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Addendum Review of Environmental Factors

Extension of the Reconfigured Car Park

Cronulla High School

31 Bate Bay Road, Greenhills Beach

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1 Introduction

1.1 Foreword

A Review of Environmental Factors (REF) was authorised on 22 March 2023 for upgrades to Cronulla High School (CHS) including demolition, the construction of two (2) new buildings and the reconfiguration of a car park. The REF included certification for the works to be undertaken as development without consent under Part 5 of the *Environmental Planning and Assessment Act, 1979* (EP&A Act).

DFP Planning Pty Ltd (DFP) have been engaged by School Infrastructure New South Wales (SINSW) to prepare an Addendum Review of Environmental Factors (AREF) to assess an amendment to the proposed works. The amendment is for the extension of the reconfigured car park from 31 spaces to 43 spaces.


Based on assessment of key environmental aspects and the information presented in this AREF, it is concluded that by adopting the mitigation measures identified in this assessment, it is unlikely that there would be significant environmental impacts associated with the proposed modification.

1.2 Declaration

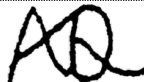
This AREF has been prepared for SINSW on behalf of the NSW Department of Education (DoE) and assesses the potential environmental impacts which could arise from the extension of a reconfigured car park at Cronulla High School, 31 Bate Bay Road, Greenhills Beach.

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

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

Author	Henry Burnett
Qualification	B Planning Macquarie University
Position	Principal Planner, DFP Planning
Signature	
Date	5 February 2024

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

Reviewing Officer	Aryan Qayumi
Qualification	B Planning Macquarie University
Position	Senior Statutory Planning Officer, SINSW
Signature	
Date	6 February 2024

1 Introduction

1.3 School Information

School Name:	Cronulla High School
School Address:	31 Bate Bay Road, Greenhills Beach
Local Government Area:	Sutherland Shire Council
Lot and DP of Proposed Works:	Lot 1 DP 815804
Land Owner:	Minister for Education

1.4 Brief Scope of Works

What are the proposed works?	Extension of a car park
Does the project involve works outside the existing educational establishment?	No
Will the project result in an increase in the educational establishment population (staff or student population) by more than 10% (compared with the average of each of those numbers for the preceding 12-month period)?	No

1.5 Site Context and Surrounds

1.5.1 The Site

The site is located in Greenhills Beach, approximately 1.3km to the north of the Cronulla Town Centre (see **Figure 1**).

Formally identified as Lot 1 DP 815804 and commonly known as 31 Bate Bay Road, Greenhills Beach, the site is occupied by Cronulla High School. Vehicular and pedestrian access to the site is available via Elouera Road (to the south west) and Captain Cook Drive to the west.

School buildings are located within an existing cluster of buildings located towards the south of the site. The northern portion of the site is occupied by ovals and sport's courts (see **Figure 2**).

Scattered vegetation exists between school buildings, with a row of trees planted along the boundaries of the site. The site has a gradual slope down from the east towards the west.

The Certificate of Title for the site includes two (2) notifications (**Appendix 2**). Those notifications relate to:

- L786518 – Easement for Water Supply & Sewerage Purposes; and
- K823023 – Land Excludes Road.

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Figure 1 Locality Plan



Figure 2 Site Aerial.

1.6 REF

The REF was authorised by SINSW on 22 March 2023 for upgrade works to Cronulla High School as described in **Section 1.6.1 to Section 1.6.4**.

1.6.1 Demolition Works

Demolition works include demolition of Building B, hardstand/landscaping at school entry and staged removal of all demountable structures.

1.6.2 New Buildings

The construction of 2 x two (2) storey buildings form part of the REF including:

- Building M comprising canteen, amenities and classrooms; and
- Building L comprising administration, amenities and classrooms.

1.6.3 Car Park Reconfiguration

Car park reconfiguration works include the provision of a 31-space car park for staff.

1 Introduction

1.6.4 Associated Services and Infrastructure

Associated services and infrastructure works include stormwater, waste storage relocation, landscaping works and new switchboard and fire safety measures.

1.6.5 Other Approvals

The REF relied upon separate approval to be obtained for tree removal.

1.7 AREF Guidelines

The NSW Department of Planning and Environment 'Guidelines for Division 5.1 assessments' (June 2022) provides the following guidance in relation to changes to a proposal:

If a proposed activity needs to be altered or modified, the REF document will need to be revised to incorporate the amendment and be reassessed through stages 2 to 4.

If a determination has been made, and a modification (e.g. a change or addition) is proposed, the modification will need to be assessed by either preparing a new REF document, or a REF document addendum.

Section 5.4 of the EP&A Act does not require an assessment of a proposed modification in very limited circumstances – being a modification whose environmental impact has already been considered, that will reduce its overall environmental impact.

A REF document addendum will describe the proposed modification and assessment and consultation undertaken to assess the environmental impacts of the modified proposal. It may be in the form of the original REF document and include the modification, or be an attachment to the original REF document. In both cases a revised comprehensive list of mitigation measures must be included.

In some cases, the addendum may relate to a group or multi-site activity. This may be prepared for a specific site and incorporate a common set of mitigation measures together with site specific mitigation measures.

The modified activity is determined as per the determination process described in Stage 4.

This AREF has been prepared in accordance with the Guidelines as it:

- Assesses the altered proposal in accordance with stages 2 to 4 of the Guidelines (**Section 3 to 5**);
- Describes the proposed modification, assessment and consultation (**Section 2 to 5**);
- Can be considered as an attachment to the original REF;
- Includes a revised comprehensive list of mitigation measures (**Appendix 1**); and
- Includes a section to determine the modified activity (**Section Error! Reference source not found.**)

2 Description of Modification

2.1 Justification of the Proposed Modification

The proposed modification to extend the car park is work permitted without consent under Section 3.37(1)(a)(vi) of SEPP TI. The car park extension will provide an additional 12 car parking spaces to provide a total of 43 car parking spaces within the car park.

2.2 Definition of Proposed Modification

For the purposes of the SEPP TI, the proposed modification is defined as 'development permitted without consent'. For the purposes of Part 5 of the EP&A Act, the proposal is defined as 'works' or an 'activity'. Any reference to 'development', 'works' or an 'activity' is considered to have the same meaning for the purposes of this assessment.

2.3 Summary of Proposed Modification

Plans for the proposed works are provided at **Appendix 2** to this AREF. The proposed works can be summarised as follows:

Car Park Extension

The proposal includes the extension of an at-grade 31 space car park that was reconfigured as part of the REF. The car park extension will provide for an additional 12 car parking spaces, resulting in a total of 43 spaces provided within the school car park.

A comparison of the REF car park reconfiguration plan and proposed AREF car park reconfiguration plan is provided in **Figure 3** and **Figure 4** below.

