



Environmental Impact Statement

Designated Development (SEAR 1718)

Proposed ancillary works at Narrabeen North Public School in a mapped Coastal Wetlands area

6 Namona Street, North Narrabeen


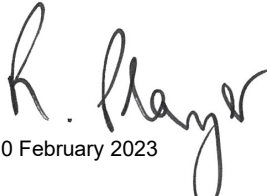
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DECLARATION
ENVIRONMENTAL IMPACT STATEMENT

Applicant Name: Applicant ABN: Applicant Address: Land to be developed: Application Number: Proposed development:	NSW Department of Education 6 Namona Street, North Narrabeen SEAR 1718 Proposed ancillary works at Narrabeen North Public School in a mapped Coastal Wetlands area
ENVIRONMENTAL IMPACT STATEMENT	
DECLARATION	
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- C. Statutory Compliance Table (*DFP Planning*)
- D. Engagement Report (*JohnStaff*)
- E. Mitigation Measures Table (*DFP Planning*)
- F. Aboriginal Cultural Heritage (*Kayandel*)
- G. Arboricultural Impact Assessment (*Independent Arboricultural Services*)
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- L. Preliminary Site Investigation (*Douglas Partners*)
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- N. Heritage Impact Assessment (*City Plan*)
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- S. Construction Management Plan (*JohnStaff*)
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- V. Waste Management Plan (*MRA Consulting Group*)
- W. Bushfire Statement (*Bushfire Code and Bushfire Hazard Solutions*)
- X. Aquatic Ecology (*ADE Consulting Group*)

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Abbreviations

AS	Australian Standard
ASS	acid sulfate soils
BC Act	<i>Biodiversity Conservation Act 2016</i>
BCA	Building Code of Australia
CIV	capital investment value
CM Act	<i>Coastal Management Act 2016</i>
Council	Northern Beaches Council
DCP	development control plan
DD	Designated Development
DFP	DFP Planning Pty Limited
DPE	NSW Department of Planning and Environment
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2021</i>
EPI	environmental planning instrument
ESCP	erosion and sedimentation control plan
ESD	ecologically sustainable development
LEP	local environmental plan
LGA	local government area
NNHS	Narrabeen North High School
NNPS	Narrabeen North Public School
NPW Act	<i>National Parks and Wildlife Act 1974</i>
NPWS	NSW National Parks and Wildlife Service
OEH	Former NSW Office of Environment and Heritage
RL	reduced level
RMS	Former NSW Roads and Maritime Services
SEPP	state environmental planning policy
WM Act	<i>Water Management Act 2000</i>

Summary

Narrabeen North Public School is located at 6 Namona Street, North Narrabeen (the Site). The proposed development relates to ancillary works to Narrabeen North Public School (NNPS) within a Coastal Wetlands mapped area.

The proposed works the subject of the Designated Development (DD) Application comprise:

- Removal of eight (8) trees;
- New accessible pedestrian pathways;
- New substation on Namona Street frontage and associated conduit connections;
- New fire hydrant booster and associated conduit connections; and
- New hard and soft landscaping including the planting of twelve (12) new trees.

The proposed works are located within a Coastal Wetlands mapped area and therefore are Designated Development under Section 2.7 of *State Environmental Planning Policy (Resilience and Hazards) 2021* (R&H SEPP).

The proposed works will not increase student or staff numbers at NNPS.

School Infrastructure NSW (SINSW) and the project team have consulted with the local community, Aboriginal Elders, Northern Beaches Council (Council) and State government agencies throughout the design of the proposed development. Feedback provided through this consultation process has been incorporated and addressed where possible in the final design and supporting documentation, including this EIS.

Whilst the site is not affected by bushfire, it is recommended that the site in its entirety remain as an Asset Protection Zone (APZ) – inner protection area.

The site is partially affected by flood, however the accessible pathways, substation and hydrant booster facility are located outside of the 1 in 100 flood area. No on-site detention is required for the proposed works.

An Aboriginal Cultural Heritage Report prepared by Kayandel has determined that there is low risk of Aboriginal items within the project area due to extensive previous disturbance. The Report recommends that an ‘unexpected finds’ procedure is implemented prior to the commencement of works.

No additional parking is proposed at NNPS and no ongoing additional traffic generation will result from the proposal. A Construction Traffic Management Plan has been prepared by Ason Group, which details haulage routes, construction parking and other traffic management issues.

The proposed works have been assessed and on balance provide significant public benefit to the school community through the provision of accessible pathways as well as a substation, hydrant booster facility and landscaping works.

This Environmental Impact Statement report has been prepared under Part 4 of the *Environmental Planning and Assessment Act 1979*, in accordance with the Secretary’s Environmental Assessment Requirements (SEARs) for DD 1718 issued by the Department of Planning and Environment, and Part 8 of the *Environmental Planning and Assessment Regulation 2021*. The works proposed under this Designated Development (DD) Application will be subject to the recommendations of specialist consultant reports and mitigation measures to ensure appropriate outcomes are achieved.

The proposed works have been designed to, and will be carried out in, the interests of the public. The proposed works will meet the project objectives, including to improve the accessibility of NNPS and protect the natural environmental values of the Coastal Wetlands mapped area of the NNPS.

Accordingly, it is requested that Council grant approval to the proposed works of the Designated Development Application as set out in this EIS.

1 Introduction

1.1 Overview

1.1.1 Purpose of Report

DFP Planning Pty Ltd (DFP) has been commissioned by the NSW Department of Education (the Department) to provide planning services in relation to the proposed upgrades to the Narrabeen Education Precinct (NEP) comprising Narrabeen North Public School (NNPS) at 6 Namona Street, North Narrabeen (the site) and Narrabeen Sports High School (NSHS) at 10 Namona Street, North Narrabeen. DFP Planning has prepared this Environmental Impact Statement (EIS) to accompany the Designated Development Application in relation to proposed tree removal, pedestrian pathways, landscaping, and other ancillary works within the 'Coastal Wetlands' mapped area at NNPS to Northern Beaches Council (Council).

The proposed development is declared to be designated development pursuant to Section 2.7 of *State Environmental Planning Policy (Resilience and Hazards) 2021* (R&H SEPP) as it comprises development on land identified as 'coastal wetlands'.

The proposed works the subject of the Designated Development Application comprise:

- Removal of eight (8) trees;
- New accessible pedestrian pathways;
- New substation on Namona Street frontage along with associated conduit connections;
- New fire hydrant booster and associated conduit connections; and
- New hard and soft landscaping including the planting of 12 new trees.

