

Statement of Environmental Effects

Upgrades to Former Shoalhaven Anglican School Site for Public Education

PREPARED FOR:
THE DEPARTMENT OF EDUCATION

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This document has been reviewed by the Project Director.

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Table of Contents

1. Introduction	6
1.1. Project Team and Documents	7
2. The Site.....	9
3. Background	12
3.1 Planning History	12
3.2 Pre-Lodgement Meeting	13
4. The Proposal	15
4.1. Demolition	16
4.2. Built Form.....	17
4.3. Materials and Finishes	20
4.4. Playing Fields and Outdoor Recreation Areas	20
4.5. Use and Operation	20
4.6. Parking and Access	21
4.7. Waste Management	22
4.8. Stormwater Management	22
4.9. Earthworks	23
4.10. Easement.....	23
5. Statutory Planning Framework	24
5.1. Environmental Planning & Assessment Act 1979	24
5.1.1. <i>Integrated Development</i>	24
5.2. Environmental Planning Instruments	25
5.2.1. <i>State Environmental Planning Policy (Sustainable Buildings) 2022</i>	25
5.2.2. <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i>	25
5.2.3. <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i>	26
5.2.4. <i>State Environmental Planning Policy (Biodiversity and Conservation) 2021</i>	26
5.2.5. <i>State Environmental Planning Policy (Planning Systems) 2021</i>	26
5.2.6. <i>Shoalhaven Local Environmental Plan 2014</i>	27
5.3. Applicable Draft Environmental Planning Instruments	28
5.4. Development Control Plans.....	28
5.5. Planning Contributions and Agreements	28
6. Planning Evaluation	29
6.1. Built Form and Urban Design	29
6.2. Traffic, Transport and Parking	29
6.2.1 <i>Operation</i>	30
6.2.2 <i>Construction</i>	31
6.3. Bushfire.....	32
6.4. Biodiversity.....	33
6.5. Arboricultural.....	34



6.6. Aboriginal Heritage.....	35
6.7. Acoustic and Vibration	36
6.7.1 Operation	37
6.7.2 Construction.....	38
6.8. Civil.....	39
6.8.1. Stormwater Management.....	39
6.8.2. Sediment and Erosion.....	39
6.8.3. Impact on Waterway	39
6.9 Contamination.....	39
6.9.1 Hazardous Materials	39
6.9.2 Detailed Site Investigation.....	40
6.10. Waste Management.....	41
6.10.1. Operational Waste Management.....	41
6.10.2. Construction and Demolition Waste Management.....	42
6.11. CPTED.....	42
6.12. BCA and Access	43
6.12.1. BCA Design Assessment	43
6.12.2. Access Assessment	44
6.13. Economic	44
6.14. Social	45
6.15. Cumulative Impacts.....	45
6.16. Suitability of the Site.....	46
6.17. Public Interest	46
7. Conclusion.....	48



Figures

Figure 1: The Site (Outlined in Green)	10
Figure 2: Locality Map (Lot outlined in black, FSAS outlined in green)	10
Figure 3: Site entrance looking towards the south-west from Croobyar Road	11
Figure 4: Internal site entry looking towards the south from the internal driveway	11
Figure 5: Site Plan	15
Figure 6: Extract of Part Site Plan 1 – Buildings to be Demolished in Red	17
Figure 7: Building A Floor Plan.....	18
Figure 8: Building H Floor Plan	18
Figure 10: Building I Floor Plan	19
Figure 11: Block I Elevations.....	19
Figure 12: Building V Floor Plan.....	20
Figure 13: Part Site Plan 1 – New Car Park	21
Figure 14: Land Zoning Map	28
Figure 15: PCTs and Proposed Vegetation Removal	34
Figure 16: Study Area	35
Figure 17: Sensitive Receivers.....	37
Figure 18: Proposed bin collection zone in carpark	42

Tables

Table 1: Supporting Documentation	7
Table 2: Summary of Key Features.....	9
Table 3: Summary of Historic Approvals	12
Table 4: Proposed Development Parameters.....	16
Table 5: Summary of Integrated Development Triggers	24
Table 6: Summary of Compliance with Shoalhaven LEP.....	27
Table 7: Development Bushfire Protection Solutions and Recommendations	32
Table 8: Bin Allocation and Collection Schedule	41



1. Introduction

This Statement of Environmental Effects (**SEE**) has been prepared by Mecone Group Pty Limited on behalf of The Department of Education (the Department) to support a Development Application (**DA**) to Shoalhaven City Council (**Council**) at 17 Croobyar Road, Milton (**the site**).

The proposed development for an educational establishment at 17 Croobyar Road, Milton NSW 2538 comprises the refurbishment and upgrade of the decommissioned Shoalhaven Anglican School site for public education, and includes:

- Demolition of seven existing buildings to provide a new car park and landscaping/arrival plaza
- Upgrade of the existing playing court to two basketball courts
- Refurbishment and upgrade of existing Building "I" for gymnasium facilities
- Refurbishment and upgrade of existing Building "H" for VET kitchen facilities
- Refurbishment and upgrade of existing oval to provide track and field facilities
- Refurbishment and upgrade of existing Buildings "A" and "V" for classroom and administration use
- Ancillary landscaping, stormwater, civil and associated site works

The DA is lodged with Council under section 4.12 of the *Environmental Planning and Assessment Act 1979* (**EP&A Act**) and this SEE has been prepared in accordance with the requirements of Part 3, Section 24 of the *Environmental Planning and Assessment Regulation 2021* (**EP&A Regulation**). This application is integrated development under section 100B of the *Rural Fires Act 1997*.

This SEE includes an assessment of the proposed development in relation to the matters for consideration set out under section 4.15 of the EP&A Act and should be read in conjunction with accompanying documentation.

The SEE is structured as follows:

- Section 2 - The Site: provides an analysis of the site and its context;
- Section 3 - Background: provides an outline of any planning approvals and any pre-lodgement meetings;
- Section 4 - The Proposal: provides a detailed description of the proposal;
- Section 5 - Statutory Planning Framework: assessment of the proposal against relevant State and local environmental planning instruments and development control plan; and any draft environmental planning instruments and planning agreements and contributions;
- Section 6 - Planning Evaluation: assessment of the proposal's environmental impacts and identification of mitigation measures where required. This section also outlines why the site is suitable and the proposed development is in the public interest; and
- Section 7 - Conclusion: provides an overview and conclusion of the development assessment for the development application.



The proposed works have an estimated development cost (EDC) of \$18,838,362 (excluding GST), refer to the Estimated Development Cost Report prepared by Blue Stone (**Appendix 13**).

Because the cost of works exceeds \$5 million, and this DA is made by the Crown, the relevant consent authority for this application is the Southern Regional Planning Panel. It is noted that the NSW Planning System Reform Bill intends to abolish Regional Panels, however details have not been released. As such, the consent authority may change during the course of assessment.

The DA is compliant with the statutory controls and the use is permitted with consent. Furthermore, it will lead to positive social, economic, and environmental outcomes. It does not seek to vary any guidelines or development controls and results in no unacceptable impacts. Therefore, the proposed development is considered to have merit, is appropriate for the site, and approval is recommended subject to appropriate conditions of consent.

1.1. Project Team and Documents

This DA is supported by and should be read in conjunction with the following plans and specialist reports in **Table 1**.

Table 1: Supporting Documentation

Document	Consultant	Appendix
Architectural Plans	Edmiston Jones	1
Civil Concept Design Plans	Indesco	2
BCA Report	DC Partnership	3
Accessibility Capability Statement	DC Partnership	4
Landscape Plans	Edmiston Jones	5
Crime Prevention Through Environmental Design (CPTED)	Edmiston Jones	6
Noise and Vibration Impact Assessment	Stantec	7
Traffic Access Impact Assessment	SCT Consulting	8
Flora and Fauna Assessment	Water Technology	9
Bushfire Protection Assessment	EcoLogical	10
Waste Management Plan	MRA Consulting	11
Hazardous Materials Survey	Douglas Partners	12
Estimated Development Cost (EDC) Report	Blue Stone	13
Geotechnical Report	Stantec	14
Arboricultural Impact Assessment	Eco Logical	15



Document	Consultant	Appendix
Survey	LandTeam	16
Detailed Site Investigation	Stantec	17
DCP Assessment Table	Mecone	18



2. The Site

A summary of the key site features and characteristics are summarised in **Table 2** below.

Table 2: Summary of Key Features

Item	Description
Address	17 Croobyar Road, Milton, NSW 2538
Legal Description	Part of Lot 200 DP1192140
Local Government Area	Shoalhaven
Total Site Area	7.76ha
Description of the Site	The site was previously used for the former Croobyar Christian School, then acquired and expanded under the former Shoalhaven Anglican School, which closed in 2016 when the property was purchased by the Department. The disused Anglican School (shown in green outline in Figure 1) features a range of buildings constructed in the 1990s and includes classrooms, staff facilities, administration and a hall, as well as outdoor recreational areas and car parking. The lot is also occupied by the currently operational Budawang School and Budawang Early Learning Centre situated to the northeast of the development site.
Topography	The site slopes down slightly from east to west with a high of 58mAHd at the south-east corner of the site and a low of 42mAHd on the western boundary.
Easements	The site is affected by a number of easements. The relevant easement for this application is an Easement to Pump Sewage 3m wide, identified on DP811690, which runs through the site and supports the Shoalhaven Water surcharge/rising main sewage pipeline. The easement location is shown on the architectural plans at Appendix 1 .
Local Context	The site is located to the south of the Milton town centre within the Shoalhaven LGA (Figure 2).
Surrounding Development	North: Low density residential East: Low density residential South: Rural and agricultural West: Industrial development
Transport and Access	Driveway access is provided from Croobyar Road (Figure 3). Private vehicle access is the primary mode of transportation in the locality. There is a bus stop (Croobyar Rd after Drury Lane) opposite of the site entry servicing route 740 to Ulladulla which provides daily pickups.

Refer to **Figure 1**, **Figure 2**, **Figure 3** and **Figure 4** below which illustrate the site, its local context and access from Croobyar Road.





Figure 1: The Site (Outlined in Green)

Source: Nearmap

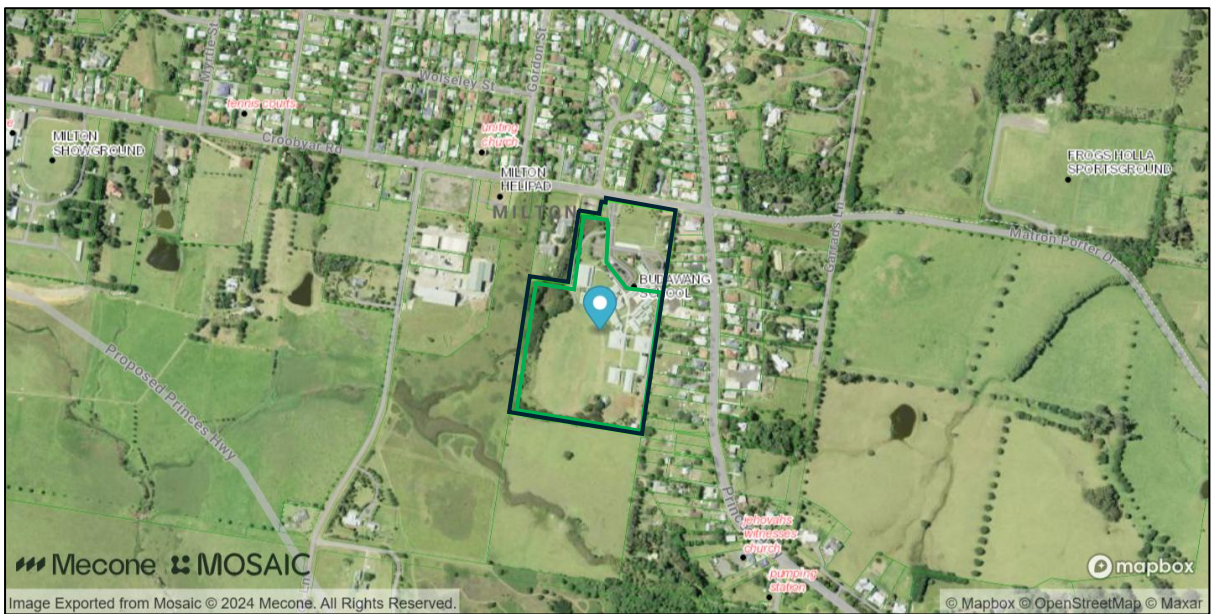


Figure 2: Locality Map (Lot outlined in black, FSAS outlined in green)

Source: Mecone MOSAIC





Figure 3: Site entrance looking towards the south-west from Croobyar Road

Source: Google maps (August 2025)



Figure 4: Internal site entry looking towards the south from the internal driveway.

