



planning consultants



## Submissions Report

Review of Environmental Factors  
New Primary School in Worrigeer

PLANNING. URBAN DESIGN. HERITAGE

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## Abbreviations

|                 |                                                                                                |
|-----------------|------------------------------------------------------------------------------------------------|
| ACHAR           | Aboriginal Cultural Heirtage Assessment Report                                                 |
| AHIP            | Aboriginal Heirtage Impact Permit                                                              |
| Council         | Shoalhaven City Council                                                                        |
| DA              | Development Application                                                                        |
| DCCEEW          | Department of Climate Change, Energy, the Environment and Water                                |
| DFP             | DFP Planning Pty Ltd                                                                           |
| DOPU            | Drop Off/Pick Up                                                                               |
| DPHI            | Department of Planning, Housing and Infrastructure                                             |
| DPIRD           | Department of Primary Industries and Regional Development                                      |
| DoS             | Degree of Saturation                                                                           |
| EP&A Act        | <i>Environmental Planning and Assessment Act 1979</i>                                          |
| EP&A Regulation | <i>Environmental Planning and Assessment Regulation 2021</i>                                   |
| LEP             | Local Environmental Plan                                                                       |
| LoS             | Level of Service                                                                               |
| NVIA            | Noise and Vibration Impact Assessment                                                          |
| REF             | Review of Environmental Factors                                                                |
| SCPP DoE        | Stakeholder and Community Participation Plan for New Schools and Major School Upgrade Projects |
| SCPP DPHI       | Stakeholder and Community Participation Plan for new Health Services Facilities and Schools    |
| SES             | State Emergency Service                                                                        |
| SIDRA           | Signalised & Unsignalised Intersection Design and Research Aid                                 |
| TI SEPP         | <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i>                 |
| TAIA            | Transport and Access Impact Assessment                                                         |
| TfNSW           | Transport for New South Wales                                                                  |

# 1 Introduction

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## 1.1 Purpose of this Report

This Submissions Report has been prepared by DFP Planning Pty Ltd (DFP) on behalf of the NSW Department of Education (the department) to support the proposed New Primary School in Worrigeer activity.

The proposed activity involves the construction and operation of a new primary school at 9 Worrigeer Road, Worrigeer and includes the following:

- Demolition.
- Removal of 46 trees.
- Permanent classroom building including a support learning unit.
- Hall.
- Canteen.
- Covered outdoor learning area.
- Library.
- Administration buildings/offices.
- Sports field.
- Waste storage and collection area.
- Landscaping including tree planting.
- Car parking.
- Public domain works.
- Infrastructure upgrades.
- A capacity of 582 students.

A Review of Environmental Factors (REF) and Mitigation Measures prepared by DFP were publicly exhibited between 14 May and 11 June 2026. A total of 52 submissions have been received, including five agency submissions and 47 public submissions.

This report has been prepared in accordance with statutory requirements under *State Environmental Planning Policy (Transport and Infrastructure) 2021* (TI SEPP) including the following plans:

- *Stakeholder and Community Participation Plan for New Health Services Facilities and Schools* (DPHI, 2024) (SCPP DPHI)
- *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, 2024) (SCPP DoE)

The purpose of this report is to analyse the submissions received (**Section 2**), to provide a response to those submissions (**Section 3**) and, where relevant, provision of further assessment (**Section 4**) or updated/amended mitigation measures (**Section 5**).

Following a review of this report, the department will finalise their assessment of the proposed activity and determine the activity in accordance with Division 5.1 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

Where there is an inconsistency between the exhibited REF document, and this report, this report prevails to the extent of that inconsistency.

## 2 Analysis of Submissions

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The New Primary School in Worrigeer activity was publicly exhibited between 14 May and 11 June 2026.

A total of 52 submissions including five agency submissions and 47 public submissions have been received.

The public agencies that made submissions included:

- Department of Climate Change, Energy, the Environment and Water (DCCEEW);
- Department of Primary Industries and Regional Development (DPIRD);
- Endeavour Energy;
- State Emergency Service (SES); and,
- Transport for New South Wales (TfNSW).

**Note:** Endeavour Energy submission only contained generic conditions of consent for DA's and did not identify project specific concerns.

Of the 47 public submissions received:

- Four form letters were received contributing 25 of the 47 public submissions;
- 26 'unique' submissions were received (counting form letters once); and
- No petition letters were received.

Submissions generally express overall support for new education facilities in Worrigeer but raise concern over particular elements of the proposed activity and/or the selected location for the new primary school.

### 2.1 Key Themes

The key themes which arise in submissions are detailed in the following subsections.

#### 2.1.1 Reporting and Consultation Process

Reporting and consultation process matters are raised in **six (6) public submissions**.

Two public submissions identify concerns with the community consultation process. One submission questions when community consultation occurred, the second submission states that community consultation was not meaningful and occurred after key decisions were made.

Three submissions question why the New Preschool in Worrigeer and New Primary School in Worrigeer were exhibited as separate projects when they are located on the same parcel of land, share common infrastructure and could result in additional cumulative environmental impacts.

#### 2.1.2 Traffic, Transport and Accessibility

Traffic, transport and accessibility matters are raised in **20 public submissions** and by **TfNSW**.

Key concerns in the public submissions relate to traffic congestion, intersection performance, parking considerations, the lack of public transport options and active transport infrastructure resulting in unrealistic mode share predictions and unsafe pedestrian environments.

The TfNSW submission raises the following issues:

- Safety and performance of Worrigeer Road and Booligal Road intersection;
- Constrained verge widths on Worrigeer Road resulting in substandard footpath outcomes;
- Lack of supporting active transport infrastructure in the locality increasing dependence on private vehicle use; and

## 2 Analysis of Submissions

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- Insufficient shoulder width on Greenwell Point Road at proposed northern vehicular access.

TfNSW request ongoing consultation between Shoalhaven City Council and the department to identify solutions to the Worrigee Road and Booligal Road intersection.

### 2.1.3 Land Use Conflict

Land use conflict matters are raised in **five (5) public submissions** and by **DPIRD**.

Key concerns relate to the position of the new primary school near agricultural land and the potential impacts to/from Terara Dairy on/from the future school, particularly with regard to noise, dust, odour and truck movements.

### 2.1.4 Built Form and Character

Built form matters are identified in **seven (7) public submissions**.

The key concern relates to the visual appearance of the three-storey classroom building and its compatibility with the low density character of Worrigee.

### 2.1.5 Noise

Noise matters are raised in **two (2) public submissions**.

Key concerns relate to construction and operational noise impacts on surrounding residential land. Additional submissions identified noise impacts emanating from ongoing dairy operations, however, these have been captured above under **Section 2.1.3**.

### 2.1.6 Vegetation Removal and Biodiversity Impacts

Biodiversity matters are raised in **six (6) public submissions** and by **DCCEEW**.

DCCEEW request cumulative tests of significance which consider the impacts of the proposed Public Preschool in Worrigee, particularly in regard to hollow bearing tree loss.

Key concerns in the public submissions relate to vegetation removal and biodiversity impacts including loss of canopy shade trees, urban heat and loss of habitat for threatened species.

### 2.1.7 Stormwater, Drainage and Flooding

Stormwater, drainage and/or flooding matters are raised in **four (4) public submissions** and by **SES**.

Flood emergency response matters are raised by SES and two public submissions. Concerns relate to inconsistent flood emergency response protocols depending on the type of flooding occurring. Submissions request a uniform emergency response protocol for all flood events.

Stormwater and drainage matters are raised in an additional two public submissions, particularly the adequacy of the proposed stormwater system and the impacts of overland flow on adjoining properties.

### 2.1.8 Aboriginal Cultural Heritage

Aboriginal cultural heritage matters are raised in **two (2) public submissions**.

The key concern relates to the management of known Aboriginal cultural heritage.

### 2.1.9 Site Selection

Site selection matters are raised in **14 public submissions**.

Key concerns include the site being too small for the proposed school capacity, and that some, or all, of the issues identified above including traffic and land use conflict constitute poor site selection.

## 2.2 Public Submissions Snapshot

A breakdown of the key themes identified in public submissions in order of prevalence is provided in **Table 1**.

## 2 Analysis of Submissions

| Table 1 Public Submissions Snapshot         |                              |
|---------------------------------------------|------------------------------|
| Key Themes                                  | Number of Public Submissions |
| Traffic, Transport and Accessibility        | 20                           |
| Site Selection                              | 14                           |
| Built Form and Character                    | 7                            |
| Reporting and Consultation Process          | 6                            |
| Vegetation Removal and Biodiveristy Impacts | 6                            |
| Land Use Conflict                           | 5                            |
| Stormwater, Drainage and Flooding           | 4                            |
| Aboriginal Cultural Heritage                | 2                            |
| Noise                                       | 2                            |

## 3 Response to Submissions

The following subsections provide a detailed response to the issues raised in the agency and public submissions received during the exhibition of the REF.

### 3.1 Agency Submissions

Responses to agency submissions received is provided in **Table 2**.

| Table 2 Response to Agency Submissions |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| Ref.                                   | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 2.1                                    | <p><b>Department of Primary Industries and Regional Development</b></p> <p><i>We have reviewed the current proposal as outlined in the REF based on that expertise and remit, and in consideration of the local context of the proposal, which is near to a substantial dairy (Terara Dairy) and an important locality for that industry. As highlighted in our previous advice, the area east of Nowra is highly significant to NSW's dairy industry, and land uses on the perimeter require careful consideration and management to ensure production can continue unimpeded.</i></p> <p><i>The dairy sector around NSW and in the Shoalhaven has undergone significant consolidation in recent decades. Despite this Shoalhaven's dairy industry remains highly important, ranking first among all LGAs in the state by production value.</i></p> <p><i>Due to its current size, connectivity to existing logistical networks, and location across high-quality agricultural land, we anticipate that the Terara site will persist as a dairy, and likely continue to expand (if not in land area, through further intensification).</i></p> <p><i>As stated in the Department's submission on the previous REF, a Land Use Conflict Risk assessment (LUCRA) should be undertaken for proposals of this nature (being a highly sensitive receiver) in or adjacent to productive rural areas. While the assessment in the current REF, including sections with reference to DPI's Land Use Conflict Risk Assessment (LUCRA) Guide (2011), may form part of that investigation, several elements require further consideration:</i></p> <ul style="list-style-type: none"> <li><i>It is not clear that the full extent of the dairy's operations and associated risks have been evaluated. While as noted the majority of operational infrastructure, including waste management and potential expansion areas occur at some distance from the proposed school site, some significant operational elements appear to have been omitted, including potential silage pits and other operational areas at the south of the dairy site near Greenwell Point Road.</i></li> <li><i>Full appraisal of dairy activities and assessment of potential conflict risks should be made with direct consultation with the dairy operator, not relying only on written submissions.</i></li> <li><i>Although the risk ranking matrix scheme from the LUCRA Guide is referenced, it is not clearly demonstrated with regard to all identified risks. Showing rankings determined for each identified risk would assist in assessment and transparency.</i></li> </ul> | <p>It is acknowledged the area east of Nowra is significant to NSW's Dairy industry and that the site is located near Terara Dairy. The site is located on R5 Large Lot Residential zoned land and does not result in a reduction in rural land zoned for agricultural purposes.</p> <p>The REF has considered the planned intensification of the Terara Dairy with a thorough review of the potential environmental impacts resulting from the proposed changes under DA 26/1016, provided within Section 7.11 and 7.15 of the exhibited REF.</p> <p>Additional assessment has been undertaken following public exhibition and is provided in <b>Section 4.2</b> of this report. Noise, air quality and odour reports prepared as part of DA 26/1016 support the REF conclusions, that the proposed dairy intensification will have negligible impacts on the school site.</p> <p>Post exhibition amendments have also been made to Section 7.11, and Tables 35 to 38 of the exhibited REF to provide a more comprehensive LUCRA assessment supported by the additional assessment detailed in <b>Section 4.2</b> of this report.</p> <p>Through community consultation, public exhibition and other information available, the department has a comprehensive understanding of Terara Dairy's concerns. Additional assessment is provided in <b>Section 4.2</b> of this report in response to the latest comments received during the public exhibition period.</p> <p>The proposed school is found to have minimal impacts on heavy vehicle travel times as provided in the additional traffic assessment in <b>Section 4.1</b> of this report.</p> |

### 3 Response to Submissions

Table 2 Response to Agency Submissions

| Ref. | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      | <ul style="list-style-type: none"> <li>While the REF assesses air pollution conflict risk as ‘unlikely’, and ‘moderate’ in consequence (using the LUCRA Guide risk matrix scheme), it notes that dust and odour reports are required to evaluate potential impacts. As air quality impacts are complicated to understand and depend among other things on local environmental factors, air quality modelling may be required.</li> <li>Buffer plantings are supported in general as an appropriate mitigation measure for reducing land use conflict risk, though their effectiveness will depend on many factors including their composition and implementation. This should be detailed following completion of LUCRA investigations.</li> <li>The Transport and Accessibility Impact Assessment notes that heavy vehicle use of the surrounding road network is relatively low during peak volume times for the proposed school (8:00-9:00 AM and 2:45PM-3:45 PM). Noting that volumes for vehicles servicing dairies are likely to be substantially higher outside these times, the REF should examine whether there is potential for greater conflict during special events or other non-peak uses of the education facility site, and whether there are any appropriate mitigation measures that might be considered to reduce this.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 2.2  | <p><b>NSW State Emergency Service</b></p> <p><i>In summary, we:</i></p> <ul style="list-style-type: none"> <li><b>Note</b> the proposed activity is outside Council’s Flood Planning Area (FPA) and unaffected by riverine (mainstream) flooding but is located within a low-risk overland PMF extent.<sup>4</sup> The PMF overland flood level is recommended as an FFL for the proposed school buildings across the site.<sup>5</sup></li> <li><b>Note</b> the surrounding road network is expected to be impacted by hazardous flooding in both riverine<sup>6</sup> and overland flow flooding events,<sup>7</sup> with the site modelled to become <b>isolated by high hazard floodwaters</b> (...) for up to <b>40 hours</b> in a riverine PMF event.<sup>8</sup> We <b>recommend</b> considering the risk of coincident flooding, as site access may become isolated by local overland flooding (in <b>as little as 10 minutes</b>)<sup>9</sup> prior to the onset of riverine flooding, which may result in people missing the opportunity to evacuate and remain isolated at the site, or people may be surprised by flash flooding while trying to evacuate. People will not be able to effectively distinguish between a local catchment and a regional flooding event, particularly whether what starts as localised flooding event may progress to a regional event.</li> <li><b>Advise</b> revising the flood emergency strategy due to conflicting advice and the possibility of confusion in times of emergency. The proposed flood emergency strategy of sheltering in place for (local) overland flooding and evacuation for (regional) riverine flooding events <b>is not consistent</b> with the Shelter in Place Guideline,<sup>11</sup> <b>is not appropriate and can result in increased risk to life</b>. This can be particularly dangerous noting the sensitive uses of this proposal. From an emergency management perspective, transitioning from telling people explicitly to shelter in place to then enacting evacuation will complicate the flood emergency</li> </ul> | <p>The finished floor level (FFL) of the primary school is located above the PMF flood level. The FFL requirement is also subject of Mitigation Measure C11*. A minor amendment to the wording of this Mitigation Measure is proposed to ensure reference is made to the relevant source report being the Flood Impact Risk Assessment exhibited with the REF.</p> <p>In relation to NSW SES concerns with the exhibited flood emergency strategy, the Flood Emergency Response Plan (FERP) has been amended (<b>Attachment 1</b>) to remove Shelter In Place. The FERP provides a single emergency response protocol for clarity being early evacuation and closure of the school when an extreme rainfall or flooding event is forecast.</p> <p>The site stormwater management design reduces the impact of flooding and runoff on the community by capturing surface water run-off through a series of grates and swales, and utilising On-Site Stormwater Detention (OSD).</p> <p>Construction flood management is managed through Mitigation Measure C1. Operational flood management will be managed and guided by the FERP which is required to be implemented under Mitigation Measure OM5*.</p> |

### 3 Response to Submissions

**Table 2 Response to Agency Submissions**

| Ref. | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      | <p>response, will put people's life at risk, and may result in an increased burden to NSW SES and Council resources in a flood event.</p> <ul style="list-style-type: none"> <li>• <b>Support</b> the strategy of closing the school early, before the start of the school day, if there is any indication of the risk of flooding or isolation of the site from riverine or overland flow, such as on receipt of a Flood Warning for the Lower Shoalhaven River and/or a severe weather warning for the broader area. The evacuation time would require additional travel time required for parents/caregivers to reach the school prior to access becoming affected and proceed to safety. <b>Evacuation must not require people to drive or walk through flood water. The Flood Emergency Response Plan (FERP) should be updated to reflect the above considerations.</b></li> <li>• <b>Recommend</b> pursuing site design and stormwater management that reduces the impact of flooding and runoff and minimises any risk to the community. Any improvements that can be made to reduce flood risk will benefit the community.</li> <li>• <b>Ensure</b> workers and people using the facility during and after the upgrades are aware of the flood risk, for example through site inductions or by using signage.</li> <li>• <b>Notify</b> NSW SES where there are likely to be significant delays in the operation of the roads affected by the upgrades as this may impact the ability for emergency vehicles to use these routes.</li> </ul> | <p>Mitigation Measure TA2* has been updated to include a requirement to notify the SES where there are likely to be significant delays in the operation of the roads affected by the upgrades as provided in <b>Section 5</b> of this report.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 2.3  | <p><b>Endeavour Energy</b></p> <p>Agency provided standard conditions of consent for consideration.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <p>The REF includes Mitigation Measures UI4 and UI5 to ensure the new primary school is adequately serviced by electricity infrastructure</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 2.4  | <p><b>Transport for NSW</b></p> <p><b>Local road intersection:</b></p> <ul style="list-style-type: none"> <li>• TfNSW notes that Council had proposed an upgrade of the intersection of Worrigee Road and Booligal Road as it is adjacent to a key school access point. Noting the introduction of bus movements, pick-up and drop-off activity, and new priority crossings increases the need for a safe intersection. The DET should work with Council to identify the best outcome for this intersection.</li> </ul> <p><b>Footpaths:</b></p> <ul style="list-style-type: none"> <li>• TfNSW notes that there are constrained verge widths resulting in path designs that reduce either path width or offsets to traffic lanes to fit within the corridor. Thus leading to substandard outcomes at key interfaces including school frontage, crossings, and future shared path connections. This constrained verge could lead to perceived safety concerns thus discouraging walking and cycling and increasing vehicle use.</li> <li>• TfNSW also notes that although there is provision of footpaths around the school, there is a considerable lack of supporting active transport infrastructure across the broader catchment. This pedestrian connectivity is reliant on Council delivery via the 2025 Active Transport</li> </ul>                                                                                                                                                                                                          | <p><b>Local Road Intersection</b></p> <p>The proposed activity has been amended post-exhibition to now include an upgrade of the Worrigee Road, Booligal Road and Golden Grove intersection with a single lane mountable roundabout.</p> <p>In response to TfNSW, Mitigation Measure TA4* has been amended to include this intersection upgrade. <b>Section 5</b> of this report provides the new or amended mitigation measures.</p> <p><b>Footpaths</b></p> <p>Consultation is ongoing between the department and Council in relation to the path designs.</p> <p>Consultation is ongoing between the department and Council regarding the delivery of broader footpath upgrades by Council under the 2025 Active Transport Strategy and potential ways for Council to bring forward key components to support the school opening.</p> |