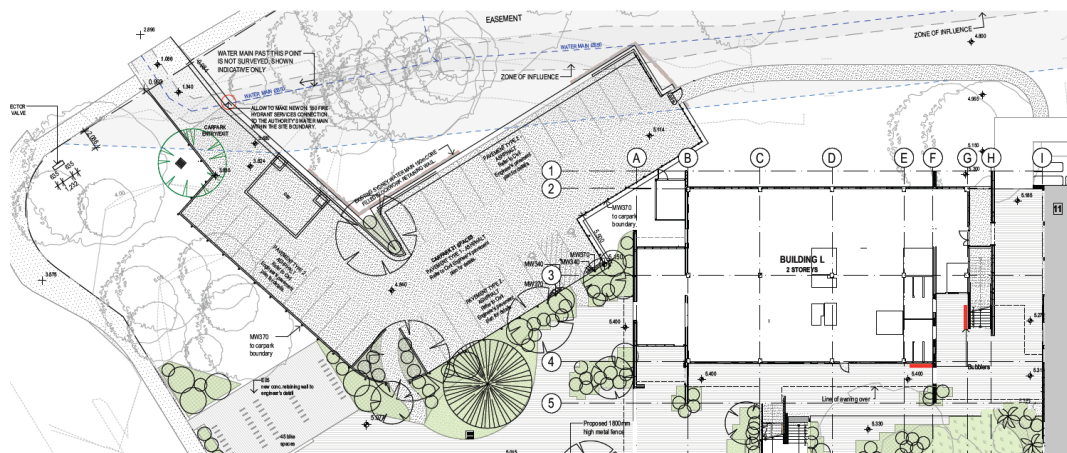


Figure 3 REF Car Park Reconfiguration Plan

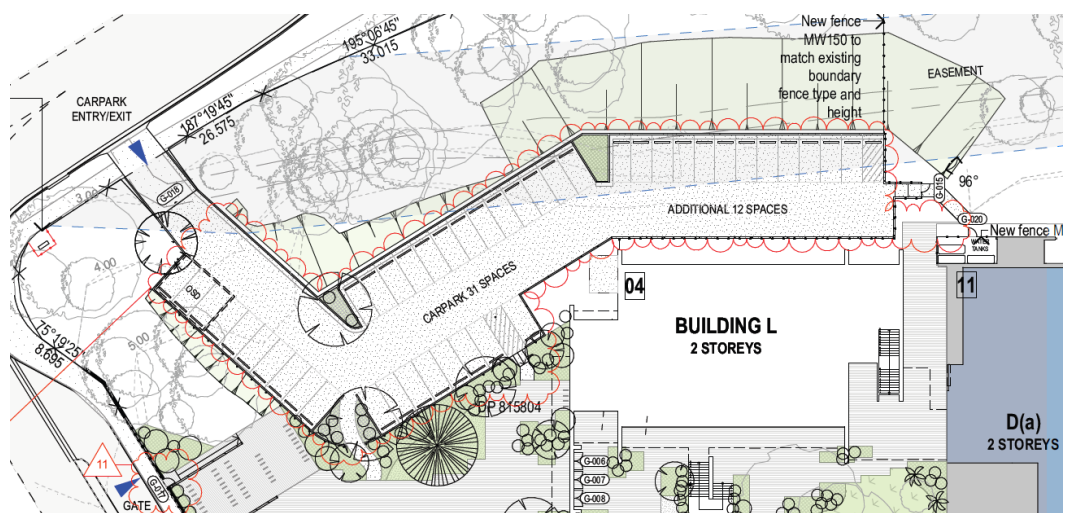


Figure 4 Proposed AREF Car Park Reconfiguration Plan

2 Description of Proposed Works

The cumulative total of on-site car parking spaces at the completion of these extension works would be 83 car parking spaces.

Due to Sydney Water requirements, the extension to the car park must be built on battered fill which will require the removal of a number of trees.

Nine (9) trees in total require removal to facilitate the proposed car park extension and associated works. Notwithstanding, the removal of these trees is subject to a separate planning pathway and does not form part of this REF.

3 Statutory Framework

This Section describes the statutory framework under which the proposed modification has been assessed.

3.1 General Planning Context

LEP Name:	<i>Sutherland Shire Local Environmental Plan 2015</i>
LEP Zoning:	SP2 Infrastructure
Prescribed Zoning of Land Subject to Works:	SP2 Infrastructure
Is the existing zone a prescribed zone under the Education SEPP?	Yes – the SP2 zone is a prescribed zone. Refer Section 3.34 of SEPP TI.
Permissibility:	Development for the purpose of educational establishments is permissible with consent within the SP2 zone under the LEP and under the SEPP TI.
Is the site “environmentally sensitive land” under any environmental planning instrument?	No
Does the site comprise bushfire prone land?	No
List any environmental constraints identified in the Section 10.7 Certificate:	Flood Prone Land Acid Sulfate Soils – Class 3 & 4
Is the site listed as a Heritage Item or within a Heritage Conservation Area?	No

3.2 Strategic Context

3.2.1 Development Control Plans

Sutherland Shire Control Plan 2015 (the DCP) provides a broad range of development and site-specific planning controls across The Sutherland Shire LGA. The works will comply with the relevant parts of the DCP.

It is noted that assessment against the DCP is not a mandatory consideration as SEPP TI is the relevant environmental planning instrument for the proposal and development without consent (under SEPP TI) is not subject to local planning controls.

3.3 State Environmental Planning Policies

3.3.1 State Environmental Planning Policy (Transport and Infrastructure) 2021

The proposed modification does not alter compliance with SEPP TI as previously assessed. Additional consultation was undertaken under Section 3.10 and 3.38 of SEPP TI with Council and NSW SES. The reassessment against the provisions of SEPP TI is provided as follows:

Part 3.1 - Preliminary

Section 3.3 of SEPP TI sets out the following in relation to interpretation of the provisions of the SEPP:

- (1) *A word or expression used in this Chapter has the same meaning as it has in the Standard Instrument unless it is otherwise defined in this Chapter*

educational establishment means a building or place used for education (including teaching), being—

- (a) a school, or

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(b) a tertiary institution, including a university or a TAFE establishment, that provides formal education and is constituted by or under an Act.

***school** means a government school or non-government school within the meaning of the Education Act 1990.*

These definitions are relevant to the assessment of the proposed works as discussed below.

Part 3.2 – General

Division 1 Consultation and Notification

Section 3.8 of SEPP TI sets out the consultation requirements with Council where the works will impact on council-related infrastructure or services. Subject to compliance with the recommendations as detailed within the accompanying documentation, the proposed modification will not result in any substantial impacts on council-related infrastructure or services. No consultation was undertaken under Section 3.8 of SEPP TI.

Section 3.9 of SEPP TI sets out the consultation requirements with Council in relation to development without consent where the works will impact on local heritage item or conservation area. The subject site is not identified as comprising a heritage item and is not located within a heritage conservation area and the works are not considered to impact on any local heritage item proximate to the site (refer to **Section 5.2.4**). No consultation was undertaken under Section 3.9 of SEPP TI.