Source: Mecone



3. Background

3.1 Planning History

The site was previously used for the former Croobyar Christian School, then acquired and expanded under the former Shoalhaven Anglican School, which closed in 2016 when the property was purchased by the Department. A childcare facility (Budawang Early Learning Centre) was approved 21 March 2023 (DA22/2363) and operates from one of the former Anglican School buildings. On September 2021 the Budawang School was approved (SSD-8845345) and has been constructed, commencing operation on 30 January 2024 in the north-east portion of the site fronting Croobyar Road.

Mecone is aware that the subject site was subdivided through Torrens title as part of a historic SF consent SF10626. Mecone has undertaken a review of information publicly available on Shoalhaven City Council's DA tracker. The subdivision was approved for 17 Croobyar Road as Lot 20, and 5 Croobyar Road as Lot 21, however, the entire property is still recognised as Lot 200 on the NSW Planning Portal Spatial Viewer.

The subject site has an extensive planning and approvals history, which includes a number of development applications made and approved for the site in relation to educational facilities and the former Shoalhaven Anglican School, as well as the Budawang Early Learning Centre and Budawang School.

Table 3 below provides an overview of the approval history on the site.

Table 3: Summary of Historic Approvals

Reference	Description
DA90/2270	On 24 October 1990 consent was issued for an educational establishment including a primary classroom block being Stage 1 of a Primary and Secondary School.
DA90/3260	On 12 February 1991 consent was issued for a childcare centre including an extended hours pre-school.
Building Permit 91/1170	On 18 December 1991 a Building permit was issued for a brick pre-school.
Building Permit 91/2579	On 18 December 1991 a Building permit was issued for a brick/ timber school.
Amended Building Permit 92/2579	On 1 July 1992 an Amended Building permit was issued for a brick/ timber school.
DA99/1739	On 22 June 1999 a consent was issued for an educational establishment, including 5 classrooms, learning centre and toilet facilities.
DA99/3847	On 22 December 1999 a consent was issued for an educational establishment.
DA00/1987	On 22 May 2000 a consent was issued for school extensions (2 additional classrooms).
DA00/2355	On 28 July 2000 a consent was issued for a technology block, conversion of classroom in the existing science block from a technology classroom to a science classroom, 5 additional sealed parking spaces.



Reference	Description
DA02/2516	On 8 August 2002 a consent was issued for a gymnasium and road.
DA02/4050	On 8 November 2002 a consent was issued for alterations and additions to existing school (erection of arts block).
DA02/4050 – DS03/1041	On 6 March 2003 a consent was issued for creation of sporting field, retaining wall and associated regrading, filling and earthworks on the land.
DA03/1214	On 28 March 2003 a modification consent was issued for creation of a sporting field, battered embankment and associated regrading, filling and earthworks on the land.
DA05/3019	On 15 July 2005 a consent was issued for construction of a dam within the existing watercourse and construction of sporting field and associated regrading, filling and earthworks within 40m of Watercourse.
DA06/2368	On 22 January 2007 a consent was issued for the construction of a building for Vocational Education Training.
SSD – 8845345	On 30 September 2021 a consent was issued for State Significant Development for construction of Budawang School for Specific Purpose for 56 students. The approval also granted consent for demolition, removal of trees, landscaping fences and signage.
PP-2022-2631	Department of Planning and Environment issued Gateway Determination for the Planning Proposal on 28 October 2022 and gazetted on 13 January 2023 for a 'centre-based childcare facility' on land at 17 Croobyar Road, Milton.
SSD – 8845345-MOD1	On 15 December 2022 a modification was approved to extend the boundary of the Budawang School site to the south to allow for future classrooms, demolition of existing buildings, tree removal, modify the carpark area and central courtyard area and the deletion of compliance reporting conditions.
DA22/2363	On 21 March 2023 a consent was issued for Alterations/additions to an existing building on site and change of use of that building to a centre based childcare facility.

3.2 Pre-Lodgement Meeting

A pre-lodgement meeting with Shoalhaven City Council officers was held on 12 August 2025. The key topics raised during the meeting are summarised and responded to below.

1. Interaction between the proposal and other existing uses on site (Budawang School and Budawang Early Learning Centre)

The proposed educational establishment will operate independently from Budawang School and Budawang Early Learning Centre, which will continue their existing operations on site under separate development consents. The three educational uses are compatible and complementary within the broader educational campus setting. The proposal includes physical separation measures including dedicated waste management facilities, separate parking allocations, and security fencing with gated entries to ensure clear operational boundaries between each facility. The site's substantial area (7.76ha) and established educational character provide sufficient capacity to accommodate all three uses without adverse operational impacts. Detailed analysis of traffic management, parking provision, waste servicing, and facility operations is provided in the Traffic Access Impact Assessment



(**Section 6.2** and **Appendix 8**), and Waste Management Plan (**Section 6.10** and **Appendix 11**).

2. Bushfire Protection

This application is accompanied by a bushfire assessment report which addresses the provisions of NSW Rural Fire Service, Planning for Bushfire Protection (November 2019). Refer to **Section 6.3** of this SEE.

3. Treatment of Watercourse

The site contains a Category 3 watercourse. No native vegetation will be removed, and the riparian corridor will be retained. Stormwater drains to the existing system and erosion and sediment controls will be implemented during construction as shown in **Appendix 2**.

4. Traffic & Parking

A Traffic Impact Assessment (**Appendix 8**) has been provided and considers bus and car parking design, swept paths, and vehicle generation. More detail is provided in **Section 6.2** of this SEE.

5. Stormwater Detention, Earthworks, and Waste

Detailed analysis of stormwater management (**section 6.7**), earthworks (**section 4.9**), and Waste Management (**section 6.8**) is provided in this SEE.

6. Public Domain Works

The site does not rely upon or require pedestrian transport including footpaths or road crossings, as students will be bussed to the site and there is ample parking for staff. Therefore, there is no nexus between public domain upgrades and this development.

7. Biodiversity

A Flora and Fauna Assessment is provided at **Appendix 9** and specifically addresses the nominated native vegetation communities identified by Council including:

- 4052 South Coast Low Hills Red Gum Grassy Forest
- 3588 Shoalhaven Foothills Bloodwood Heathy Forest
- 3077 Illawarra Complex Dry Rainforest

An Arborist Report is provided at **Appendix 15**. It is noted that none of the relevant triggers are met to require the preparation of a Biodiversity Development Assessment Report (BDAR). Refer to **section 6.4** of this SEE for further information.



Table 4: Proposed Development Parameters

Parameter	Proposed
Demolition	Demolition of 7 existing buildings on the site and some internal walls to facilitate refurbishment works.
Land Use	Educational establishment
Car Parking	35 car parking spaces (including 2 disability access spaces) 4 bus pickup and drop off bays
Refurbishment and Fitout	Buildings A, V, H, and I

4.1. Demolition

The proposal involves the demolition of seven existing buildings on the site. These structures are part of the former Shoalhaven Anglican School facilities, which are no longer in use and are being removed to make way for an at-grade car park, landscaping, and an arrival plaza / waiting zone to support the site's redevelopment for public education purposes.

The demolition also includes some of internal walls in buildings A, V, H and I to facilitate reconfiguration. Refer to **Appendix 1, Figure 6**, and **Section 4.2** for detailed drawings.



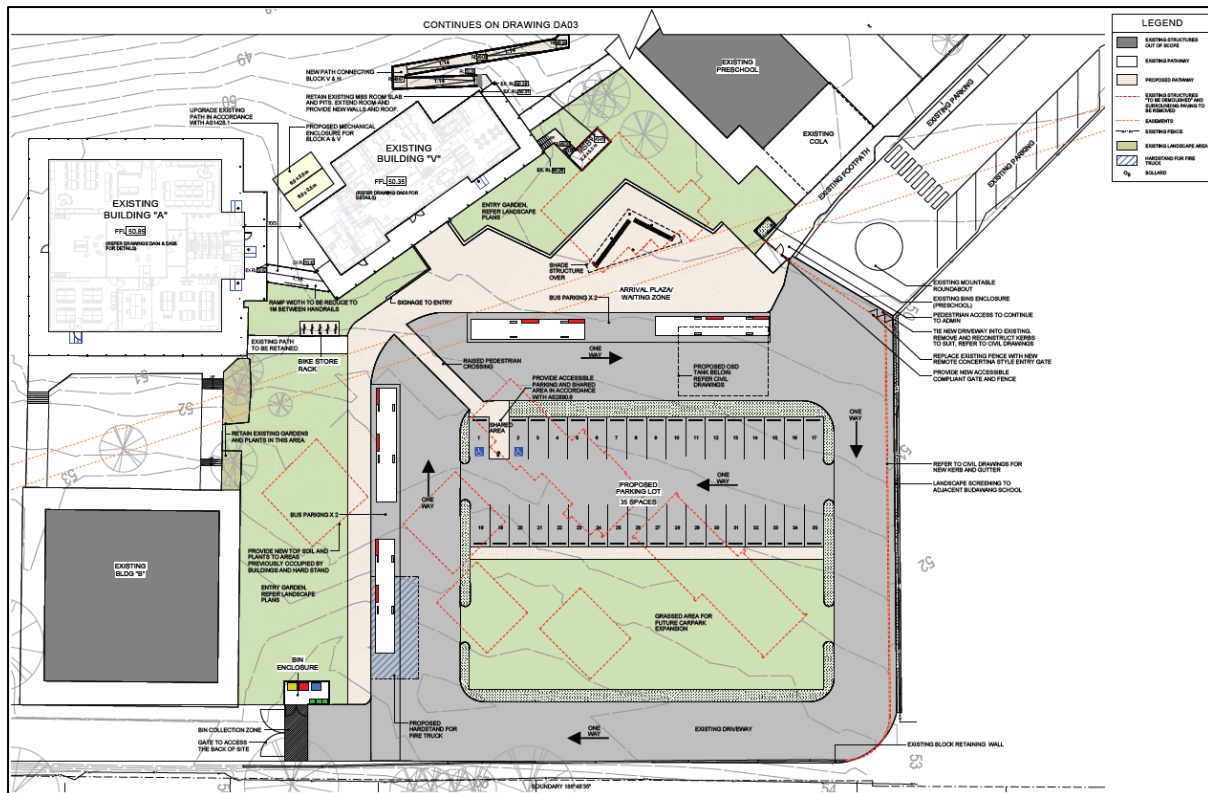


Figure 6: Extract of Part Site Plan 1 – Buildings to be Demolished in Red

Source: Edmiston Jones

4.2. Built Form

The proposal involves the refurbishment and repurposing of existing buildings on the former Shoalhaven Anglican School campus, together with minor external works. The development comprises upgrades to four existing buildings and demolition of some redundant structures. No changes to building heights, footprints, or external massing are proposed. The buildings maintain their original low-rise, campus-style character consistent with the site's history. Refer to **Figure 7** through to **Figure 11** for building floor plans.

Building A - General Learning Spaces: Single-storey classroom building with gabled roof form. Existing external envelope and building footprint retained. Building A comprises four general learning spaces each 56m², a central shared learning space 117m², two staff study rooms each 23m², amenities including separate boys' and girls' toilets each 23m², an accessible toilet, and storage areas. Refer to **Figure 7** below.