This EIS has been prepared in accordance with the SEARs, Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and Part 8 of the *Environmental Planning and Assessment Regulation 2021* (the Regulation) to provide Council and any relevant NSW State government agencies with the information necessary to assess the proposed development, and to determine the DA in accordance with Section 4.16 of the EP&A Act.

The proposed development is assessable pursuant to Part 4 of the EP&A Act.

Pursuant to Section 4.33 of the EP&A Act, the DA will be a Crown Development Application. Section 4.32 of the EP&A Act defines a crown development application as a "*development made by or on behalf of the crown.*" The proposed works within the Coastal Wetlands mapped area at the NNPS are being undertaken on behalf of the NSW Department of Education.

NNPS is identified as containing an item (Building B Double Bini Dome) of State heritage significance (SHR No. 02037 The Binishell Collection (Department of Education)) on the State Heritage Register (SHR) under the *Heritage Act 1977*. No works are proposed within the boundary of the SHR curtilage. Therefore, the proposed development does not require approval under the Heritage Act.

The proposed development includes works located within the Namona Street (road reserve) that require approval under Section 138 of the *Roads Act 1993*. Namona Street is a local road and Council is the relevant roads authority for these proposed works.

Pursuant to clause 4(a) of Schedule 2 of the Local Planning Panels Direction issued under Section 9.1 of the EP&A Act on 30 June 2020, the application will need to be referred to the Northern Beaches Local Planning Panel (the LPP) for determination as the development is a designated development.

1.1.2 Project Objectives and Summary

1.1.3 Overall Proposed Development Works

The objectives of the overall proposed development works within the Narrabeen Education Precinct (NEP), utilising several planning pathways are to upgrade both schools to support

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high-quality educational outcomes to meet the needs of students within the local community and deliver:

- New and upgraded learning spaces from Kindergarten to Year 12;
- Upgraded learning spaces for specialist support classes;
- New multi-purpose hall for sports and performance at the primary school and refurbished multi-purpose hall at the high school;
- Upgraded learning specialist support classes; and
- Upgraded specialist teaching facilities such as science classrooms at the high school.

1.1.4 Proposed Development Works Subject to this Application

The objective of the proposed works the subject of the Designated Development Application within the Coastal Wetlands mapped area of the NNPS is to upgrade the main accessible pedestrian pathways entry from Namona Street, improving accessibility and sightlines towards the main school buildings. The proposed works also include a new substation and fire hydrant to service the upgraded NNPS development on the site and landscaping works.

1.1.5 Overall Proposed Development Works Being Conducted Under Alternate Planning Pathways

It is proposed to undertake the overall proposed development at NNPS under multiple planning pathways to enable the works to be staged on site, which maintains operational continuity and minimises programme risks, whilst delivering the upgrades to the school in a safe, effective, and efficient manner.

In addition to the proposed works being assessed as part of this Designated Development Application, the overall proposed development works set out in **Table 1** are proposed under alternative planning pathways. The proposed works at NNPS are proposed to be undertaken in eight (8) stages (the proposed works the subject of this Designated Development Application are identified in **bold text**).

Table 1 Works under Alternate Planning Pathways		
Stage	Project Element	Planning Pathway
1	Removal / relocation of existing demountable classrooms at NNPS to temporary location with NSHS site.	Exempt Development
2	Tree Removal	Development Application (DA2022/1259)
	Demolition of existing amphitheatre / COLA	Development without consent (REF)
3	Construction of new Building E (two (2) storey classroom and amenities building)	Development without consent (REF)
	Refurbishment and conservation works to Building B (Double Bini Dome)	Development without consent (REF)
4	Refurbishment of ground floor of Building V	Development without consent (REF)
5	Demolition of Buildings J & H	Development without consent (REF)
	Tree Removal	Development Application (DA2022/1259)
	Removal of existing demountable classrooms from NNPS site	Exempt Development
6	Construction of Building D (Construction of new part-one and part-two storey administration building, multi-purpose hall, staff hub and out-of-school-hours care (OSHC) building with associated Covered Outdoor Learning Area (COLA))	Development Application (DA2022/1649)
7	Refurbishment of Building K	Development without consent (REF)

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Table 1 Works under Alternate Planning Pathways

Stage	Project Element	Planning Pathway
8	Landscape works including pathways (hard and soft landscaping)	Multiple planning pathways (including Designated Development)
	Removal of demountable classrooms from NSHS	Exempt development
	Installation of substation and hydrant booster	Designated Development

The NNPS site plan prepared by DesignInc indicates the proposed works that are the subject of different planning pathways as follows (**Figure 1**):

- Development Application Blue
- Development without consent Pink
- Designated Development Green