### 3 Response to Submissions

| Table 2 Response to Agency Submissions |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Ref.                                   | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|                                        | <p><i>Strategy and is likely to take many years. This will increase dependence on private vehicle and bus movements within the school community and will be difficult to change in the future. DET could develop a Green Travel Plan that will facilitate future green travel as pedestrian connectivity is delivered in the future.</i></p> <p><b>Bus Planning:</b></p> <ul style="list-style-type: none"> <li><i>TfNSW notes that bus operators should be included in ongoing discussions. The Department of Education should consult with operators to ensure existing services and future arrangements are considered prior to the school becoming operational.</i></li> </ul> <p><b>Greenwell Point Access</b></p> <ul style="list-style-type: none"> <li><i>Insufficient shoulder width at the Greenwell Point Rd access will increase the risk of rear-end crashes and shoulder damage from vehicles travelling around queued traffic waiting to turn right into the site. The DET should work with Council to ensure this proposed access works with the medians required for the roundabout upgrade scheduled in the near future.</i></li> </ul>                                                                                                                                                                     | <p>A School Transport Plan (STP) is required to be prepared under Mitigation Measure TA1. Ongoing consultation is occurring between Council and the department regarding the delivery of active transport infrastructure in the locality in accordance with the Shoalhaven Active Transport Strategy in the locality.</p> <p><b>Bus Planning</b></p> <p>An additional Mitigation Measure, TA6*, has been included which requires the department to consult with local bus operators on existing and future arrangements as provided in <b>Section 5</b> of this report</p> <p><b>Greenwell Point Access</b></p> <p>Consultation is ongoing between the department and Council regarding the design of the new Greenwell Point Road roundabout and any additional requirements relating to the new vehicle cross-over on Greenwell Point.</p> <p>Additional assessment of traffic impacts has been undertaken following public exhibition and is provided in <b>Section 4.1</b> of this report.</p> |
| 2.5                                    | <p><b>Department of Climate Change, Energy, the Environment and Water (DCCEEW) Conservation Programs, Heritage and Regulation (CPHR).</b></p> <ul style="list-style-type: none"> <li><i>The Ecology Mitigation Measures presented in the FFA and Appendix 1 of the REF are comprehensive and supported. This includes tree replacement planting at a ratio of 1:1 is proposed to offset the loss of native species that require removal. New plantings will incorporate native species.</i> <ul style="list-style-type: none"> <li><b>CPHR recommend</b> – a Landscape Plan be required as an approval condition that includes tree replacement planting at a ratio of 1:1 and the use of appropriate native species.</li> </ul> </li> <li><i>Section 6.3 includes a cumulative impacts discussion, which combines the proposed impacts to PCT 3269 during construction of both the Primary and Preschool facilities. We agree that the total removal of 0.5ha of PCT (107 trees) is not likely to have a significant impact on the vegetation community itself, however, the cumulative impact should also be considered within the Tests of Significance for threatened species.</i> <ul style="list-style-type: none"> <li><b>CPHR recommend</b> – update the assessment of significance to include</li> </ul> </li> </ul> | <p><b>Landscape Plan</b></p> <p>Landscaping will be provided throughout the site with replacement tree planting at a ratio of 1:1. A preliminary landscape plan was prepared to support early design work, and a final landscape plan will be prepared prior to construction.</p> <p><b>Test of Significance</b></p> <p>A revised test of significance that considers the cumulative impacts of both the new preschool and new primary school projects on hollow bearing tree removal has been undertaken by the project ecologist. The proposed activity is still considered unlikely to have a significant impact on threatened species.</p>                                                                                                                                                                                                                                                                                                                                                     |

### 3 Response to Submissions

| Table 2 Response to Agency Submissions |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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| Ref.                                   | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|                                        | <p><i>consideration of cumulative impacts, particularly in relation to total loss of hollow bearing trees.</i></p> <ul style="list-style-type: none"> <li><i>The REF and Arborist Report recommend, “Any loss of trees regardless of retention value should be offset with replacement planting. While no specific policy applies under Part 5 of the EP&amp;A Act, replacement planting should be afforded within the landscape plans to provide canopy coverage and to offset removal. Consultation with the project arborist, project ecologist, or Council’s Tree Officer may be undertaken to guide the replacement schedule if required”.</i> <ul style="list-style-type: none"> <li><b>CPHR Recommend</b> – <i>provision of nest boxes to replace lost hollows, landscape plans to focus on replanting species from PCT 3269 Shoalhaven Lowland Spotted Gum-Paperbark Forest. This PCT supports a variety of local threatened species and in combination with nest boxes could provide a valuable opportunity for future students to learn about and take ownership of restoring and protecting their local biodiversity.</i></li> </ul> </li> </ul> | <p>Further details of the additional assessment carried out is provided in <b>Section 4.6</b> of this report.</p> <p><b>Nest Boxes and Replacement Planting Species</b></p> <p>Species selection will include locally native flora including selections from threatened plant community PCT 3269 Shoalhaven Lowland Spotted Gum-Paperbark Forest, as required by amended Mitigation Measure E6* provided in <b>Section 5</b> of this report.</p> <p>Nest boxes are required to offset hollow bearing tree loss as per Mitigation Measure E8*; which has been updated to provide offset nest boxes for the cumulative loss of 10 hollow bearing trees as provided in <b>Section 5</b> of this report.</p> |

## 3 Response to Submissions

### 3.2 Community Submissions

A response to the issues raised in community submissions is provided in **Table 3**.

| Ref. | Submission | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| 3.1  | PK         | <p><b><u>Key Theme:</u> Reporting and Consultation Process</b></p> <p><i>I am seeking clarification as to why the proposed preschool and primary school at 9 Worrigee Road, Worrigee were exhibited and assessed through separate REFs, despite appearing to form one interdependent precinct with linked access, road works and operational assumptions. Could the Department please explain whether it considers the public to have been given a clear and integrated picture of the full proposal, rather than successive fragments exhibited at different times? Given the evident relationship between the two proposals, I would appreciate a direct response on the assessment rationale.</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <p><b>Reporting and Consultation Process</b></p> <p>It is acknowledged that the new primary school and new preschool projects are both located on the same parcel of land and share some common infrastructure.</p> <p>However, both projects are being delivered on separate construction timeframes with the preschool scheduled to open in Term 1 2027, and the primary school in 2028.</p> <p>The separate approval pathways allow for the construction and operation of the preschool to commence, irrespective of approval for construction and operation of the primary school.</p> <p>Notwithstanding, cumulative impacts have been considered in the REF for the New Primary School in Worrigee. Some cumulative assessment has been strengthened following public exhibition as provided in <b>Section 4</b> of this report.</p> |
| 3.2  | SUB-16770  | <p><b><u>Key Theme:</u> Reporting and Consultation Process</b></p> <p><i>The proposed primary school and the adjacent preschool already approved at P5-2026-40 occupy the same legal parcel — Lot 1 DP 576975. They will share car parking, with the primary school's 34 staff spaces accessed through the preschool car park. Most significantly, the primary school REF discloses that the preschool's stormwater detention tank has been "sized to support the catchment of the preschool and the relevant sub-catchment of the New Primary School in Worrigee." Infrastructure that is physically designed and sized to serve two projects is shared infrastructure, and shared infrastructure is the engineering definition of a single project.</i></p> <p><b><u>Key Theme:</u> Traffic, Transport and Accessibility</b></p> <p><i>The traffic assessment for the primary school, prepared by WSP, was modelled with the preschool already assumed to be operational. It finds that the combined precinct will generate approximately 1,350 vehicle movements per day. That figure — the one that actually describes what the surrounding road network will experience — has never</i></p> | <p><b>Reporting and Consultation Process</b></p> <p>The rationale for separate planning pathways is described in Row 3.1 of this table.</p> <p><b>Traffic, Transport and Accessibility</b></p> <p>The exhibited Traffic Impact Assessment (TIA) considered the cumulative traffic impacts generated by both the new primary school and preschool projects. Further modelling has been undertaken to demonstrate that traffic performance would be satisfactory, should the Greenwell Point Road, Worrigee Road and Millbank Road roundabout (being delivered by</p>                                                                                                                                                                                                                                                                        |

### 3 Response to Submissions

**Table 3 Response to Community Submissions**

| Ref. | Submission | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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|      |            | <p><i>been placed before the community in a single document, because the two assessments were exhibited sequentially rather than together.</i></p> <p><i>I am not suggesting the school should not be built. I am asking that before determination, the department provide, in a publicly available document, a clear account of the combined operational profile of the precinct: its total daily vehicle movements, its total student and staff population, its shared infrastructure obligations, and the road network conditions under which both facilities will operate simultaneously. The roundabout upgrade at Greenwell Point Road and Worrigee Road is identified as a prerequisite to the primary school opening, and the Booligal Road upgrade is described as a prerequisite to preschool opening. A single condition requiring all external works to be completed and certified before either facility operates at capacity would provide certainty for the community and the road network alike.</i></p> <p><b>Key Theme: Stormwater, Drainage and Flooding</b></p> <p><i>The Flood Impact and Risk Assessment prepared by Water Technology (Appendix 7) is a thorough document. It finds that the school site can become isolated by floodwaters on the surrounding road network for up to 40 hours during an extreme flood event, and that isolation is likely to occur approximately 13 hours after a flood warning is issued. The Flood Emergency Response Plan (Appendix 8) addresses this risk and requires the school to close and evacuate if a forecast flood event is approaching.</i></p> <p><i>This is a manageable risk for a primary school, provided the evacuation strategy is realistic. What the assessment does not address is the coordination of this evacuation with the adjacent preschool. If both facilities are in operation when a flood warning is issued, the same roads, the same car parks, and the same access points at Worrigee Road and Booligal Road will be used simultaneously by parents collecting primary school children and parents collecting preschool children. The FERP for each facility appears to have been prepared independently. There is no joint emergency response protocol for the combined site.</i></p> <p><i>I ask that, as a condition of approval, the department be required to prepare and maintain a single, site-wide Flood Emergency Response Plan that covers both facilities operating concurrently, that is reviewed annually, and that is shared with Shoalhaven City Council and the NSW State Emergency Service. This is a straightforward condition that would meaningfully improve community safety without adding any burden to the project's design or construction.</i></p> <p><b>Key Theme: Land use Conflict</b></p> | <p>Shoalhaven Council) not be operational upon the commencement of school operations.</p> <p>Road upgrades and safety measures within the vicinity of the school including a new roundabout at the intersection of Worrigee Road, Booligal Road and Golden Grove, pedestrian crossings and implementation of a school zone speed limit are required in Mitigation Measure TA4* , and must be delivered prior to the commencement of operations by Mitigation Measure TA5.</p> <p>Further discussion on traffic matters is provided in <b>Section 4.1</b> of this report.</p> <p><b>Stormwater, Drainage and Flooding</b></p> <p>The Flood Emergency Response Plan (FERP) has been updated to remove reference to 'shelter in place' as an emergency response measure, to provide greater clarity on the emergency response protocols followed during a flood event. The school will be closed and/or evacuated early when extreme rainfall or flooding is forecast. This strategy is consistent with the approved preschool. The requirement for a combined FERP is considered reasonable and is reflected in amended Mitigation Measure OM5*.</p> <p><b>Land Use Conflict</b></p> |

### 3 Response to Submissions

**Table 3 Response to Community Submissions**

| Ref. | Submission | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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|      |            | <p><i>The REF includes a Land Use Conflict Risk Assessment (LUCRA) addressing the potential for conflict between the school and Terara Dairy, which operates approximately 150 metres north of the site at 233 Millbank Road. The LUCRA is a genuine attempt to address a legitimate concern raised by the community and by the dairy operator. However, the REF itself acknowledges within the LUCRA that "noise, dust and odour reports are required to evaluate the potential impacts." Those reports have not been provided. The LUCRA reaches a conclusion — that impacts are unlikely and manageable with buffer planting — without the specialist inputs it identifies as necessary to reach that conclusion.</i></p> <p><i>This matters because the dairy operator has a Development Application currently before Shoalhaven City Council (DA26/1016) seeking to convert from a pasture-based to a barn-based system, with proposed barns located approximately 783 metres from the school. A barn-based dairy of 2,200 cows at that distance would have a materially different odour, noise, and waste profile than the current operation. The REF assesses the current dairy. The DA assesses the future dairy. Neither assessment considers the school and the expanded dairy together.</i></p> <p><i>I ask that the department either commission the noise, dust and odour specialist reports that its own LUCRA identifies as necessary, or condition the school's approval on the outcome of DA26/1016, so that the land use conflict between these two facilities is assessed on the basis of what will actually operate in each location, not on what currently exists. This would also be of benefit to the dairy operator, who deserves to have the school's presence properly accounted for in the assessment of its own application.</i></p> <p><b>Key Theme: Aboriginal Cultural Heritage</b></p> <p><i>The Aboriginal Cultural Heritage Assessment Report (Appendix 3) found that a single test pit on the school site contains three pieces of culturally flaked glass, registered as AHIMS site 52-5-1199. An Aboriginal Heritage Impact Permit (AHIP) from Heritage NSW is required before any ground disturbance can occur in that area. The ACHAR makes clear that during preschool construction, the AHIP area must be temporarily fenced and kept free of vehicle access and ground disturbance. This means that during construction of both facilities — which may overlap — the same physical area will need to be protected from two different construction workforces, under two different contracts, managed by two different site supervisors. Each project's CEMP refers to the AHIP area protection obligation in its own document only. There is no coordinated construction management framework that covers the site as a whole.</i></p> <p><i>I ask that the department require, as a condition of approval, that a single heritage protection protocol for AHIMS site 52-5-1199 be agreed before either construction</i></p> | <p>Further assessment of land use conflict is provided in <b>Section 4.2</b> of this report including more comprehensive consideration of noise and air quality impacts and cross-reference to additional LUCRA detail provided within an updated post-exhibition REF.</p> <p><b>Aboriginal Cultural Heritage</b></p> <p>The New Primary School and New Public Preschool in Worrigeer are both subject to the same mitigation measures in relation to Aboriginal Cultural Heritage being H1, H2, H3, H4* and H5*. Mitigation Measures H1 - H3 relate to unexpected finds, H4* outlines the requirement to obtain an Aboriginal Heritage Impact Permit (AHIP) and to establish a no-go zone surroundings AHIMS 52-5-1199 until the AHIP is granted, and H5* outlines the site induction requirements for construction workers and contractors. The new preschool is subject to the same mitigation measures during construction and operation, with both projects utilising the ACHAR as guidance for the location of the no-go zone. This means both projects must adhere to the same management practices regarding Aboriginal heritage impacts.</p> |

### 3 Response to Submissions

**Table 3 Response to Community Submissions**

| Ref. | Submission | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|------|------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      |            | <p><i>program begins, covering the full period during which any ground disturbance is occurring anywhere on the lot. The ACHAR also notes that consultation with Registered Aboriginal Parties must be maintained at least every six months for the AHIP application to remain valid. A condition requiring the department to confirm ongoing RAP consultation at six-monthly intervals, and to notify the determining authority if a gap occurs, would ensure this statutory obligation is not inadvertently allowed to lapse.</i></p> <p><i>This is a minor point, but worth raising in good faith. The Acknowledgement of Country in this REF recognises the Dharawal, Wandi Wandian and Jerrinja peoples as traditional custodians of the land on which the school is proposed. The ACHAR (Appendix 3) describes the study area as sitting within Wandi Wandandian Country and notes that consultations brought together Dharawal and Yuin Elders. The 12 Registered Aboriginal Parties who engaged in the ACHAR process represent a range of groups, and the appropriate acknowledgement for this specific lot should be confirmed with them directly. I raise this not as a criticism but as an invitation to ensure the acknowledgement reflects what the RAP consultation has actually established.</i></p> | <p>Evidence of RAP consultation will be provided as part of the pending AHIP application. Heritage NSW will review all RAP consultation undertaken for this project as part of their assessment of the AHIP application.</p> <p>The Wandi Wandian and Jerrinja people are part of the broader Yuin Nation, addressed correctly in both the REF and ACHAR.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 3.3  | SUB-17331  | <p><b><u>Key Theme:</u> Traffic, Transport and Accessibility</b></p> <p><i>I have big concerns around the increased traffic congestion on Booligal Road - in particular the Worrigee - Booligal Road intersection.</i></p> <p><i>I have concerns around changes to access of large machinery, trucks, tractors and floats to our driveway. I have concerns about people attending events at the school and driving down our driveway looking for parking spots. I also want to know about the catchment area for the school and if there's been any changes to the zoning of properties surrounding the school. Is there plans to extend Booligal Road at some point and make it a through road?"</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <p><b>Traffic, Transport and Accessibility</b></p> <p><u>Worrigee/Booligal Road Intersection</u></p> <p>The proposed activity has been amended post-exhibition to now include an upgrade of the Worrigee Road, Booligal Road and Golden Grove intersection with a single lane mountable roundabout. The roundabout is expected to reduce traffic impacts as provided in <b>Section 4.1</b> of this report.</p> <p><u>Private Property Access</u></p> <p>Booligal Road will be upgraded with formalised kerb and gutter, a cul-de-sac head (turning circle), and vehicular crossovers, which will provide more distinct boundaries between public domain and private land.</p> <p><u>School Intake Area</u></p> <p>Intake areas are established approximately one year prior to new schools opening. The latest demographic data and anticipated growth trends within the community will be considered and the final intake area will be determined in consultation with local principals and relevant stakeholders.</p> <p><u>Zoning</u></p> |

### 3 Response to Submissions

**Table 3** Response to Community Submissions

| Ref. | Submission | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|------|------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      |            | <p><b>Key Theme: Stormwater, Drainage and Flooding</b></p> <p><i>I'm concerned about drainage being channelled to the existing storm drains on Worrigee Road as that's funnelling all that properties water to mine and my neighbours properties - it is highly likely doing this will flood my neighbours house and our access to our property.</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>The current zoning of properties around the school can be viewed on the NSW Planning Portal Spatial Viewer.</p> <p><u>Booligal Road Extension</u></p> <p>There are no plans to extend Booligal Road as part of the primary school or preschool projects, and a formalised cul-de-sac head will be provided at the road's current terminus.</p> <p><b>Stormwater, Drainage and Flooding</b></p> <p>The Booligal Road upgrades are being delivered under the New Preschool in Worrigee activity.</p> <p>The stormwater design includes On-Site Detention (OSD) to ensure the post-development stormwater flows into the road reserve do not exceed pre-development flows. More so, the proposed activity provides swales on-site to ensure surface water is appropriately captured/directed into the OSD.</p> <p>A Flood Impact Risk Assessment (FIRA) was prepared and exhibited alongside the REF. That report modelled the proposed primary school and found that the activity results in same or less overland flow during extreme rainfall and flooding events on neighbouring properties and found minimal impacts on downstream catchments.</p> |
| 3.4  | SUB-17580  | <p><b>Key Theme: Reporting and Consultation Process / Traffic, Transport and Accessibility</b></p> <p><u>Issue 1 — The Precinct Has Not Been Assessed as a Whole</u></p> <p><i>The proposed primary school and the adjacent preschool at P5-2026-40 occupy the same legal parcel — Lot 1 DP 576975. The site has not been subdivided. There is no legal boundary between the two projects. The separation exists only in the respective REF documents.</i></p> <p><i>The primary school REF makes the physical integration explicit. Section 3.12 discloses that the preschool's on-site stormwater detention tank "has been sized to support the catchment of the preschool and the relevant sub-catchment of the New Primary School in Worrigee." Infrastructure engineered and sized to serve two projects cannot, by any reasonable definition, belong to two independent activities.</i></p> | <p><b>Reporting and Consultation Process</b></p> <p>The rationale for separate planning pathways is described in Row 3.1 of this table.</p> <p><b>Traffic Transport and Accessibility</b></p> <p>The exhibited Traffic Impact Assessment (TAIA) considered the cumulative traffic impacts generated by both the new primary school and preschool projects. The REF and TAIA were published for the purpose of public exhibition and discloses in a single consolidated document the cumulative impacts.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