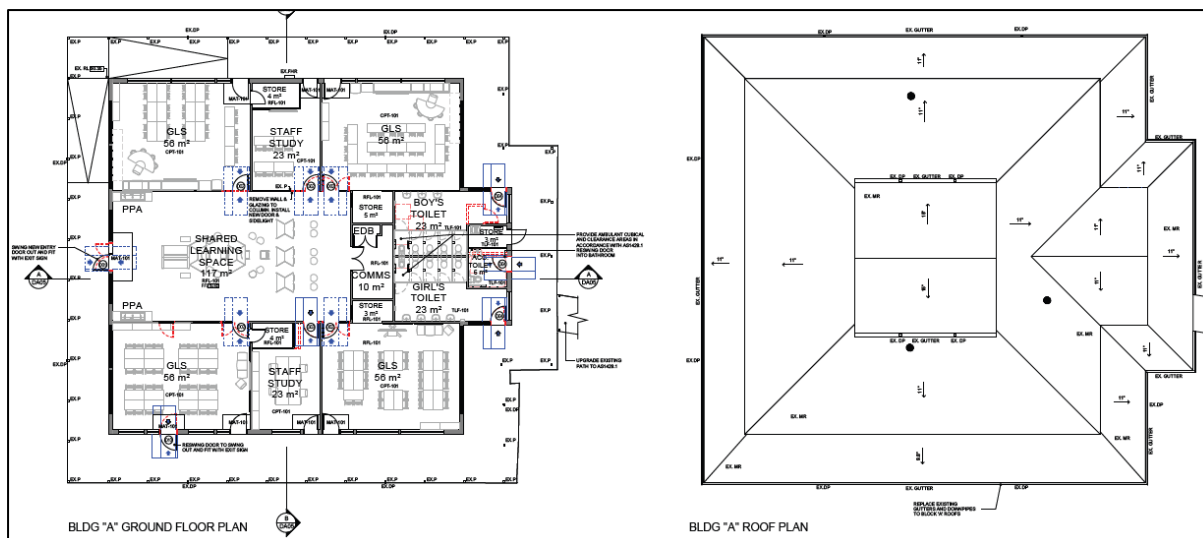


Figure 7: Building A Floor Plan

Source: Edmiston Jones

Building H - VET Kitchen: Single-storey building with skillion roof. Floor area approximately 109m² (kitchen) with adjoining 10m² laundry/dry store and 15m² store/pantry. Existing external walls and roof structure retained. Refer to **Figure 8**

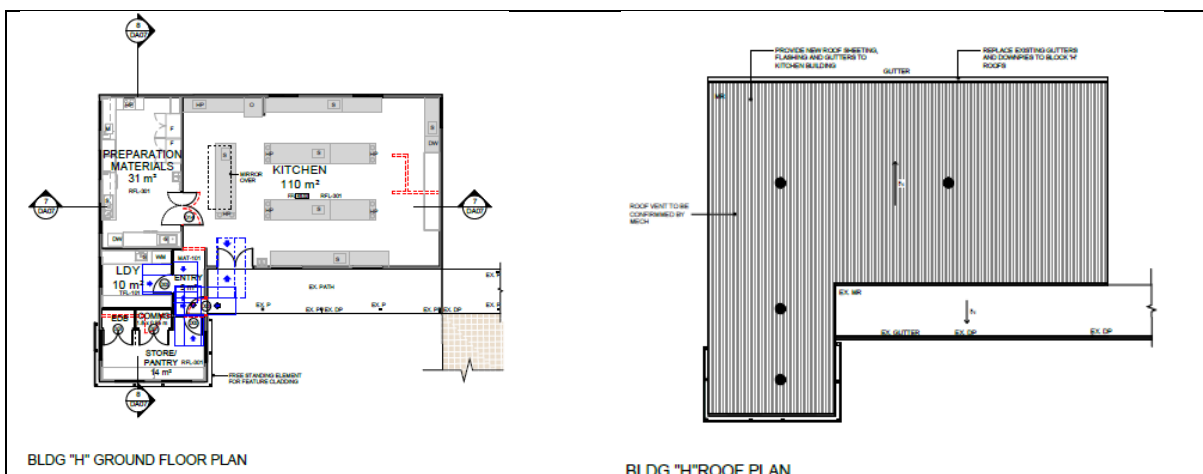


Figure 8: Building H Floor Plan

Source: Edmiston Jones

Building I - Gymnasium: Large single-storey gymnasium building with gabled roof. Main gymnasium space 632m² with ancillary facilities including stage (48m²), equipment stores, change rooms, and amenities. Existing building envelope retained with internal upgrades, amenity and disability discrimination act (DDA) access improvements. Refer to **Figure 9** below.

Building I (Gym) will undergo exterior modifications including new glazing, portal frames, and prefinished cement cladding. Existing concrete panels will be painted while face brickwork, metal cladding, and roof sheeting will be largely retained. See **Figure 10** below for Block I Elevations.

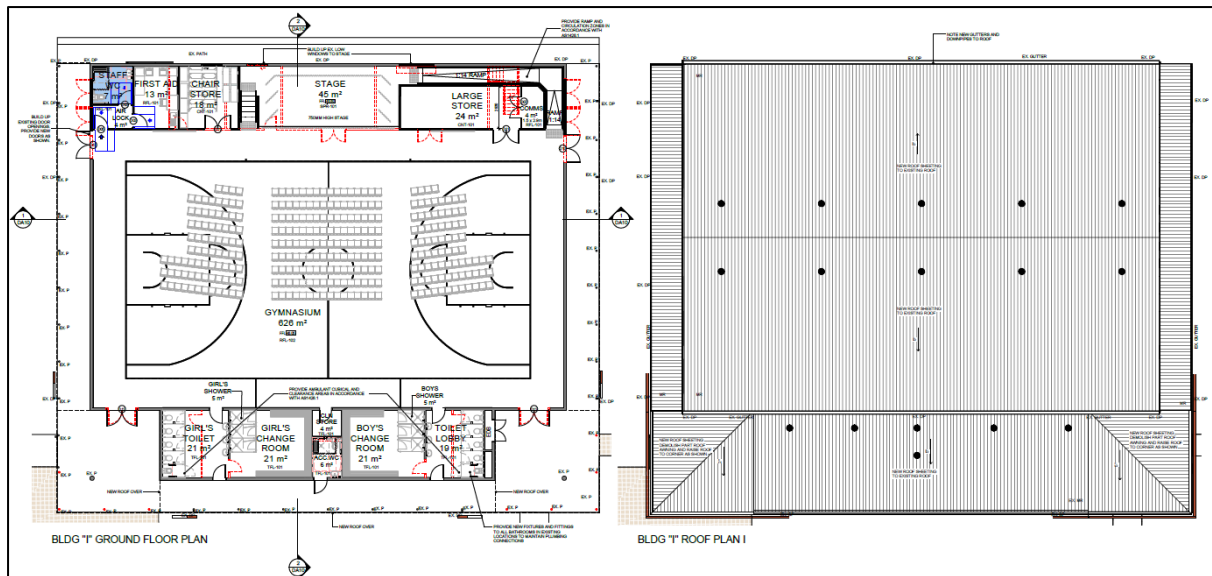


Figure 9: Building I Floor Plan

Source: Edmiston Jones

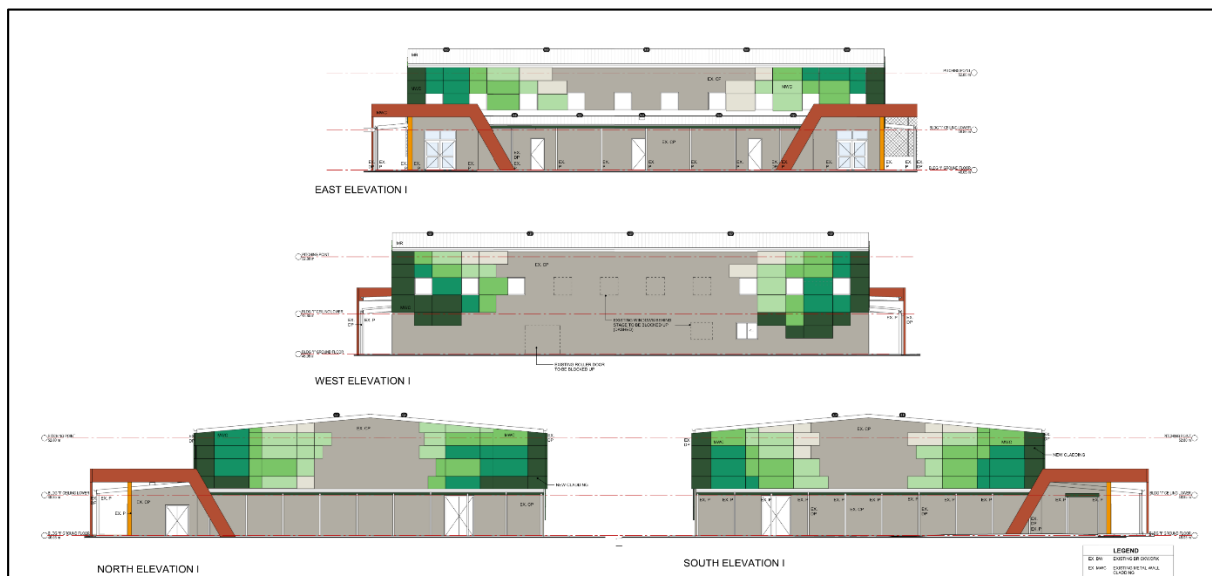


Figure 10: Block I Elevations

Source: Edmiston Jones

Building V - Admin/Staff Area: Single-storey building with stepped roof profile. Internal areas include executive office (12m²), staff study area (46m²), admin/clerical space (31m²), public/student reception (25m²), interview rooms, staff lounge (36m²), and ancillary facilities including sick bay, clinic rooms, and amenities. Existing building envelope will be retained with internal reconfiguration only. Refer to **Figure 11** below.

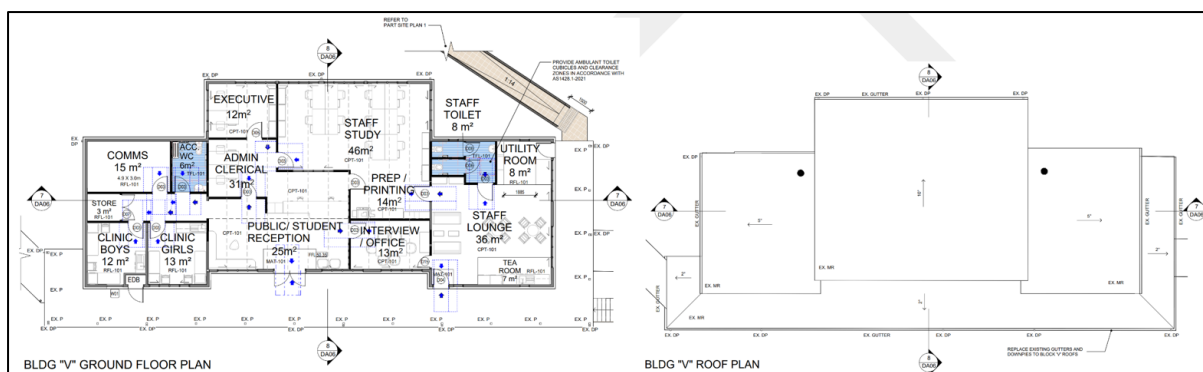


Figure 11: Building V Floor Plan

Source: Edmiston Jones

4.3. Materials and Finishes

The proposed works primarily retain existing materials and finishes across the site, consistent with the refurbishment approach. However, some exterior modifications to Building I are proposed as noted above.

4.4. Playing Fields and Outdoor Recreation Areas

The proposal includes upgrades to existing outdoor recreation facilities to support physical education and sporting activities as shown in **Figure 5**.

Track and Field

A 400m running track is proposed around the perimeter of the existing grass playing field. Works are limited to line marking.

Outdoor Courts

Two new basketball courts will be provided in place of where an existing court is located. The courts will feature hard court surfaces with appropriate line marking. Both courts are located on previously disturbed land in proximity to the existing gymnasium facilities (Building I).

Landscape Integration

All playing field and outdoor recreation improvements are designed to utilise existing, largely cleared areas. The works integrate with existing site drainage patterns and stormwater management systems and complement existing recreational facilities.

4.5. Use and Operation

The facility will provide shared educational infrastructure on an as-needs basis for Milton Public School, Ulladulla Public School, Ulladulla High School, and Budawang School, which already operates on the site.

The site will operate as a satellite campus that can support 184 students and 13 staff across indoor sports courts, a VET kitchen, general learning spaces, and outdoor playing fields. It is anticipated that the site and educational facilities will be used approximately 8 days per month (based on 4 schools utilising it 1-2 days each per month).

Budawang School students will access the facilities via direct pedestrian connection, while students from Milton PS, Ulladulla PS, and Ulladulla HS will travel via chartered buses coordinated from their respective origin schools. A Travel Coordinator will manage bus bookings to ensure efficient scheduling and site access.

No new gas connections are proposed. Existing LPG bottle connections will be retained for the VET kitchen, with bottles delivered and replaced as required.

No community use of the facilities is proposed, with operations limited to weekday educational activities during school terms.

4.6. Parking and Access

The development utilises the existing shared access driveway from Croobyar Road, which serves all educational facilities on the campus. No modifications to the primary site entry point are proposed. Internal circulation is maintained via existing driveways and pathways, with a new connection to the proposed carpark area.

See **Figure 12** below for car park details.