Section 3.10 of SEPP TI sets out notification requirements to Council and the State Emergency Service (SES) for development on flood liable land. In accordance with Council's online mapping tool, part of the western side of the site is mapped as being flood prone land. The proposed works are partly within this mapped area and as a result, the development was notified to SES and Council on 30 November 2023. Refer to **Section 3.9** for consultation undertaken.

Section 3.11 of SEPP TI requires consideration of the requirements of *Planning for Bush Fire Protection 2019* before carrying out of development in an area that is bush fire prone land. The site does not contain bush fire prone land.

Section 3.12 of SEPP TI sets out consultation with public authorities other than councils. The proposed modification does not meet any of the thresholds for consultation under Section 3.12 of SEPP TI.

Section 3.13 of SEPP TI provides exceptions to consultation. Given the extent of fill proposed, the car park extension cannot be undertaken as exempt development under SEPP TI (or any other environmental planning instrument) and is therefore not exempt from consultation.

Part 3.4 School – Specified Development Controls

Section 3.37 – Development Permitted Without Consent

Section 3.37 of SEPP TI sets out the following provisions for development which may be carried out without consent:

(1) Development for any of the following purposes may be carried out by or on behalf of a public authority without development consent on land within the boundaries of an existing school—

(a) construction, operation or maintenance, more than 5 metres from any property boundary with land in a residential zone and more than 1 metre from any property boundary with land in any other zone, of—

(i) a library or an administration building that is not more than 2 storeys high, or

(ii) a portable classroom (including a modular or prefabricated classroom) that is not more than 2 storeys high, or

(iii) a permanent classroom that is not more than 2 storeys high to replace an existing portable classroom and that is used for substantially the same purpose as the portable classroom, or

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- (iv) a kiosk or shop selling school-related goods to students and staff, such as books, stationery or school uniforms, that is not more than 2 storeys high, or
 - (v) a cafeteria or canteen that is not more than 2 storeys high and carried out in accordance with AS 4674—2004, Design, construction and fit-out of food premises, published by Standards Australia on 11 February 2004, or
 - (vi) a car park that is not more than 1 storey high,
 - (b) minor alterations or additions, such as—
 - (i) internal fitouts, or
 - (ii) alterations or additions to address work health and safety requirements or to provide access for people with a disability, or
 - (iii) alterations or additions to the external facade of a building that do not increase the building envelope (for example, porticos, balcony enclosures or covered walkways),
 - (c) restoration, replacement or repair of damaged buildings or structures,
 - (d) security measures, including fencing, lighting and security cameras,
 - (e) demolition of structures or buildings (unless a State heritage item or local heritage item).
- (2) Subsection (1) applies only if the development does not require an alteration of traffic arrangements, for example, a new vehicular access point to the school or a change in location of an existing vehicular access point to the school.
- (3) Subsection (1)(a) applies only if the development does not result in a prohibited increase in student or staff numbers.
- (4) Nothing in this section authorises the carrying out of development in contravention of any existing condition of the development consent currently operating (other than a complying development certificate) that applies to any part of the school, relating to hours of operation, noise, car parking, vehicular movement, traffic generation, loading, waste management, landscaping or student or staff numbers.
- (5) A reference in this section to development for a purpose referred to in subsection (1)(a), (b) or (c) includes a reference to development for the purpose of construction works in connection with the purpose referred to in subsection (1)(a), (b) or (c).
- (6) This section does not apply to development for the purposes of campus student accommodation.
- (7) In this section—
prohibited increase in student or staff numbers means—
 - (a) an increase in the number of students that the school can accommodate that is more than the greater of 10% or 30 students, compared with the average number of students for the 12 months immediately before the commencement of the development, or
 - (b) an increase in the number of staff employed at the school that is more than 10%, compared with the average number of staff for the 12 months immediately before the commencement of the development.

The following provisions of Section 3.37 are relevant in regard to the works being proposed:

Section 3.37(1)(a)(vi)

- (1) Development for any of the following purposes may be carried out by or on behalf of a public authority without development consent on land within the boundaries of an existing school—
 - (a) construction, operation or maintenance, more than 5 metres from any property boundary with land in a residential zone and more than 1 metre from any property boundary with land in any other zone, of—
 - (vi) a car park that is not more than 1 storey high

Comment: The proposed at grade car park extension is development that can be undertaken as development without consent, pursuant to Section 3.37(1)(a)(vi) SEPP TI.

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Section 3.37(2) – Traffic Arrangements

Subsection 3.37(2) of the SEPP TI states as follows:

- (1) *Subsection (1) applies only if the development does not require an alteration of traffic arrangements, for example, a new vehicular access point to the school or a change in location of an existing vehicular access point to the school.*

Comment: No changes to existing traffic arrangements are proposed.

Section 3.37(3) & (7) – Prohibited increase in students

Subsection 3.37(3) of SEPP TI states as follows:

- (3) *Subsection (1)(a) applies only if the development does not result in a prohibited increase in student or staff numbers.*

Comment: Under Section 3.37(7) of SEPP TI, prohibited increase in student or staff numbers is defined as follows:

prohibited increase in student or staff numbers means—

- (a) *an increase in the number of students that the school can accommodate that is more than the greater of 10% or 30 students, compared with the average number of students for the 12 months immediately before the commencement of the development, or*
- (b) *an increase in the number of staff employed at the school that is more than 10%, compared with the average number of staff for the 12 months immediately before the commencement of the development.*

The proposed development relating to a car park extension do not relate to any increase in the number of students or staff.

Section 3.37(4) - Development Consent

Section 3.37(4) of SEPP TI states as follows:

- (4) *Nothing in this clause authorises the carrying out of development in contravention of any existing condition of the development consent currently operating (other than a complying development certificate) that applies to any part of the school, relating to hours of operation, noise, car parking, vehicular movement, traffic generation, loading, waste management, landscaping or student or staff numbers.*

A review of Council's DA tracker identifies the following previous development consents issued for the site:

- **Development Consent No. DA13/0926 (as modified); and**
- **Development Consent No. DA23/0118.**

Comment: Following a review of these development consents, the proposed works will not contravene any existing conditions of development consent currently operating with respect to hours of operation, noise, car parking, vehicular movement, traffic generation, loading, waste management, landscaping or student or staff numbers.

Council was contacted as part of preliminary investigations undertaken during the REF, to seek a copy of the consent that related to the construction and operation of the school since it's commencement in 1961. Council advised that records held only date back until 1968 (Attachment 12 to the REF).

Section 3.38 – Notification of carrying out of certain Development Without Consent

Comment: Section 3.38 of SEPP TI sets out consultation requirements for development without consent, including consultation with the Council for the area in which the land is located (being Sutherland Shire Council). Refer to **Section 3.9** for consultation undertaken.

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3.3.2 State Environmental Planning Policy (Resilience and Hazards) 2021

Chapter 2 – Coastal Management

The proposed modification does not alter compliance with Chapter 2 – Coastal Management as previously assessed. While the proposal increases the extent of development within the buffer zone to coastal wetlands (which are located to the north of Captain Cook Drive), the existing mitigation measures including erosion and sediment control are sufficient to avoid impacts.