### 3 Response to Submissions

**Table 3** Response to Community Submissions

| Ref. | Submission | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|      |            | <p><i>The integration extends to three further systems:</i></p> <ul style="list-style-type: none"> <li>• <i>Car parking: 34 of the primary school's 40 staff spaces are accessed through the preschool car park. The car parks are physically shared.</i></li> <li>• <i>Access and drop-off: the Booligal Road upgrade — delivered under the preschool REF — includes 10 dedicated DOPU bays and 17 short-stay spaces described in the preschool TAIA as being "for the primary school." The primary school REF states it "relies on" this upgrade being completed before the school opens.</i></li> <li>• <i>Services: the primary school REF notes individual connections for each facility from a shared water and sewer corridor delivered by the preschool works.</i></li> </ul> <p><i>The traffic assessment prepared by WSP for the primary school was modelled with the preschool assumed to be already operational. It finds the combined precinct will generate approximately 1,350 vehicle movements per day. That figure — the one that actually describes what the surrounding road network will experience — has never appeared in a single publicly exhibited document. Anyone who submitted on the preschool REF did so without knowing the primary school's scale: three storeys, 582 students, a 1,000 kVA substation, and a shared car park through which the majority of staff movements will flow each day.</i></p> <p><i>There is also no combined peak-stacking analysis of the shared Booligal Road DOPU bays and short-stay spaces during the overlapping morning and afternoon arrival and departure windows. The preschool operates from 8am, the primary school bell times are 8:45am and 2:50pm. Both sets of families will be using the same 65-metre indented DOPU bay simultaneously. No modelling of that scenario has been exhibited.</i></p> <p><i>Under section 5.5(1) of the Environmental Planning and Assessment Act 1979, the determining authority must examine and take into account to the fullest extent possible all matters affecting or likely to affect the environment by reason of the activity. In Palm Beach Protection Group Incorporated v Northern Beaches Council [2020] NSWLEC 156, Preston CJ held at [260] that this duty is mandatory and sets a high standard. Assessing one precinct through two consecutively exhibited REFs — neither of which models the combined operational impact of both facilities — risks falling short of that standard. This concern is not the submitter's alone: Shoalhaven City Council's Mayor Patricia White wrote to the Minister for Education raising concerns about traffic levels, stormwater adequacy, and the lack of active transport at this specific site.</i></p> <p><u><i>What I am asking</i></u><br/> <i>Before determination, the department publish — in a single publicly available document — the combined operational profile of the precinct: total daily vehicle</i></p> | <p>No peak-stacking analysis is required as the pre-school has dedicated on-site DOPU bays provided in accordance with Council requirements.</p> <p>The preschool only requires the upgrade of Booligal Road to support operations. Accordingly, it is not necessary to condition the road upgrades required to support the primary school activity to occur prior to operation of the preschool.</p> <p>In relation to the subject activity, the proposed public domain works subject to the control of the department will be undertaken prior to the commencement of the operations of the primary school. This is reflected in Mitigation Measures TA4* and TA5.</p> <p>In relation to the assessment requirements of Section 5.5(1) of the EP&amp;A Act, 1979, is achieved by cumulative assessment contained within the exhibited REF, albeit it is no longer a requirement under the EP&amp;A Act to assess to the fullest extent possible.</p> |

### 3 Response to Submissions

Table 3 Response to Community Submissions

| Ref. | Submission | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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|      |            | <p>movements, total student and staff population, shared infrastructure obligations, and road network conditions under simultaneous operation of both facilities.</p> <p>As a condition of approval: all external works — the Booligal Road upgrade, the roundabout at Greenwell Point Road and Worrigee Road, and the shared stormwater infrastructure — to be completed, certified, and confirmed operational before either facility opens at its approved enrolment capacity.</p> <p><b>Key Theme: Stormwater, Drainage and Flooding</b></p> <p><u>Issue 2 — Two Flood Assessments, Same Site, Incompatible Conclusions</u><br/>The Flood Impact and Risk Assessment prepared by Water Technology (Appendix 7) is a thorough document. It finds that the school site can become isolated by floodwaters for up to 40 hours during an extreme event, with approximately 13 hours of warning before access routes are cut.</p> <p>The preschool REF, assessed by a different firm — BMB Engineers — for the same site and the same surrounding road network, found an isolation duration exceeding 48 hours. These are materially different conclusions, from different methodologies, applied to adjacent land parcels in the same catchment. Neither study references the other. No reconciliation has been provided anywhere in either REF.</p> <p>The consequence is that each facility's Flood Emergency Response Plan rests on different assumptions about how long the site can be isolated and how much warning will be available. When a flood warning is issued, both facilities will be evacuating simultaneously through the same access points at Worrigee Road and Booligal Road. Parents collecting preschool children and parents collecting primary school children will be using the same car parks at the same time, under plans that were written on different modelling. That is not a sound foundation for child safety.</p> <p><u>What I am asking</u><br/>As conditions of approval: first, a reconciled flood assessment that resolves the discrepancy between the two existing studies and establishes a single authoritative characterisation of flood isolation risk for the combined precinct. Second, a single site-wide Flood Emergency Response Plan covering both facilities operating concurrently, reviewed annually, and shared with Shoalhaven City Council and the NSW State Emergency Service.</p> <p><b>Key Theme: Traffic, Transport and Accessibility</b></p> <p><u>Issue 3 — The Roundabout Delivery Assumption Is Not Secured</u></p> | <p><b>Stormwater, Drainage and Flooding</b></p> <p>The Flood Emergency Response Plan (FERP) has been updated to remove reference to 'shelter in place' as an emergency response measure, to provide greater clarity on the emergency response protocols followed during a flood event. The school will be closed and/or evacuated early when extreme rainfall or flooding is forecast. This strategy is consistent with the approved preschool. The requirement for a combined FERP is considered reasonable and is reflected in amended Mitigation Measure OM5*.</p> <p><b>Traffic, Transport and Accessibility</b></p> <p>Further modelling has been undertaken to demonstrate that traffic performance would be satisfactory, should the Greenwell Point Road,</p> |

### 3 Response to Submissions

**Table 3 Response to Community Submissions**

| Ref. | Submission | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|------|------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      |            | <p><i>The REF identifies the roundabout upgrade at Greenwell Point Road and Worrigee Road as necessary to the school's safe operation. The traffic modelling shows that, for the primary school alone in 2028, the intersection at Worrigee Road, Golden Grove Road and Booligal Road is projected to operate at Level of Service C in the AM peak, with a degree of saturation of 0.78 and a 95th percentile queue of 89 metres. That is before adding simultaneous preschool DOPU movements through the same shared kerbside infrastructure.</i></p> <p><i>The REF states the roundabout will be completed "by late 2027." Shoalhaven City Council's published roadworks schedule programs the Worrigee Road and Greenwell Point Road roundabout from August 2027 to February 2028 — a completion date that falls in the same year the school is scheduled to open. If the roundabout is not complete when the school opens, the surrounding network will operate under conditions that the REF's own modelling identifies as marginal. The REF does not examine what happens in that scenario.</i></p> <p><u>What I am asking</u><br/> <i>A condition that the primary school may not operate at full enrolment capacity until the roundabout upgrade at Greenwell Point Road and Worrigee Road has been completed and certified by the relevant road authority. This is consistent with the REF's own traffic assumptions and provides a clear, verifiable trigger.</i></p> <p><b>Key Theme: Land Use Conflict</b></p> <p><u>Issue 4 — The Land Use Conflict Assessment Lacks Its Supporting Evidence</u><br/> <i>The REF includes a Land Use Conflict Risk Assessment addressing potential conflict between the school and Terara Dairy, which operates approximately 150 metres north of the site. The LUCRA is a genuine attempt to engage with a concern raised by both the community and the dairy operator.</i></p> <p><i>However, the REF acknowledges within the LUCRA that noise, dust and odour specialist reports are required to evaluate the potential impacts. Those reports have not been provided. The LUCRA identifies an unmitigated risk ranking of 9 (moderate) for the existing dairy operation and concludes that buffer planting will be adequate — before the specialist inputs it identifies as necessary have been obtained.</i></p> <p><i>This matters because the dairy operator has a Development Application before Shoalhaven City Council (DA26/1016) seeking to convert to a barn-based system with proposed barns approximately 783 metres from the school and a herd of 2,200 cows. A barn-based dairy at that scale would have a materially different odour, noise and waste profile than the current operation. The REF assesses the current dairy.</i></p> | <p>Worrigee Road and Millbank Road roundabout (being delivered by Shoalhaven Council) not be operational upon the commencement of school operations, as provided in <b>Section 4.1</b> of this report. The assessment is on the basis of lower student enrolments below capacity during early operation.</p> <p><b>Land Use Conflict</b></p> <p>Further assessment of land use conflict is provided in <b>Section 4.2</b> of this report including more comprehensive consideration of noise and air quality impacts and cross-reference to additional LUCRA detail provided within an updated post-exhibition REF.</p> |

### 3 Response to Submissions

**Table 3 Response to Community Submissions**

| Ref. | Submission | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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|      |            | <p>DA26/1016 will assess the future dairy. Neither document assesses the school and the expanded dairy as co-existing uses.</p> <p>When this approval appears on the planning register, it will be cited as a sensitive receiver in the assessment of DA26/1016. The school's children will occupy that site for decades, and</p> <p>the dairy operator equally deserves certainty about the school's presence being properly accounted for in its own assessment.</p> <p><u>What I am asking</u><br/>The department either commission the noise, dust and odour specialist reports its own LUCRA identifies as necessary before determination, or condition the school's approval on the outcome of DA26/1016, so that the land use relationship is assessed on the basis of what will actually operate in each location.</p> <p><b>Key Theme: Aboriginal Cultural Heritage</b></p> <p><u>Issue 5 — Aboriginal Heritage Requires a Single Coordinated Protocol</u><br/>The Aboriginal Cultural Heritage Assessment Report (Appendix 3) found three pieces of culturally flaked glass within the school site, registered as AHIMS site 52-5-1199. An Aboriginal Heritage Impact Permit from Heritage NSW is required before any ground disturbance in that area. During preschool construction, the AHIP area must be temporarily fenced and kept free of vehicle access and ground disturbance.</p> <p>Construction of the preschool and primary school may overlap. Both programs will operate on the same lot, with the AHIP protection zone shared between them: two construction contracts, two site supervisors, one protection obligation. Each project's construction management plan refers to the obligation in its own document only. There is no coordinated framework covering the site as a whole during the period when both programs are simultaneously active.</p> <p>The ACHAR also requires ongoing consultation with Registered Aboriginal Parties at minimum six-monthly intervals, or the AHIP consultation basis lapses and must be restarted. If the primary school construction is delayed beyond approximately September 2026 without further RAP consultation, the AHIP application may not be valid when submitted.</p> <p><u>What I am asking</u><br/>As conditions of approval: first, a single heritage protection protocol for AHIMS site 52-5-1199 agreed and in place before either construction program begins, covering the full period during which ground disturbance is occurring anywhere on the lot. Second,</p> | <p><b>Aboriginal Cultural Heritage</b></p> <p>The New Primary School and New Public Preschool in Worrigee are both subject to the same mitigation measures in relation to Aboriginal Cultural Heritage being H1, H2, H3, H4* and H5*. Mitigation Measures H1 - H3 relate to unexpected finds, H4* outlines the requirement to obtain an Aboriginal Heritage Impact Permit (AHIP) and to establish a no-go zone surroundings AHIMS 52-5-1199 until the AHIP is granted, and H5* outlines the site induction requirements for construction workers and contractors. The new preschool is subject to the same mitigation measures during construction and operation, with both projects utilising the ACHAR as guidance for the location of the no-go zone. This means both projects must adhere to the same management practices regarding Aboriginal heritage impacts.</p> <p>Evidence of RAP consultation will be provided as part of the pending AHIP application. Heritage NSW will review all RAP consultation undertaken for this project as part of their assessment of the AHIP application.</p> <p>The Wandj Wandj and Jerringa people are part of the broader Yuin Nation, addressed correctly in both the REF and ACHAR.</p> |

### 3 Response to Submissions

**Table 3 Response to Community Submissions**

| Ref. | Submission  | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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|      |             | <p>the department to confirm ongoing RAP consultation at six-monthly intervals and notify the determining authority if a gap occurs.</p> <p>I also raise, in good faith, that the Acknowledgement of Country in this REF identifies the Dharawal, Wandj Wandian and Jerrinja peoples as Traditional Custodians of the land on which the school is proposed, while the preschool REF for the same lot acknowledges different nations. Both REFs draw on the same ACHAR, which engaged twelve Registered Aboriginal Parties representing a range of groups. Both acknowledgements cannot be correct for the same legal parcel. I raise this not as a criticism but as an invitation to confirm with the relevant RAPs which acknowledgement is appropriate for Lot 1 DP 576975 before the REF is finalised.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 3.5  | SUB - 17619 | <p><b>Key Theme: Land Use Conflict</b></p> <p>For many reasons we OBJECT to this PROPOSED LOCATION for a new Worrigeer primary school that has been chosen by School Infrastructure NSW.</p> <ul style="list-style-type: none"> <li>Our Dairy Farm business – RH Boyd &amp; Son Pty Ltd has been operating in the Shoalhaven since 1967, producing fresh liquid milk from our dairy cows on a daily basis. Our farm boundaries are on the following road addresses : <ul style="list-style-type: none"> <li>- 'Congla' : 315 Greenwell Point Rd Worrigeer 2540 NSW Farm machinery and Truck entrance</li> <li>- Terara Dairy : 233 Millbank Rd Terara 2540 NSW</li> <li>- Calf Rearing : 370 Comerong Island Rd Terara 2540 NSW</li> </ul> </li> <li>Our farm business is already underway with submission of an application for the building of 2 x undercover barns to protect our dairy cows from the increasing harsh weather elements caused by the increasing impact of climate change, with increased and extreme wet weather adversely affecting our dairy livestock.</li> </ul> <p>We have already submitted a DA directly to our and then after 2 years we were then advised that we had to submit an EIS. As part of this whole planning process we have had to have consultants do extensive planning have numerous surveys and investigations undertaken.</p> <p>We object to the proposed new Worrigeer Primary School Site for the following reasons :</p> <ul style="list-style-type: none"> <li>The close proximity of this new school site to our dairy business which is on land that has been zoned BASL: Biophysical Strategic Agricultural Land.</li> <li>Potential conflicts of land use compatibility: school amenity versus agricultural viability.</li> </ul> | <p><b>Land Use Conflict</b></p> <p>In relation to the school being on land zoned BASL, the New Public Preschool in Worrigeer has addressed this as follows:</p> <p>The site is identified as Biophysical Strategic Agricultural Land (BSAL), along with surrounding rural land to the east. BSAL mapping identifies land with high-quality soil and water resources; however, it is undertaken at a broad regional scale and does not always reflect current on-ground conditions.</p> <p>The site is located within an emerging urban area and is zoned for residential purposes rather than active agricultural use. As a result, its agricultural capability has already been substantially diminished. In this context, the delivery of essential community infrastructure, such as a public preschool, represents an appropriate and efficient land use outcome.</p> <p>BSAL mapping does not prohibit non-agricultural development, including education infrastructure, but requires consideration of land-use impacts. The proposal will not result in a meaningful loss of agricultural productivity, will not fragment viable agricultural land, and will not give rise to land-use conflicts with surrounding activities.</p> <p>While the site is identified as BSAL, the proposed activity is not subject to Gateway assessment and will not result in unacceptable</p> |

### 3 Response to Submissions

**Table 3 Response to Community Submissions**

| Ref. | Submission | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|      |            | <ul style="list-style-type: none"> <li>Complaints from a school site of odour and noise issues that could be linked to agricultural production</li> <li>Potential issues with lack of access for B-Double rated trucks along Greenwell Point Rd if there is a school speed limited zone ( morning and afternoon) put in place on Greenwell Point Rd. We have already had this occur with Hay trucks not being able to travel along Old Southern Rd near the Christian Community School during the school time zones.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <p><i>impacts on agricultural values. The development of a public preschool on the site is considered appropriate given the urbanising context and the need to provide essential social infrastructure.</i></p> <p>In relation to amenity, there is sufficient information contained within the Dairy Farm's Environmental Impact Statement (EIS) to ascertain the risk of land use conflict arising from amenity impacts on the school remains low including in relation to air quality and noise.</p> <p>In relation to B-Double Rated Trucks, there is no proposal to limit B-Double Truck Movements on Greenwell Point Road.</p> <p>Further discussion of the above land use conflict is provided in <b>Section 4.2</b> of this report with additional LUCRA detail provided within an updated post-exhibition REF.</p> |
| 3.6  | SUB –17621 | <p><b><u>Key Theme: Land Use Conflict</u></b></p> <p><b><u>1. Existing lawful agricultural operations</u></b><br/> Our property is an established, long-standing dairy operation. As part of routine farm management, we undertake pest control activities, including the shooting of corellas. These activities are:</p> <ul style="list-style-type: none"> <li>Lawful and undertaken in accordance with relevant approvals and permits</li> <li>Necessary to prevent significant damage to farm infrastructure, pasture, and equipment</li> <li>A regular and ongoing component of responsible farm management These operations are essential to maintaining the viability of the farm.</li> </ul> <p>Refer to Attachment 1 – Licence to Harm Protected Animals (PDF attached)<br/> This licence, issued by the NSW National Parks and Wildlife Service under the Biodiversity Conservation Act 2016, authorises the use of firearms for pest control on the property and demonstrates that these activities are lawful, current, and recurring.</p> <p><b><u>2. Firearm use and impulse noise</u></b><br/> Pest control is regularly undertaken near our workshop area, which is the closest point to the proposed school site.</p> <p>This involves:</p> <ul style="list-style-type: none"> <li>Use of a semi-automatic 12-gauge shotgun</li> <li>Daytime operation, including during standard school hours</li> </ul> | <p><b>Land Use Conflict</b></p> <p>Refer to additional LUCRA Assessment and response to land use conflict related matters in <b>Section 4.2</b> of this report including an assessment of noise and air quality impacts from the commercial dairy farm.</p> <p>Firearm noise will be managed as part of school operations, through acknowledgement of occasional pest control activities including firearm use on surrounding farms e.g. in parent welcome packs.</p> <p><b>Traffic Impacts</b></p> <p>Refer to additional assessment and response to traffic related matters in <b>Section 4.1</b> of this report.</p>                                                                                                                                                                                                     |

### 3 Response to Submissions

**Table 3 Response to Community Submissions**

| Ref. | Submission | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Response |
|------|------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|
|      |            | <ul style="list-style-type: none"> <li>High-intensity, impulsive noise events (gunshots), distinct from typical rural background noise</li> <li>Activities that may be visible from surrounding land</li> </ul> <p>These activities are inherent to the operation of the farm and cannot be reasonably relocated or eliminated.</p> <p><u>3. Likely impacts on a school environment</u><br/> The proximity of these lawful activities raises foreseeable impacts on a sensitive land use such as a school, including:</p> <ul style="list-style-type: none"> <li>Noise impacts: Impulsive gunshot noise is abrupt and disruptive</li> <li>Wellbeing impacts: Potential distress or anxiety for students and staff</li> <li>Perception and community concern: Likely concern from parents and the broader community</li> </ul> <p>These impacts are predictable and should be treated as a primary planning consideration.</p> <p><u>4. Land use conflict and reverse sensitivity</u><br/> The proposal introduces a highly sensitive land use directly adjacent to an established agricultural operation.<br/> This creates a clear risk of reverse sensitivity, including:</p> <ul style="list-style-type: none"> <li>Complaints arising from normal, lawful farming activities</li> <li>Pressure to curtail or modify essential pest control practices</li> <li>Constraints affecting the long-term viability of the farm</li> </ul> <p><u>5. Site proximity</u><br/> Refer to Attachment 2 – Aerial Image Showing Proximity<br/> Figure 1: Aerial image showing the immediate proximity between the proposed school site (yellow) and the existing dairy farm operations (blue), including the workshop area where licensed pest control activities using firearms are regularly undertaken. This image clearly demonstrates the direct interface between the proposed school and active farm operations.</p> <p><u>6. Traffic and heavy vehicle access - Greenwell Point Road</u><br/> Our operation relies on regular heavy vehicle movements, including B-double trucks, along Greenwell Point Road. Concerns include:</p> <ul style="list-style-type: none"> <li>Potential school zone restrictions</li> <li>Impacts on heavy vehicle access during operational hours</li> <li>Possible limitations imposed by the National Heavy Vehicle Regulator, including restrictions during school zone times</li> </ul> <p>Any restriction on these movements would have serious operational and financial consequences.</p> |          |

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**Table 3 Response to Community Submissions**

| Ref. | Submission | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Response |
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|      |            | <p><u>7. Farm machinery movements and seasonal operations</u><br/>           In addition to heavy vehicle movements, our operation involves the regular use of large agricultural machinery, particularly during key periods such as silage harvesting. This includes:</p> <ul style="list-style-type: none"> <li>• Tractors, forage harvesters, silage trucks, and associated equipment</li> <li>• Frequent movements along Greenwell Point Road and into farm access points</li> <li>• Turning movements involving large machinery in close proximity to the proposed school site</li> <li>• Extended operating hours during peak periods (including early mornings and late evenings)</li> <li>• High levels of noise associated with engines, exhaust brakes, and harvesting equipment Silage harvest and similar operations are time-critical and weather-dependent, meaning they cannot be delayed or restricted to avoid school hours.</li> </ul> <p>These activities are an essential and routine component of dairy farming and represent an additional source of noise, traffic interaction, and visual impact that must be considered in assessing the suitability of the proposed school location.</p> <p><u>8. Matters requiring detailed assessment in the REF</u><br/>           The REF must:</p> <ul style="list-style-type: none"> <li>• Specifically assess impulsive firearm noise</li> <li>• Consider visual and psychological impacts</li> <li>• Undertake a genuine land use conflict and reverse sensitivity assessment</li> <li>• Address traffic and heavy vehicle implications</li> <li>• Consider farm machinery movements and seasonal operations, including silage harvest impacts</li> <li>• Identify measures to protect existing lawful agricultural activities</li> </ul> <p><u>9. Objection on legal and planning grounds</u><br/>           This submission raises a formal objection on the following grounds:</p> <p><u>Failure to consider existing lawful use:</u> The adjoining land is subject to lawful agricultural activities, including licensed firearm-based pest control authorised by the NSW National Parks and Wildlife Service under the Biodiversity Conservation Act 2016. These activities must be recognised and protected.</p> <p><u>Inadequate environmental assessment:</u> Under the Environmental Planning and Assessment Act 1979, all relevant impacts must be assessed, including impulsive noise and ongoing operational realities.</p> |          |