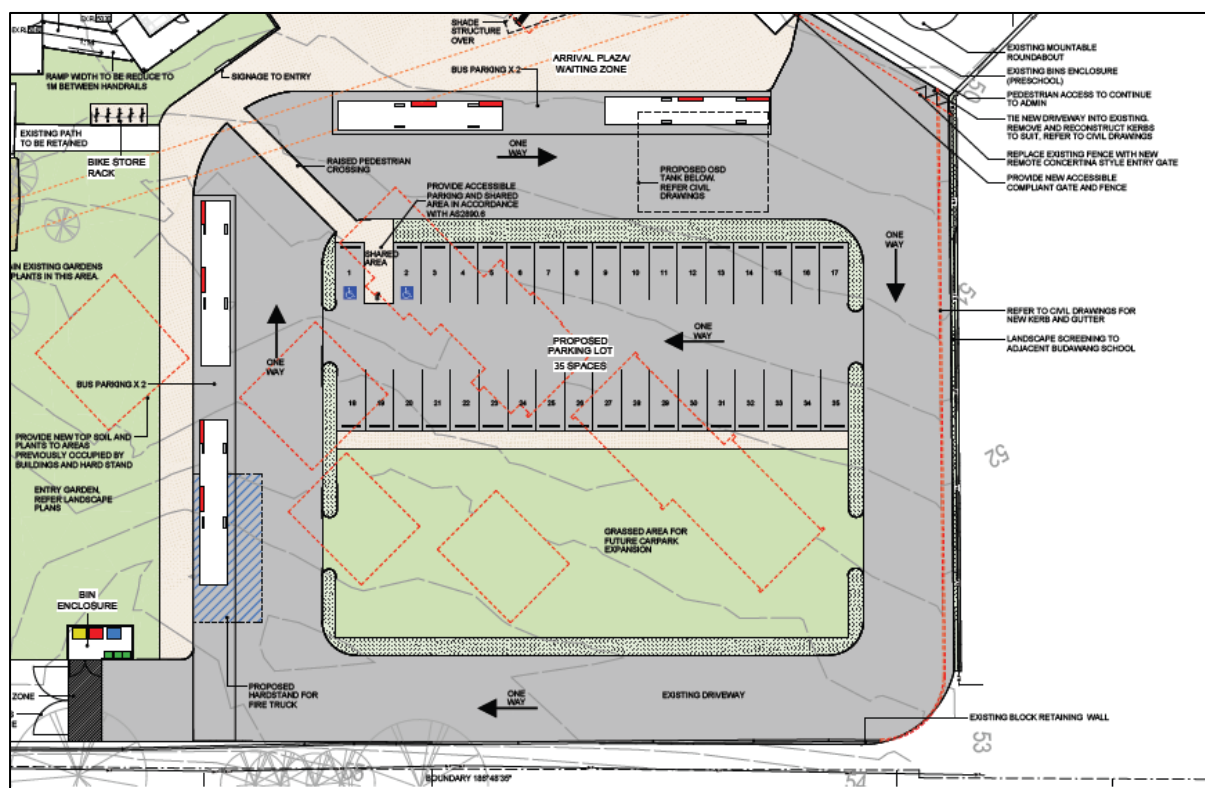


Figure 12: Part Site Plan 1 – New Car Park

Source: Edmiston Jones

A new at-grade carpark is proposed on the location of building to be demolished, providing:



- 35 car parking spaces (including 2 accessible spaces compliant with AS2890.6)
- 4 dedicated bus parking bays with adequate manoeuvring space for B99 and 14.5m rigid bus vehicles
- Raised pedestrian crossing connecting carpark to main building areas
- Arrival plaza and bus parking and waiting zone adjacent to the carpark entry
- Bike storage facilities
- A dedicated waste collection zone is located on the southern side of the carpark, accessed via the main driveway.

The carpark layout has been designed to accommodate swept paths for large vehicles including 14.5m rigid buses as demonstrated in the Traffic Access Impact Assessment (refer **Section 6.2** and **Appendix 8**).

4.7. Waste Management

Waste collection will be undertaken by a private waste contractor with twice-weekly collection service. A dedicated bin enclosure is proposed at the southern edge of the carpark, adjacent to the site boundary (refer to **Figure 12**). The enclosure would provide secure, screened storage for waste and recycling bins between collection days. Access to the bin collection zone is via a gated entry from the back-of-site, allowing bins to be wheeled to the kerbside collection point on collection days. Collection will be undertaken outside of school hours.

The carpark and waste collection area have been designed to accommodate forward-in, forward-out waste vehicle access. Swept path analysis (refer Traffic Access Impact Assessment, **Appendix 8**) demonstrates that waste collection vehicles can:

- Enter the site via the main driveway from Croobyar Road
- Circulate through the carpark to the bin collection zone
- Access the bin pickup location at the southern boundary
- Exit the site in forward gear without reversing manoeuvres.

A detailed Waste Management Plan prepared in accordance with Shoalhaven DCP Chapter G7 and NSW EPA Guidelines is provided at **Appendix 11**, addressing:

- Waste generation estimates for the educational establishment
- Bin quantities and sizing for general waste and recycling streams
- Collection frequency and operational procedures
- Staff and student education regarding waste separation

4.8. Stormwater Management

Civil Design plans addressing stormwater management for the proposed development have been prepared by Indesco and are provided at **Appendix 2**.



Rainwater tanks (RWT) are being introduced to Building A, Building V, Building H and Building I, with corresponding new overflows and pits being introduced and directed into the existing stormwater network on site. With the exception of the RWTs, the management of stormwater will remain in large part as existing for the buildings and the new basketball courts, with stormwater directed to the existing pits and pipe network.

For the new carpark, circulation space and new hardstand areas, new stormwater pits and pits are proposed to be introduced and directed to a new 9.0m x 10.0m on-site rainwater detention tank located in the north-west corner of the access road circulation space and bus parking. The detention tanks include a main holding tank, treatment chamber and filters, with the outlet connecting to the stormwater main within the access road.

Erosion and sediment control plans to be implemented during construction are provided.

4.9. Earthworks

Civil Design plans addressing the proposed earthworks for the proposed development have been prepared by Indesco and are provided at **Appendix 2**.

Total earthworks quantities are proposed as follows:

- Total cut (including 200 mm topsoil removal) = -1,875.615 m³
- Total fill = 245.921 m³
- Total balance (cut over fill) = -1,629.693 m³

The initial design proposed to reuse and upgrade the existing basketball court. However, as the design progressed, the two new basketball courts were relocated to a slightly more southern position to achieve a better balance between cut and fill volumes.

With the exception of the stormwater detention tank, earthworks cuts are generally shallow between zero and one metre in depth and required for the establishment of the car park and circulation areas, new paths and hardstand, and the construction of the basketball courts. Earthworks fill is confined to the western end of the proposed basketball courts at up to approximately one metre in depth.

Up to 830m³ of excess cut material can be accommodated in an embankment area to the east of the proposed car parking area. It is proposed that a condition of consent be imposed that if there is any further excess cut material, it is to be classified, removed from site and appropriately reused or disposed of.

4.10. Easement

The site is burdened by an Easement to Pump Sewage 3m wide, identified on DP811690, which traverses the site and accommodates the Shoalhaven Water surcharge/rising main sewage pipeline. The easement location is shown on the architectural plans at **Appendix 1**.

The proposal includes a hardstand area over the easement, comprising portions of the carpark and arrival plaza. This approach is consistent with the existing site conditions, where the easement is located beneath the existing driveway. No buildings or structures are proposed within the easement.



5. Statutory Planning Framework

This section provides a preliminary assessment of the proposal in relation to key relevant provisions contained in section 4.15(1)(a)(i)-(iiia) of the EP&A Act.

5.1. Environmental Planning & Assessment Act 1979

5.1.1. Integrated Development

Section 4.46 of the EP&A Act requires a review of whether the proposed development would trigger an approval under other environmental or related legislation.

A summary outlining any required integrated approvals is provided within **Table 5**.

Table 5: Summary of Integrated Development Triggers

Relevant Statute	Provisions	Approval Required?
<i>Coal Mine Subsidence Compensation Act 2017</i>	Approval is required to alter or erect improvement, or to subdivide land, within a mine subsidence district.	No
<i>Fisheries Management Act 1994</i>	Requires a permit for the carrying of certain works which may damage or destroy marine vegetation or restrict the free passage of fish.	No
<i>Heritage Act 1977</i>	Approval is required in respect of doing or carrying out an act, matter or thing as referred to within s57(1) relating to an interim heritage order or listing on the State Heritage Register.	No
<i>Mining Act 1992</i>	Requires an approval to the granting of a mining lease.	No
<i>National Parks and Wildlife Act 1974</i>	Requires an approval under s90 for an Aboriginal Heritage Impact Permit (AHIP).	No
<i>Petroleum (Onshore) Act 1991</i>	Requires an approval to the granting of a production lease.	No
<i>Protection of the Environment Operations Act 1997</i>	This statute requires an environmental protection licence for the carrying out of certain works.	No
<i>Roads Act 1993</i>	Approval is required for works in, on or over a classified road including connecting to a classified road and pumping water into a public road.	No
<i>Rural Fires Act 1997</i>	Authorisation is required in respect of bush fire safety of subdivision of land that could lawfully be used for residential or rural residential purposes or development of land for special fire protection purposes.	Yes – Approval required under section 100B (see discussion below).



<i>Water Management Act 2000</i>	Approval is required under sections 89, 90 and 91 for certain water related uses and activities.	No – The applicant is a public authority. Approval would otherwise be required under section 91.
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The development is 'integrated development' under section 100B of the *Rural Fires Act 1997* requiring a bush fire safety authority for development of bush fire prone land for a special fire protection purpose. It is noted the Bushfire Protection Assessment prepared by Eco Logical Australia (**Appendix 10**) concludes that the proposed works do not involve development on land identified as bushfire prone, and therefore a BFSA is not required. Notwithstanding this conclusion, given the proposal seeks to develop the site for use as an educational establishment and no active use currently exists on the site (albeit the last approved use was as an educational establishment), it is recommended that the application be referred to the NSW Rural Fire Service.

As a public authority, under Part 2 of the Water Management Regulation 2018, the Department does not need to obtain a controlled activity approval for any controlled activities that it carries out in, on or under waterfront land. Approval would have otherwise been required. Comprehensive erosion and sediment control plans have been prepared to address potential impacts (**Appendix 2**), and it is envisaged that standard construction conditions and requirements for a construction environmental management plan will mitigate any potential impacts.

5.2. Environmental Planning Instruments

The relevant State and local environmental planning instruments that apply to the site and the proposal include:

- *State Environmental Planning Policy (Sustainable Buildings) 2022*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*
- *State Environmental Planning Policy (Resilience and Hazards) 2021*
- *State Environmental Planning Policy (Biodiversity and Conservation) 2021*
- *State Environmental Planning Policy (Planning Systems) 2021*
- *Shoalhaven Local Environmental Plan 2014*

5.2.1. State Environmental Planning Policy (Sustainable Buildings) 2022

Chapter 3 Standards for non-residential development of the *State Environmental Planning Policy (Sustainable Buildings) 2022* does not apply in this instance, as the land to which the development pertains is zoned RU1 which is excluded under section 3.1(2)(b)(i).

5.2.2. State Environmental Planning Policy (Transport and Infrastructure) 2021

Chapter 3 Educational establishments and child care facilities of the *State Environmental Planning Policy* applies to this application.

Section 3.37 of the T&I SEP sets out development permitted without consent which may be carried out by or on behalf of a public authority without development consent on land within



the boundaries of an existing or approved government school. The former Shoalhaven Anglican School site is not an existing or approved government school, and as such this section does not apply.

Section 3.37A of the T&I SEP sets out requirements for the establishment of new government schools which may be carried out by or on behalf of a public authority without development consent on land in a prescribed zone and on which there is no existing or approved school. The site is zoned RU1 which is not a prescribed zone for the purposes of this clause, and as such this section does not apply.

It is further noted that section 2.120 does not apply in this instance as the site is not situated adjacent to a freeway, tollway or transitway or a road with an annual average daily traffic volume of more than 20,000 vehicles. Nonetheless, the TAIA (**Appendix 8**) confirms compliance with the recommended maximum noise level under this section (being 40 dB(A)).

5.2.3. State Environmental Planning Policy (Resilience and Hazards) 2021

Chapter 4 of *State Environmental Planning Policy (Resilience and Hazards) 2021* (Resilience and Hazards SEPP) contains provisions relating to the remediation of contaminated land to reduce risk of harm to human health and the environment.