Chapter 4: Remediation of Land

The proposed modification requires further consideration against Chapter 4 of *State Environmental Planning Policy (Resilience and Hazards) 2021* (SEPP RH).

The REF was accompanied by a Detailed Site Investigation (Attachment 15 to the REF) which identified an area as having soils impacted by Asbestos Containing Material (ACM) as shown in **Figure 5**.



Figure 5 ACM Impacted Soils

The REF was further accompanied by a Remedial Action Plan (RAP) (Attachment 17 to the REF) which included a methodology for the on-site reburial and capping of ACM impacted soils.

The proposed car park extension area is within the area identified in the DSI/RAP as containing soils impacted by ACM.

The proposed car park extension works alter the proposed civil design in this location including the introduction of a batter which may impact the methodology for capping outlined in the RAP.

Accordingly, the RAP will be required to be revised prior to the commencement of works to address the modification to the car park design. Refer to **Appendix 1** for revised mitigation measures.

Subject to receipt and implementation of the modified RAP, the REF (as modified) would be capable of satisfying the provisions of SEPP RH.

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3.4 State Environmental Planning Policy (Biodiversity and Conservation) 2021

Chapter 6 – Water Catchments

Chapter 6 of *State Environmental Planning Policy (Biodiversity and Conservation) 2021* (SEPP BC) is a relevant planning consideration.

The proposed modification is not on part of the site that is land within the Georges River Catchment. That is, the proposed modification is to the south of the catchment boundary as shown in **Figure 6**. Accordingly, the proposed modification is not subject to the provisions of SEPP BC.



Figure 6 Georges River Catchment Boundary

3.5 Sutherland Local Environmental Plan 2015

Table 1 provides an assessment of the proposed modification against the relevant provisions of the LEP.

Table 1 Assessment of proposal against relevant provisions of the Sutherland LEP		
Provision	Assessment	Consistent
Clause 2.2: Zoning - SP2 Infrastructure	The site is zoned SP2 Infrastructure under the LEP. Educational Establishments, including schools, are permissible within the SP2 zone under the LEP.	Yes
Clause 4.3: Height of Buildings - Max. 12m	The site is subject to a maximum building height restriction of 12m. The proposed development relating to a car park extension does not exceed the height limit.	Yes
Clause 5.10: Heritage Conservation	<p>The site does not comprise an item of heritage significance and is not located within a heritage conservation area.</p> <p>The site is in proximity to two (2) State listed heritage items and one locally listed archaeological site 'Four wheel drive track' (Item No. A2523) within the Captain Cook Drive road reserve.</p> <p>The proposed modification results in a minor increase to the car park area and does not result in a material change to the heritage impact as previously assessed.</p>	Yes

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Table 1 Assessment of proposal against relevant provisions of the Sutherland LEP

Provision	Assessment	Consistent
Clause 5.21 Flood Planning	<p>The proposed modification is wholly outside of the flood planning area (being the area below the flood planning level which is the 1% AEP flood level plus freeboard).</p> <p>Accordingly, the provisions of Clause 5.21 do not apply to the proposal.</p> <p>It is noted that the proposed modification is between the flood planning area and the probably maximum flood (PMF) level.</p> <p>A flood impact assessment has been prepared by Stantec to assess the potential flood impacts associated with the proposed works (Appendix 3).</p>	Yes
Clause 6.1 Acid Sulfate Soils	<p>The site is mapped as Class 3 & Class 4 Acid Sulfate Soils (ASS). The REF included preliminary laboratory testing of soil samples was undertaken to understand the ASS risk for the site. The results of these tests are documented in the Geotechnical Report prepared by Mertens.</p> <p>As provided in Appendix A of the Geotechnical Report, there are borehole locations as part of the assessment that are within the vicinity of the proposed car park extension.</p> <p>The results of the laboratory testing found that none of the tested soil samples exceeded the action criteria for the acid trail. It was therefore concluded that excavation in the proposed development areas will not require the preparation of an Acid Sulfate Soils Management Plan to address risk associated with ASS and potential acid generation.</p>	Yes
<p>Clause 6.2: Earthworks</p> <p>(3) In deciding whether to grant development consent for earthworks (or for development involving ancillary earthworks), the consent authority must consider the following matters—</p> <p>(a) the likely disruption of, or any detrimental effect on, drainage patterns and soil stability in the locality of the development,</p> <p>(b) the effect of the development on the likely future use or redevelopment of the land,</p> <p>(c) the quality of the fill or the soil to be excavated, or both,</p> <p>(d) the effect of the development on the existing and likely amenity and structural integrity of adjoining properties,</p>	<p>Subject to drainage being managed in accordance with the Stormwater Management Plan (SMP) prepared by Cardno/Stantec (Attachment 5 to REF as modified by Appendix 4), the proposed development is not likely to result in any detrimental impacts on drainage patterns and soil stability in the locality of the development.</p> <p>The proposed development is not likely to impact the future use or redevelopment of the land.</p> <p>The quality of the soil to be excavated is addressed in the DSI and RAP and can be appropriately handled subject to compliance with the RAP.</p> <p>The proposed car park extension is located entirely within the boundaries of the site and screened by existing vegetation to the north. The works are also located a considerable distance away from residential properties towards the east of the site and therefore, it is unlikely that the development will adversely affect the amenity and structural integrity of adjoining properties.</p>	Yes

3 Statutory Framework

Table 1 Assessment of proposal against relevant provisions of the Sutherland LEP

Provision	Assessment	Consistent
(e) the source of any fill material and the destination of any excavated material,	As per RAP.	
(f) the likelihood of disturbing relics,	The proposal is unlikely to disturb relics. However, if during the construction phase of the development any relics are found, works will cease immediately and the relevant authority will be contacted.	
(g) the proximity to, and potential for adverse impacts on, any waterway, drinking water catchment or environmentally sensitive area,	Subject to implementation of appropriate erosion and sediment control measures, the proposed works are unlikely to impact on any waterway, drinking water catchment or environmentally sensitive area.	
(h) any appropriate measures proposed to avoid, minimise or mitigate the impacts of the development.	The development must be in accordance with the Mitigation Measures (Appendix 1), to avoid, minimise or mitigate the impacts of the development.	
Clause 6.13A Green Grid Links	The Green Grid map extends into the first 10m of the site from Captain Cook Drive. The works are wholly outside (10.5m setback) the mapped area and accordingly the provisions of Clause 6.13A do not require further assessment.	Yes

3.6 Environmental Planning and Assessment Act 1979

The provisions of SEPP TI allow the proposed works to be carried out as development without consent under Part 5 of the EP&A Act.

This addendum REF also considers the requirements of Section 6.28 of the EP&A Act and Section 170 and Section 171 of the EP&A Regulation.

3.7 Additional Relevant Legislation

The following legislation is also potentially applicable to the proposed development. The proposed works are not inconsistent with any of the provisions of these Acts (where applicable). Any approvals required under this legislation (if any) have been documented in **Section 3.8**.