### 3 Response to Submissions

Table 3 Response to Community Submissions

| Ref. | Submission | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Response |
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|      |            | <p><u>Creation of reverse sensitivity conflict:</u> The proposal introduces a sensitive land use that is likely to generate complaints and pressure to restrict lawful farming practices.</p> <p><u>Land use incompatibility:</u> The siting of a school adjacent to land where firearms are regularly discharged, heavy vehicles operate, and large-scale farm machinery is used raises fundamental compatibility concerns.</p> <p><u>Risk of interference with lawful operations:</u> Any future constraints on pest control, freight movement, or farm machinery operations would represent an unreasonable interference with an existing lawful use.</p> <p><u>10. Position and requested outcome</u><br/> Given the above, I do not support the proposal in its current form due to the high likelihood of ongoing land use conflict and incompatibility.<br/> However, if the proposal is to proceed, I formally request that the NSW Department of Education provide a written and enforceable commitment confirming that:</p> <ul style="list-style-type: none"> <li>Existing lawful agricultural activities, including firearm-based pest control, will not be restricted, curtailed, or subject to additional limitations</li> <li>No future complaints or land use conflicts arising from the school will result in constraints on current or future farm operations</li> <li>Heavy vehicle access (including engine brake use where required) along Greenwell Point Road will not be restricted or impacted</li> <li>Farm machinery movements and seasonal operations, including silage harvesting, will not be restricted or impacted</li> <li>The operation of the farm, both current and future, will be explicitly protected</li> </ul> <p>This confirmation should be formalised in writing as part of the project approval framework.</p> <p><u>11. Conclusion</u><br/> The proposed Preschool and Primary school is to be located in immediate proximity to an active agricultural operation involving regular firearm use, heavy vehicle movements, and large-scale farm machinery operations, including seasonal silage harvesting.</p> <p>These are not hypothetical issues—they are current, lawful, and essential activities.</p> <p>Without proper consideration, the proposal risks creating a long-term and inappropriate land use conflict, particularly given the frequency, intensity, and timing of these operations.</p> |          |

### 3 Response to Submissions

**Table 3 Response to Community Submissions**

| Ref. | Submission                                                                                              | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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|      |                                                                                                         | <i>I request that these matters are fully addressed prior to any determination.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 3.7  | <b>SUB – 18648, 18650, 18651, 18652, 18654, 18655, 18658, 18667, 18672, 18738, 18739, 18740, 18741.</b> | <p><b>Key Themes: Site Selection / Traffic, Transport and Accessibility</b></p> <p><i>To Whom It May Concern,</i><br/> <i>I strongly object to the current proposal for the new Worrigee Public School as presented in the Review of Environmental Factors (REF).</i></p> <p><i>This objection is not to the delivery of a new public school. Worrigee and South Nowra clearly require additional educational infrastructure. My objection is to the selection of an unsuitable site and the attempt to force an excessively large development onto land that is incapable of safely accommodating it.</i></p> <p><i>The central issue is simple: the proposed development is too large for the site.</i></p> <p><i>The proposal seeks to place a school of approximately 582 students and a further 60 preschool students, together with staff, parents, visitors and service vehicles, on a constrained parcel of land located at the intersection of Worrigee Road, Booligal Road and Greenwell Point Road. In practice, this will result in well over 700 people accessing the site daily.</i></p> <p><i>The surrounding road network, parking provision and pedestrian infrastructure are not capable of safely supporting this level of activity.</i></p> <p><i>The REF significantly underestimates the real-world impacts that local residents will experience. It relies on optimistic assumptions regarding traffic movements, active transport and parking demand that do not reflect how families in the Shoalhaven actually travel.</i></p> <p><i>Public transport options are limited. Most staff and parents will arrive by private vehicle. The proposed parking provision is inadequate even before considering school events, assemblies, meetings and visitor demand. The inevitable result will be parking overflow onto surrounding roads, particularly Worrigee Road.</i></p> <p><i>This creates a foreseeable safety risk. Children will be required to move between parked vehicles and traffic on roads that already carry substantial traffic volumes. The lack of comprehensive pedestrian infrastructure further compounds this risk. The proposal effectively transfers the consequences of inadequate on-site capacity onto the surrounding community.</i></p> <p><i>The location itself is fundamentally flawed. Rather than being centrally located within the catchment, the school is positioned on the edge of the community, increasing</i></p> | <p><b>Site Selection</b></p> <p>Site selection rationale is addressed in <b>Section 4.4</b> of this report.</p> <p><b>Traffic, Transport and Accessibility</b></p> <p>Refer to Row 2.4 in <b>Table 2</b>, responding to TfNSW for a discussion of broader footpath upgrades and public transport to support the activity.</p> <p>The TAIA has determined sufficient parking on Booligal Road. The department in response to public exhibition is committing to deliver a roundabout at the intersection of Golden Grove, Booligal Road and Worrigee Road to further enhance efficient vehicular movement to/from the principal DOPU and short-stay parking spaces on Booligal Road. This will have the effect of minimising impacts on the road network in the AM and PM school peak.</p> <p>The traffic consultant who prepared the TAIA for the REF has provided additional assessment and response to traffic related matters raised in public submissions in <b>Section 4.1</b> of this report.</p> |

### 3 Response to Submissions

**Table 3 Response to Community Submissions**

| Ref. | Submission | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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|      |            | <p><i>reliance on private vehicles and reducing the practicality of walking and cycling for many families.</i></p> <p><b>Key Theme: Built Form and Character</b></p> <p><i>The scale of development is also inconsistent with the character of Worrigea. The proposed three-storey building is not a reflection of good planning; it is evidence that the site is being pushed beyond its reasonable capacity. A three-storey metropolitan-style school is entirely out of keeping with the surrounding low-density and semi-rural environment and will create significant visual, privacy and amenity impacts.</i></p> <p><b>Key Theme: Vegetation Removal and Biodiversity</b></p> <p><i>Environmental impacts have likewise been understated. The proposal requires the removal of mature Spotted Gum trees that provide habitat, cooling, screening and landscape value that cannot be replaced within any meaningful timeframe. Residents regularly observe wildlife using these trees, including hollow-dependent species. Once removed, these environmental values will be lost for generations.</i></p> <p><i>Decision-makers should carefully consider whether this proposal genuinely represents good long-term planning for the Shoalhaven. Schools are critical community assets that will serve generations of families. A poor site selection decision made today will create traffic, safety and environmental consequences for decades.</i></p> <p><i>Accordingly, I respectfully request that the Department:</i></p> <ul style="list-style-type: none"> <li><i>Reject the proposal in its current form and pursue a more suitable site capable of safely accommodating the intended student population;</i></li> </ul> <p><i>OR, if the current site is retained:</i></p> <ul style="list-style-type: none"> <li><i>Reduce the student capacity to less than half of that currently proposed;</i></li> <li><i>Redesign the three-storey building into a lower-scale form consistent with the character of the area;</i></li> <li><i>Provide substantially greater parking capacity and supporting infrastructure;</i></li> <li><i>Deliver continuous and safe pedestrian connections beyond the immediate school frontage;</i></li> <li><i>Reassess traffic, parking and road safety impacts using realistic assumptions;</i></li> <li><i>Maximise retention of mature native trees and reassess biodiversity impacts; and</i></li> </ul> | <p><b>Built Form and Character</b></p> <p>Additional assessment demonstrating compatibility with character is provided in <b>Section 4.3</b> of this report.</p> <p><b>Vegetation Removal and Biodiversity</b></p> <p>The proposed REF was supported by an Arboricultural Impact Assessment and Flora and Fauna Assessment.</p> <p>DCCEEW have reviewed the assessments undertaken and agree with the conclusion that the proposed activity, including the removal of 46 trees, is unlikely to significantly impact threatened species (see <b>Table 2</b>).</p> <p>A number of Mitigation Measures are proposed including replacement tree planting at a ratio of 1:1, placement of hollow boxes and tree species selection consistent with the identified Plant Community Type (PCT).</p> <p>Additional cumulative impact test of significance assessments have been undertaken in accordance with the recommendations of DCCEEW with no change to the exhibited findings. Further detail is provided in <b>Section 4.6</b> of this report.</p> |

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|------|-------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      |             | <ul style="list-style-type: none"> <li>Further investigate stormwater, flooding and cumulative environmental impacts.</li> </ul> <p><i>This proposal should not proceed on the basis that infrastructure can be retrofitted later or that community concerns will resolve themselves over time. If the site cannot safely accommodate the intended development, then either the site or the scale of the proposal must change.</i></p> <p><i>The safety of children, the amenity of existing residents and the long-term planning outcomes for the Worrigee community demand nothing less.</i></p>                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 3.8  | SUB - 18657 | <p><b>Key Themes:</b> Site Selection / Traffic, Transport and Accessibility</p> <p><i>I am concerned about the parking pick up and drop off of children and children walking around in this area. Greenwell Point Road is a major road I drive this road every day and seeing some children who get off buses from other schools and many cars waiting for their children and once the school opens the amount of cars and children in the area would become dangerous. Yes I understand that NAC is on a highway but there is no access for children to leave the highway entrance. Greenwell Point Road and Worrigee Road are very narrow, with no walk ways for children to walk home. I think this school would have been better further toward the new housing estate near twin waters where most of the children would have been attending.</i></p> | <p><b>Traffic, Transport and Accessibility</b></p> <p>The department and Council are undertaking substantial road upgrades including road carriageway improvements, pedestrian infrastructure and bus zones, which will support the activity.</p> <p>Refer to additional assessment and response to traffic related matters in <b>Section 4.1</b> of this report.</p> <p><b>Site Selection</b></p> <p>Site selection rationale is addressed in <b>Section 4.4</b> of this report.</p>                                                                                                                                                                                                                                                                                                                    |
| 3.9  | SUB - 18660 | <p><b>Key Theme:</b> Reporting and Consultation Process</p> <p><i>Why was there no public discussion? There was a proposed date but this never happened.</i></p> <p><b>Key Themes:</b> Site Selection / Traffic, Transport and Accessibility</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p><b>Reporting and Consultation Process</b></p> <p>The department has undertaken community consultation as follows:</p> <ul style="list-style-type: none"> <li>28 July 2025 – Door knock of 97 properties near the site</li> <li>31 July 2025 – Letterbox drop planning update to project distribution area.</li> <li>18 December 2025 – Further mailing list and letterbox distribution of planning update.</li> <li>10 March 2026 – Community information session</li> <li>17 February - 29 March 2026 - School naming survey.</li> <li>10 March 2026 - Drop in community information session</li> <li>2 – 29 April 2026 – New Public Preschool in Worrigee REF exhibition</li> <li>14 May – 10 June 2026 – New Primary School in Worrigee Public Exhibition.</li> </ul> <p><b>Site Selection</b></p> |

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|      |             | <p><i>This is the most ridiculous site for a new school. The intersection is dangerous on the best day. Putting a roundabout in is not the solution. This is a busy road with B-Double and Semi Trailer trucks servicing local Dairy Farmers and Supermarkets. The site itself was a rural home and now you wish to turn a small plot of land into a school. Do you not have any foresight? Do you not have any consideration for locals, traffic, the students themselves? Buses and cars dropping off and picking up students will cause chaos and a potential injury or death. There is limited room and this school is partially on a dead end road. Where will buses and cars be able to park and turn around? You only have to look at Terara Public School to see how dangerous the parking situation is. There is always a danger there. Cars illegally parked, cars doing illegal U-Turns, cars speeding through the school zone, a narrow road with trucks, cars, tractors and children. It's a recipe for disaster. But now the Government wants to add another disaster at the other end of that road.</i></p> <p><i>There is plenty of room and land further down Worrigee Road. Anywhere past Isa Road would be far more suitable and safe. There would be more room for students to play, more parking for buses and cars but overall more safety. Can we please start thinking smarter and think of the future growth of this community. The Worrigee area has grown significantly and continues to grow and yet you want to cram over 500 children onto a small parcel of land. Make this school one that can be used and expanded as the need arises. Make this school one that the children of this area can be safe and not put into a busy environment with massive amounts of traffic that is already happening.</i></p> <p><i>We had a saying when I worked for what was then called the Roads and Traffic Authority. WHEN IN DOUBT, THROW IN A ROUNDABOUT!!! This proposed school is one of the BIGGEST mistakes I have seen in this area. I was born here and spent my whole 54 years here. There is time to rectify this mistake. There is time to make better decisions for the children. There is time to avoid the chaos."</i></p> | <p>Site selection rationale is addressed in <b>Section 4.4</b> of this report.</p> <p><b>Traffic, Transport and Accessibility</b></p> <p>A response to traffic related matters is provided in <b>Section 4.1</b> of this report.</p> <p>The proposed school was modelled to have minor and inconsequential additional impacts on intersection performance during peak periods. New modelling provided post-exhibition confirms the previous assessment.</p> <p>A new roundabout is being delivered by Shoalhaven City Council at the intersection of Greenwell Point Road, Worrigee Road and Millbank Road to improve intersection safety and performance.</p> <p>In addition, in response to the submissions received during public exhibition, the department will provide a roundabout at the Booligal and Worrigee Road intersection, as part of this activity. Separately, the Booligal Road upgrade being undertaken in association with the New Public Preschool in Worrigee will include a cul-de-sac head.</p> |
| 3.10 | SUB - 18661 | <p><b>Key Themes:</b> Traffic, Transport and Accessibility / Site Selection</p> <p><i>I am a local of Worrigee and have some concerns about the location of the new proposed school and roundabout on the corner of Greenwell Point and Worrigee Roads.</i></p> <p><i>Having lived here and a frequent user of said roads for several years, I can confirm it is a highly unsuitable location for a new school. The property the school is set to be built on is inadequate and on a road that is unfortunately known for hooning as well as being in a state I deem to be questionable with numerous sections that have been</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <p><b>Traffic, Transport and Accessibility</b></p> <p>Refer to additional assessment and response to traffic related matters in <b>Section 4.1</b> of this report. Significant upgrades are occurring to the existing road infrastructure which will support the activity.</p> <p><b>Site Selection</b></p> <p>Site selection rationale is addressed in <b>Section 4.4</b> of this report.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

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|      |             | <p><i>poorly repaired, leaving it prone to potholes after a small amount of rain.</i></p> <p><i>I am greatly concerned for the safety of future staff and students, as well as the local residents who will now have to deal with a massive surge in traffic. This will create further congestion along already busy streets and I strongly advise the school being built elsewhere and on an area that will support the student population and not compromise safety</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 3.11 | SUB - 18666 | <p><b>Key Themes:</b> Traffic, Transport and Accessibility / Site Selection</p> <p><i>I am writing on behalf of my husband and myself to strongly oppose the proposed construction of the new Worrigee Public School.</i></p> <p><i>Having worked at the local Christian school for over 30 years, I have witnessed firsthand the significant traffic congestion and safety risks associated with school drop-off and pick-up times. The combination of school buses, parents dropping off and collecting students, and children walking to and from school creates a busy environment that requires careful traffic management.</i></p> <p><i>We believe the proposed location is unsuitable due to its distance from many residential areas. In our area of around Rayleigh Drive, most households do not have primary school-aged children, meaning that a large proportion of students attending the school would likely be driven by their parents. This would place additional pressure on an already busy road network.</i></p> <p><i>Of particular concern is the impact on traffic around the Worrigee Road and Greenwell Point Road intersection. Increased vehicle movements associated with the school would affect not only parents and students but also local residents and commuters who use these roads daily.</i></p> <p><i>In addition, planned residential developments in the Culburra and Callala areas are expected to significantly increase traffic volumes travelling towards Nowra. Morning traffic from these areas is already heavy, and the addition of a new school at this location will only compound existing congestion and increase the potential for traffic-related safety issues.</i></p> <p><i>For these reasons, we strongly oppose the proposed development and urge decision-makers to carefully consider the long-term traffic and safety implications for the broader community.</i></p> <p><i>We understand the need for another school in our area, but would ask that you reconsider the current proposed location.</i></p> | <p><b>Traffic, Transport and Accessibility</b></p> <p>Refer to the response to traffic related matters in <b>Section 4.1</b> of this report.</p> <p>Significant upgrades are occurring to the existing road infrastructure which will result in the proposed activity having minor and inconsequential additional impacts on intersection performance during peak periods.</p> <p><b>Site Selection</b></p> <p>Site selection rationale is addressed in <b>Section 4.4</b> of this report.</p> |

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| 3.12 | SUB - 18668 | <p><b>Key Themes:</b> Traffic, Transport and Accessibility / Site Selection</p> <p><i>I totally disapprove of the new Worrigee School planned for the current site as Greenwell Point Road intersection is an extremely busy all the time and the intersection already has a bad reputation for car accidents. I am concerned for the safety of the children who would attend the school especially children who would be walking to and from school on Worrigee road . It is to close of proximity to Terara Public School which has been there for over 100 years serving our rural communities of Terara and Numbaa. While we need a new school it would be better suited further down Worrigee Road even down past the cemetery in a quiet area of Worrigee surrounds. And it would be far more central for the community there now as well as any future growth.</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <p><b>Traffic, Transport and Accessibility</b></p> <p>Refer to the response to traffic related matters in <b>Section 4.1</b> of this report.</p> <p>Significant upgrades are occurring to the existing road infrastructure which will result in the proposed activity having minor and inconsequential additional impacts on intersection performance during peak periods.</p> <p><b>Site Selection</b></p> <p>Site selection rationale is addressed in <b>Section 4.4</b> of this report.</p>                         |
| 3.13 | SUB - 18673 | <p><b>Key Themes:</b> Traffic, Transport and Accessibility / Site Selection</p> <p><i>I do not believe the site selected in this proposal is adequate for the following reasons.</i></p> <p><i>1. Zoning, its close to Terrara Public and will cause conflict, thats a small school which could be considered for expansion. The general growth in the area is in a different part of worrigee and south nowra, with south nowra being home to an expansive residential development - the students from the south nowra and inner worrigee areas are the ones who need this school, not outer worrigee, it will create a zoning issue and be frustrating for everyone.</i></p> <p><i>2.Parking and accessibility, this will continue to be an issue as this school will welcome a large number or students on an already notoriously dangerous corner. The space of the location wont be able to host families for parking and will create a huge traffic logistical nightmare.</i></p> <p><i>3. There is no bus turn around locations there, buses already struggle with other schools in the area, this school is an opportunity to find a location far more suitable which is able to facilitate the growing needs of the school which will be around for many years to come.</i></p> <p><i>Other suitable locations could include south nowra, there are so many locations with so much land available, further down that road is Worrigee House which boasts great land space and would make a great location for students, the roads would need some attention but that would be minor in comparison. I think the correct location is dangerous and unsuitable. I would hope it could be reconsidered.</i></p> | <p><b>Site Selection</b></p> <p>Site selection rationale is addressed in <b>Section 4.4</b> of this report.</p> <p><b>Traffic, Transport and Accessibility</b></p> <p>Refer to the response to traffic related matters in <b>Section 4.1</b> of this report.</p> <p>Significant upgrades are occurring to the existing road infrastructure which will improve road safety and result in the proposed activity having minor and inconsequential additional impacts on intersection performance during peak periods.</p> |