Section 4.6 stipulates that the consent authority must not consent to the carrying out of development on land unless it has considered whether the land is contaminated, and, if the land is contaminated, whether the land is suitable in its contaminated state or will be made suitable following remediation for the purpose for which the development is proposed to be carried out. The application is accompanied by a detailed site investigation undertaken by Stantec (**Appendix 14**) which concludes that the site is suitable for development without remediation.

5.2.4. State Environmental Planning Policy (Biodiversity and Conservation) 2021

Chapter 3 of *State Environmental Planning Policy (Biodiversity and Conservation) 2021* (BC SEPP) relates to koala habitat protection. The site is identified within the Central and Southern Tablelands Koala and the South Coast Management areas.

A koala assessment is included in the flora and fauna report (**Appendix 9**) and confirms that the proposed development does not impact core koala habitat.

5.2.5. State Environmental Planning Policy (Planning Systems) 2021

Section 2.19 of the *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP), under Section 4 of Schedule 6, classifies development over \$5 million undertaken by the Crown to be Regionally Significant development. As such, this application is made to Shoalhaven City Council and determined by the Southern Regional Planning Panel.



5.2.6. Shoalhaven Local Environmental Plan 2014

The Shoalhaven Local Environmental Plan 2014 (SLEP) is the relevant local planning instrument which applies to the site, and which establishes the land use zone, permissible uses and key development standards. The proposed development is permitted with consent under the SLEP as an 'educational establishment'.

A summary of the key planning controls and a preliminary assessment of the proposal is provided in **Table 6** below.

Table 6: Summary of Compliance with Shoalhaven LEP

Section and Requirement	Compliance
Clause 2.3 Zone objectives and Land Use Table	Complies. The site is zoned RU1 Primary Production where educational establishments are permissible with consent. Refer to Figure 13 below.
Clause 4.3 Height of Buildings	Complies. There is no maximum height of building nominated.
Clause 4.4 Floor Space Ratio	Complies. There is no maximum floor space ratio nominated.
Clause 5.10 Heritage	Complies. The site is not situated on any mapped heritage items.
Clause 7.1 Acid Sulfate Soils	Complies. While the site is identified as Class 5 Acid Sulfate Soils, it is not within 500 metres of adjacent Class 1, 2, 3 or 4 land, and as such, no further consideration is required.
Clause 7.2 Earthworks	Complies. Earthworks are to be suitably managed to ensure no detrimental impact on the environment, surrounding land uses, cultural or heritage items, and the features of the surrounding land.
Clause 7.6 Riparian land and watercourses	Complies. The land contains a watercourse classified as category 3. The proposal will not adversely impact water quality, watercourse flows, or the stability of the bed and banks. No native vegetation will be removed, and the existing vegetated riparian corridor will be retained. The development does not involve water extraction and will not impede the passage of aquatic organisms. Stormwater will drain to the existing system. Erosion and sediment control measures including sediment fencing, earth basins, and geotextile inlet filters will be implemented during construction to prevent sediment-laden runoff entering the watercourse.
Clause 7.11 Essential Services	Complies. The site will be serviced by suitable vehicular access, reticulated water, sewerage, and electricity.



See **Figure 13** below for Land Zoning Map.

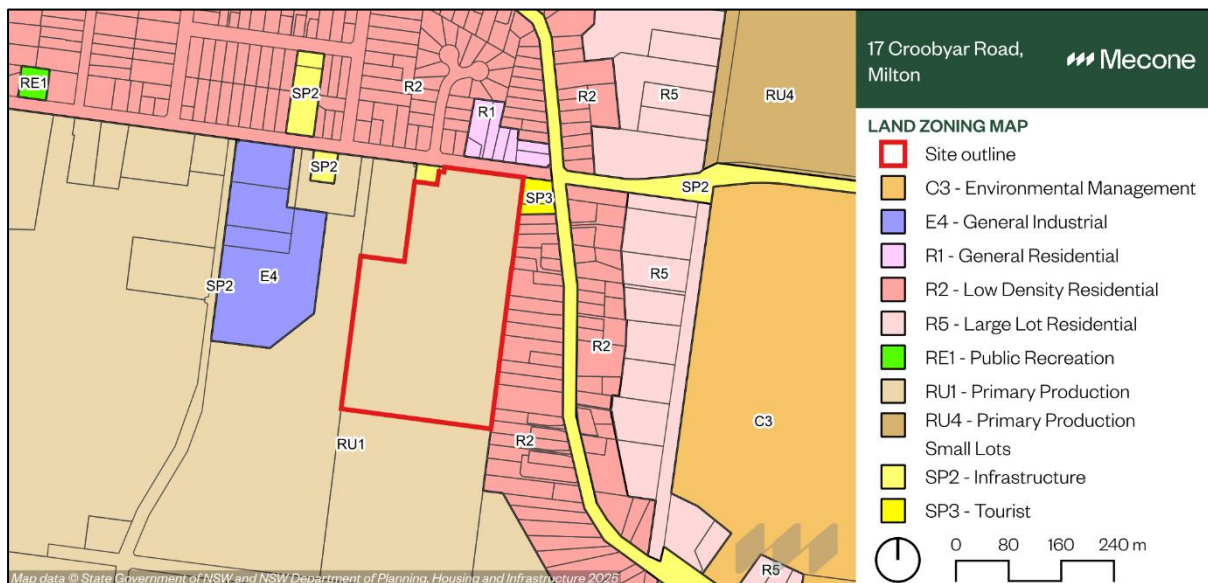


Figure 13: Land Zoning Map

Source: Mecone

5.3. Applicable Draft Environmental Planning Instruments

The NSW Planning System Reform Bill intends to amend the EP&A Act, which would abolish Regional Panels, however details have not been released. As such, the consent authority may change during the course of assessment.

There are no further applicable draft Environmental Planning Instruments (EPIs) relevant to this DA.

5.4. Development Control Plans

The site is subject to the provisions of the Shoalhaven Development Control Plan, and an assessment of the application against the Shoalhaven Development Control Plan (**SDCP**) is undertaken in **Appendix 18**. The assessment found the application is generally compliant with the requirements of the SDCP.

5.5. Planning Contributions and Agreements

The Shoalhaven Contributions Plan 2019 does not specify that 7.11 or 7.12 contributions apply to educational establishments. As such, it is anticipated that there are no planning contributions plans or agreements that apply to the site or the proposed development. The applicant is not offering to enter into a planning agreement for the purposes of s.7.4 of the EP&A Act.

6. Planning Evaluation

6.1. Built Form and Urban Design

The proposed demolition and refurbishment works will have minimal built form impact on the locality. Demolition of existing buildings is largely screened from the streetscape by the retained Budawang School building, which maintains the established built form presentation to Croobyar Road.

The new basketball courts in the eastern portion of the site may be partially visible from the street, however this is consistent with the site's established educational character and former use as Shoalhaven Anglican School. The courts represent typical sporting infrastructure expected in school environments.

The retention and refurbishment of selected buildings (Buildings A, V, H, and I) retains the site's existing built form scale and character. The low-rise nature of retained structures is consistent with the surrounding Milton locality.

No overshadowing impacts are anticipated on adjoining properties. The proposal involves only refurbishment of existing low-rise buildings and demolition works, with no increase in building height or massing that would generate additional shadow impacts beyond the existing condition.

The proposed demolition and refurbishment works present no adverse impact on the locality's character or amenity. The refurbishment of the external component of the gym is an improvement to the visual amenity of the site. The development maintains appropriate screening, preserves the educational character of the site, and ensures visual consistency with the streetscape presentation.

6.2. Traffic, Transport and Parking

A Transport Access Impact Assessment was prepared by SCT Consulting (**Appendix 8**) to evaluate transport access, infrastructure, parking, and travel behaviour in relation to the proposed development. The TAIA assessed the transport implications of upgrading the former Shoalhaven Anglican School site to accommodate off-site use for students and staff from Milton Public School, Ulladulla Primary School, and Ulladulla High School for special events and learning opportunities. The assessment considered:

- Existing transport infrastructure and access arrangements
- Proposed bus infrastructure and parking facilities
- Vehicle manoeuvrability and swept path analysis
- Travel demand and trip generation
- Compliance with relevant planning controls and transport guidelines

The methodology included site visits, review of existing site conditions, analysis of the proposed master plan, swept path analysis for various vehicle types, and assessment against Shoalhaven City Council Development Control Plan requirements.



6.2.1 Operation

The site will support 184 students and 13 staff across various facilities, including indoor sports courts, a VET kitchen, general learning spaces, and outdoor playing fields. Student and staff access during school hours will be exclusively via chartered buses coordinated from origin schools (Milton PS, Ulladulla PS, and Ulladulla HS).

The proposed development includes two bus zones, each approximately 38 meters long, capable of accommodating two 14.5m coaches parked concurrently. This allows four chartered buses to be accommodated on site. A Travel Coordinator will manage bus bookings to ensure smooth access. Bus movements will enter and exit via Croobyar Road, with swept path analyses confirming safe vehicle manoeuvrability for 14.5m coaches.

The development includes a new carpark providing 35 spaces for staff and visitors, plus 4 bus bays. All vehicles will access the site via the existing shared driveway from Croobyar Road, which also serves Budawang School and the Budawang Early Learning Centre. The internal loop road has been designed to provide safe circulation and adequate separation between the various educational facilities on site.

The TAIA concludes that the proposed development is supported by adequate bus infrastructure, parking provision, and access arrangements, provided the following recommendations are implemented:

- Appoint a Travel Coordinator (TC) to manage bus bookings and ensure smooth access
- Restrict student and staff access during school hours to chartered buses only (no private vehicle drop-off/pick-up)

Impact on Budawang School and Early Learning Centre

Budawang School, a combined primary and high school with 35 students, is located at the northeastern corner of the site and has a dedicated 32-space car park (including two accessible spaces). This car park is accessed via an internal road connecting to Croobyar Road. The proposed development does not impact upon the Budawang School's traffic or parking operation.

The Early Learning Centre, licensed for up to 35 children, is situated at the southern end of the internal road and does not have a dedicated car park. However, 15 existing parking spaces are provided along the internal road, comprising eight pick-up/drop-off spaces and seven angled spaces (including one accessible space). These spaces are used by Early Learning Centre staff and for child drop-off and collection, and these will not be impacted by the proposed development.

The proposed parking strategy retains these existing arrangements for Budawang SSP and the Early Learning Centre. The new 35-space car park, bus parking area, and future expansion area will be located to the south of the Budawang School and Early Learning Centre, providing dedicated parking for the proposed development without impacting the existing parking provisions for Budawang School or the Early Learning Centre. Private parking for Budawang School will remain separate from the proposed development, ensuring continued independent access and operation.



Parking Provision

The Shoalhaven DCP 2014 parking rates are not directly applicable to this proposal given the unique operational model where all staff and students will travel to the site via chartered buses rather than private vehicles. The proposed 35-space car park is provided for future-proofing purposes, with additional landscaped area available for expansion should parking demand increase over time. Bus capacity has been assessed on a first principles basis, with two bus bays capable of accommodating four 14.5m coach buses. As the car park will not be occupied during school hours, the proposal represents an appropriate and flexible response to the site's actual transport requirements.

6.2.2 Construction

The contractor will prepare a detailed Construction Traffic Management Plan (CTMP) for approval prior to commencement of construction. All construction vehicles will access the site via Croobyar Road from the Princes Highway. Swept path assessments demonstrate required manoeuvres can be undertaken. Construction activities will typically occur outside peak travel hours and school arrival/departure times (8:00am-9:00am and 2:30-6pm) to minimise impact on the surrounding transport network. Access will be maintained to the Budawang School carpark, the Budawang Early Learning Centre, and existing carpark during construction.

Traffic management will require Council approval. Extra attention is required since the project will be carried out on an operating school/early learning site, with construction workers needing to be aware of potential risks involving children. Road safety measures must avoid pedestrian, cyclist, and vehicle conflicts, particularly during loading and unloading activities. Temporary diversions to footpaths or shared paths need to provide safer crossing facilities, clear sightlines, and alternative walking paths of adequate width.

The estimated peak workforce is approximately 100 full-time equivalent (FTE) workers, generating up to 50 light vehicles per hour during peak periods (assuming 100% private vehicle transport with two people per car), which is accommodated by a temporary carparking area within the site.

Key mitigation measures include:

- Temporary carparking area within the site to avoid construction workers parking on residential streets
- Safe access maintained to Budawang School carpark, Budawang Early Learning Centre (including waste collection), and existing carpark
- Truck loads covered during transportation off-site
- Neighbouring properties notified of construction works and timing
- Material deliveries and spoil removal during standard construction hours only
- Avoidance of idling trucks alongside sensitive receivers
- Consistent and minimal number of trucks arriving at any one time
- Scheduled truck movements with forward-in/forward-out access
- Give way to pedestrians and construction plant at all times



6.3. Bushfire

A Bushfire Protection Assessment has been prepared by Eco Logical Australia and is provided at **Appendix 10**.