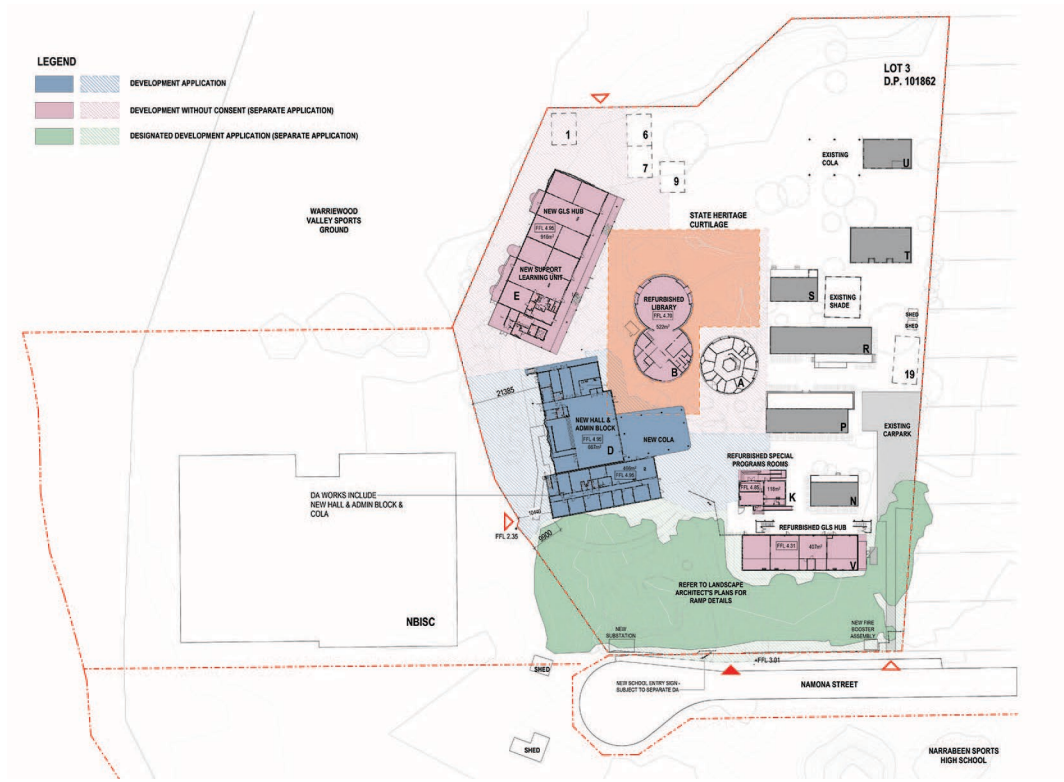


Figure 1 Proposed NNPS site plan showing the location of the various planning pathways

1.2 Site History

A detailed history of NNPS is provided in the Heritage Impact Statement prepared by CityPlan Heritage.

Table 2 describes the historical data of the area.

Table 2 Chronological History of the area

Year	Development History
Pre 1788	Evidence of the extended period of Aboriginal occupation in the Northern Beaches
1814 - 1815	First record of Narrabeen appears on the maps of Surveyor James Meehan
1818	Earliest land grant in Narrabeen to John Ramsay

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Table 3 describes the historical development of the site.

Table 3 Chronological History of the Site – North Narrabeen Public School	
Year	Development History
1928	North Narrabeen Infants School was built on 5-acre lot, encompassing two buildings, and officially opened in 1939.
1947	38 acres purchased by Department of Education for a secondary school.
1956	Timber framed building was erected and supplied with electricity.
1974	Three (3) concrete shell dome complex was constructed at Narrabeen North Public School

Table 4 describes the historical development of Narrabeen Sports High School

Table 4 Chronological History of the Site – North Narrabeen High School	
Year	Development History
1954	Narrabeen Girls High School established in January 1954
1959	Narrabeen Boys High School established in January 1959
1975	Both Narrabeen Girls and Boys High School closed and merged into Narrabeen High School, now known as Narrabeen Sports High School. The only remaining building from the former high schools is the former gymnasium.

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1.3 Site Context

1.3.1 Location

Narrabeen North Public School (NNPS) is located within the Narrabeen Education Precinct that comprises NNPS and NSHS. The site is located to the north of Narrabeen Lagoon and east of Mullet Creek. The Tasman Sea is located approximately 900 metres to the west of the site.

1.3.2 Site Description

NNPS is located at 6 Namona Street, North Narrabeen and is legally described as Lot 3 Deposited Plan (DP) 1018621 (the NNPS site). NNPS has a total site area of 23,750m² and is irregularly shaped with a street frontage to Namona Street of 92m.



Figure 2 Site Location

Figure 3 is an aerial photograph of NNPS and its immediate context showing the Coastal Wetlands mapped area (highlighted in blue).



Figure 3 Aerial Photograph

The site topography rises in the centre of the NNPS site, with the majority of the school buildings situated at RL4.3. There is a retaining wall along the Namona Street frontage.

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Existing buildings at NNPS include:

- Building A: Administration Building (single-storey Bini Shell);
- Building B: Before and After School Care (single storey with two interconnected Bini Shells)
- Building H: Staff Rooms;
- Building J: Homebases, computer room, storage, and amenities;
- Building K: Special programs (1938 single-storey brick classroom building);
- Building N: Homebases;
- Building P: Homebases and storage;
- Building R: Homebases and amenities;
- Building S: Homebases;
- Building T: Homebases;
- Building U: Canteen, amenities and covered outdoor learning area (COLA); and
- Building V: Two storey building with homebases on the ground floor and library/music room on the first floor.

Other structures include the amphitheatre located on the western part of the site and 19 demountable buildings.

The main open play space is at the northern end of the NNPS site, along with a multi-purpose sports court.

Vegetation on the site includes a mixture of native and exotic species. Vegetation along the southern boundary of the site has been identified as the vegetation community 'South-Coast Sands Bangalay Forest' (PCT 3638).

In 2022, the NNPS had an enrolment of 719 students (Kindergarten to Year 6) and 62 staff (including full-time equivalent (FTE), temporary and casual staff). This Designated Development Application does not propose any increase in numbers of students or staff at NNPS.

Figure 4 – 6 show the NNPS site.

1 Introduction



Figure 4 Existing view of NNPS from Namona Street



Figure 5 Existing pedestrian access to the NNPS site from Namona Street

1 Introduction



Figure 6 View of existing landscaped area located within the front setback to Namona Street

1.3.3 Surrounding Development

Existing development within the immediate vicinity of the site includes the Northern Beaches Indoor Sports Centre (NBISC) located to the west of NNPS and Warriewood Valley Sports Ground located to the north-west. Immediately adjoining the eastern boundary of NNPS are low density residential properties which are located on Oak Street. South of NSHS is the Pittwater Sports Centre (PSC). To the west of the site is Mullet Creek which flows into the Narrabeen Lagoon. East of the site is Pittwater Road, Narrabeen Lagoon, and public reserves as well as commercial buildings and low-density residential properties to the east of Pittwater Road.

1.3.4 Surrounding Transport Network

Road Network

The Site is only accessible by vehicle via Namona Street to the south. The school car park is located on the eastern boundary of the site.

Pittwater Road is the major connecting Road to the site and is located approximately 100m to the east.

Transport and Access

NNPS has the following existing access and transport facilities:

- On-site car parking spaces for staff accessed via Namona Street (a total of 36 spaces comprising 20 formal car parking spaces, including one (1) accessible car space and 16 informal car parking spaces);
- On-site bicycle parking rails (total 94 spaces);
- Three (3) pedestrian access points:
 - One (1) pedestrian access point from Warriewood Valley Sportsground;
 - One (1) pedestrian access point from Namona Street; and

1 Introduction

- One (1) pedestrian access point in the south east corner of the NNPS;
- School bus zones along both sides of Namona Street (shared with NSHS); and
- Pedestrian crossing on Namona Street.

Service vehicles (deliveries and waste) use the existing staff car park and driveway.

