.

6. Justification and Conclusion

The proposed demolition and remediation works at Willyama High School are subject to assessment under Part 5 of the EP&A Act. The REF has examined and taken into account to the fullest extent possible all matters affecting, or likely to affect, the environment by reason of the proposed activity.

As discussed in detail in this report, the proposal will not result in any significant or long-term impact. The potential impacts identified can be reasonably mitigated and where necessary managed through the adoption of suitable site practices and adherence to accepted industry standards.

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

- It responds to an established need for demolition activities at the site;
- 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 any impacts.

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

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

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