The report concludes that although part of the site is bushfire prone the proposal does not involve development on any land that is identified as bushfire prone. As such the proposed development does not require a Bush Fire Safety Authority (BFSA) under Section 100B of the *Rural Fires Act 1997*.

Notwithstanding this conclusion, given the proposed use is for educational purposes and no active use currently exists on the site, it is recommended that the application be referred to the NSW Rural Fire Service under Section 100B of the *Rural Fires Act 1997*.

The Bushfire Protection Assessment identifies vegetation nearby that could potentially result in bushfire risk, and recommends approval from a bushfire protection standpoint subject to application of the recommendations in **Table 7** below.

Table 7: Development Bushfire Protection Solutions and Recommendations

Bushfire Protection Measures	Recommendations
Asset Protection Zones	From the commencement of building works and in perpetuity, the property around the buildings must be maintained as an inner protection area (IPA) to the following distances and aspect in accordance with Appendix 4 of PBP: • North-east, east and south to the property boundary; and • North and west to the edge of riparian corridor.
Landscaping	New landscaping within the site to meet the requirements of PBP listed in Appendix A. A landscape maintenance plan shall be prepared to ensure the extent of vegetation within the riparian corridor (within the site) does not increase. Provision of non-combustible path around entire perimeter of Building I of ≥1.5 m in width.
Construction	New construction shall be constructed as follows in accordance with AS 3959-2018 and as modified by Section 7.5 of PBP. • Building “I” (Gymnasium): BAL-40 • Building “H” (Kitchen): BAL-29 • Building “V” (Administration): BAL-12.5 • Building “A” (General Learning Spaces): BAL-19 The following additional construction upgrades shall be implemented to each building that is being upgraded by the proposed development: • Ember protection to all gaps, screens to windows, weather seals to doors as: ○ Enclose all openings or covering openings with a non-corrosive bronze or steel metal mesh ≤2 mm aperture. Where applicable, this includes any openable windows, vents, weepholes and eaves; ○ Affix draught excluders/weather strips to the base of all side-hung external doors. • Building “I” to replace all windows and doors, and provide an unobstructed non-combustible path around the perimeter of the building.
Access	Carparking to be designed and constructed to ensure it can be safely manoeuvred by a fire appliance (up to RFS Cat 13/FRNSW General fire appliance).
Water supply	New fire hydrant system to meet PBP acceptable solution specifications for a SFPP Class 9 development.
Electricity service	No requirements as electricity supply located underground.



Gas service	New gas services (if installed) are to be installed and maintained in accordance with AS/NZS 1596:2014 (SA 2014). <i>Note: No new street gas connections are to be installed.</i>
Emergency Management	A Bush Fire Emergency Management and Evacuation Plan shall be prepared in accordance with Table 6.8d of PBP and be consistent with the NSW RFS document: A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan (RFS 2014). The plan must also include the following: • Facility to be closed on extreme and catastrophic Fire Danger Ratings (FDR); • A mechanism for the early relocation of occupants on days when adverse fire weather is notified, or adverse fire activity occurs in the local government area in which the development operates; • Buildings V and A designated the onsite shelter-in-place option. • Contact details for the local Rural Fire Service office; • Procedures for coordinated evacuation of the site in consultation with local emergency services. A copy of the Bush Fire Emergency Management and Evacuation Plan should be provided to the Local Emergency Management Committee for its information prior to the occupation of the development.
Better Bushfire Outcome	Recommendations detailed in Table 12 to be implemented to achieve a better bushfire outcome for the school i.e. APZ (as detailed), landscaping (compliant with Appendix 4 of PBP), construction (as detailed), access (designed as per Appendix C), firefighting water supply (compliant with AS2419.1:2021), Bush Fire Emergency Management and Evacuation Plan (including facility closure and relocation triggers, Buildings "V" and "A" designated the onsite shelter-in-place option).

6.4. Biodiversity

A Flora and Fauna Assessment Report was prepared by Water Technology (**Appendix 9**) to assess biodiversity values and impacts associated with the proposed redevelopment of the former Shoalhaven Anglican School site at 17 Croobyar Road, Milton. The assessment addresses requirements under section 7.9 of the *Biodiversity Conservation Act 2016* and associated regulations to determine whether relevant biodiversity values are present or likely to be impacted.

The assessment involved site investigation of the subject site, which comprises mainly planted shrubs, trees, and lawn areas with scattered buildings proposed for refurbishment, demolition, or replacement. The methodology included review of NSW Government Biodiversity Values Map (BV Map), identification of Plant Community Types (PCTs) along riparian boundaries, threatened species habitat assessment, and evaluation of whether a Biodiversity Development Assessment Report (BDAR) would be required.

No areas mapped on the BV Map are present within the subject land. Three PCTs occur along riparian boundaries: Illawarra Complex Dry Rainforest, South Coast Low Hills Red Gum Grassy Forest, and Shoalhaven Foothills Bloodwood Heathy Forest. These riparian vegetation communities are not to be impacted by the development. No threatened fauna species are considered highly likely to occur within the subject land. Development is confined to already-cleared areas and existing buildings, avoiding significant biodiversity impacts. Works will not impact remnant vegetation or threatened ecological communities. A BDAR is not required, demonstrating that biodiversity values are negligible and any impacts on native vegetation or threatened biodiversity values are negligible.





Figure 14: PCTs and Proposed Vegetation Removal

Source: Water Technology

The Flora and Fauna Assessment Report confirms the subject land is suitable for redevelopment. The proposed works avoid impacts to remnant vegetation and threatened ecological communities, with development confined to previously cleared areas. Implementation of the following recommended mitigation measures via a condition of consent will ensure no unreasonable biodiversity impacts:

- Compensatory replanting
- Tree protection zones for retained vegetation
- Fauna protection measures including pre-clearance checks
- Weed management protocols
- Erosion and sediment control measures

6.5. Arboricultural

An Arboricultural Impact Assessment (AIA) has been prepared by Eco Logical Australia (**Appendix 15**). A total of 91 trees were assessed, comprising 81 trees inspected in November 2025 and 10 additional trees previously inspected by Allied Tree Consulting in June 2025.

Of the 91 trees assessed, 53 trees are retention-incompatible due to major encroachment from the proposed works. Of the 53 trees to be removed, 28 are of medium retention value and 25 are of low retention value. No high value retention trees require removal. Two trees are retention-compatible subject to mitigation measures, and 36 trees are retention-compatible.

Six trees on neighbouring properties are subject to minor or medium encroachment and are compatible for retention with appropriate protections. Seven trees are identified as exempt species, five of which are not viable for retention.

The AIA recommends consultation with the consent authority regarding tree permits and replacement planting requirements, adherence to the tree protection measures outlined in the report, and that all works are undertaken in accordance with AS 4970-2025 Protection of Trees on Development Sites. Subject to these measures, retained trees will be protected during construction.

6.6. Aboriginal Heritage

An Aboriginal Cultural Heritage Assessment was prepared by Tocomwall for the Budawang School for Specific Purposes development (SSD-8845345, approved 2021) covering the broader site at 17 Croobyar Road, Milton. The assessment remains applicable to the current proposal for the former Shoalhaven Anglican School upgrade.



Figure 15: Study Area

Source: Tocomwall

A pedestrian archaeological survey was undertaken on two occasions: the first by William Moon, Tocomwall archaeologist, on 16 September 2020 as part of a Due Diligence assessment, and the second on 27 October 2020 with Lee Carriage representing Ulladulla Local Area Land Council. The survey covered the entire development footprint plus additional areas of the lot that may be subject to future development. No Aboriginal objects were identified during the archaeological survey.



The study identified two Aboriginal stone artefacts within dispersed, low-density surface soils lacking stratification. The artefact types and materials are common to the locality and the site is assessed as having low scientific, educational and representational significance due to limited capacity to contribute additional information about the area or region.

Direct harm to both artefact sites occurred as a result of the Budawang School development. The remaining area of intact soil within the test excavation sample area was expected to be a continuation of a disperse low density distribution of artefacts, which was also destroyed. Any objects that may have been present in this area were directly harmed, resulting in total loss of value for both identified sites.

Given the comprehensive assessment undertaken for SSD-8845345 and the total harm already occurring to identified Aboriginal heritage values on the broader site, the proposed former Shoalhaven Anglican School upgrade will not result in additional unreasonable impacts to Aboriginal heritage. The current proposal involves refurbishment of existing buildings and construction of ancillary facilities in areas previously disturbed by the former school operations.

As a precautionary measure, the following recommendation is made:

- Implement an Unexpected Finds Protocol during construction to manage any Aboriginal objects or ancestral remains that may be unexpectedly encountered during earthworks.

6.7. Acoustic and Vibration

A Noise and Vibration Impact Assessment was prepared by Stantec (**Appendix 7**) to assess acoustic impacts associated with the proposed redevelopment of the former Shoalhaven Anglican School site at 17 Croobyar Road, Milton.

The assessment addressed requirements under the Shoalhaven DCP 2014, NSW EPA Noise Policy for Industry 2017, NSW Road Noise Policy 2011, and NSW EPA Interim Construction Noise Guideline 2009. The methodology included unattended noise monitoring at two locations (10-16 September 2025), attended noise measurements at three positions, and acoustical modelling to predict noise impacts from operations and construction.

The site is an acoustic environment dominated by natural sounds (birds, insects, small animals), minimal road traffic noise, and generally low background noise levels. Background noise monitoring established Rating Background Levels of 36-37 dB(A) during day, 33 dB(A) during evening, and 30 dB(A) during night. Project Noise Trigger Levels were established at 41 dB(A) day, 38 dB(A) evening, and 35 dB(A) night for residential receivers.

The sensitive receivers assessed are identified in **Figure 16**.



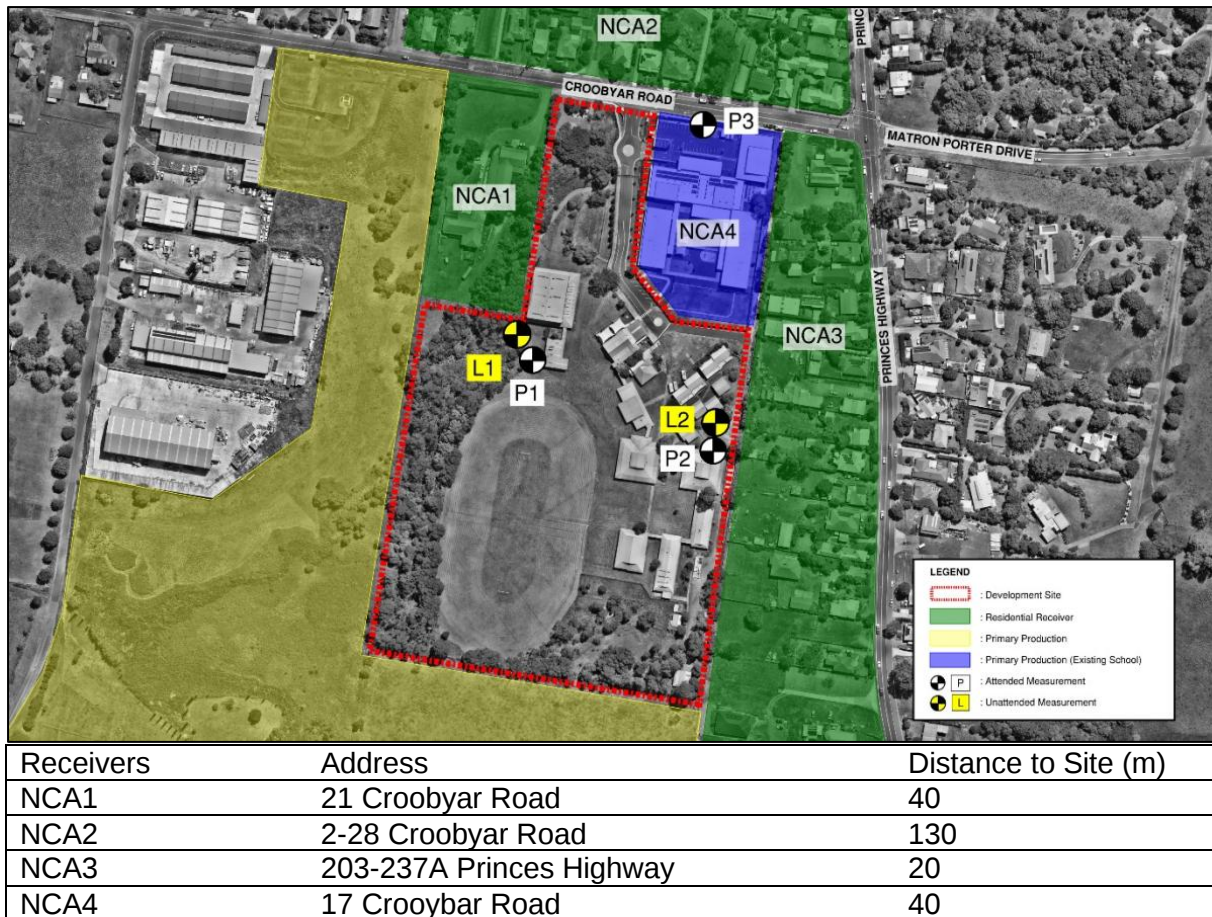


Figure 16: Sensitive Receivers

Source: Stantec

6.7.1 Operation

Mechanical plant noise emissions are expected to comply with established criteria through appropriate unit selection, considerate layout, and standard acoustic treatments. A detailed acoustic assessment is recommended prior to Construction Certificate.