Public Transport

The following State bus routes are located in the vicinity of the NEP:

- Pittwater Road:
 - 182: Narrabeen – Mona Vale
 - 185: Narrabeen – Mona Vale via Warriewood
 - 190X: City Wynard to Avalon Beach (Express Service)
 - 199: Manly – Palm Beach
- Jacksons Road:
 - 182: Narrabeen – Mona Vale
 - 185: Warringah Mall – Mona Vale via Warriewood
- Garden Street
 - 182: Narrabeen – Mona Vale.

The Warriewood B-Line stop is located to the north of the intersection of Jacksons Road and Pittwater Road.

Active Transport

The site is located within a locality with an established and extensive pedestrian and cycling network.

2 Strategic Context

2.1 Strategic Justification and Project Need

The NSW Government has increased their 'School Building Program' investment from \$6.7 billion to \$7 billion to deliver 200 new and upgraded schools to support communities across NSW. In the past year 50 new schools or upgraded schools were delivered.

As part of this investment, the need to upgrade the Narrabeen Education Precinct comprising NNPS and NSHS has been identified. These upgrades are to support high quality educational outcomes to meet the needs of students within the existing locality. The proposed works the subject of this Designated Development Application are limited to the 'coastal wetlands' mapped area of the NNPS site and are to upgrade the NNPS main entry from Namona Street, improving accessibility and sightlines towards the main school buildings. The proposed works also include a new substation and fire hydrant booster service upgrade and landscaping works on the site.

2.2 Strategic Plans

Table 5 provides a summary assessment of the proposed works as a part of the overall Narrabeen Education Precinct project against the relevant provisions, goals and objectives of relevant State and regional plans and policies, along with local plans and policies to provide an overall strategic context.

Table 5 Response to Provisions, Goals and Objectives of State Policies	
State Policy	Response
<p>NSW State and Premier's priorities (Dept. Premier and Cabinet)</p> <ul style="list-style-type: none"> • Highest quality education • Bumping up education results for children • Increasing the number of Aboriginal young people reaching their learning potential • Greening our city 	<p>The proposal is consistent with relevant State and Premier priorities as it will:</p> <ul style="list-style-type: none"> • Create new jobs for construction workers, and maintain employment for teachers, support staff and maintenance workers. • Provide superior educational infrastructure to support the growing population in the locality. • Provide specialist educational facilities including equitable access. • Provide a high-quality environment to enable a high quality publicly funded education; and • Provide a safe learning environment and education regarding personal protection and welfare.
<p>Greater Sydney Region Plan: A metropolis of three cities (Greater Sydney Commission)</p>	<p>The <i>Greater Sydney Region Plan – A Metropolis of Three Cities</i>:</p> <ul style="list-style-type: none"> • Sets a 40-year vision (to 2056) and establishes a 20-year plan to manage growth and change for Greater Sydney in the context of social, economic, and environmental matters; • Informs district and local plans and the assessment of planning proposals; • Assists infrastructure agencies to plan and deliver for growth and change, and to align their infrastructure plans to place-based outcomes; and • Informs the private sector and the wider community of the growth management and infrastructure investments of the NSW government. <p>A Metropolis of Three Cities applies to the Greater Sydney Region and sets the strategic planning framework for the five districts that make up the region. Northern Beaches LGA is located in the Northern District. As discussed below, the proposed development is generally consistent with the vision, objectives and planning priorities articulated by the North District Plan and therefore consistent with the directions and objectives of the Greater Sydney Region Plan.</p> <p>In particular, the proposed overall development at NNPS is consistent with Objective 6 'Services and infrastructure meet communities' changing needs' of the Greater Sydney Region Plan, as it provides upgraded educational facilities for primary students. The proposal provides for community use of the facilities out-of-</p>

2 Strategic Context

Table 5 Response to Provisions, Goals and Objectives of State Policies

State Policy	Response
<p>North District Plan (Greater Sydney Commission)</p>	<p>school hours. The design incorporates flexible and collaborative learning spaces that respond to changing education needs.</p> <p>Narrabeen North Public School is located within the North District Plan area which covers the City of Ryde, Hornsby, Hunters Hill, Kuring-gai, Lane Cove, Mosman, North Sydney, Northern Beaches, and Willoughby Local Government Areas (LGAs). The North District Plan seeks to manage growth in the context of economic, social, and environmental matters. It contains the planning priorities and actions for implementing the Greater Sydney Region Plan A Metropolis of Three Cities, at a district level and is a bridge between regional and local planning.</p> <p>The proposed development is considered to be generally consistent with the planning priorities identified in the North District Plan, in particular the following planning priority under the theme of 'Liveability':</p> <p style="text-align: center;"><i>Planning Priority N3 – Providing services and social infrastructure to meet people's changing needs.</i></p> <p>The proposed development seeks to upgrade an existing educational establishment to support high-quality educational outcomes for students in the local area.</p>
<p>Northern Beaches Local Strategic Planning Statement: Towards 2040 (Northern Beaches Council)</p>	<p>The proposed development is generally consistent with the provisions of Council's <i>Towards 2040: Local Strategic Planning Statement</i> (LSPS). The LSPS provides a 20-year vision to guide land-use planning across the Northern Beaches LGA. The LSPS identifies planning priorities and actions and has been prepared by Council in accordance with the requirements of Section 3.9 of the EP&A Act. It will inform Council's consolidated Local Environmental Plan and Development Control Plan as well as Council's policies and strategies. The LSPS aligns with the Greater Sydney Regional Plan and the North District Plan, providing a bridge between strategic land use planning at a district level and local statutory planning.</p> <p>The proposal is consistent with the following Planning Priorities identified in the LSPS:</p> <ul style="list-style-type: none"> • Sustainability <ul style="list-style-type: none"> ○ Landscape <ul style="list-style-type: none"> ▪ Priority 2: Protected and enhanced bushland and biodiversity. ▪ Priority 5: Greener Urban Environments. ○ Efficiency <ul style="list-style-type: none"> ▪ Priority 7: A low-carbon community, with high energy, water, and waste efficiency. • Infrastructure and collaboration <ul style="list-style-type: none"> ▪ Priority 9: Infrastructure delivered with employment and housing growth. • Liveability <ul style="list-style-type: none"> ○ People <ul style="list-style-type: none"> ▪ Priority 10: World-class education facilities, including a university. ▪ Priority 11: Community facilities and services that meet changing community needs. ▪ Priority 12: An inclusive, healthy, safe, and socially connected community. ▪ Priority 13: Strong engagement and cooperation with Aboriginal communities. ○ Great places <ul style="list-style-type: none"> ▪ Priority 18: Protected, conserved, and celebrated heritage. <p>In particular the proposed overall Narrabeen Education Precinct development is consistent with Priority 10, which seeks to provide world-class education facilities across the Northern Beaches LGA. The proposed development will increase the availability of local education opportunities and provide for contemporary education</p>