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| 3.14 | SUB - 18679 | <p><b>Key Themes:</b> Traffic, Transport and Accessibility / Site Selection</p> <p><i>I strongly oppose the new primary school proposed for the corner of Worrigee Rd and Greenwell Point Rd.</i></p> <p><i>This location is definitely not suited for a school. Both Worrigee Rd and Greenwell Point Roads are major thoroughfares, the traffic on these roads is busy enough without adding buses and parents dropping off and picking up children from. It is totally irresponsible putting a school there, believe me a child will get run over in this area if this building goes ahead.</i></p> <p><b>Key Theme: Noise</b></p> <p><i>Apart from the traffic congestion, the peace and quiet will be disrupted by putting a school there.</i></p> <p><i>We bought our land in 1998 after looking at the SCC development plans, there was NO school proposed for that location then. We would not have bought land here knowing a school would pop up just around the corner.</i></p> <p><i>Maybe a few residents should get a class action against this, this is a disruption to our "fringe" peace.</i></p> | <p><b>Site Selection</b></p> <p>Site selection rationale is addressed in <b>Section 4.4</b> of this report.</p> <p><b>Traffic, Transport and Accessibility</b></p> <p>Refer to the response to traffic related matters in <b>Section 4.1</b> of this report.</p> <p>Significant upgrades are occurring to the existing road infrastructure which will improve road safety and result in the proposed activity having minor and inconsequential additional impacts on intersection performance during peak periods.</p> <p><b>Noise</b></p> <p>A Noise and Vibration Impact Assessment (NVIA) has been prepared to assess the impacts of the proposed primary school.</p> <p>It is acknowledged that construction works will result in temporary noise level exceedances for five sensitive receivers near the school site. Mitigation Measure C10 has been included to restrict high noise generating work to continuous blocks of no more than three hours, within standard business hours only.</p> <p>The NVIA found that operational noise including outdoor play noise, additional vehicle traffic and mechanical plant from the proposed school is unlikely to result in significant adverse impacts on surrounding sensitive receivers as the operational noise criteria will not be exceeded. Mitigation Measures NV3* and NV4* have been included to maintain operational noise levels below the relevant project noise trigger levels.</p> |
| 3.15 | SUB - 18681 | <p><b>Key Themes:</b> Site Selection / Built Form and Character / Traffic, Transport and Accessibility</p> <p><i>I support a new public school for our growing community, but I don't support forcing an oversized school onto an unsuitable site. 582 Students – 3 Storey building. If it can't be relocated, its capacity should be cut by more than half and the three-storey design scrapped.</i></p> <p><i>A constrained site at the intersection of Worrigee Rd and Greenwell Point Rd is only</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <p><b>Site Selection</b></p> <p>Site selection rationale is addressed in <b>Section 4.4</b> of this report.</p> <p><b>Built Form and Character</b></p> <p>Additional assessment demonstrating compatibility with character is provided in <b>Section 4.3</b> of this report.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

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|------|------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      |                                                                                    | <i>going to end in tragedy. We should not wait for a serious injury or child fatality before acknowledging that the site is being asked to accommodate more than it safely can. 582 Children deserve more than 1 oval and 1 basketball court to play on, let's encourage active kids!</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <p><b>Traffic, Transport and Accessibility</b></p> <p>Refer to the response to traffic related matters in <b>Section 4.1</b> of this report.</p> <p><b>Other Matters</b></p> <p><u>Outdoor Play</u></p> <p>A minimum of 10m<sup>2</sup> of open space is provided per student which is consistent with The Department's Design Framework for Site Selection and Development.</p>                                                                                                                                                                                                                                                                                                                                                          |
| 3.16 | <b>SUB - 18688</b>                                                                 | <p><b><u>Key Theme:</u> Traffic, Transport and Accessibility</b></p> <p><i>I have raised this concern locally with your planning team. The concern I have relates to Safe and efficient traffic movement between the roundabout to be constructed on Greenwell Point Road and Worrigee Road.</i></p> <p><i>Buses and Public vehicles will create dangerous congestion along Worrigee Road during School Drop off and Pick up Times. There is likelihood of traffic congestion caused by the school because there is insufficient distance between the roundabout and the Bus Zones. This is likely to increase risk of traffic blockages as occurs at other local schools.</i></p> <p><i>A.better solution will be to relocate the Bus Zone inside the side street and create a safer bus pick up experience inside the school grounds with a turn around bay in Booligal Road, which will reduce the risk of traffic congestion and incidents.</i></p> | <p><b>Traffic, Transport and Accessibility</b></p> <p>The Worrigee Road frontage of the site is proposed to have bus zones and support learning DOPU spaces in a shoulder from the main traffic carriageway.</p> <p>These facilities are separate from private vehicular DOPU which is proposed to occur on Booligal Road.</p> <p>In response to public exhibition, the department is proposing to upgrade the intersection of Golden Grove, Booligal Road and Worrigee Road to a roundabout, further improving traffic flows in the section of Worrigee Road between Booligal Road and Greenwell Point Road.</p> <p>In addition, refer to the consolidated response to traffic related matters in <b>Section 4.1</b> of this report.</p> |
| 3.17 | <b>SUB – 18697, 18705, 18706, 18708, 18710, 18711, 18716, 18717, 18743, 18744.</b> | <p><b><u>Key Theme:</u> Traffic, Transport and Accessibility</b></p> <p><i>My most significant concern relates to traffic generation, pedestrian safety and the inevitable conflict between vehicles and children that this proposal will create.</i></p> <p><i>The proposal seeks to accommodate approximately 582 students on a site located at the intersection of Worrigee Road, Booligal Road and Greenwell Point Road. This is not a quiet residential location. Greenwell Point Road is one of the primary arterial roads servicing the Nowra area and carries substantial traffic volumes. Worrigee Road is one of the primary access roads for the Worrigee community and also functions as an arterial route. The proposal therefore places a large primary school directly at the</i></p>                                                                                                                                                    | <p><b>Traffic, Transport and Accessibility</b></p> <p>Refer to additional assessment and response to traffic related matters in <b>Section 4.1</b> of this report.</p> <p>Worrigee Road is not identified as an arterial road or regional road by TfNSW. However, it could be considered a collector road, providing access to southern Worrigee.</p>                                                                                                                                                                                                                                                                                                                                                                                     |

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| Ref. | Submission | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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|      |            | <p><i>intersection of two heavily used roads. The REF consistently understates the implications of this.</i></p> <p><i>Any parent, resident or road user familiar with this area understands that introducing a school of this scale to this intersection will result in significant congestion, increased conflict between vehicles and pedestrians and increased risks to children. The statement within the REF that intersections will experience only minor reductions in performance is difficult to reconcile with common sense. Adding hundreds of daily vehicle movements associated with approximately 582 students, staff, visitors, deliveries and service vehicles cannot reasonably be expected to result in only minor impacts.</i></p> <p><u><b>Parking Provision Is Grossly Inadequate</b></u></p> <p><i>The proposal provides approximately 40 staff parking spaces and a limited number of short-stay spaces. This is completely inadequate for a school of this size. The REF assumes that many staff will utilise alternative transport methods. This assumption demonstrates a lack of understanding of how people travel within the Shoalhaven. Unlike metropolitan Sydney, public transport is not a realistic transport option for most workers in this area. Similarly, cycling is unlikely to be adopted by significant numbers of staff given the distances travelled and the road environment surrounding the site. The reality is that almost all staff are likely to arrive by private vehicle. The proposed parking supply appears insufficient even for staff alone. This inevitably means staff vehicles will spill into surrounding streets. The proposal then assumes that parents will utilise a combination of drop-off facilities and limited short-term parking. This assumption is also unrealistic. Many parents of primary school aged children choose to walk their children into school, particularly given how dangerous Worrigee Rd is. Many attend assemblies, meetings, sporting events, learning support appointments and other school activities. The proposed parking provision does not reflect these realities. The result will be large numbers of vehicles parking on surrounding roads, of which there are not many. This outcome is entirely predictable.</i></p> <p><u><b>Worrigee Road Presents a Significant Safety Risk</b></u></p> <p><i>The REF fails to properly acknowledge the dangers associated with Worrigee Road. Worrigee Road is not a typical suburban street. It is a relatively narrow arterial road carrying significant traffic volumes. The road is bordered by drainage swales along sections and provides limited opportunities for safe pedestrian movement. Once vehicles begin parking along Worrigee Road, the available road width will be reduced. Visibility will be compromised. Drivers will be forced to navigate around parked vehicles. Children and families will be moving between parked cars. Pedestrians will be forced closer to traffic. The likelihood of near misses and collisions will increase. The</i></p> | <p>Additional assessment and modelling of intersection performance has been completed and confirms the proposed activity will have a minor impact on traffic, considering the proposed road upgrades.</p> <p>Pedestrian safety upgrades including pedestrian crossings, footpath upgrades, a new roundabout at the Worrigee and Booligal Road intersection and the implementation of a school zone speed limit are required under Mitigation Measures TA4* and TA5*.</p> <p>On-site parking is provided for all staff at a ratio of 1:1, meaning staff will not need to park in surrounding streets.</p> <p>10 DOPU spaces and 17 short stay parking spaces have been provided which is expected to meet generated demand as outlined in the exhibited TAIA.</p> <p>Consultation between the department and Council regarding the provision of pedestrian infrastructure upgrades in the locality is ongoing.</p> <p>The preparation of a School Transport Plan is required under Mitigation Measure TA1. Ongoing consultation is occurring between Council and the department around the delivery of active transport infrastructure in the locality under the Shoalhaven Active Transport Strategy.</p> |

### 3 Response to Submissions

Table 3 Response to Community Submissions

| Ref. | Submission | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Response                                                                                                             |
|------|------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------|
|      |            | <p><i>REF largely ignores this foreseeable outcome. It appears to assume that parents will simply find safe parking elsewhere. There is no evidence to support this assumption. The reality is that parents will park wherever space is available. If that means parking along Worrigee Road, then that is what will occur. The planning of the school should reflect likely human behaviour, not idealised assumptions.</i></p> <p><i>While reduced speed limits are beneficial, the proposed school-zone speed limit should not be relied upon as the primary safety mitigation measure. A reduced speed limit does not address the underlying issues of inadequate parking, pedestrian conflict points, limited footpath infrastructure and the interaction between children and vehicles along surrounding roads.</i></p> <p><u><b>Pedestrian Infrastructure Is Inadequate</b></u></p> <p><i>One of the most concerning aspects of the proposal is the limited extent of pedestrian infrastructure. The public domain works focus primarily on the immediate vicinity of the school. This completely ignores where many children and parents are actually likely to park. The greatest pedestrian safety risk will not occur immediately outside the school gates. It will occur along the routes people use to access the school after parking. The REF should have included continuous pedestrian infrastructure extending significantly further south along Worrigee Road. Families parking along Worrigee Road should not be expected to walk along road shoulders or adjacent to drainage swales while supervising young children. The absence of comprehensive pedestrian infrastructure creates foreseeable and avoidable safety risks. The Department has a responsibility to consider the entire journey to school, not simply the area immediately adjacent to the school boundary.</i></p> <p><u><b>Active Transport Assumptions Are Flawed</b></u></p> <p><i>The REF repeatedly references walking and cycling as preferred transport modes. The existing active transport mapping actually demonstrates why this site is poorly located. The site sits on the north-eastern edge of the catchment. If a circle is drawn around the school, a substantial proportion of the surrounding area contains very little residential population. The school is effectively located on the corner of the community rather than centrally within it. Many families will simply be too far away to realistically walk. For others, walking routes require travel along roads that currently lack appropriate pedestrian infrastructure. The proposal therefore overestimates active transport participation and underestimates vehicle dependence.</i></p> <p><u><b>Key Themes: Site Selection / Built Form and Character</b></u></p> <p><u><b>Site Selection Concerns</b></u></p> | <p><b>Site Selection</b></p> <p>Refer to site selection rationale provided in <b>Section 4.4</b> of this report.</p> |

### 3 Response to Submissions

**Table 3** Response to Community Submissions

| Ref. | Submission | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Response |
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|      |            | <p><i>The REF concludes that the site is appropriate due to its size and multiple street frontages. I strongly disagree with this conclusion. While the site may technically have three street frontages, two of those roads are significant arterial roads that present substantial traffic and pedestrian safety concerns. The REF treats these frontages as an advantage, however from a practical and community perspective they are a significant constraint.</i></p> <p><i>The site is also located on the north/-eastern corner of Worrigeer, limiting accessibility for a large portion of the intended catchment. The growing South Nowra community in particular appears to have been inadequately considered when selecting the location of this school.</i></p> <p><i>The REF states that the site is large; however, when considered against the proposed capacity of approximately 582 students, it is difficult to agree with this assessment. The proposal effectively seeks to accommodate almost 600 students on a site of approximately two hectares. This represents a highly intensive use of the land and appears to be driving many of the issues associated with the proposal, including inadequate parking, limited outdoor space, extensive tree removal and the need for a three-storey building.</i></p> <p><i>The proposed three-storey building is a clear indication that the site is being pushed beyond what would normally be expected within this community. Worrigeer is characterised by low-density residential development, rural-residential properties and open landscapes. The immediate surrounding area is overwhelmingly made up of single-storey homes and rural-style development. To my knowledge, there are no comparable three-storey buildings in the vicinity and there are not even any two-storey residential developments surrounding the site.</i></p> <p><i>The proposed school building will therefore become the dominant built form within the local landscape and represents a significant departure from the existing character of the area. Rather than complementing the existing community, the development introduces a large urban-scale structure into what is otherwise a semi-rural environment. This may be a common approach in metropolitan Sydney where land constraints often dictate multi-storey educational facilities, however it is entirely out of keeping with the character and expectations of the Worrigeer community.</i></p> <p><i>The three-storey design appears to be a consequence of attempting to maximise student numbers on a constrained site rather than a design outcome that delivers the best educational, environmental or community outcomes. The visual impact of this building has not been adequately considered within the REF.</i></p> |          |

### 3 Response to Submissions

**Table 3 Response to Community Submissions**

| Ref. | Submission | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Response                                                                                                                      |
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|      |            | <p><i>Many local residents currently enjoy open views, a sense of space and the benefits associated with living in a low-density environment. The proposed three-storey structure will be highly visible from surrounding roads and neighbouring properties and will fundamentally alter the character of the locality.</i></p> <p><i>The proposal also raises significant privacy concerns for surrounding residents.</i></p> <p><i>The upper levels of the building will allow direct views into neighbouring properties, backyards and outdoor living areas. The current mature vegetation surrounding the site provides an important visual and privacy buffer. However, the proposal simultaneously seeks to remove a substantial number of these mature trees while introducing a much larger building.</i></p> <p><i>The combined impact of extensive vegetation removal and a three-storey structure has not been adequately assessed. Many of the mature Spotted Gum trees proposed for removal currently soften the appearance of the site, provide screening for neighbouring residents and help maintain the semi-rural character of the area. Once removed, the scale and bulk of the proposed building will become significantly more prominent.</i></p> <p><i>The loss of these trees will not only impact biodiversity and urban cooling but will also exacerbate the visual and privacy impacts of the development. The REF does not adequately address these cumulative impacts.</i></p> <p><i>Furthermore, the proposal appears to prioritise maximising student capacity rather than providing the highest quality educational environment. Children in the Shoalhaven deserve access to spacious, safe and well-designed school environments. Attempting to accommodate nearly 600 students on a constrained site risks creating a school that prioritises quantity over quality.</i></p> <p><i>A larger and more appropriately located site could have provided:</i></p> <ul style="list-style-type: none"> <li><i>• Greater retention of mature native trees;</i></li> <li><i>• Improved traffic circulation and parking;</i></li> <li><i>• Larger outdoor play and recreation areas;</i></li> <li><i>• A lower-scale building more consistent with the surrounding community;</i></li> <li><i>• Reduced privacy impacts on neighbouring residents;</i></li> <li><i>• Better active transport opportunities;</i></li> <li><i>• A more appropriate educational environment for students.</i></li> </ul> <p><i>The REF does not adequately demonstrate why alternative sites capable of achieving these outcomes were rejected.</i></p> | <p><b>Built Form and Character</b></p> <p>Refer to additional visual impact assessment provided in in <b>Section 4.3</b>.</p> |

### 3 Response to Submissions

Table 3 Response to Community Submissions

| Ref. | Submission | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Response                                                                                                                                                                                                                                                                                                                                                              |
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|      |            | <p><i>Given the long-term significance of this project to the Worrigee and South Nowra communities, I believe greater consideration should be given to whether this site is genuinely the most appropriate location for a school of this size and whether the proposed scale of development is compatible with the existing character of the area.</i></p> <p><u>Alternative Site Options and South Nowra Growth</u></p> <p><i>There are clearly alternative sites available that would present significantly lower risks to children and families than the currently proposed location. The South Nowra area continues to experience substantial residential growth, with much of this expansion being driven by young families. This presents an opportunity to deliver a school in a location that is better aligned with the community it is intended to serve, while also allowing access roads, pedestrian infrastructure and traffic management measures to be designed specifically around the development from the outset.</i></p> <p><i>Land near the intersection of Isa Road and Worrigee Road, for example, could potentially provide a larger and more suitable site. A location of this nature could offer greater space for students, safer vehicle access, improved parking opportunities, dedicated footpaths and cycleways, and better connectivity for South Nowra residents especially through the walking bush tracks.</i></p> <p><i>Alternative locations such as the former golf course, could also be assessed. While that would result in longer walking or cycling distances for students, this must be weighed against the benefits of substantially larger play areas, improved parking opportunities, and a significant reduction in the risk of vehicle-related incidents involving children.</i></p> <p><i>One option that warrants serious consideration is reducing the proposed capacity of the Worrigee school by at least half and planning a second primary school within South Nowra. This approach would not only reduce traffic and safety risks at the Worrigee site, but would also recognise South Nowra as a rapidly growing suburb that deserves access to its own local primary school. A two-school solution would distribute enrolments more effectively, provide students with more space, improve safety outcomes, and better meet the long-term needs of both communities.</i></p> <p><b>Key Theme: Vegetation Removal and Biodiversity</b></p> <p><u>Loss of Mature Native Trees</u></p> <p><i>The removal of mature Spotted Gum trees is another disappointing aspect of the proposal. These are not recently planted landscape trees. Many appear to be over 100 years old and some may be significantly older. These trees provide:</i></p> <ul style="list-style-type: none"> <li>• wildlife habitat</li> </ul> | <p><b>Vegetation Removal and Biodiversity</b></p> <p>Site selection for the proposed school considered potential tree impacts. This site was selected because of reduced tree impacts being already partially cleared. The proposed school footprint has been designed to minimise tree impacts while providing offset planting to replace unavoidable tree loss.</p> |

### 3 Response to Submissions

**Table 3 Response to Community Submissions**

| Ref. | Submission | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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|      |            | <ul style="list-style-type: none"> <li>• <i>nesting hollows</i></li> <li>• <i>cooling</i></li> <li>• <i>stormwater interception</i></li> <li>• <i>privacy screening</i></li> <li>• <i>visual amenity</i></li> <li>• <i>educational opportunities</i></li> </ul> <p><i>Once removed, these values cannot be replaced. The proposed one-for-one replacement planting ratio is inadequate. A newly planted tree is not equivalent to a mature tree that has developed over more than a century. The REF should place much greater emphasis on retention and redesign rather than removal and replacement.</i></p> <p><i>In addition to providing habitat, the mature Spotted Gum trees form part of a broader wildlife movement corridor through the locality. The removal of these trees has the potential to fragment habitat and reduce connectivity between remaining vegetation patches. The REF appears to focus primarily on individual trees rather than considering the ecological function of the corridor as a whole</i></p> <p><u><i>Hollow-Bearing Trees and Threatened Species</i></u><br/> <i>I do not believe the fauna assessment adequately reflects conditions on site. There are substantially more hollow-bearing trees present than identified within the report. Residents regularly observe wildlife using these trees. Species observed include:</i></p> <ul style="list-style-type: none"> <li>• <i>Glossy Black Cockatoos</i></li> <li>• <i>King Parrots</i></li> <li>• <i>Eastern Rosellas</i></li> <li>• <i>Galahs</i></li> <li>• <i>Rainbow Lorikeets</i></li> <li>• <i>Tawny Frogmouths</i></li> <li>• <i>Possums</i></li> <li>• <i>Microbats</i></li> </ul> <p><i>The ecological significance of these trees appears to have been underestimated. A more comprehensive assessment should be undertaken before any clearing occurs.</i></p> <p><u><i>Climate Change and Urban Heat</i></u><br/> <i>The REF does not adequately consider the role these mature trees play in mitigating heat. The proposal will replace a large canopy of mature trees with buildings, hardstand areas and young replacement plantings. This will inevitably increase temperatures within the site and the surrounding area. The cooling benefits currently provided by mature trees extend beyond the school site and assist surrounding properties. These benefits will be lost for decades. This is inconsistent with contemporary approaches to climate resilience and urban heat management.</i></p> | <p>A revised test of significance that considers the cumulative impacts of both the new preschool and new primary school projects on hollow bearing tree removal and associated biodiversity impacts has been provided in <b>Section 4.6</b> of this report. The proposed activity is still considered unlikely to have a significant impact on threatened species.</p> <p>Tree replacement planting is required by Mitigation Measure E6* at a ratio of 1:1 to offset tree loss using locally native vegetation from threatened plant community type PCT 3629 Shoalhaven Lowland Spotted Gum-Paperbark Forest.</p> <p>A Sustainable Development Report was prepared to support the REF. That report identifies several design solutions to reduce urban heat including:</p> <ul style="list-style-type: none"> <li>• Roofing material having a solar reflectance index of 34 for roof pitch greater than 15, and 64 for roof pitch less than 15.</li> <li>• Retention of mature canopy trees where possible, and replacement tree planting at a ratio of at least 1:1 to provide shading of impervious surfaces.</li> </ul> <p>Replacement tree planting is expected to provide site canopy coverage of 18% on opening, increasing to 26% after 5 years, and 44% after 10 years, all of which exceed The Department's canopy cover targets in the <i>Educational Facilities Standards and Guidelines 2025</i>.</p> |