The gymnasium/hall in Building I was assessed for events with up to 313 occupants (representing a more conservative approach than the worst-case scenario). With external façade meeting minimum Rw50 (excellent sound insulation) performance, predicted noise levels at the nearest residential receiver (NCA1) comply with evening criteria (38 dB(A)) with doors open or closed during day and evening periods.

The two basketball courts were assessed using an Offensive Noise Test in accordance with NSW Noise Guideline for Local Government. The assessment concluded outdoor sports activities are not expected to generate offensive noise, with limited impact on the nearest residential receiver. Play noise will occur during weekdays and within limited daytime hours only.

Traffic generation noise assessment determined the proposed development will generate minimal additional traffic noise (≤ 2 dB) due to low vehicle trip numbers (eight bus trips per peak period). This complies with NSW Road Noise Policy criteria and will not cause discernible adverse impacts.



The assessment concludes that with implementation of recommended mitigation measures, the proposed development can achieve compliance with relevant acoustic criteria during operation. The operational mitigation measures include:

- Detailed mechanical plant acoustic assessment prior to Construction Certificate
- Appropriate mechanical plant selection and layout with standard acoustic treatments
- External building façade to meet minimum Rw50 (excellent sound insulation) performance
- Close all gymnasium/hall doors if events are held at night
- Restrict basketball court use to daytime only.

6.7.2 Construction

Construction is proposed Monday to Friday 7:00am-6:00pm and Saturday 8:00am-1:00pm, with no work on Sundays or public holidays. Four construction stages were assessed: site establishment, demolition, structure, and fitout.

Predicted noise levels at all residential receivers exceed the Noise Management Level (47 dB(A)) during site establishment, demolition, and structure phases, with exceedances ranging from 9-23 dB. However, all predicted levels comply with the Highly Noise Affected criterion of 75 dB(A). With a 2.4m hoarding around the development site, predicted noise levels reduce by approximately 8 dB but still exceed Noise Management Levels during most construction stages. During fitout, predicted noise levels comply at all receivers.

Construction vibration assessment identified safe working distances for vibration-intensive plant ranging from 1m (nominal) for handheld jackhammers to 73m for large hydraulic hammers. For receivers within recommended safe working distances, more detailed analysis and site measurements are required as part of the Construction Noise and Vibration Management Plan.

The assessment concludes that while construction noise exceedances are unavoidable, they are manageable through appropriate controls and community engagement, including:

- Install 2.4m hoarding around development site perimeter
- Use temporary barriers (stockpiles, shipping containers, site offices) for screening
- Increase distance between noise sources and sensitive receivers where possible
- Fit appropriate silencers and acoustic screens to diesel-operated equipment
- Use broadband, variable-level, or non-audible warning alarms instead of traditional "beeper" reversing alarms
- Provide multiple respite periods per day for vibration-intensive activities
- Maintain regular communication with affected residents
- Implement noise and vibration monitoring strategy
- Prepare detailed Construction Noise and Vibration Management Plan prior to construction.



6.8. Civil

6.8.1. Stormwater Management

Runoff from the development of the new car park, and hard surfaced entrance areas will be directed to a new stormwater detention tank. The design of the tank ensures that stormwater is directed through a treatment chamber and filtered before being discharged via the outlet to the Council reticulated stormwater system. Conditions of consent will ensure the discharge of stormwater will be designed to Council standards and is not expected to give rise to any adverse impacts.

6.8.2. Sediment and Erosion

During the removal of the existing infrastructure and pavement, removal of vegetation, and the disturbance of soils, sediment-laden surface water runoff from disturbed areas has the potential to increase and to enter drainage channels and degrade water quality, including the waterway in the north-west of the site.

To mitigate the impact of increased surface water volumes/flows and sedimentation, surface water run-off volumes and rates are to be effectively managed during construction. The civil concept design plans in **Appendix 2** include construction erosion and sediment control plans detailing the location and proposed installation of sediment fences, stockpile location, stabilised site entry, geotextile, mesh and gravel inlet filters, silt and sandbag protections to drainage paths.

A detailed ESCP will be prepared and measure implemented before any excavation, earthworks, or construction begins. ESCP measures will comply with the NSW Guidelines for Erosion and Sediment Control on Building Sites 2024 and best-practice documents such as Managing Urban Stormwater: Soils and Construction (“Blue Book”).

The gradients on site are low and, subject to the introduction of appropriate erosion and sediment control measures, it is anticipated that any potential adverse impacts can be appropriately mitigated.

6.8.3. Impact on Waterway

The western portion of the site constitutes waterfront land, with works proposed for the new sports courts and oval upgrades located in proximity to the watercourse. The proposal does not involve removal of native vegetation and will not impact the vegetated riparian corridor. Stormwater from the development will drain to the existing stormwater system. Erosion and sediment control measures described above will be implemented during construction to prevent sediment-laden runoff entering the watercourse. Subject to implementation of the proposed erosion and sediment controls, the works are not expected to result in adverse impacts to the waterway.

6.9 Contamination

6.9.1 Hazardous Materials

A Hazardous Building Materials (HAZMAT) Report has been prepared by Douglas Partners and provided at **Appendix 12**.



The HAZMAT survey comprised a visual inspection and limited testing program to identify relevant hazardous materials prior to modification of nominated buildings. The survey identified the following:

- Asbestos containing material (ACM);
- Lead paint;
- Lead dust in ceiling cavities;
- Synthetic mineral fibre (SMF) insulation;
- Polychlorinated biphenyls (PCB) in fluorescent light fittings;
- Ozone depleting substances (ODS); and
- Bulk chemical storage.

The assessment recommends that:

- Inaccessible areas should be assumed to potentially contain HAZMAT unless assessment of these areas by a Competent Person confirms otherwise.
- HAZMAT should be managed in accordance with the requirements of the NSW Work Health and Safety (WHS) Act 2011 (WHS Act), NSW WHS Regulation 2017 (WHS Regulation) and relevant Codes of Practice, Australian Standards and Guidelines. HAZMAT should be removed prior to any significant disturbance including from maintenance, refurbishment and demolition work.

6.9.2 Detailed Site Investigation

A Detailed Site Investigation (DSI) has been prepared by Stantec and provided at **Appendix 17**.

The DSI concluded the following:

- All contaminant concentrations in soil were below the applicable human health criteria for the current and future land use.
- Elevated concentrations of metals and PFOS were identified in some sediment and surface water samples that were collected from the creek line along the western site boundary. Such contaminants were not identified in on-site soils at concentrations that would present a possible pathway or mechanism for impacting surface water and/or sediment within the creek line.

The DSI provides the following recommendations:

- A Hazardous Building Materials Assessment was conducted in April 2025. To ensure that hazardous building materials are not dispersed to the environment, demolition and alteration of existing structures must be completed in accordance with the recommendations stated in the HAZMAT Report (DP, 2025).
- Materials possessing contaminant concentrations that exceed the ecological criteria should not be used as a growing medium or within the root zone where ecological features will exist, such as plantings, garden beds or within areas of cultivation.
- Due to the presence of waste and debris within the subfloor of some buildings constructed on brick piers, a post-demolition assessment of asbestos is



recommended. The scope of the investigation should be determined by a consultant based on observations of the materials within the subfloor.

- Any material being removed from site must be classified for off-site disposal in accordance the EPA (2014) Waste Classification Guidelines and/or an applicable NSW EPA Resource.
- Recovery Order. The information presented within this report must be considered during future classification.
- A Construction and Environmental Management Plan (CEMP) must be prepared to minimise potential risks to human health and the environment during the future construction work. An appropriate Unexpected Finds Protocol (UFP) should also be incorporated into the CEMP and implemented during ground disturbance in the unlikely event of encountering impacted materials.

Stantec consider that based on current information, the site is suitable for the intended land use without the requirement for remediation.

6.10. Waste Management

6.10.1. Operational Waste Management

Refer to the Waste Management Plan at **Appendix 11**. The facility will operate on an intermittent basis supporting 184 students and 13 staff approximately one to two times per month per origin school. This low-intensity use will generate modest waste volumes as outlined below.

The proposed bin allocation and collection schedule is as follows:

Table 8: Bin Allocation and Collection Schedule

Waste Stream	Weekly Generation	Bin Allocation	Collection Frequency
General waste	1,656L	1 x 1,100L bin	Twice weekly
Co-mingled recycling	1,840L	1 x 1,100L bin	Twice weekly
Paper and cardboard	1,840L	1 x 1,100L bin	Twice weekly
Food waste	1,104L	3 x 240L bin	Twice weekly
Bulky waste	As required	Dedicated storage area	As required

The proposed 18 square metre waste storage enclosure at the southeastern corner of the car park provides adequate capacity for the six bins and bulky waste storage area as shown in **Figure 17**. The enclosure is positioned within the site and screened from the streetscape, ensuring no adverse visual impact on the locality.



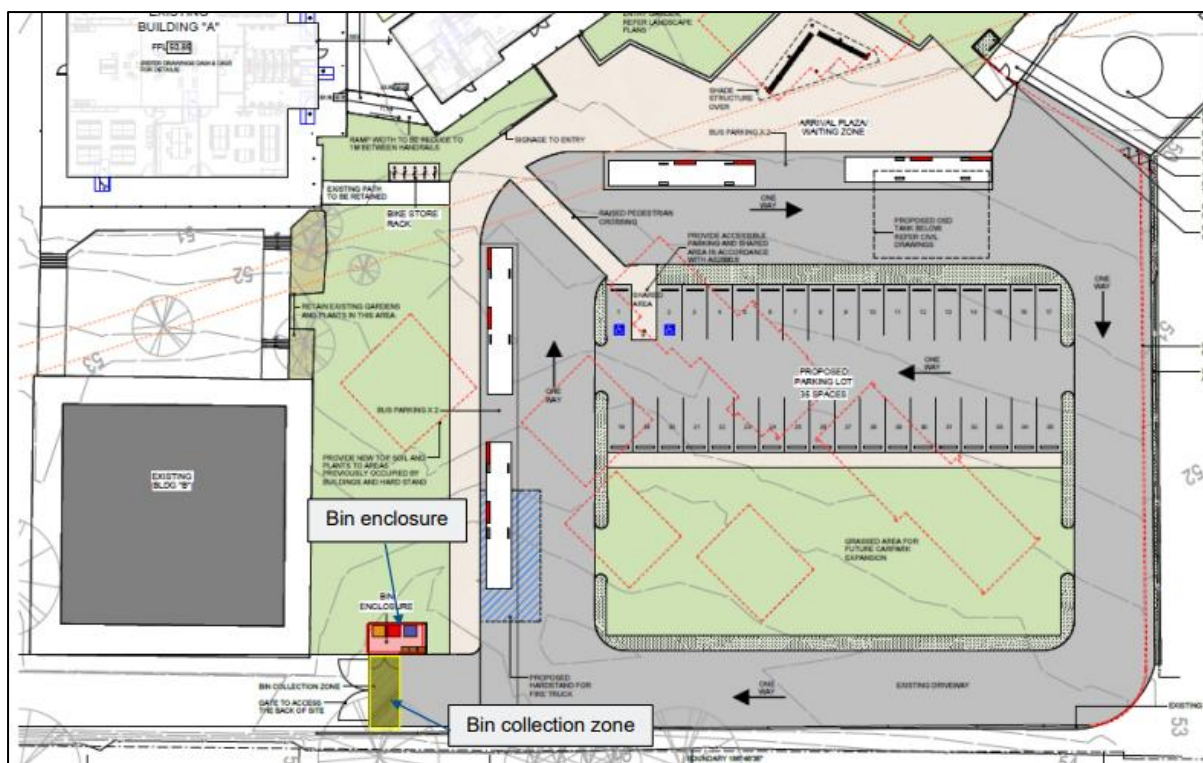


Figure 17: Proposed bin collection zone in carpark.