3.7.1 NSW Legislation

- *State Environmental Planning Policy (Biodiversity and Conservation) 2021 – Chapter 2 – Vegetation in Non-Rural Areas*
- *National Parks and Wildlife Act 1974;*
- *Heritage Act 1977;*
- *Aboriginal Land Rights Act 1983;*
- *Local Government Act 1993;*
- *Roads Act 1993;*
- *Rural Fires Act 1997;*
- *Waste Avoidance and Resource Recovery Act 2001;*
- *Work Health and Safety Act 2011;*
- *Work Health Safety Regulations 2017;*
- *Biodiversity Conservation Act 2016;* and
- *Clause 61 of the EP & A Regulation 2021, and AS 2061-1991 – Demolition of Structures.*

3 Statutory Framework

3.7.2 Commonwealth Legislation

- *Disability Discrimination Act 1992*
- *Native Title Act 1993*
- *Environment Protection and Biodiversity Conservation Act 1999;*

3.8 Approvals, Certificates and Authorities

3.8.1 State Environmental Planning Policy (Biodiversity and Conservation) 2021

Chapter 2 – Vegetation in Non-Rural Areas

The proposed modification would require the removal of nine (9) additional trees. The tree removal would require a permit under Chapter 2 of SEPP BC. The REF mitigation measures include a requirement to obtain separate approval for tree removal.

3.9 Consultation

3.9.1 Consultation – Council

Section 3.8 of SEPP TI, relating to ‘*consultations with councils-development with impacts on council related infrastructure or service*’, states the following:

(1) This section applies to development carried out by or on behalf of a public authority that this Chapter provides may be carried out without development consent if, in the opinion of the public authority, the development—

(a) will have a substantial impact on stormwater management services provided by a council, or

(b) is likely to generate traffic to an extent that will strain the capacity of the road system in a local government area, or

(c) involves connection to, and a substantial impact on the capacity of, any part of a sewerage system owned by a council, or

(d) involves connection to, and use of a substantial volume of water from, any part of a water supply system owned by a council, or

(e) involves the installation of a temporary structure on, or the enclosing of, a public place that is under a council’s management or control that is likely to cause a disruption to pedestrian or vehicular traffic that is not minor or inconsequential, or

(f) involves excavation that is not minor or inconsequential of the surface of, or a footpath adjacent to, a road for which a council is the roads authority under the Roads Act 1993 (if the public authority that is carrying out the development, or on whose behalf it is being carried out, is not responsible for the maintenance of the road or footpath).

(2) A public authority, or a person acting on behalf of a public authority, must not carry out development to which this section applies unless the authority or the person has—

(a) given written notice of the intention to carry out the development (together with a scope of works) to the council for the area in which the land is located, and

(b) taken into consideration any response to the notice that is received from the council within 21 days after the notice is given.

Comment: Sutherland Shire Council (Council) was notified of the proposed modification on 30 November 2023. Council provided a response on 18 January 2024 (**Appendix 13**) in which they requested consideration of landscaping and trees, engineering, and construction management. A summary of the comments provided and a response is provided as follows:

Landscaping & Trees

Council’s preference would be to remove the need for the batter to the west of the car park, so as to reduce the amount of tree removal required. Notwithstanding, if trees are removed, Council has requested that trees are replaced onsite at a ratio of 8:1.

3 Statutory Framework

Response: Sydney Water was consulted in preparation of the car park extension design. Sydney Water did not support a retaining wall in the easement and require a batter. Accordingly, it is not possible to provide for a retaining wall in this location for the purpose of minimising tree removal. Tree removal and associated tree replacement planting requirements is the subject of a separate tree permit application and does not form part of this AREF.

Engineering

Council has recommended that consultation with Sydney Water be undertaken prior to the commencement of works, in order to restrict impact to the Sydney Water asset that is located within the vicinity of the car park. Council's preference is that the car park is supported on piers.

Response: Sydney Water has been consulted (as above).

Construction

Council has requested a number of conditions be imposed relating to works on public land, car park design, stormwater drainage and Sydney Water.

Response: The matters raised by Council are already incorporated within the REF mitigation measures or design.

3.9.2 Consultation – Occupiers of Adjoining Land

Section 3.38 of SEPP TI relates to consultation and states the following:

3.38 Notification of carrying out of certain development without consent

- (1) *This section applies to development to which section 3.37(1)(a) applies.*
- (2) *Before development to which this section applies is carried out, the proponent of the development must—*
 - (a) *give written notice of the intention to carry out the development to the council for the area in which the land is located (unless the proponent is that council) and to the occupiers of adjoining land, and*
 - (b) *take into consideration any response to the notice that is received within 21 days after the notice is given.*

Comment: Occupiers of adjoining land were notified of the proposed modification by the school on 30 November 2023. No responses were received.

3.9.3 Consultation – NSW State Emergency Service

Section 3.10 of SEPP TI relating to 'notification of councils and State Emergency Service—development on flood liable land' states the following:

- (1) *A public authority, or a person acting on behalf of a public authority, must not carry out, on flood liable land, development that this Chapter provides may be carried out without development consent (other than demolition of buildings or structures, or internal works to existing buildings) unless the authority or person has—*
 - (a) *given written notice of the intention to carry out the development (together with a scope of works) to the council for the area in which the land is located and the State Emergency Service, and*
 - (b) *taken into consideration any responses to the notice that are received from the council and State Emergency Service within 21 days after the notice is given.*
- (2) *In this section, flood liable land means land that is susceptible to flooding by the probable maximum flood event, identified in accordance with the principles set out in the manual titled Floodplain Development Manual: the management of flood liable land published by the New South Wales Government and as in force from time to time.*

Comment: State Emergency Services (SES) was notified of the proposed modification on 30 November 2023. A response was received from SES on 21 December 2023 (**Appendix 12**) recommending consideration of the impact of flood behaviour on the surrounding areas, infrastructure and people using the site.

3 Statutory Framework

Response: Refer to **Section 5.2.2** for details of the flood assessment undertaken for the AREF. It is noted that the REF already includes mitigation measures relating to SES requirements (Refer to Mitigation Measure No. 37 in **Appendix 1**).

4 Environmental Risk Assessment

4.1 Assessment Method

The methodology applied to the environmental risk assessment for the proposed modification is as follows:

- Initial risk assessment of environmental constraints based upon:
 - Review of relevant planning controls and legislation;
 - Review of consultant plans and reports; and
 - Examination of aerial photographs, site photos and site inspection.
- Identifying potential environmental risks/impacts associated with the proposed modification;
- Evaluating identified risks/impacts to determine the potential for occurrence and degree of severity; and
- Identifying and determining suitable environmental management procedures and control measures appropriate for the proposed works as modified.

Section 171 of the *Environmental Planning and Assessment Regulation 2021* sets out which factors must be taken into account when assessing the impact of an activity on the environment. The proposed modification has been evaluated in the context of these provisions in **Section 5** of this addendum REF, while applicable environmental management procedures and control measures are summarised in the Mitigation Measures (**Appendix 1**).