### 3 Response to Submissions

**Table 3 Response to Community Submissions**

| Ref. | Submission | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|      |            | <p><b><u>Key Theme: Stormwater, Drainage and Flooding</u></b></p> <p><b><u>Flooding and Stormwater</u></b><br/> <i>The proposal substantially increases hard surfaces throughout the site. At the same time, large numbers of mature trees are proposed to be removed. The combination of increased runoff and reduced vegetation raises concerns regarding downstream impacts. The flood modelling appears focused primarily on the school site itself rather than the broader impacts on neighbouring properties. Further investigation should be undertaken to demonstrate that adjacent landowners will not experience increased flooding, nuisance runoff or drainage issues. The proposed rainwater harvesting infrastructure appears inadequate for a development of this size. The provision of only two 5,000-litre tanks raises questions regarding whether meaningful efforts have been made to maximise water reuse and reduce stormwater discharge. Additional rainwater storage and reuse opportunities should be incorporated into the design.</i></p> <p><b><u>Key Theme: Reporting and Consultation Process</u></b></p> <p><b><u>Community Consultation</u></b><br/> <i>Many residents feel that consultation occurred after key decisions had already been made. There is a widespread perception that community feedback was sought only after the site had effectively been selected and the project scope determined. This has left many residents feeling unheard and frustrated. A project of this scale should involve genuine consultation before major decisions are finalised.</i></p> <p><b><u>Conclusion</u></b><br/> <i>While I support the construction of a new public school for the Worrigee and South Nowra communities, I do not support the current proposal in its present form. My primary position is that the school should be relocated to a more suitable site that can safely accommodate the intended student population and associated infrastructure requirements.</i></p> <p><i>However, if the Department proceeds with the current location, the scale of the development must be substantially reduced. In my view, the proposed student capacity should be reduced to less than half of that currently proposed. The surrounding road network, pedestrian infrastructure, parking provision and site constraints are simply not capable of safely supporting a school of this size.</i></p> <p><i>The proposal currently seeks to accommodate easily over 700 people each day on a constrained site, resulting in inadequate parking, increased traffic impacts, extensive vegetation removal and the need for a three-storey building that is entirely out of character with the surrounding area. The proposed building height is more reflective of</i></p> | <p><b>Stormwater, Drainage and Flooding</b></p> <p>It is acknowledged the proposed school results in an increase in hard surfaces on the site. A stormwater drainage system has been prepared which results in the same or decreased overland flow on adjoining properties, as supported by flood modelling which was exhibited in the Flood Impact and Risk Assessment (FIRA).</p> <p>Refer to response to flooding, stormwater and drainage matters in <b>Section 4.5</b> of this report.</p> <p><b>Reporting and Consultation Process</b></p> <p>The department has undertaken community consultation as follows:</p> <ul style="list-style-type: none"> <li>- 28 July 2025 – Door knock of 97 properties near the site</li> <li>- 31 July 2025 – Letterbox drop planning update to project distribution area.</li> <li>- 18 December 2025 – Further mailing list and letterbox distribution of planning update.</li> <li>- 10 March 2026 – Community information session</li> <li>- 17 February - 29 March 2026 - School naming survey.</li> <li>- 10 March 2026 - Drop in community information session</li> <li>- 2 – 29 April 2026 – New Public Preschool in Worrigee REF exhibition</li> <li>- 14 May – 10 June 2026 – New Primary School in Worrigee Public Exhibition.</li> </ul> |

### 3 Response to Submissions

**Table 3 Response to Community Submissions**

| Ref. | Submission  | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Response                                                                                                              |
|------|-------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|
|      |             | <p><i>a metropolitan school developed on a constrained urban site than a school within a low-density, semi-rural community such as Worrigee.</i></p> <p><i>If the school remains on this site, the design needs to be fundamentally reconsidered. A significantly reduced student population would allow for a lower-scale development that is more consistent with the character of the locality, better integrated with the surrounding community, and capable of providing a safer environment for students, staff and residents. The three-storey building should be redesigned into a more appropriate low-rise form that reflects the existing built character of the area and reduces the visual, privacy and amenity impacts on neighbouring properties. The projected student number could still be reached with the construction of another Primary School in the South Nowra area, a growing suburb that is separate from Worrigee and warrants its own Primary school.</i></p> <p><i>Without either relocation or a substantial reduction in capacity and redesign of the built form, I do not believe the proposal can adequately address the significant safety, traffic, parking, environmental and community impacts identified throughout this submission.</i></p>                                                                                                                                                                                                       |                                                                                                                       |
| 3.18 | SUB - 18715 | <p><b>Key Themes:</b> Site Selection / Vegetation Removal and Biodiversity / Built Form and Character / Traffic, Transport and Accessibility</p> <p><i>Please see Attached document - While I support the construction of a new public school for the Worrigee and South Nowra communities, I do not support the current proposal in its present form. My primary position is that the school should be relocated to a more suitable site that can safely accommodate the intended student population and associated infrastructure requirements.</i></p> <p><i>However, if the Department proceeds with the current location, the scale of the development must be substantially reduced. In my view, the proposed student capacity should be reduced to less than half of that currently proposed. The surrounding road network, pedestrian infrastructure, parking provision and site constraints are simply not capable of safely supporting a school of this size.</i></p> <p><i>The proposal currently seeks to accommodate easily over 700 people each day on a constrained site, resulting in inadequate parking, increased traffic impacts, extensive vegetation removal and the need for a three-storey building that is entirely out of character with the surrounding area. The proposed building height is more reflective of a metropolitan school developed on a constrained urban site than a school within a low-density, semi-rural community such as Worrigee.</i></p> | <p><b>Site Selection</b></p> <p>Refer to response to site selection matters in <b>Section 4.4</b> of this report.</p> |

### 3 Response to Submissions

**Table 3 Response to Community Submissions**

| Ref. | Submission  | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Response                                                                                                              |
|------|-------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|
|      |             | <p><i>If the school remains on this site, the design needs to be fundamentally reconsidered. A significantly reduced student population would allow for a lower-scale development that is more consistent with the character of the locality, better integrated with the surrounding community, and capable of providing a safer environment for students, staff and residents. The three-storey building should be redesigned into a more appropriate low-rise form that reflects the existing built character of the area and reduces the visual, privacy and amenity impacts on neighbouring properties. The projected student number could still be reached with the construction of another Primary School in the South Nowra area, a growing suburb that is separate from Worrigee and warrants its own Primary school.</i></p> <p><i>Without either relocation or a substantial reduction in capacity and redesign of the built form, I do not believe the proposal can adequately address the significant safety, traffic, parking, environmental and community impacts identified throughout this submission.</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                       |
| 3.19 | SUB - 18707 | <p><b>Key Themes: Site Selection</b></p> <p><i>There are clearly alternative sites available that would present significantly lower risks to children and families than the currently proposed location. The South Nowra area continues to experience substantial residential growth, with much of this expansion being driven by young families. This presents an opportunity to deliver a school in a location that is better aligned with the community it is intended to serve, while also allowing access roads, pedestrian infrastructure and traffic management measures to be designed specifically around the development from the outset, rather than attempting to retrofit solutions to an already constrained site.</i></p> <p><i>Land near the intersection of Isa Road and Worrigee Road, for example, could potentially provide a larger and more suitable site. A location of this nature could offer greater space for students, safer vehicle access, improved parking opportunities, dedicated footpaths and cycleways, and better connectivity for South Nowra residents, particularly through the existing network of walking tracks that already link residential areas to surrounding open spaces. A larger site would also provide greater flexibility for future expansion and reduce the need for intensive development outcomes such as multi-storey buildings and heavily constrained outdoor areas.</i></p> <p><i>Alternative locations, such as the former golf course, could also be assessed. While this may result in longer walking or cycling distances for some students, that consideration must be balanced against the benefits of a safer and more functional school environment. A larger site could provide substantially more open space for recreation and learning, improved traffic circulation, greater parking capacity, and a significant reduction in the likelihood of vehicle-related incidents involving children. The</i></p> | <p><b>Site Selection</b></p> <p>Refer to response to site selection matters in <b>Section 4.4</b> of this report.</p> |

### 3 Response to Submissions

**Table 3 Response to Community Submissions**

| Ref. | Submission  | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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|      |             | <p><i>long-term safety and wellbeing of students should be prioritised over convenience alone.</i></p> <p><i>One option that warrants serious consideration is reducing the proposed capacity of the Worrigee school by at least half and planning a second primary school within South Nowra. This approach would not only reduce traffic, parking and pedestrian safety risks at the Worrigee site, but would also recognise South Nowra as a rapidly growing suburb that deserves access to its own local primary school. Rather than concentrating hundreds of students onto a constrained site, a two-school solution would distribute enrolments more effectively, provide children with more space to learn and play, improve road safety outcomes, and better accommodate future population growth. It may also prove to be a more cost-effective long-term solution by reducing the need for extensive traffic upgrades and other supporting infrastructure that would otherwise be required to make the current proposal function safely.</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 3.20 | SUB - 18718 | <p><b>Key Themes:</b> Site Selection / Traffic, Transport and Accessibility / Built Form and Character / Vegetation Removal and Biodiversity</p> <p><i>My objections are based on the following specific grounds:</i></p> <p><u>1. Excessive Scale and traffic generation.</u></p> <p><i>the proposal intends to place approximately 582 primary students and 60 preschool students, alongside teaching staff, administrative personnel and visitors, on a restricted parcel of land. With over 700 people accessing the site daily, the local road network - specifically the intersection of Worrigee Road and Greenwell Point Road - is inadequate for this volume of traffic. The proposal of a roundabout within this high-traffic intersection is absurd and neglectful as a solution for both safe road and pedestrian traffic. The REF relies on unrealistic, optimistic traffic and transport assumptions that do not reflect the reality of commuter behaviours in the Shoalhaven region, where public transport options are highly constrained and private vehicle reliance is high.</i></p> <p><u>2. Inadequate Parking and Foreseeable Safety Risks.</u></p> <p><i>The proposed on-site parking provision is deficient and fails to account for peak drop-off/pick-up periods, let alone staff parking, school assemblies, or community events. This lack of capacity will inevitably result in severe parking overflow onto surrounding residential streets, particularly Worrigee Road, Booligal Road, Golden Gove and Litoria Parade. This introduces a predictable and significant safety hazard, forcing young children to navigate a high-volume road clogged with parked vehicles. furthermore, the surrounding area currently lacks comprehensive pedestrian infrastructure required to</i></p> | <p><b>Traffic, Transport and Accessibility</b></p> <p>Additional assessment of intersection performance confirms the proposed school will have minor traffic impacts. Following public exhibition, a roundabout is proposed at the Worrigee and Booligal Road intersection which further improves intersection performance.</p> <p>Staff parking has been provided at a ratio of 1:1 and the proposed DOPU spaces and short stay parking are considered satisfactory to meet expected demand, as outlined in the exhibited TAIA.</p> <p>Refer to additional assessment and response to traffic related matters in <b>Section 4.1</b> of this report.</p> |

### 3 Response to Submissions

**Table 3 Response to Community Submissions**

| Ref. | Submission | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|------|------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      |            | <p>safety facilitate active transport.</p> <p><u>3. Flawed Catchment Location.</u></p> <p><i>The physical location of the school is counter-intuitive to sound urban planning. Rather than being centrally positioned within its residential catchment to encourage walking and cycling, the site sits on the periphery of the community. This poor positioning locks in a long-term reliance on private vehicles, directly contradicting modern planning principles aimed at reducing traffic congestion.</i></p> <p><u>4. Incompatibility with Local Character and Amenity.</u></p> <p><i>The proposed three-storey design is entirely inconsistent with the established character of Worrige, which consists of low-density residential and semi-rural properties. Introducing a metropolitan-scale, three-storey structure will result in unacceptable visual bulk, overshadowing and privacy impacts for adjacent residents. Further demonstrating evidence of the site being pushed beyond its reasonable capacity.</i></p> <p><u>5. Environmental and Biodiversity Loss.</u></p> <p><i>The project requires the clearing of mature, established Spotted Gum trees. These trees provide critical cooling, visual screening, and habitat for local wildlife, including hollow-dependent species regularly observed by residents. The environmental offset measures proposed cannot replicate or replace the ecological value of these mature trees within any meaningful timeframe, leading to a net loss for local biodiversity for generations.</i></p> <p><i>A school is a multi-generational community asset. Constructing an oversized facility on an unsuitable site based on the assumption that infrastructure issues can be retrofitted later is a flawed and unacceptable plan.</i></p> <p><i>Therefore, I request that the Department take the following actions:</i></p> <ul style="list-style-type: none"> <li><i>Reject the proposal in its current form and seek a larger, more centrally located site that can safely accommodate the projected student population.</i></li> </ul> <p><i>Alternatively, if the current site must be used, the project must be significantly modified to:</i></p> <ul style="list-style-type: none"> <li><i>Reduce the student capacity by at least 50% to align with the site's actual spatial constraints.</i></li> <li><i>Redesign the facility to a lower-scale, two-storey maximum form that respects the local visual amenity.</i></li> </ul> | <p><b>Site Selection</b></p> <p>Site selection rationale is addressed in <b>Section 4.4</b> of this report.</p> <p><b>Built Form and Character</b></p> <p>Additional assessment demonstrating compatibility with character is provided in <b>Section 4.3</b> of this report.</p> <p><b>Vegetation Removal and Biodiversity</b></p> <p>The REF was supported by an Arboricultural Impact Assessment and Flora and Fauna Assessment.</p> <p>DCCEEW have reviewed the assessments undertaken and agree with the conclusion that the proposed activity, including the removal of 46 trees, is unlikely to significantly impact threatened species (see <b>Table 2</b>).</p> <p>A number of Mitigation Measures are proposed including replacement tree planting at a ratio of 1:1, placement of hollow boxes and tree species selection consistent with the identified Plant Community Type (PCT).</p> <p>Additional cumulative impact test of significance assessments have been undertaken in accordance with the recommendations of DCCEEW with no change to the exhibited findings. Further detail is provided in <b>Section 4.6</b> of this report.</p> |

### 3 Response to Submissions

**Table 3 Response to Community Submissions**

| Ref. | Submission  | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|------|-------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      |             | <ul style="list-style-type: none"> <li>Substantially increase on-site parking and drop-off zones to completely absorb school-related traffic.</li> <li>Fund and construct continuous, safe pedestrian pathways extending well beyond the immediate school boundary prior to the school opening.</li> <li>Enforce stricter retention targets for mature native vegetation.</li> <li>Further investigate stormwater, flooding and cumulative environmental impacts.</li> </ul> <p>The safety of local children and the long-term livability of the Worrigee Community must take priority over a compromised planning outcome.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 3.21 | SUB - 18727 | <p><b>Key Themes:</b> Site Selection / Traffic, Transport and Accessibility / Built Form and Character / Vegetation Removal and Biodiversity</p> <p><i>I have concerns and object to the current proposal for the Public School to be built at Worrigee.</i></p> <p><i>My concerns about the proposed building design of the school on Worrigee Road –</i></p> <ul style="list-style-type: none"> <li><i>School location is supposed to cover the growing population of East Nowra, Worrigee, South Nowra, Twin Waters Estate, this is not in walking distance for families to access. Therefore this will increase traffic flow of parents trying to get their kids to school, the need for on site parking to ensure the safety of families, staff and to prevent the overflow of cars onto surrounding streets and roads. The need for new bus routes to help with public transport.</i></li> <li><i>Road Conditions will need to improve infrastructure, be upgraded to handle the flow of traffic and maintained to accommodate the extra traffic, while ensuring the safety of pedestrians, cyclists, motorists and property.</i></li> <li><i>Considering the previous location of the school was concerned to small for the proposed school, Shouldn't that be considered for the new location- which is located on the edge of residential, semi rural and rural farmland. A three story metropolitan urban building is not in character with the area - a rural historic country community.</i></li> <li><i>In seeing the proposed Calderwood public school design- it is Not a three storey building in a growing community.</i></li> <li><i>The proposed estimate of 500 students + preschool children presents concerns of overcrowding and the inability to ensure the safety of students amongst growing problems of bullying, mental health and shortages of teachers. This school development cannot cover our community as it continues to grow, the need for further schools will need to be addressed to provide the education and services needed in the new housing developments in South Nowra, West Nowra, Cambewarra, Bomaderry.</i></li> <li><i>Governments are failing to take into account the Environmental impacts of destroying the landscape in the name of progress, the loss of existing trees</i></li> </ul> | <p><b>Traffic</b></p> <p>Refer to additional assessment and response to traffic related matters in <b>Section 4.1</b> of this report.</p> <p><b>Site Selection</b></p> <p>Site selection rationale is addressed in <b>Section 4.4</b> of this report.</p> <p><b>Built Form and Character</b></p> <p>Additional assessment demonstrating compatibility with character is provided in <b>Section 4.3</b> of this report.</p> <p><b>Tree &amp; Biodiversity Impacts</b></p> <p>Site selection for the proposed school considered potential tree impacts. This site was selected because of reduced tree impacts being already partially cleared. The proposed school footprint has been designed to minimise tree impacts while providing offset planting to replace unavoidable tree loss.</p> <p>The exhibited Flora and Fauna Assessment (FFA) has been updated to include a revised test of significance that considers the cumulative impacts of both the new preschool and new primary school projects on hollow</p> |

### 3 Response to Submissions

**Table 3 Response to Community Submissions**

| Ref. | Submission                       | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|------|----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      |                                  | <p><i>will effect the climate, the habitats and wildlife of the area, previous destruction of trees in the area resulted in the decline of the frog population. There is also the concern of soil impact on the area. In today's climate it would be of benifit that the school be built in conjunction with the existing environment, allowing children to grow, learn and play in a natural landscape that provides immediate shade and value.</i></p> <ul style="list-style-type: none"> <li><i>I respectfully request that the concerns of the community are Not dismissed,, more planning and consultation is needed to ensure the building remains low density, in keeping with &amp; to fit into the residential communities and semi rural environment.</i></li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <p>bearing tree removal. The proposed activity is still considered unlikely to have a significant impact on threatened species.</p> <p>Tree replacement planting is provided at a ratio of 1:1 to offset tree loss as required by mitigation measure E6.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 3.22 | <b>SUB – 18728, 18732, 18733</b> | <p><b>Key Themes: Traffic, Transport and Accessibility / Vegetation Removal and Biodiversity Impacts</b></p> <p><i>I strongly object to the current proposal for the new Worrigee Public School as presented in the Review of Environmental Factors (REF).</i></p> <p><i>This objection is not to the delivery of a new public school. Worrigee and South Nowra clearly require additional educational infrastructure. My objection is to the selection of an unsuitable site and the attempt to force an excessively large development onto land that is incapable of safely accommodating it.</i></p> <p><i>The central issue is simple: the proposed development is too large for the site.</i></p> <p><i>The proposal seeks to place a school of approximately 582 students and a further 60 preschool students, together with staff, parents, visitors and service vehicles, on a constrained parcel of land located at the intersection of Worrigee Road, Booligal Road and Greenwell Point Road. In practice, this will result in well over 700 people accessing the site daily.</i></p> <p><i>The surrounding road network, parking provision and pedestrian infrastructure are not capable of safely supporting this level of activity.</i></p> <p><i>The REF significantly underestimates the real-world impacts that local residents will experience. It relies on optimistic assumptions regarding traffic movements, active transport and parking demand that do not reflect how families in the Shoalhaven actually travel.</i></p> <p><i>Public transport options are limited. Most staff and parents will arrive by private vehicle. The proposed parking provision is inadequate even before considering school events, assemblies, meetings and visitor demand. The inevitable result will be parking overflow onto surrounding roads, particularly Worrigee Road.</i></p> | <p><b>Traffic, Transport and Accessibility</b></p> <p>Refer to additional assessment and response to traffic related matters in <b>Section 4.1</b> of this report.</p> <p><b>Vegetation Removal and Biodiversity Impacts</b></p> <p>Site selection for the proposed school considered potential tree impacts. This site was selected because of reduced tree impacts being already partially cleared. The proposed school footprint has been designed to minimise tree impacts while providing offset planting to replace unavoidable tree loss.</p> <p>The exhibited Flora and Fauna Assessment (FFA) has been updated to include a revised test of significance that considers the cumulative impacts of both the new preschool and new primary school projects on hollow bearing tree removal. The proposed activity is still considered unlikely to have a significant impact on threatened species.</p> <p>Tree replacement planting is provided at a ratio of 1:1 to offset tree loss as required by mitigation measure E6.</p> <p><b>Site Selection</b></p> <p>Site selection rationale is addressed in <b>Section 4.4</b> of this report.</p> <p><b>Built Form and Character</b></p> |