2 Strategic Context

Table 5 Response to Provisions, Goals and Objectives of State Policies

State Policy	Response
	services for local students. The new educational buildings exhibit design excellence and integrates with the surrounding locality.
Northern Beaches Environment and Climate Change Strategy 2040 (Protect. Create. Live) (Northern Beaches Council)	The proposed works are consistent with Theme 4 – Biodiversity. The proposal includes a net increase of four (4) trees on the site plus additional shrubs, groundcovers, and grasses. The proposed works also ensure minimal disturbance to the coastal wetland area.
Northern Beaches Climate Change Action Plan	As part of the Climate Change Action Plan, Council aims to increase the existing urban tree canopy to expand the local green grid and commits to planting a minimum of 5,000 trees each year. The proposal will assist in achieving Council's objectives by increasing the urban tree canopy through a net increase of landscaping by four (4) trees. No additional buildings are proposed as part of this application.

2.3 Masterplan and Analysis of Alternatives

A comprehensive masterplan for the redevelopment of the Narrabeen Education Precinct (NEP) has been undertaken by DesignInc.

The master plan and design principles have informed the location of the new buildings at NNPS as follows:

- Maximise the retention of existing permanent buildings on the eastern part of the site with the new school buildings replacing existing demountable classrooms;
- Creation of a new welcoming entrance and accessible pathway from Namona Street to the school buildings;
- Incorporation of the principles of design with country;
- Development of the 'treehouse' design strategy with the new school buildings being sited amongst the trees providing a strong connection with nature and allowing for opportunities for indoor-outdoor learning;
- New two (2) storey school buildings located away from existing low density residential development to the east of the site to minimise amenity impacts (overshadowing, noise, visual and acoustic privacy);
- New buildings have been sited outside of the SHR curtilage. The new buildings have been sited to provide views and vistas towards the heritage listed Bini domes (Blocks A and B) from the south (Namona Street) and west;
- New buildings have been sited to avoid impacting on the part of the site mapped as 'high biodiversity value' under the Biodiversity Conservation Act 2016 (BC Act) and 'coastal wetland' under Chapter 2 of *State Environmental Planning Policy (Biodiversity and Conservation) 2021* (B&C SEPP);
- Retention of the existing trees along the western boundary of the site to provide landscape screening of the new buildings;
- Maintain existing cleared play space at the northern end of the school;
- Locating the new buildings above the probable maximum flood (PMF) level, which results in increased ramp lengths and maximum building height to Building D;
- Trees to be removed will be offset with new tree planting at NNPS and NSHS.

Figure 7 is an extract of the proposed master plan prepared by DesignInc.

2 Strategic Context

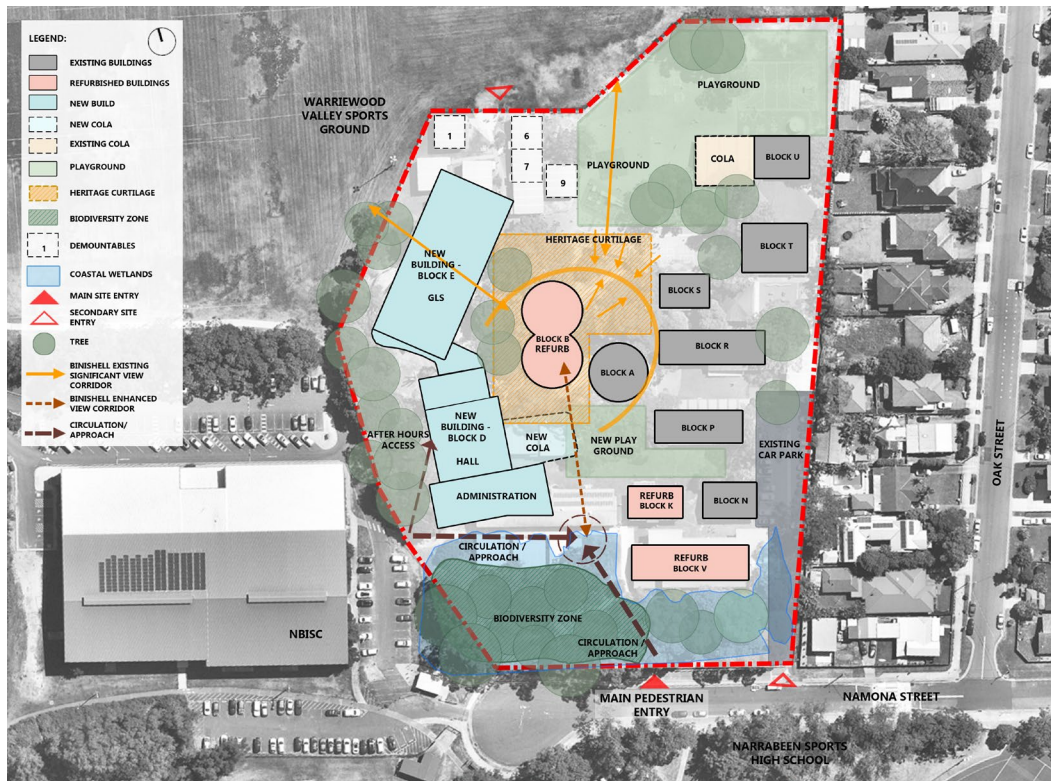


Figure 7 Proposed NNPS Masterplan (DesignInc)

The following options in **Table 6** have been considered in relation to the works the subject of this Designated Development Application.

Table 6 Options considered	
Option	Discussion
Do nothing	The proposed works upgrade the existing pedestrian access from Namona Street into the existing NNPS site as well as provide a pedestrian access from the south east corner of the NNPS. The proposed works include a new substation and fire hydrant at the site's street frontage, as well a landscaping works. The option to 'do nothing' is not feasible as the site's only street frontage to the existing NNPS is to Namona Street
Expand onto other land	The sites to the east of NNPS (Warriewood Valley Sportsground and NBISC) are owned by the NSW Department of Education but are leased by Northern Beaches Council to provide public recreation facilities for the local community. Therefore, it is not feasible to expand into the adjoining site.
Development within the site	The preferred option is to undertake the proposed ancillary works within the NNPS site in the mapped 'Coastal Wetlands' area.