4.2 Site Constraints

Table 2 identifies constraints applicable to the site. Where an environmental issue is identified, impact assessment is provided in **Section 5** and mitigation is provided in **Appendix 1**.

4 Environmental Risk Assessment

Table 2 Site Constraints

Constraint	Factor	Yes	No	Action
Contamination	Is the site affected by contamination as identified in Section 10.7 Certificate or 'List of NSW contaminated sites notified to the EPA' and/or potentially affected by contamination?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The site is not identified as being contaminated in the Section 10.7 planning certificate or listed on the NSW contaminated land sites notified by the EPA.
	Does the project involve demolition of buildings or part of a building that may contain Asbestos?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The proposed modification will result in the disturbance of soils containing Asbestos Containing Material. The REF also includes disturbance addressed in a Remedial Action Plan (Attachment 17 to the REF). The proposed modification warrants modification to the Remedial Action Plan which forms part of the revised mitigation measures (Appendix 1).
	Does the project require the disturbance of any other hazardous material (e.g. lead paint, lead dust, PCBs, ozone depleting substances)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The proposed modification does not require the disturbance of any other hazardous materials.
Flooding	Is the site affected by flooding? (i.e. is the land below the 1 in 100 year flood planning level)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The proposed modification is wholly outside the 1 in 100 year flood planning level, but is partially within the PMF level. A flood impact assessment (Appendix 3) concludes the proposed works will have negligible impact on the PMF distribution.
Coastal Hazards	Is the site identified within the coastal zone in the <i>Coastal Management Act 2016</i> OR has the site been identified by Council as affected, or potentially affected, by existing and future coastal hazards? This includes coastal storm erosion and recession of land due to sea level rise.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Pursuant to <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> (SEPP RH), part of the site is mapped as a Coastal Use Area and part of a Coastal Environment Area. Having regard to Section 2.10 and Section 2.11 of SEPP RH it is unlikely that the proposed car park extension works will result in adverse impacts on the surrounding coastal environment, subject to the implementation of erosion and sediment controls measures and developing in accordance with an updated Construction Management Plan.
Bushfire Hazard	Is the land nominated as Bushfire Prone Land on the Section 10.7 Certificate or is the site within 100m of unmanaged bushland?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The site is not mapped as bush fire prone land.
Threatened Species	Does the Project involve the clearing of vegetation that would affect any threatened species? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, answer the following two questions:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The proposed modifications would result in the removal of nine (9) trees. The removal is subject to separate approval.
	Has the Section 10.7 Certificate and/or consultation with Council and/or review of the OEH critical habitat register identified a known critical habitat or threatened species, populations or endangered ecological communities and their habitat on or in close proximity to the site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A

4 Environmental Risk Assessment

Table 2 Site Constraints

Constraint	Factor	Yes	No	Action
	Is the Project Site adjacent to an area of bushland (including a National Park, State Forest, Council Reserve or area of unmanaged bushland) OR a natural watercourse (including a creek, river, estuary, lake or wetland)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
Native Vegetation	Does the project involve the clearing of native vegetation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Tree removal required by the proposed modification is subject to separate approval.
Aboriginal Cultural Significance	Has the Section 10.7 certificate and/or consultation undertaken with Council identified that the site has, or is likely to have, significance to Aboriginal people, AND / OR will the proposed project impact on an Aboriginal place or known Aboriginal Objects?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The Section 10.7 Certificate has not identified the site as having or likely to have significance to Aboriginal people, an Aboriginal place or known Aboriginal objects. Furthermore, a AHIMS Search was undertaken on 28 November 2023, which does not identify any aboriginal sites within the boundaries of the school. Two (2) Aboriginal items are identified approximately 250m towards the north east and east of the site respectively. Due to the minor nature of the proposed works, it is unlikely that the identified Aboriginal site's will be affected, subject to compliance with the Mitigation Measures.
	Is the site in an area very highly disturbed /modified (i.e. does it contain large areas of sealed surface, fill or previously excavated areas?)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No action required.
	If NO, does the project involve more than 1ha of ground disturbance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No action required.
	Is the project site within 200m of a high-water mark of coastal waters of NSW?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No action required.
	Is the project site within 200m of a wetland, coastal lake or waterway?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The site is located within 200m of a mapped wetland area, towards the west of the site. The mapped wetland is towards the western side of Captain Cook Drive, being the Woollooware Wader Lagoon. Subject to the implementation of erosion and sediment controls measures and developing in accordance with an updated Construction Management Plan, it is unlikely that any adverse impacts towards the wetland area will be generated by the proposed car park extension works.
	Is the project site located on a sand sheet or within a dune area located on a ridge top?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No action required.
	Is the project site within 20m of a cave, rock shelter, or a cave mouth?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No action required.
Acid Sulphate Soils	Is the site less than 6m AHD?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No action required.
	Does the site contain acid sulphate soils of Class 1-4?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The geotechnical report accompanying the REF (Attachment 16) did not recommend any specific mitigation measures in relation to acid sulfate soil construction or management requirements.

4 Environmental Risk Assessment

Table 2 Site Constraints

Constraint	Factor	Yes	No	Action
	If YES, does the Project involve the excavation of more than 1 tonne of soil?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No action required.
Mine Subsidence	Is the land located in a Mine Subsidence District?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No action required.
Land Slip	Does the Section 10.7 Certificate and/or consultation with the relevant council identify the site as being affected by land slip?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No action required.
Heritage	Does the site contain an item of local or state heritage significance or is the site located in the vicinity of a local or state heritage item?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The site is located in the vicinity of a heritage item, located on the western side of Captain Cook Drive, known as Towra Point Nature Reserve and Quibray Bay. Notwithstanding, this heritage item is located approximately 160m to the north of the proposed car park extension and is screened by existing vegetation. It is unlikely that any heritage impacts would be generated by the proposed works.
Other	Is the project site subject of any other known environmental constraint following review of the Section 10.7 Certificate and consultation with the relevant local council?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No action required.

5 Environmental Impact Assessment

This section provides an environmental impact assessment for the proposed modification. The assessment includes an overview of the proposal and provides additional information for any specific environmental issues relating to the site which required more detailed consideration.

5.1 Matters of National Environmental Significance

In assessing the impact of the proposal for the purposes of the Commonwealth EPBC Act 1999, the factors are summarised in **Table 3**.

Table 3 EPBC Act 1999 Checklist	
Factor	Yes/No
Any significant impact on a declared World Heritage Property?	No
Any significant impact on a National Heritage place?	No
Any significant impact on a declared RAMSAR wetland?	No
Any significant impact on Commonwealth listed threatened species or endangered community?	No
Any significant impact on Commonwealth listed migratory species?	No
Does any part of the proposal involve nuclear actions?	No
Any significant impact on Commonwealth marine areas?	No
Any significant impact on the Great Barrier Reef Marine Park?	No
Any significant impact on Commonwealth land?	No

5.2 Detailed Environmental Assessment

The following environmental aspects are considered to be applicable to the proposed modification:

- Remediation
- Flooding
- Traffic and Parking
- Heritage
- Stormwater

5.2.1 Remediation

The proposed modification is in an area of soils containing Asbestos Containing Material (ACM) as detailed in **Section 3.3.2** of this AREF warranting a revision to the RAP as a mitigation measure (Refer to **Appendix 1**).