### 3 Response to Submissions

**Table 3 Response to Community Submissions**

| Ref. | Submission | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Response                                                                                                                  |
|------|------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|
|      |            | <p><i>This creates a foreseeable safety risk. Children will be required to move between parked vehicles and traffic on roads that already carry substantial traffic volumes. The lack of comprehensive pedestrian infrastructure further compounds this risk. The proposal effectively transfers the consequences of inadequate on-site capacity onto the surrounding community.</i></p> <p><i>The location itself is fundamentally flawed. Rather than being centrally located within the catchment, the school is positioned on the edge of the community, increasing reliance on private vehicles and reducing the practicality of walking and cycling for many families.</i></p> <p><i>The scale of development is also inconsistent with the character of Worrigee. The proposed three-storey building is not a reflection of good planning; it is evidence that the site is being pushed beyond its reasonable capacity. A three-storey metropolitan-style school is entirely out of keeping with the surrounding low-density and semi-rural environment and will create significant visual, privacy and amenity impacts.</i></p> <p><i>Environmental impacts have likewise been understated. The proposal requires the removal of mature Spotted Gum trees that provide habitat, cooling, screening and landscape value that cannot be replaced within any meaningful timeframe. Residents regularly observe wildlife using these trees, including hollow-dependent species. Once removed, these environmental values will be lost for generations.</i></p> <p><i>Decision-makers should carefully consider whether this proposal genuinely represents good long-term planning for the Shoalhaven. Schools are critical community assets that will serve generations of families. A poor site selection decision made today will create traffic, safety and environmental consequences for decades.</i></p> <p><i>Accordingly, I respectfully request that the Department:</i></p> <ul style="list-style-type: none"> <li><i>Reject the proposal in its current form and pursue a more suitable site capable of safely accommodating the intended student population;</i></li> </ul> <p><i>OR, if the current site is retained:</i></p> <ul style="list-style-type: none"> <li><i>Reduce the student capacity to less than half of that currently proposed;</i></li> <li><i>Redesign the three-storey building into a lower-scale form consistent with the character of the area;</i></li> <li><i>Provide substantially greater parking capacity and supporting infrastructure;</i></li> <li><i>Deliver continuous and safe pedestrian connections beyond the immediate school frontage;</i></li> </ul> | <p>Additional assessment demonstrating compatibility with character is provided in <b>Section 4.3</b> of this report.</p> |

### 3 Response to Submissions

**Table 3 Response to Community Submissions**

| Ref. | Submission  | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|------|-------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      |             | <ul style="list-style-type: none"> <li>Reassess traffic, parking and road safety impacts using realistic assumptions;</li> <li>Maximise retention of mature native trees and reassess biodiversity impacts; and</li> <li>Further investigate stormwater, flooding and cumulative environmental impacts.</li> </ul> <p><i>This proposal should not proceed on the basis that infrastructure can be retrofitted later or that community concerns will resolve themselves over time. If the site cannot safely accommodate the intended development, then either the site or the scale of the proposal must change.</i></p> <p><i>The safety of children, the amenity of existing residents and the long-term planning outcomes for the Worrigeer community demand nothing less.</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 3.23 | SUB - 18747 | <p><b>Key Themes:</b> Traffic, Transport and Access / Noise / Built Form and Character</p> <p><i>I am writing to formally object to the proposed development of the 3 storey school for approximately 550+ students in worrigeer.</i></p> <p><i>I am a resident on Rayleigh drive, close to the proposed development.</i></p> <p><i>After reviewing the proposal, I have significant concerns regarding the impact on local amenity, safety, and the character of the area.</i></p> <p><u>Key concerns</u></p> <ol style="list-style-type: none"> <li><i>Traffic and road safety; this development will increase traffic volumes, particularly during peak drop-off and pick-up times. The area is on a main road, which is already heavily used. Additional congestion is likely to increase accident risk, reduce visibility and safe access for residents, impact emergency vehicle access.</i></li> <li><i>Parking impacts; insufficient parking on-site for staff and parents will result in overflow parking into surrounding streets. Local streets are not designated to accommodate high volumes of short-term parking. This will impact resident access to properties, and general road safe and traffic flow.</i></li> <li><i>Noise impacts; a school this size will generate significant noise from playgrounds, bells and announcements, sports and events, as well as vehicle congestion. This is inconsistent with the current quieter, rural residential setting.</i></li> <li><i>Visual bulk; a 3 storey building is out of character with the existing low-scale, farming/rural landscape. The development will dominate the visual</i></li> </ol> | <p><b>Traffic, Access and Parking</b></p> <p>Refer to additional assessment and response to traffic related matters in <b>Section 4.1</b> of this report.</p> <p><b>Noise</b></p> <p>A Noise and Vibration Impact Assessment (NVIA) was prepared to consider noise impacts of the proposed school during construction and operational phases of the activity.</p> <p>The NVIA found that operational noise including outdoor play noise, additional vehicle traffic and mechanical plant from the proposed school is unlikely to result in significant adverse impacts on surrounding sensitive receivers as the noise criteria will not be exceeded.</p> |

### 3 Response to Submissions

**Table 3 Response to Community Submissions**

| Ref. | Submission  | Summary of Submission Topic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|------|-------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      |             | <p><i>environment reduce the natural scenic quality of the area and be inconsistent with the surrounding land use.</i></p> <p>5. <i>Loss of rural amenity; the proposal will fundamentally change the character of the area from a quiet, semi rural environment to a high activity institutional use. The will impact the residents enjoyment of their properties and natural setting.</i></p> <p><i>Given the above concerns, I request that council:</i></p> <ul style="list-style-type: none"> <li><i>Carefully assess the cumulative impacts of traffic, parking and noise.</i></li> <li><i>Condiser whether the development is appropriate for this location</i></li> <li><i>Require significant modifications or refuse the application if impacts cannot be adequately mitigated.</i></li> </ul> | <p><b>Built Form and Character</b></p> <p>Additional assessment demonstrating compatibility with character is provided in <b>Section 4.3</b> of this report.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 3.24 | SUB - 18748 | <p><b>Key Themes: Land Use Conflict / Reporting and Consultation Process / Site Location / Traffic, Transport and Accessibility</b></p> <p>As per letter from premise dated 11/06/2026 Reference -222021-L01.</p> <p>Key Issues in the submission include:</p> <ul style="list-style-type: none"> <li>Insufficient LUCRA</li> <li>Separation of Primary School and Preschool into separate REF's;</li> <li>Site is located away from urban release areas west of Nowra and Bomaderry;</li> <li>Traffic and access impacts, particularly intersection performance, and B-double vehicle movements and pedestrian safety.</li> </ul>                                                                                                                                                                       | <p><b>Traffic, Transport and Accessibility</b></p> <p>Refer to additional assessment and response to traffic related matters in <b>Section 4.1</b> of this report.</p> <p><b>Land Use Conflict</b></p> <p>Refer to additional LUCRA Assessment and response to land use conflict related matters in <b>Section 4.2</b> of this report.</p> <p><b>Site Location</b></p> <p>Refer to site selection rationale provided in <b>Section 4.4</b> of this report.</p> <p><b>Reporting and Consultation Process</b></p> <p>It is acknowledged that the new primary school and new preschool projects are both located on the same parcel of land and share some common infrastructure. However, they have both been designed as independent projects, capable of operating independently, irrespective of the other facility operating.</p> <p>Both projects are being delivered on separate construction timeframes with the preschool scheduled to open in Term 1 2027, and the primary school in 2028.</p> <p>The separate approval pathways allow for the construction and operation of the preschool to commence, irrespective of approval for construction and operation of the primary school.</p> |

### 3 Response to Submissions

Table 3 Response to Community Submissions

| Ref. | Submission | Summary of Submission Topic | Response                                                                                                                                                                                                                                                                                                                                                                                                          |
|------|------------|-----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      |            |                             | Notwithstanding; assessment of the cumulative impacts of both projects has been included in various sections throughout the exhibited Review of Environmental Factors (REF) which is considered to provide a clear and integrated picture of the impacts of the proposed projects. Some cumulative assessments have been strengthened following public exhibition as provided in <b>Section 4</b> of this report. |

## 4 Additional Environmental Assessment

### 4.1 Traffic, Transport and Accessibility

The traffic consultant has reviewed the agency and public submissions. As identified in **Sections 2 and 3**, the key themes raised in submissions relate to:

- Traffic Impacts;
- Road Safety;
- Heavy Vehicle Impacts;
- Active Transport Connections; and,
- Parking.

#### 4.1.1 Design Changes

The impacts of the proposed school on traffic was one of the most prevalent concerns in submissions. Additional transport infrastructure upgrades have been included as part of the activity following public exhibition, including:

- Provision of a single lane mountable roundabout at the intersection of Worrigee Road, Booligal Road and Golden Grove.

Consultation is ongoing between the department and Shoalhaven City Council regarding additional transport infrastructure upgrades in the precinct, including Council delivery of infrastructure proposed under the Shoalhaven Active Transport Strategy.

#### 4.1.2 Additional Assessment

##### Intersection Performance

Following public exhibition and the above design amendments, updated SIDRA modelling was undertaken to model intersection performance.

##### Intersection – Worrigee Road, Booligal Road and Golden Grove

The intersection of Worrigee Road, Booligal Road and Golden Grove is expected to experience improved performance with the provision of the roundabout upgrade compared to the exhibited intersection performance, as outlined in **Table 4**.

**Table 4 SIDRA Intersection Results: Worrigee Road / Booligal Road / Golden Grove**

| Site                                        | Type                                                                                | AM peak period results |                         |     |                   | PM peak period results |                         |     |                   |
|---------------------------------------------|-------------------------------------------------------------------------------------|------------------------|-------------------------|-----|-------------------|------------------------|-------------------------|-----|-------------------|
|                                             |                                                                                     | DoS                    | Average Delay (sec/veh) | LoS | 95% Queue (m)     | DoS                    | Average Delay (sec/veh) | LoS | 95% Queue (m)     |
| 2025 Existing                               |  | 0.09                   | 6.7                     | A   | < 6m              | 0.10                   | 6.3                     | A   | < 6m              |
| Future with preschool without school        |  | 0.13                   | 7.6                     | A   | < 6m              | 0.10                   | 6.9                     | A   | < 6m              |
| Future with preschool + school              |  | 0.78                   | 28.5                    | C   | 89m (Booligal Rd) | 0.62                   | 18.9                    | B   | 48m (Booligal Rd) |
| Future with preschool + school - roundabout |  | 0.63                   | 16.9                    | B   | 49m (Worrigee Rd) | 0.52                   | 10.6                    | A   | 32m (Booligal Rd) |

## 4 Additional Environmental Assessment

It is acknowledged there will be a change in intersection performance from the existing condition. However, the impacts are expected to be minor with performance staying within acceptable limits with an increase in delay of around ten seconds per vehicle in the AM peak.

The impact of additional traffic generation from the proposed school results in an additional 316 inbound and 269 outbound vehicles in the AM peak. Of these, 75% are expected to arrive from the south via Worrigee Road, 22.5% from the west via Greenwell Point Road, and the remaining 2.5% from the north or east. This increase in traffic volume can be accommodated within the current road capacity.

### Intersection – Greenwell Point Road, Worrigee Road and Millbank Road

The intersection upgrade of Greenwell Point Road, Worrigee Road and Millbank Road has been funded, with early design work underway. Notwithstanding, SIDRA modelling was also undertaken to ascertain the traffic impacts in the scenario that delivery of the intersection upgrade by Shoalhaven Council is delayed. The results are provided in **Table 5**.

| Site                                               | Type                                                                                | AM peak period results |                         |     |                               | PM peak period results |                         |     |                               |
|----------------------------------------------------|-------------------------------------------------------------------------------------|------------------------|-------------------------|-----|-------------------------------|------------------------|-------------------------|-----|-------------------------------|
|                                                    |                                                                                     | DoS                    | Average Delay (sec/veh) | LoS | 95% Queue (m)                 | DoS                    | Average Delay (sec/veh) | LoS | 95% Queue (m)                 |
| 2025 Existing Situation                            |  | 0.38                   | 22.4                    | B   | 14 (Worrigee Rd)              | 0.40                   | 22.2                    | B   | 13 (Worrigee Rd)              |
| Future Base Existing Layout without school         |  | 0.43                   | 23.8                    | B   | 16 (Worrigee Rd)              | 0.45                   | 24.1                    | B   | 16 (Worrigee Rd)              |
| Future Existing Layout with school - first years   |  | 0.58                   | 51.8                    | D   | 23 (Worrigee Rd)              | 0.79                   | 54.8                    | D   | 34 (Worrigee Rd)              |
| Existing with roundabout upgrade without school    |  | 0.27                   | 12.4                    | A   | 14m (Greenwell Point Rd east) | 0.30                   | 13.5                    | A   | 16m (Greenwell Point Rd west) |
| Future Base with roundabout upgrade without school |  | 0.28                   | 12.5                    | A   | 15m (Greenwell Point Rd east) | 0.32                   | 13.6                    | A   | 17m (Greenwell Point Rd west) |
| Future with roundabout upgrade with school         |  | 0.78                   | 28.5                    | C   | 89m                           | 0.62                   | 18.9                    | B   | 48m                           |

If the Greenwell Point Road, Worrigee Road and Millbank Road roundabout is not completed in time for school opening, intersection performance will be lower, but still within acceptable limits; considering the temporary nature of the situation and the improved performance when the roundabout is installed.

### **Road Safety**

Worrigee Road is not an arterial road or a regional road as identified by TfNSW however it could be considered a collector road as it provides access to Worrigee from a regional road.

## 4 Additional Environmental Assessment

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Traffic surveys on Worrigee Road indicated that average vehicle speeds and 85<sup>th</sup> percentile speeds within the vicinity of the site are lower than the current 60km/hr speed limit. A 40km/hr school zone speed limit will be implemented prior to operation of the school. The changed road layout, reduced speed limit and introduction of a roundabout at the intersection with Booligal Road/Golden Grove will seek to further reduce vehicle speeds, improving the environment for students.

Pedestrian safety will be enhanced through the provision of pedestrian crossings at the intersection of Worrigee Road / Booligal Road / Golden Grove.

Students arriving to school using bus services or DOPU bays will not have to cross any roads to access the school.

Mitigation Measure TA4\* has been updated to include the above design amendments, and an additional Mitigation Measure TA7\* has been included requiring the completion of a road safety audit as provided in **Section 5** of this report.

### Heavy Vehicle Impacts

There is currently no proposal to restrict heavy vehicles on Greenwell Point Road due to the proposed school. B-double vehicles travel on roads around the NSW road network that have 40km/h school speed zones without facing automatic restrictions from the National Heavy Vehicle Regulator. An example is the Princes Highway near West Bunberra Street in Bomaderry (near Nowra Anglican College). Agricultural vehicles and freight trucks are already moving past Terara Public School on Millbank Road.

The main entrance to the primary school is located on Worrigee Road with less interaction with Greenwell Point Road. Regardless, the Terara Dairy has access to multiple roads including Millbank Road, Comerong Island Road and is not constrained to travel past the school site.

The proposed school will result in minor impacts on heavy vehicle travel time along Greenwell Point Road. Factors impacting on travel time include:

- The proposed 40km/hr school zone speed limit along an approximately 500m length of Greenwell Point Road which is expected to add additional travel time of 15 seconds for all vehicles, when in effect during peak times.
- Additional traffic generated by the school at the future roundabout intersection with Worrigee and Millbank Roads will add an additional 0.4 to 2.7 seconds of travel time compared to standard operation of the roundabout without school traffic.
  - **Note:** The proposed roundabout is expected to result in travel delays between 7 and 10.3 seconds for all vehicles; however, the roundabout upgrade is proposed by Shoalhaven Council regardless of the new primary school proceeding and is not a traffic impact generated by the proposed activity.

Mitigation Measure TA2\* has been included in the REF which requires a Construction Traffic Management Plan (CTMP) to mitigate impacts on heavy vehicles during construction, as provided in **Section 5** of this report.

### Active and Public Transport

Consultation is ongoing between The Department and Shoalhaven City Council regarding the delivery of active transport infrastructure.

A School Travel Plan will be prepared to facilitate future active and public transport travel as infrastructure is upgraded throughout the locality. Consultation is ongoing between the department and Council around the delivery of active transport infrastructure upgrades proposed under the Shoalhaven Active Transport Strategy.

## 4 Additional Environmental Assessment

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An additional Mitigation Measure TA6\* has been included to ensure consultation occurs between the department and school bus operators. The inclusion of this mitigation measure will assist in providing public transport options for students, reducing dependence on private vehicles. The updated Mitigation Measures are provided in **Section 5** of this report.

### Parking

The parking provision for the school has been assessed on the basis of a first-principles assessment of parking demand. In addition, the pick-up and drop-off spaces along the access road has been provided to cater for the student population as detailed in Section 4.7 of the exhibited TAIA.

Sufficient parking has been provided for staff at a ratio of 1:1 (i.e. one space for each staff member). Staff will not need to park in surrounding streets.

The following new parking spaces are proposed to cater for the demand the school will create:

- Three accessible drop-off and pick-up spaces for the support learning unit on Worrigee Road (one per classroom – standard rate)
- Ten drop-off and pick-up spaces for general students on Booligal Road (north side) – calculated from benchmarked transport mode share, students numbers and typical assumptions for students per car and dwell time)
- 17 short-stay parking spaces for general students on Booligal Road (south side) – calculated from benchmarked transport mode share, students numbers and typical assumptions for students per car and parking time).

The short-stay parking provides for parents / care givers who want to walk their child to the classroom. It will also cater for parents visiting the school during or after school hours.

It is noted that parents could choose to park in any legal parking space in the vicinity of the school. However, the school has provided sufficient parking for its anticipated demand in a location that is most convenient for access to the school. Any parking impacts on surrounding streets typically occur for a short-duration before and after school.

It is also noted that there will be times such as presentations, performances and ceremonies when more parents are likely to drive to the school than normal. This is likely to result in parking on surrounding streets. However, these events are typically one hour in duration and are held infrequently (a few times per term).

### 4.2 Land Use Conflict

#### Land Use Conflict Risk Assessment

The post exhibition REF includes some amendments to **Section 7.11 Rural Land Use**, providing a more comprehensive LUCRA Assessment by:

- In depth consideration of the surrounding environment under *Step 1 Gather Information* providing an enhanced understanding of surrounding agricultural operations.
- In depth consideration of results under *Step 4 Record LUCRA Results* responding to the additional findings in Step 1.

The updated LUCRA meaningfully considers the implications of the surrounding agricultural land and Terara Dairy, and is still considered not to result in significant land use conflict, as supported by the additional assessment provided below.

#### Noise and Air Quality Assessment

The proposed school is located on R5 Large Lot Residential zoned land. Accordingly, the school will not result in a reduction in available agricultural land.

## 4 Additional Environmental Assessment

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The specialist consultant reports prepared for Terara Dairy in support of DA 26/1016 finds that the environmental impacts on the New Primary School in Worrigee site (assessed as a residential sensitive receiver) in relation to noise, air quality, dust and odour are minimal.

The following documentation (which is publicly accessible on Council's website: <https://apptracker.shoalhaven.nsw.gov.au/details/?id=c4025b9b-db51-f111-bec6-6045bde54848>) provides the following conclusions.