3 Project Description

3.1 Project Overview

The key aspects of the proposed development are set out in Error! Reference source not found..

Table 7 Summary of Key Aspects of Project	
Aspect	Description
Site Area	2.375ha
Site Description	6 Namona Street, North Narrabeen Lot 3 DP 1018621
Use	Educational establishment
Project Summary	Removal of eight (8) trees, new accessible pedestrian pathways within the NNPS site from Namona Street and in the south east corner of the NNPS, new substation on Namona Street along with associated conduit connections, new fire hydrant booster and associated conduit connections and new hardstand and soft landscaping including planting of 12 new trees.
Site Preparation	Removal of eight (8) trees, minor earthworks, demolition of existing pathway and fencing.
Built Form and Signage	No built form of school buildings or signage is proposed.
Landscaping	Hard and soft landscaping including seating, permeable paving, timber boardwalk, accessible pathways, new entry, 12 new trees, 537 shrubs, 1,037 ground covers and grasses.
Utility Infrastructure	A new fire hydrant booster is proposed to the south-east corner of the site, to the west of the existing driveway. One electrical substation and associated conduit connection is proposed 15.6m west of the proposed new fire hydrant booster.
Public Domain Works	Public domain works along Namona Street required for connecting the new fire hydrant booster and electrical substation.
Capacity	No change to student or staff numbers are proposed.
Maximum Height	N/A
Access/ parking	No change to vehicular access or car parking arrangements. Vehicular access remains off Namona Street.
Hours of operation	No change to the operating hours of the school are proposed.
Construction Staging	No staging of construction is proposed.
Construction hours	<ul style="list-style-type: none"> 7:00am – 5:00pm Monday to Friday 8:00am – 1:00 Saturday No works to occur on Sundays and public holidays No construction deliveries between 7.30am to 9:30am, and between 2.30pm to 4.00pm on school days. If required, approval for construction works outside of the above hours will be sought from the relevant authorities.
Anticipated date of construction/ operation.	Construction Commence – Mid March 2023 (Anticipated) Operation – January 2024
Jobs	Up to 8 (direct and indirect) full time construction jobs. 10-month construction period
CIV	\$654,149

3 Project Description

3.2 Project Description

3.2.1 Demolition and Tree Removal

The proposed development includes the removal of the existing pedestrian entry pathway from Namona Street and removal of part of the existing boundary fencing to facilitate the new works. The proposed development also include minor earthworks in order to construct the new pedestrian pathway.

An Arboricultural Impact Assessment (AIA) report and Tree Management Plan has been prepared by Independent Arboricultural Services.

A total of eight (8) trees are proposed to be removed to facilitate the proposed works the subject of this Designated Development Application. **Table 8** identified each tree to be removed, its tree retention value and the reasons for removal.

Tree Number	Botanical (Common Name)	Name	Tree Retention Value	Reason for Removal
2	<i>Angophora costata</i> (Smooth-barked Apple Tree)		High	Major impact. Impacted by proposed infrastructure. Removal to be offset by new tree planting.
22	<i>Cinnamomum camphora</i> (Camphor Laurel)		Low	Major impact. Located within footprint of new pedestrian pathway. Removal to be offset by new tree planting.
30	<i>Eucalyptus botryoides</i> (Southern Mahogany)		High	Major impact. Located within footprint of new pedestrian pathway. Removal to be offset by new tree planting.
39	<i>Glochidion ferdinandi</i> (Cheese Tree)		Medium	Major impact. Located within footprint of new pedestrian pathway. Removal to be offset by new tree planting.
88	<i>Cupaniopsis anacardioides</i> (Tuckeroo)		Medium	Major impact. Located within footprint of new pedestrian pathway. Removal to be offset by new tree planting.
176	<i>Eucalyptus botryoides</i> (Southern Mahogany)		High	Major impact. Impacted by proposed infrastructure. Removal to be offset by new tree planting.
182	<i>Eucalyptus robusta</i> (Swamp Mahogany)		High	Major impact. Impacted by proposed infrastructure. Removal to be offset by new tree planting.
183	<i>Banksia integrifolia</i> (Coastal Banksia)		High	Major impact. Located within footprint of new pedestrian pathway. Removal to be offset by new tree planting.

Of the trees proposed to be removed:

- Five (5) trees have been identified as having high tree retention value;
- Two (2) trees have been identified as having medium tree retention value; and
- One (1) tree has been identified as having low tree retention value.

A further 13 trees have been identified as being able to be retained subject to the recommendations of the arborist and final detailed design (Trees 18, 20, 21, 25, 28, 31, 36., 37, 44, 172, 177, 179 and 184).

All other trees are proposed to be retained and protected during the works. The AIA report provides recommendations in relation to the establishment of appropriate Tree Protection Zones (TPZ) for the trees to be retained and the mitigation of construction impacts on the retained trees in accordance with the requirements of *AS 4970(2009) Protection of trees on development sites* and *AS 4373 (2007) Pruning of amenity trees*.

3 Project Description

3.2.2 Landscaping

A landscape strategy has been prepared by DesignInc and includes vegetation to be retained, seating (sandstone benches with timber batten tops), timber boardwalk, accessible ramps, walkways, learning areas, permeable paving, fencing, gates, retaining walls and new vegetation/ tree planting (12 new trees) within the area subject to this Designated Development Application.

The following vegetation is proposed:

- 12 trees;
- 537 shrubs;
- grasses;
- 656 groundcovers.

A new entry with 1:20 concrete ramp is to be located west of the existing entry. The existing entry is to be removed (including stairs) and replaced with concrete).

3.2.3 New Substation and Fire Hydrant Booster

A new fire hydrant booster is proposed to the south-east of the site, west of the existing driveway. A new electrical substation is proposed 15.6m west of the new fire hydrant booster.