5.2.2 Flooding

The proposed modification is wholly outside the flood planning area. The proposed modification is partially on land mapped as being affected by the probably maximum flood (PMF) by Council.

Figure 7 details the location of the batter required for the car park extension in relation to the PMF extent. The area outlined in yellow is where the batter coincides with the PMF mapping.

5 Environmental Impact Assessment

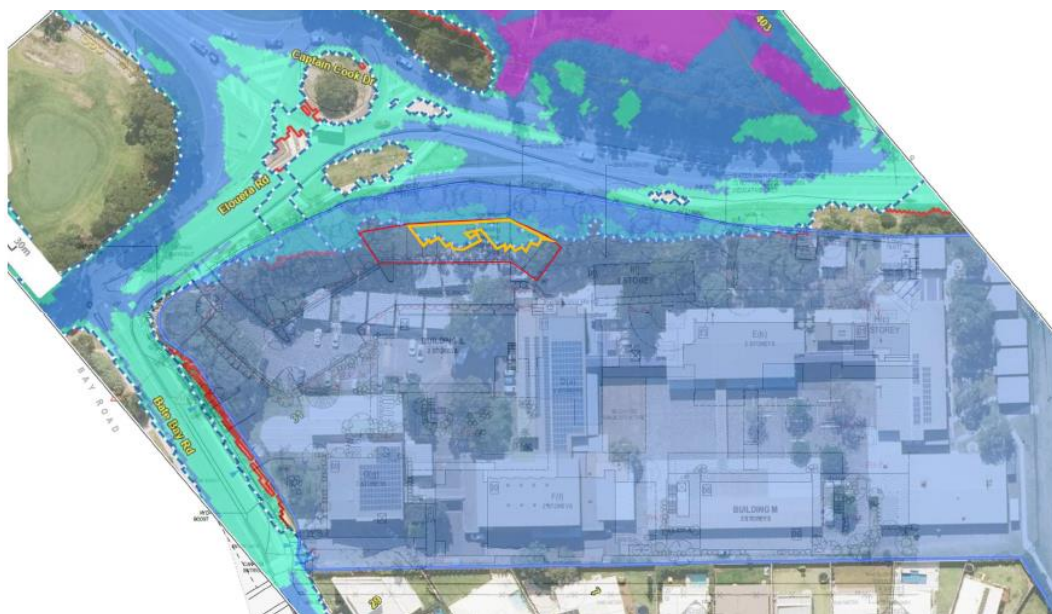


Figure 7 Location of proposed batter overlaid onto PMF Flood Extents map

The flood impact assessment prepared by Stantec (**Appendix 3**) concludes the following:

As the proposed landscape batter is located within the low risk, flood fringe extents of the PMF storm event, earthworks have no functional use outside of dense landscaping, whilst also having no properties directly either side of the zone undergoing earthworks, the assessment of flood impact should be based around the 1% AEP flood extents. This is based on the works to the proposed zone not being sensitive or hazardous to nearby development.

It should be noted that flood modelling undertaken does not take into account any existing stormwater infrastructure or potential proposed infrastructure upgrade which would have a beneficial effect on flood levels internal and external to the site. This flood modelling is considered worst-case scenario.

Following the overlay of the proposed topographical design of the school upgrade works, it was viewed that within the 1% AEP storm flood extents, the topographical surface adjustments were negligible and would not change flooding conditions in the areas around the property boundary. As design adjustments are negligible along the site boundary, flood storage is also not impacted.

5.2.3 Traffic and Parking

A Traffic Impact Assessment (TIA) prepared by Taylor Thomson Witting (TTW) accompanied the REF (Attachment 8). The TIA determined that the following in relation to traffic and parking:

- **Traffic** – the proposed development would not adversely impact the surrounding road network; and
- **Parking** - that the 71 car parking spaces proposed (across the site as a whole, including 31 in the subject car park) would be sufficient to meet the car parking demand of 78 staff and that there was no requirement under the DCP to provide for on-site parking for students.

This proposed modification seeks to reinstate the existing number of staff parking spaces from the Captain Cook Drive/Elouera Avenue entrance. Accordingly, the previous SIDRA modelling of the intersection as performing adequately in the AM and PM Peak Hours would continue to apply.

Construction parking and traffic management was previously considered in the REF and the proposed modifications do not warrant any change to the existing mitigation measures.

5 Environmental Impact Assessment

TTW has also prepared a Traffic Statement which has considered the traffic and transport impacts relating to the car park extension works, proposed as part of this addendum REF (**Appendix 11**). In relation to parking, the demand will remain at 71 car parking spaces, given the proposal does not seek any increase in student and staff capacity. In this regard, the additional 12 car parking spaces will provide for more on-site parking than is required.

With regard to traffic impacts resulting from the proposed car park extension works, TTW has assessed the intersection performance of nearby intersections (pre-development condition), with the results showing good performance (Level of Service (LoS) A-B). The conclusions of the Traffic Statement are that there is sufficient capacity in the surrounding road network to accommodate the minor increase in traffic demand that could be generated by the proposal. In this regard, the proposal is unlikely to significantly alter the surrounding traffic conditions.

5.2.4 Heritage

Aboriginal Cultural Heritage

An Aboriginal Heritage Information Management System (AHIMS) search was conducted on 28 November 2023 (**Appendix 7**) to confirm whether the AHIMS had been updated since the March 2023 authorisation of the REF. The AHIMS search identified two (2) Aboriginal sites within 200m of the school site. The location of these Aboriginal sites is shown in **Figure 8** below. The AHIMS Search has not changed from the REF.



Figure 8 Extract from AHIMS Search

The Aboriginal Heritage Due Diligence Report (Attachment 14 to the REF) was reviewed in relation to the area of the car park extension. The review did not raise any concerns noting that the report was prepared at concept design phase and included a building at the time, in the location of the proposed car park extension. No objection was raised in the report in relation to the placement of that building. Mitigation measures are already in place in the REF in relation to Aboriginal Heritage.

Heritage

The proposed modification does not alter the assessment as previously undertaken in the REF. The site does not contain a listed heritage item under any environmental planning

5 Environmental Impact Assessment

instrument or the *Heritage Act 1977*. The impacts to heritage items within the vicinity of the site from the car park extension, to be situated on finished ground level are considered to be negligible.

5.2.5 Stormwater

The proposed modification increases the extent of hardstand on the site. The increase in hardstand has been accounted for within the amended civil plans (**Appendix 4**) including a new pit which connects into a relocated OSD tank.

In comparing the REF civil plans and addendum civil plans, the OSD tank location and size have been altered.