### Noise:

The Noise and Vibration Impact Assessment (NVIA) prepared by *Assured Environmental*, Project ID 15066 and dated 26/06/2025 in support of DA 2026/1016 reaches the following conclusions:

*"Assured Environmental have undertaken a noise and vibration impact assessment of the proposed changes to the Terara Dairy. A noise and vibration impact assessment has been undertaken to confirm the suitability of the proposal in terms of acoustic amenity for nearby sensitive receptors. Specifically, the assessment has considered the potential for adverse impacts upon existing residential land uses as a result of noise emissions associated with the dairy farm.*

*A detailed assessment of construction noise revealed that consideration of reasonable and feasible mitigation measures was warranted to minimise the impact of construction activities on surrounding residential receptors.*

*Construction and operational vibration impacts were also reviewed, and no impacts are predicted.*

*Predictive noise modelling has been undertaken for the Subject Site to assess the potential impacts of noise emission from the dairy farm operations. The assessment has been guided by the minimum criteria as described in the NPfI. The results of the predictive noise modelling have determined that compliance with the adopted criteria is expected to be achieved without any additional acoustic mitigation required for the proposed expansion. Based on the assessment conducted, compliance with the applicable criteria is expected to be achieved for the proposed expansion of the dairy farm."*

**Figure 1** provides an extract from the NVIA which supports these conclusions:

## 4 Additional Environmental Assessment

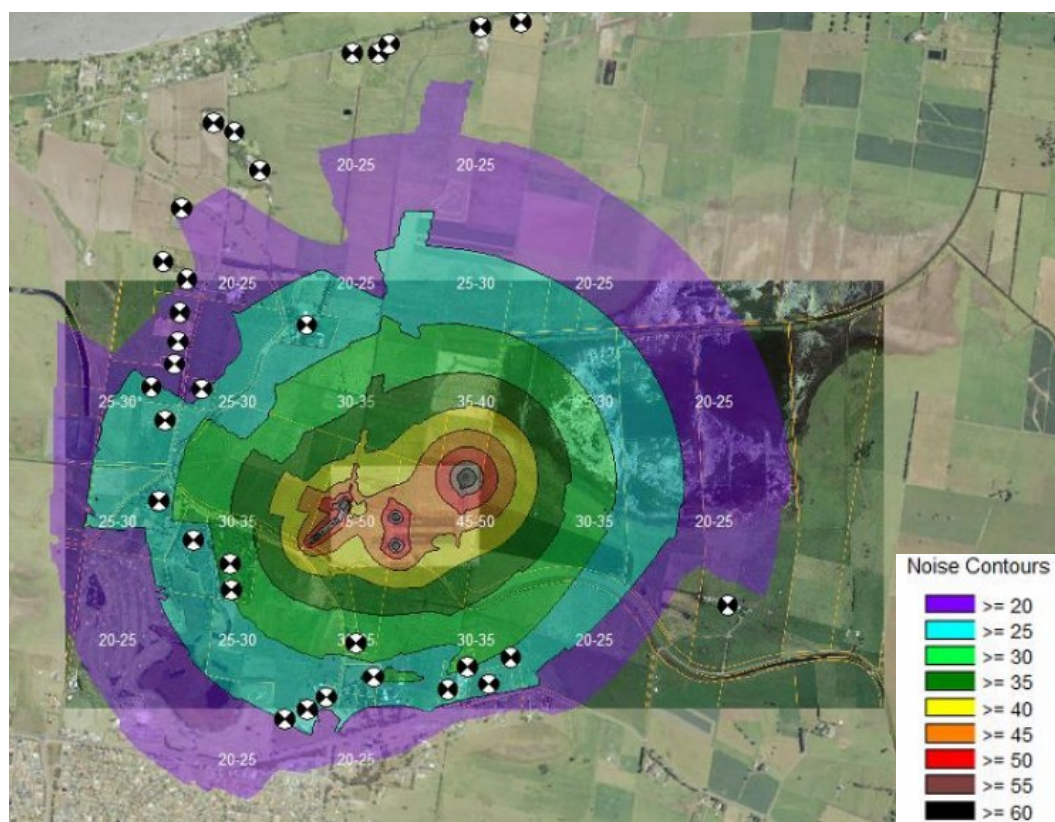


Figure 1 Predicted operational noise impacts during daytime periods. Source: Assured Environmental

The proposed school is a sensitive receiver located in an existing residential precinct that was assessed in NVIA.

The NVIA identifies a maximum internal noise criteria for Terara Public School of 45dB(A), which is less than the noise contour impacting the subject site being at most 20-25 dB(A). The impacts on the new primary school in Worrigee are therefore considered to be satisfactory.

On the basis of the above, further noise reporting is not required to support the proposed activity and LUCRA contained within the exhibited REF.

### Air Quality:

The Air Quality Impact Assessment prepared by *Assured Environmental*, Project ID 15066 and dated 25/06/2025 in support of DA 2026/1016 reaches the following conclusions:

*“Assured Environmental have undertaken an odour impact assessment of the proposed modernisation of the Terara Dairy utilising dispersion modelling as outlined in Approved Methods.*

*The results indicated that the predicted odour concentrations are well below the assessment criterion of 5.1 OU 1-second 99th percentile for both existing and future expansion. The cumulative impact of both existing and future operations is also expected to be minimal, with no significant effect on the surrounding environment or sensitive receptors.”*

The proposed school is a sensitive receiver located in an existing residential precinct that was assessed in the air quality report.

Odour modelling contained within the Air Quality Report does not identify the school site as being affected by odour concentrations as shown in **Figure 2**.

## 4 Additional Environmental Assessment

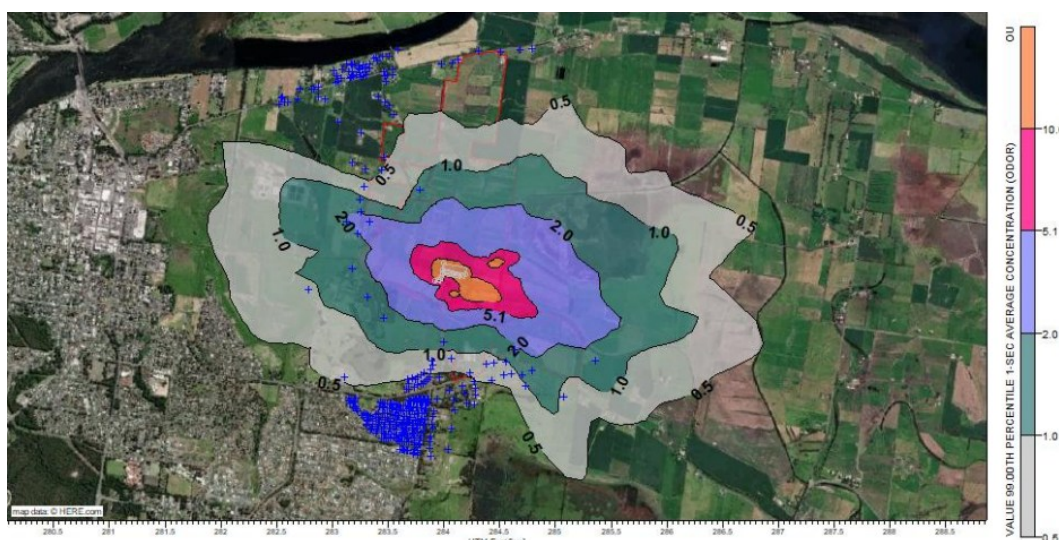


Figure 2 Predicted Odour Ground Level Concentrations during operation of proposed dairy improvements

Accordingly, the conclusions of the air quality report extend to the site when used for the purposes of an educational establishment and as such, the air quality impacts including dust and odour are expected to be minimal.

On the basis of the above, further air quality reporting is not required to support the proposed activity and LUCRA contained within the exhibited REF.

### 4.3 Built Form and Character

#### Compatibility with Worrigee Character

The new primary school is permissible pursuant to the provisions of TI SEPP, particularly Section 3.37A, which permits schools up to four storeys in height. The proposed school at its highest point contains three storeys which is below the maximum permissible height under TI SEPP.

The proposed activity includes buildings of varied scale. Single storey buildings are proposed for the school hall and co-located public preschool. A three-storey classroom building is proposed to maximise open space and parking on-site. This approach is consistent with new schools being built across the state, including in regional areas.

A visual analysis has been prepared to consider the built form compatibility with the character of the locality and is provided in **Figure 3** to **Figure 4**.

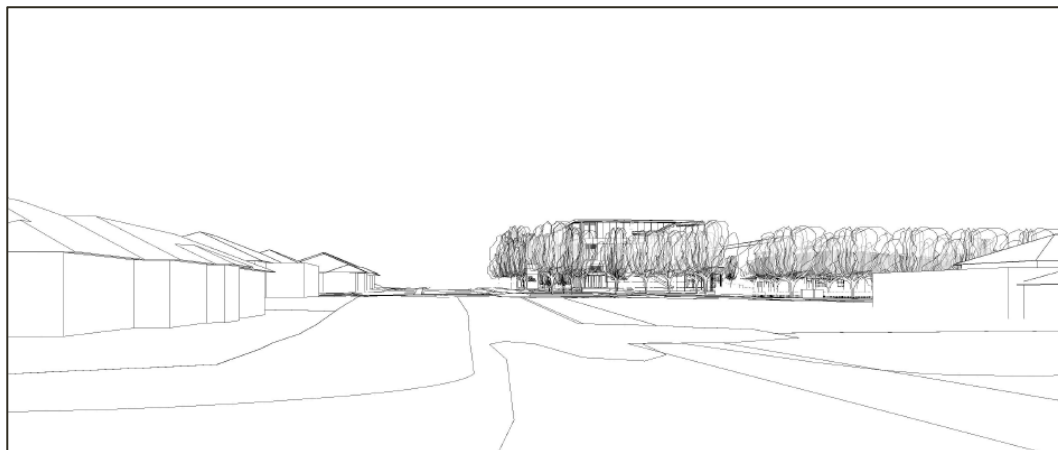


Figure 3 Visual analysis from corner of Golden Grove and Worrigee Road

## 4 Additional Environmental Assessment



Figure 4 Visual analysis from Greenwell Point Road travelling eastbound towards Worrigee Road

The proposed school provides substantial boundary landscaping including some retention of mature trees to screen built form from the surrounding public domain. The school has been designed to avoid tree removal where possible, particularly along site boundaries, and unavoidable tree loss is replaced at a ratio of 1:1.

The school buildings and landscaping are designed to achieve a balanced and visually cohesive composition of built form and natural elements. The three-storey teaching and administration building is carefully scaled and articulated to sit comfortably within the landscaped campus.

The development positively contributes to streetscape amenity along Worrigee Road and Booligal Road, with retained existing trees and new landscape buffers softening the built form and reinforcing the emerging green character of Worrigee.

The proposed school is not found to block or interfere with any significant views or vistas.

### 4.4 Site Selection

The Department's *Design Framework: Site Selection and Development (December 2024)* policy informed the selection of the site for the new primary school.

Early planning for this project started with a review of the area's demographic trends, catchment boundaries, heritage structures and the needs of the school community.

To evaluate short-listed potential sites, a multi-criteria analysis was carried out. This enabled the Department to make an informed decision in selecting the new site. Considerations included, but were not limited to:

- site capacity (e.g. size and shape of the land)
- planning and State Environmental Planning Policy (e.g. future planned use for the site and adjacent land)
- movement and place (e.g. accessibility, site frontage on at least two sides)
- site specific considerations (e.g. bushfire, flooding)
- urban design considerations (connecting with the wider community, future desired outcomes to create optimal learning environments)
- feasibility (potential requirements to mitigate any identified issues).

The selected site scored the highest and has the following benefits:

- large area of at least two hectares for the new school and allows for a preschool to be built at the same site as the primary school

## 4 Additional Environmental Assessment

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- close to growing suburbs of Worrigee and South Nowra
- has three frontages and existing vegetation along its boundaries
- no site constraints have been identified that would require remediation.

Several alternative sites were explored including sites further south however, they were determined unsuitable due to being prone to flooding and or bushfires, lack of access or being located too far from where the current and future student demand has been identified in the area.

### 4.5 Stormwater, Drainage and Flooding

The flood emergency response protocols for the primary school have been updated to reflect a uniform approach of early closure and evacuation in response to forecast extreme rainfall or flooding events. An amended Flood Emergency Response Plan is provided as **Attachment A** to this report.

Mitigation Measure OM5\* has been updated to reflect the amended emergency response protocols and a requirement for the preschool and primary school FERPs to be consolidated.

### 4.6 Vegetation Removal and Biodiversity

The proposed primary school directly impacts on four (4) hollow bearing trees. Additional assessment has considered the cumulative impacts of the proposed Public Preschool in Worrigee on hollow bearing trees, which results in the removal of an additional six (6) trees.

Nest boxes are required to offset hollow bearing tree loss as per Mitigation Measure E8\*; which has been updated to provide offset nest boxes for the cumulative loss of 10 hollow bearing trees as provided in **Section 5** of this report.

It is acknowledged that the proposed activity results in tree removal including impacts on 0.19ha of threatened plant community PCT 3269 Shoalhaven Lowland Spotted Gum-Paperbark Forest, and cumulatively with the preschool activity impacts on approximately 0.5ha of threatened plant community PCT 3269.

A revised test of significance that considers the cumulative impacts of both the new preschool and new primary school projects on hollow bearing tree removal has been undertaken by the project ecologist. The proposed activity is found to still be considered unlikely to have a significant impact on threatened species.

The test of significance considered the following species listed under the BC Act:

- *Pteropus poliocephalus* (grey-headed flying fox)
- Microchiropteran bats: *Micronomus norfolkensis* (eastern coastal free-tailed bat)
  - *Falsistrellus tasmaniensis* (eastern false pipistrelle)
  - *Saccolaimus flaviventris* (yellow-bellied sheath-tail bat)
  - *Scoteanax rueppellii* (greater broad-nosed Bat)
- *Calyptorhynchus lathami lathami* (Glossy Black Cockatoo)
- *Callocephalon fimbriatum* (Gang-gang cockatoo).

The outcome of the tests of significance concluded that the works are unlikely to result in a significant impact upon threatened species.

Replacement tree species selection will include locally native flora including selections from threatened plant community PCT 3269, as required by amended Mitigation Measure E6\* provided in **Section 5** of this report.

## 5 Updated Mitigation Measures

The Mitigation Measures included in the REF generally remain relevant, except for the updates outlined below in **Table 6**.

| <b>ID</b> | <b>MM Name</b>                                  | <b>Mitigation Measure</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>Timing</b>                                |
|-----------|-------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|
| C11*      | Flood – Finished Floor Levels and Overland Flow | All proposed building finished floor levels must be elevated at the local overland PMF level or above as detailed in <a href="#">the Flood Impact Risk Assessment Report (Appendix 7)</a> . Sufficient drainage and grading provisions must be provided (subject to detailed civil design) along the western side of the three-storey split-level building to manage overland stormwater flows away from the building footprint.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Design</b>                                |
| E6        | Replacement Planting                            | Removal of native vegetation for construction must be replaced by trees at a ratio of 1:1 derived from <a href="#">species which form threatened ecological community PCT 3269 Shoalhaven Lowland Spotted Gum-Paperbark Forest</a> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>During Construction</b>                   |
| E8*       | Artificial Habitat                              | Install artificial habitats (nest box of similar entrance diameter) for fauna in adjacent retained vegetation within the study area. <a href="#">Ten (10)</a> nest boxes with entrances between 5 mm to 20 mm should be installed to mitigate impacts of the loss of the hollow-bearing trees ( <a href="#">six</a> microbat hanging boxes and <a href="#">four</a> bird/glider boxes 10-15 cm).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Prior to Commencement of Construction</b> |
| TA2*      | Construction Traffic and Pedestrian Management  | A Construction Traffic and Pedestrian Management Plan (CTPMP) must be prepared to: <ul style="list-style-type: none"> <li>a) ensure heavy vehicle movements are safe and minimise disruption to the school and surrounding areas</li> <li>b) outline strategies and measures to manage how construction workers access the site</li> <li>c) <a href="#">Guide heavy vehicle traffic to follow the Construction Vehicle Traffic Route outlined in Section 7.1 of Appendix 2 (Traffic and Accessibility Impact Assessment)</a></li> <li>d) <a href="#">Notify NSW SES where there are likely to be significant delays in the operation of the roads affected by the upgrades as this may impact the ability for emergency vehicles to use these routes</a></li> </ul>                                                                                                                                                 | <b>Prior to commencement of Construction</b> |
| TA4*      | Design of Road Safety Measures                  | Transport Working Group (TWG) meetings (including Shoalhaven City Council and Transport for NSW) must be facilitated to finalise the design of road safety measures, including consideration of: <ul style="list-style-type: none"> <li>a) <a href="#">New single lane mountable roundabout at the intersection of Worrigee Road, Booligal Road and Golden Grove</a></li> <li>b) <a href="#">Two raised pedestrian priority crossings (wombat):</a> <ul style="list-style-type: none"> <li>— <a href="#">On Worrigee Road across the northern approach to the intersection with Golden Grove and Booligal Road</a></li> <li>— <a href="#">On Booligal Road across the eastern approach to the intersection with Golden Grove and Worrigee Road (delivered as part of the separate preschool activity)</a></li> </ul> </li> <li>c) <a href="#">One new on-grade painted pedestrian crossings (zebra):</a></li> </ul> | <b>Prior to commencement of operations</b>   |

## 5 Updated Mitigation Measures

**Table 6** Post exhibition amendments to Mitigation Measures

| ID   | MM Name                         | Mitigation Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Timing                              |
|------|---------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|
|      |                                 | <p>— On Golden Grove across the western approach to the intersection with Worrigee Road and Booligal Road</p> <p>d) <u>Request Transport for NSW Implement school zone travel speed restrictions along Greenwell Point Road, Worrigee Road and side streets</u></p> <p>e) <u>Road verge widths and path designs along Worrigee Road</u></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                     |
| TA6* | Consultation with Bus Operators | The Department of Education is to consult with bus operators on existing bus services and future arrangements.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Prior to commencement of Operations |
| TA7* | Road Safety Audit               | A road safety audit of all road upgrades associated with the proposed activity must be completed prior to handover to Council.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Prior to commencement of operations |
| OM5* | Flood Emergency Response Plan   | <p>Prior to the commencement of operation, the Flood Emergency Response Plan (FERP) (Appendix 8) is to be finalised in consultation with the NSW Department of Education's Emergency Response Team. The final FERP must be to the satisfaction of the NSW Department of Education's Emergency Response Team and include the following:</p> <ul style="list-style-type: none"> <li>a) <u>The FERP for the New Primary School in Worrigee and the adjoining preschool must be consolidated to provide a single emergency response protocol for the collective site</u></li> <li>b) <u>The school must pre-emptively close when a local or mainstream flood event is forecasted or SES advises</u></li> <li>c) <u>outline procedures to be followed in the case of local flooding occurring while the school is occupied and a warning has been issued for potential mainstream flooding of the site</u></li> <li>d) <u>procedures must ensure that there will be no chance of children and teachers being in the school when mainstream flooding of the site occurs</u></li> <li>e) <u>a simplified description of flood behaviour, including potential flood levels and associated frequencies within the site and within the adjoining road system</u></li> <li>f) <u>provides clear emergency management triggers and responses, including rainfall and water level and NSW SES alerts and Bureau of Meteorology warnings that require pre-emptive closure of the school</u></li> <li>g) School administration must undertake annual evacuation preparations and an evacuation drill prior to the commencement of the wet season (typically November to April)</li> <li>h) School administration to undertake responsibilities as set out in the FERP</li> <li>i) Ensure that the Flood Warning Notice is maintained and permanently visible</li> <li>j) <u>Include details of awareness training for employees, contractors, parents and induction of new staff members; and</u></li> <li>k) <u>Provide clear messaging and communication protocols, including but not limited to, staff and parents</u></li> </ul> | Prior to commencement of operations |

\*Blue text delineates additional post-exhibition wording for MMs where there was custom underlined text from the exhibited REF already.

## 6 Conclusion

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This Submissions Report has addressed the submissions received in response to the public exhibition of the REF prepared for the New Primary School in Worrigee.

The department can be satisfied that this submissions report and additional supporting material addresses the comments received from the DoE Part 5 Assessment Team and submissions received in response to the public exhibition of the project in accordance with the requirements of *Division 5.1 of the EP&A Act, State Environmental Planning Policy (Transport and Infrastructure) 2021* and the relevant community participation plans.