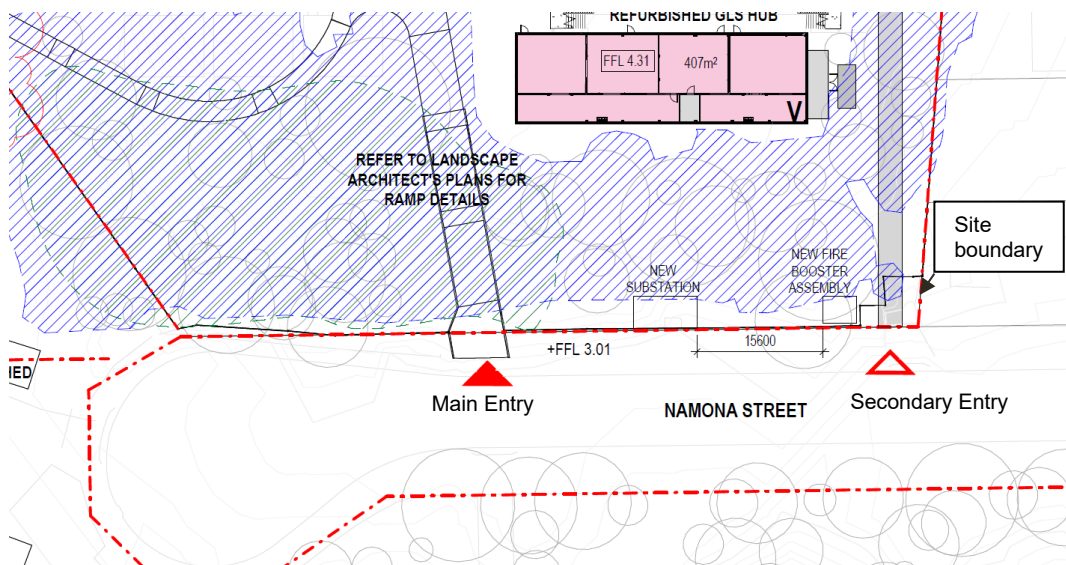


Figure 8 Fire Hydrant and Electrical Substation location (Source DesignInc) NTS

4 Statutory Context

4.1 Planning Approval Pathway

Section 4.10 of the EP&A Act notes that designated development is development that is declared to be designated development by an environmental planning instrument or the regulations. As the works are located within a Coastal Wetlands mapped area and are not for the purpose of environmental protection works, the works are declared to be designated development pursuant to Section 2.7 (2) of State Environmental Planning Policy (Resilience and Hazards) 2021.

The proposed development is subject to approval by the Northern Beaches Council under Part 4 of the Environmental Planning and Assessment Act 1979 (EP&A Act).

4.2 Permissibility

The site is zoned SP2 Infrastructure (Educational Establishment) (the SP2 zone) under *Pittwater Local Environmental Plan 2014*. (the LEP). The proposed works are ancillary development to the NNPS which is an educational establishment and is therefore permissible within the SP2 zone.

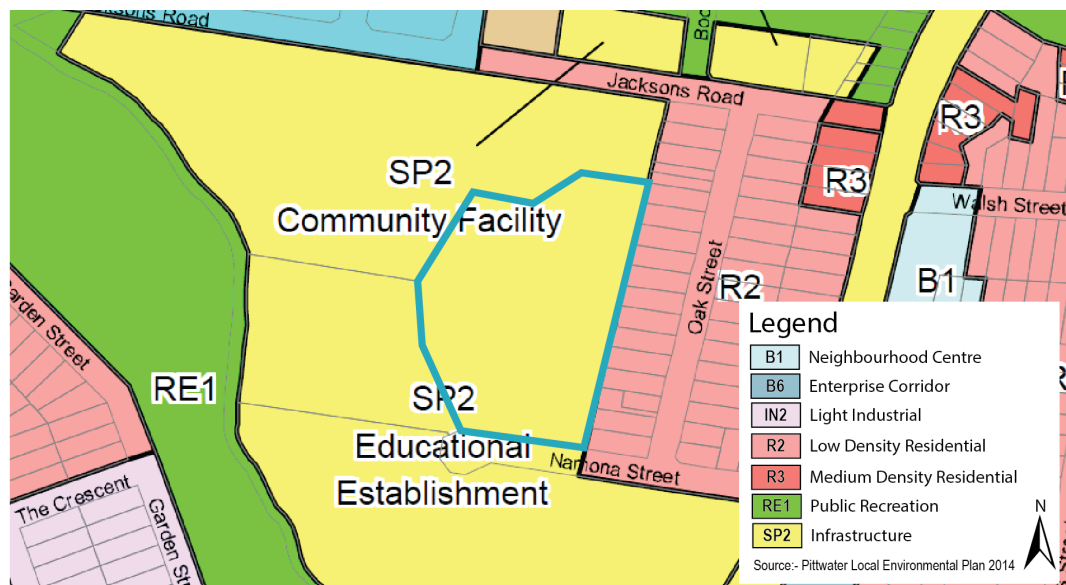


Figure 9 Extract from the LEP zoning map (source Pittwater LEP 2014)

4.3 Other Statutory Approvals

4.3.1 Commonwealth Department of Environment and Energy

Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act)

Part 3 Division 1 Subdivision C of the EPBC Act provides, amongst other things, that a person must not take an action that has, will have or is likely to have a significant impact on:

- a listed threatened species included in the extinct in the wild, critically endangered, endangered, or vulnerable categories; or
- a listed threatened ecological community included in the critically endangered or endangered categories.

unless a 'controlled action' approval has been granted under Part 9 Section 133 of the EPBC Act, the Commonwealth Minister for the Environment and Energy is responsible for the decision on such an approval.

The subject area of the site is located within coastal wetlands and contains plant community type (PCT) 1793 – Coastal Sand Bangalay Forest (associated TEC: Bangalay Sand Forest of the Sydney Basin and Southeast Corner Bioregions (Bangalay Sand Forest) Endangered

4 Statutory Context

Ecological Community (EEC) listed under Schedule 2 of the Biodiversity Conservation Act 2016). The site is not biodiversity certified land, and five (5) Ecosystem credits are required to be retired to offset the biodiversity impacts of the proposed development.

No threatened fauna species were recorded on site; however, 16 species credits are required to be retired to offset the biodiversity impacts of the proposal, being:

- Eight (8) credits for the Large-eared Pied Bat; and
- Eight (8) credits for the Eastern Cave Bat

Impacts of the proposed development are minimised to 0.17ha of native vegetation, including removal of eight (8) trees. There will be no Serious and Irreversible Impacts as a result of the proposed development as detailed in the Biodiversity Development Assessment Report (BDAR) prepared by Eco Land Consulting. Refer **Appendix J**.