The relocation and resizing of the OSD tank is not subject to this proposed modification, and is a change previously made as a modification that would not require an addendum or new REF.

The civil engineer has confirmed that the reduced OSD tank size (from 70m³ to 42m³) is a result of the project undergoing detailed design phase (using a Drains Model) to ensure that post-development flows are not greater than, or are equal to, pre-development flows.

While the change to OSD location and size does not form part of this AREF, the OSD has been appropriately sized to cater for the increased hardstand.

5.2.6 Accessibility

The AREF is accompanied by a statement confirming the car park extension complies with the relevant accessibility criteria/legislation (**Appendix 9**).

5.3 Section 6.28 of the EP&A Act

Section 6.28(2) (formerly section 109R) of the EP&A Act sets out controls for Crown building work and other Crown development, as follows:

- (2) *Crown building work cannot be commenced unless the Crown building work is certified by or on behalf of the Crown to comply with the Building Code of Australia in force as at:*
 - (a) *the date of the invitation for tenders to carry out the Crown building work, or*
 - (b) *in the absence of tenders, the date on which the Crown building work commences, except as provided by this section.*

This AREF has been prepared on behalf of SINSW, who will review and authorise this AREF. Subsequent appropriate certification of the works on behalf of the Crown will be undertaken by a suitably qualified Crown Certifier in accordance with Section 6.28 of the Act, if required.

5.4 Section 171 of the EP&A Regulation Considerations

Section 171 of the Regulation details factors which must be taken into account when assessing the impact of an activity on the environment. These factors are addressed in **Table 4**.

5 Environmental Impact Assessment

Table 4 Factors for Consideration under Section 171 of Environmental Planning and Assessment Regulation 2021

Factor	Impact Assessment	Mitigation Action Reference
a) the environmental impacts on the community;	The proposed modification extends the car park reconfiguration authorised under the REF. The existing environmental protection measures are considered satisfactory to mitigate and minimise the environmental impacts. A revised stormwater plan, and erosion and sediment control plan, accompany the AREF.	2, 13
b) the transformation of a locality;	The proposed modification will adjust the location of an existing batter towards Captain Cook Drive for the purpose of providing a level area for the car park extension. The proposed extended car park reconfiguration, replaces the existing 43 staff parking spaces with 43 staff parking spaces (being 31 staff parking spaces in the REF, and an additional 12 staff parking spaces in the AREF). The proposed modification is therefore similar in form and scale in terms of its impacts on the locality albeit adjusted to provide a design that is accessible and compliance with the relevant Australian Standards for car parking areas.	Nil
c) the environmental impact on the ecosystems of the locality;	The proposed modification will necessitate tree removal (through a separate planning approval pathway). The vegetation is noted in the REF flora and fauna report (Attachment 13) as being planted native vegetation and not forming part of an ecosystem.	6
d) reduction of the aesthetic, recreational, scientific or other environmental quality or value of the locality;	The proposed modification forms part of a suite of works within the setback area to Captain Cook Drive and Elouera Road that will enhance the aesthetic and environmental quality of the locality through a revised design that removes demountables, formalises car parking and provides new landscaping, retaining trees where practical/possible.	2
e) the effects on any locality, place or building that has – (i) aesthetic, anthropological, archaeological, architectural, cultural, historical, scientific or social significance, or (ii) other special value for present or future generations,	The proposed modification does not impact on any of these features.	N/A
f) the impact on the habitat of any protected animals (within the meaning of the Biodiversity Conservation Act 2016),	The proposed modification would not exceed the threshold requiring entry to the Biodiversity Offsets Scheme. The removal of additional trees is subject to separate assessment under the tree permit application process and the provisions of <i>SEPP (Biodiversity and Conservation) 2021</i> . Notwithstanding, the proposed modification is considered to generally be consistent with the recommendations of the flora and fauna assessment prepared as part of the REF (Attachment 13).	6
g) The endangering of any species of animal, plant or other form of life, whether living on land, in water or in the air,	The removal of additional trees is subject to separate assessment under the tree permit application process and the provisions of <i>SEPP (Biodiversity and Conservation) 2021</i> .	6
h) long-term effects on the environment,	The proposed modification will not result in any long-term effects on the environment.	2, 13, 14, 15
i) degradation of the quality of the environment,	During the works there may be short term impacts to the quality of the environment. These impacts will require mitigation during the works.	13

5 Environmental Impact Assessment

Table 4 Factors for Consideration under Section 171 of Environmental Planning and Assessment Regulation 2021

Factor	Impact Assessment	Mitigation Action Reference
j) Risk to the safety of the environment,	The presence of soils containing Asbestos Containing Material (ACM) has been considered as part of the AREF. The measures within the RAP are no longer suitable given the change from 'retained' fill to a batter and the RAP requires revision accordingly. That is, to address the suitability of the batter to contain contaminated soils in-situ. The revised RAP is likely to either provide recommendations as to how the capping layer at the batter edge would work, or recommend off-site disposal.	7, 36
k) Any reduction in the range of beneficial uses of the environment,	The proposed modification facilitates the ongoing use of the site as an educational establishment.	-
l) pollution of the environment,	The proposed modification can be appropriately managed (during construction and operation) to mitigate pollution of the environment through appropriate stormwater management, erosion and sediment control measures, tree protection measures and other requirements within the construction environmental management plan.	2, 13, 14, 15
m) environmental problems associated with the disposal of waste,	The proposed modification does not introduce any additional considerations in relation to the disposal of waste.	-
n) increased demands on resources (natural or otherwise) which are, or are likely to become, in short supply,	The proposed modification is unlikely to result in an increase in demands on resources (natural or otherwise) which are, or are likely to become, in short supply.	-
o) cumulative environmental effect with other existing or likely future activities,	The proposed modification results in a marginal increase to hardstand which has been considered cumulatively with the REF works including the provision of a revised stormwater plan.	2, 14
p) the impact on coastal processes and coastal hazards, including those under projected climate change conditions,	The proposed modification is unlikely to impact on coastal processes and coastal hazards.	-
q) Applicable local strategic planning statements, regional strategic plans or district strategic plans made under the Act, Division 3.1,	The proposed modification does not change the REF consistency with the applicable LSPS and other strategic plans.	-
r) Other relevant environmental factors.	N/A	-

6 Conclusion

This AREF for the extension of the reconfigured car park at Cronulla High School has been prepared in accordance with the relevant provisions of the EP&A Act and *NSW DPE Guidelines for Division 5.1 assessments*.

This AREF has examined and considered all additional matters affecting or likely to affect the environment as a result of the proposed modification to the REF. This assessment has found that while there may be impacts as a result of the proposed works, they are not considered to be significant, either in nature or extent, as to be regarded as unacceptable.

On balance, the beneficial outcomes of the proposed modification substantially outweigh any short-term impacts that may arise including during the construction phase.

Based on consideration of key environmental aspects and the information presented in this AREF, it is concluded that by adopting the revised mitigation measures identified in this assessment it is unlikely that there would be any significant environmental impacts associated with the proposal.