Source: MRA Consulting Group

Waste collection by Veolia will be scheduled outside peak periods to avoid conflict with student movements and bus operations. Collection vehicle access via the internal road network will not generate significant additional traffic on Croobyar Road.

The development will comply with the Food Organics Garden Organics Recycling Bill 2025 requirements by the 1 July 2026 deadline. No adverse waste management impacts on the locality are anticipated during the operational phase. Refer to the Waste Management Plan at **Appendix 11** for further detail regarding operational waste management.

6.10.2. Construction and Demolition Waste Management

The demolition and construction works will generate an estimated 360-580 cubic metres of waste material. Implementation of the source separation and management measures outlined in this plan will achieve landfill diversion rates exceeding 80 per cent for demolition waste and 90 per cent for construction waste, consistent with NSW Government targets. The use of licensed contractors and appropriately licensed recycling and disposal facilities will ensure regulatory compliance. No significant adverse waste management impacts are anticipated during the construction phase. Refer to the Waste Management Plan at **Appendix 11** for further detail regarding demolition and construction waste management.

6.11. CPTED

A Crime Prevention Through Environmental Design (CPTED) report has been prepared by Edmiston Jones (**Appendix 6**). The report assesses the crime risk of the locality and makes recommendations to satisfy the CPTED principles.



Crime Risk Context

Milton has a low crime rate compared to the NSW average and Australia overall. Between 2020-22 and 2022-24, break-ins decreased by 3.7% to 209 incidents per 100,000 residents and violent crime decreased by 41.6% to 837 incidents per 100,000 residents. In 2022-24, the rate of break-ins in Milton was 61.7% lower than the NSW average and 71.7% lower than the national average, while violent crime was 64.9% lower than the NSW average and 70.4% lower than the national average.

Notwithstanding the low crime environment, the site presents inherent security challenges due to its 7.76 hectare area, dispersed building layout, unused buildings, single street frontage at the end of a cul-de-sac, and predominantly school-age user population.

CPTED Principles Assessment

The four CPTED principles have been considered, and the following recommendations are made:

- **Surveillance:** CCTV will be installed to external areas, particularly areas out of sight from public spaces, and internally to common refurbished areas. Monitoring and patrols will be undertaken by an appointed service provider. The four unutilised buildings will be included in CCTV coverage and patrol routes.
- **Access Control:** Clear signage will direct people away from high-risk areas. Signage at the car park will include maps to guide visitors to the point of entry. Visitors are required to report to reception. The four unutilised buildings will be locked to prevent access.
- **Territorial Reinforcement:** External gates and entrances will be fitted with electric strike connections. The eastern boundary fence will be replaced where required. A gate will be installed to the car park linking the existing security fence network with Budawang School. New fencing around the oval will connect to the eastern boundary fence protecting the riparian corridor.
- **Space Management:** Internal and external lighting will be provided in accordance with Australian Standards, with particular attention to recessed areas. Traffic Impact Assessment recommendations will be implemented to manage vehicle and pedestrian movements.

The CPTED report concludes that, subject to the mitigation measures proposed, the proposal would satisfactorily address CPTED principles.

6.12. BCA and Access

6.12.1. BCA Design Assessment

A BCA Report has been prepared by DC Partnership (**Appendix 3**).

The report concludes that the development is capable of achieving compliance with the performance provisions of the BCA, either by complying with the prescriptive (deemed-to-satisfy) requirements or via a performance-based approach.



Two performance solutions are proposed. The first relates to fire safety, justifying the omission of fire hose reels to service rooms, sanitary compartments, kitchens, and storage rooms within Blocks A and I. The second relates to non-fire safety, justifying the provision of unisex staff facilities within Block V in lieu of separate sex facilities where more than 10 staff will be present. Deemed-to-satisfy compliance is available for both items.

The implementation of performance solutions shall be in consultation with relevant stakeholders and subject to approval by the certifying authority. Performance solutions for fire safety matters may be subject to consultation with Fire and Rescue NSW prior to the issue of the Construction Certificate.

6.12.2. Access Assessment

An Accessibility Capability Statement has been prepared by DC Partnership (**Appendix 4**).

The report concludes that the development is capable of achieving compliance with the relevant accessibility provisions of the BCA, either by meeting the deemed-to-satisfy requirements or via a performance-based approach.

The proposed buildings are classified as Class 5 (school administration) and Class 9b (assembly/school). Key accessibility provisions include accessible entrances to each upgraded building, accessible paths of travel from the main pedestrian entry at Croobyar Road and from the two accessible car parking spaces within the new 35-space car park, accessible sanitary facilities for students and staff within Buildings A, I and V, and accessible showers within the multi-purpose hall.

Two performance solutions are proposed relating to Building V: the location of the accessible staff facility, and the provision of unisex staff facilities in lieu of separate male and female facilities where staff numbers exceed 10. These matters are capable of being addressed through prior to the issue of a Construction Certificate.

6.13. Economic

The demolition and refurbishment works will generate short-term economic benefits through direct employment of construction workers, tradespeople, and contractors. Local suppliers and service providers in the Milton and broader Shoalhaven region are likely to benefit from procurement of materials, plant hire, and construction services.

The upgrade and repurposing of the former Shoalhaven Anglican School site for the Department will sustain use of an otherwise vacant educational facility, contributing to the productive use of existing assets. The refurbishment approach represents efficient use of existing infrastructure and reduces construction waste and demolition costs. As the facility will be utilised by existing educational staff, no significant new ongoing employment generation is anticipated, however the consolidation of operations supports ongoing economic activity in the Milton locality through maintenance.

The works are contained within the site boundaries with no anticipated disruption to adjoining commercial or residential properties. The proposed works will generate positive economic impacts through construction activity, with no adverse economic impacts on the locality anticipated.



6.14. Social

The proposed demolition and refurbishment of the former Shoalhaven Anglican School site will have positive social impacts on the Milton locality. The adaptive reuse of the vacant school facility represents productive utilisation of existing infrastructure (that might otherwise remain dormant and derelict) and will contribute to a sense of active place-making within the area.

The retention of the site's educational character through continued institutional use maintains continuity with the locality's established social fabric. The facility will provide accessible public education infrastructure serving the Milton and broader Shoalhaven community, addressing educational needs in a growing regional area and supporting families through expanded public education infrastructure.

The refurbishment works minimise construction disruption through retention of existing buildings rather than wholesale redevelopment, reducing the duration and intensity of construction impacts on neighbouring properties and the broader Milton community. The contained nature of demolition works, screened by the existing Budawang School, ensures minimal amenity impacts during the construction phase.

The proposal supports ongoing investment in a regional location. No adverse social impacts are anticipated, with the development maintaining appropriate integration with the surrounding residential and institutional character of the locality.

6.15. Cumulative Impacts

The site is occupied by the operational Budawang School and Budawang Early Learning Centre, which will continue to function independently of the proposed facility. The proposed facility will operate on an intermittent basis approximately one to two times per month per origin school, in contrast to the daily operations of Budawang School and Budawang Early Learning Centre. This low-intensity operational model minimises the potential for cumulative impacts during concurrent use. Furthermore, the site's substantial area of 7.76 hectares provides sufficient capacity to accommodate all three educational uses without unreasonable adverse cumulative impacts.

Physical separation measures include dedicated waste management facilities, separate parking allocations, and security fencing with gated entries to establish clear operational boundaries. The proposed 35-space car park and four bus bays will service the refurbished facility independently of the Budawang Early Learning Centre existing parking area. Site access and security procedures will be integrated into existing General Assistant arrangements, ensuring coordinated management.

Security measures identified in the CPTED assessment, including boundary fence replacement, installation of a gate linking the existing security fence network, and CCTV coverage, will benefit both the proposed facility and Budawang SSP.

During construction, a Construction Environmental Management Plan will be prepared and will require monthly communication with Budawang School and Early Learning Centre to address any potential dust, odour, acoustic, traffic, or other relevant construction impacts. The applicant is agreeable to the imposition of a condition of consent to this effect.



6.16. Suitability of the Site

The proposed development is suitable for the site for the following reasons:

- The proposal is consistent with the aims of the *SLEP 2014* and does not hinder the attainment of the objectives of the Zone RU1 Primary Production, which allows educational establishments as a permissible use.
- The proposal is generally consistent with the relevant environmental planning instruments and the SDCP.
- There are no environmental constraints on or in the vicinity of the site of such significance as to preclude the proposed development. While a part of the site is identified as Bush Fire Prone Land, the accompanying Bushfire Assessment Report (**Appendix 10**) identifies measures to be incorporated that appropriately mitigates risk.
- The site is capable of providing all required services, including sewer, electricity, and NBN, ensuring that the development can be adequately supported.
- The site is located in a suitable location, being a former educational facility, which aligns with the proposed use for public education purposes. The existing infrastructure and proximity to the community make it an ideal location for the proposed development. It is located near other schools in the region that will benefit from its facilities.
- The proposed development will not result in any unreasonable adverse impacts on the environment. Measures will be taken to manage stormwater, protect existing riparian watercourses, and ensure compliance with biodiversity and arborist assessments, including compliance with conditions of consent.

6.17. Public Interest

The proposed development is within the public interest for the following reasons:

- The development delivers educational infrastructure to meet growing demand for public education services in the Shoalhaven region. The adaptive reuse of the former Shoalhaven Anglican School site enables the Department to provide additional quality learning environments for students, supporting the community's long-term educational needs.
- The proposal represents sustainable development through the adaptive reuse of existing buildings and infrastructure. Rather than constructing new facilities on greenfield land, the development refurbishes and repurposes established educational buildings that have been vacant since 2016. This minimises environmental impact by avoiding new construction and associated resource consumption, utilises existing site infrastructure, returns a disused site to productive educational use, and reduces urban sprawl by intensifying use of appropriately zoned, serviced land.
- The development generates positive economic outcomes including:
 - Refurbishment works provide local construction and trades employment opportunities
 - Staff and contractor expenditure supporting local businesses and services.
- Productive use of significant public education assets owned by the Department.



- The proposal delivers social benefits by:
 - Providing accessible public education facilities serving the Milton and broader Shoalhaven community
 - Addressing educational infrastructure needs in a growing regional area
 - Supporting families through expanded public education options
 - Revitalising a site with established educational character and community recognition
- Educational establishments are permissible in the RU1 Primary Production zone, and the site has a demonstrated history of educational use spanning several decades. The development maintains established land use patterns without requiring variations to statutory development standards, demonstrating alignment between the proposal and planning framework objectives.

Therefore, the proposal represents responsible stewardship of public assets and responds to community needs for accessible, quality public education facilities.



7. Conclusion

This SEE has been prepared by Mecone Group Pty Limited on behalf of the Department to support a DA to Shoalhaven City Council for the upgrade of existing buildings and facilities at 17 Croobyar Road, Milton NSW 2538 for public education use. It provides an assessment of relevant matters listed under section 4.15 of the EP&A Act.

As the Application is lodged as integrated development, concurrence is required under the *Rural Fires Act 1997*.

To summarise, the proposal:

- Complies with the SLEP 2014.
- Is generally consistent with the objectives and controls of the SDCP.
- Promotes the efficient reuse and improvement of an abandoned educational establishments in the Shoalhaven LGA.
- Is a suitable development for the site, considering its historical use for educational purposes and the existing infrastructure that supports such a function.
- Results in acceptable environmental impacts, as the proposal includes measures to mitigate any potential adverse effects on the surrounding environment, including bushfire risk management and stormwater management strategies.
- Will offer a high standard of amenity, providing upgraded facilities that meet modern educational needs.
- Generates no unreasonable adverse amenity impacts to adjoining properties.
- The proposal is in the public interest, as it supports the provision of public education facilities, contributing to the community's social and educational development.

On balance, the application is compliant with applicable statutory controls and the proposed use is permissible with consent in the RU1 Primary Production zone. The proposal will deliver positive social, economic, and environmental outcomes through the sustainable adaptive reuse of existing infrastructure, provision of essential educational facilities, and revitalisation of an unused site. The development results in no unacceptable environmental or amenity impacts.

Therefore, the proposal has planning merit and development consent should be granted, subject to appropriate conditions of consent.