4.3.2 Heritage NSW

Heritage Act 1977

The Heritage Act 1977 contains provisions relating to the protection of items of State heritage significance or items of potential significance. The NNPS site is identified as containing an item of local heritage significance pursuant Schedule 5 of Pittwater LEP 2014 being, Item number 2270341 (Concrete geodesic domes – North Narrabeen Public school). This Item is also under consideration for a State Heritage listing Refer **Figure 10**. The concrete Bini domes are not located within the mapped 'Coastal Wetlands' area and do not form part of this Designated Development Application. The proposed works will have no adverse heritage impacts on the Binidomes. Refer **Appendix N**.

4 Statutory Context



Figure 10 State Heritage Register Curtilage (Source Heritage Council NSW).

The proposed works are located to the south of the proposed heritage curtilage of the concrete Bini domes and will have no impact on the local listed heritage item.

National Parks and Wildlife Act 1974 (NPW Act)

The NPW Act contains the primary statutory controls relating to Aboriginal heritage in NSW.

An Aboriginal Cultural Heritage Assessment Report (ACHA) has been prepared by Kayandel (see **Appendix F**). No AHIMS sites were recorded on the site and a site survey did not find any items of Aboriginal significance. Mitigation measures have been included for unexpected finds throughout the course of construction of the proposed development.

4 Statutory Context

4.3.3 Department of Planning and Environment: Environment and Heritage Coastal Management Act 2016

Part 2, Section 6 relates to Coastal Wetlands and Littoral rainforests area

Objectives:

(2) *The management objectives for the coastal wetlands and littoral rainforests area are as follows—*

(a) to protect coastal wetlands and littoral rainforests in their natural state, including their biological diversity and ecosystem integrity,

(b) to promote the rehabilitation and restoration of degraded coastal wetlands and littoral rainforests,

(c) to improve the resilience of coastal wetlands and littoral rainforests to the impacts of climate change, including opportunities for migration,

(d) to support the social and cultural values of coastal wetlands and littoral rainforests,

(e) to promote the objectives of State policies and programs for wetlands or littoral rainforest management

The proposed works are consistent with the objectives of Part 2, Section 6 as the coastal wetland is being protected through additional landscaping and raised pathways to reduce any potential impact.

4.3.4 Transport for New South Wales (TfNSW)

Roads Act 1993

Section 138(1) of the Roads Act 1993 relates to works associated with public roads and provides that a person must not:

(a) erect a structure or carry out a work in, on or over a public road, or

(b) dig up or disturb the surface of a public road, or

(c) remove or interfere with a structure, work or tree on a public road, or

(d) pump water into a public road from any land adjoining the road, or

(e) connect a road (whether public or private) to a classified road,

otherwise than with the consent of the appropriate roads authority.

The Site has public road access from Namona Street which is a local road for which Northern Beaches Council is the road authority.

These proposed works including the substation and hydrant with conduit connection works located within the public road reserve of Namona Street have been discussed with Council. The proposed works do not generate additional traffic or parking requirements, however, will have interim construction traffic. The details of this consultation and an assessment of traffic and parking impacts are discussed in **Section 5** and **6.16.2** of this EIS.

4.4 Mandatory Matters for Consideration

4.4.1 Environmental Planning and Assessment Act 1979

Section 1.3 – Objects of the EP&A Act

The proposed works as a part of the overall NNPS proposal is consistent with the Objects of the Act as it:

- Promotes the social welfare of the community;
- Allows the orderly development of land;
- Promotes good design;
- Delivers community services and facilities; and
- Is consistent with the principles of ecologically sustainable development.

4 Statutory Context

An assessment by DFP in this regard is provided at Appendix C which concludes that the proposal is consistent with the Objects of the Act.

Section 1.7 – Application of Part 7 of Biodiversity Conservation Act 2016 and Part 7A of Fisheries Management Act 1994

Part 7A of the Fisheries Management Act 1994 is not applicable to the proposed works of this Designated Development Application.

Section 1.7 states that this Act has effect subject to the provisions of Part 7 of the *Biodiversity Conservation Act 2016* that relate to the operation of this Act in connection with the terrestrial and aquatic environment.

A BDAR has been prepared by Eco Land Consulting to assess the impacts of the proposed works and the required biodiversity offsets. Refer **Appendix J**.

Section 4.10 – Designated development

Section 4.10 of the EP&A Act notes that Designated Development is development that is declared to be designated development by an environmental planning instrument or the regulations. As the works are located within Coastal Wetlands and are not for the purpose of environmental protection works, the works are declared to be Designated Development pursuant to Section 2.7 (2) of State Environmental Planning Policy (Resilience and Hazards) 2021.

The proposed development is subject to approval by the Northern Beaches Council under Part 4 of the Environmental Planning and Assessment Act 1979 (EP&A Act).

Section 4.22 – Concept Development Applications

The proposal is not a Concept Development Application (CDA).

Section 4.33 – Determination of Crown Development Applications

The proposed development is submitted by the NSW Department of Education and is therefore classified as a *Crown development application* under Section 4.32. Section 4.33 of the EP&A Act sets out matters to be considered by consent authorities in the determining or imposition of a condition upon a Crown development application.

Division 4.8 – Integrated development

The proposed works of this Designated Development Application is not an Integrated Development.

4.4.2 Environmental Planning and Assessment Regulation 2021

Section 173 – Application to Planning Secretary for environmental assessment requirements

This section relates to obtaining the Planning Secretary's assessment requirements for an application that required an EIS (SEARs). SEARs were issued by the DPE on 9 September 2022.

Section 190 - Form of environmental impact statement

This section outlines the required content and declaration requirements for an EIS. This EIS has been prepared in accordance with Section 190 of the EP&A Regulation 2021.

Section 191 – Compliance with environmental assessment requirements

This EIS complies with the SEARs issued by the Planning Secretary.

Section 192 – Content of Environmental Impact Statements

This section outlines the matters that must be contained or addressed in an EIS. This EIS complies with the requirements of section 192.

4 Statutory Context

Section 193 - Principles of ecologically sustainable development

This section requires the principles of ecologically sustainable development to be considered and the use of the precautionary principle where there are threats of serious and irreversible environment damage and the like.

The EIS has addressed the above-mentioned provisions of the EP&A Regulation (see **Section 6**).

4.4.3 Biodiversity Conservation Act 2016

Part 7 of BC Act sets out provisions relevant to biodiversity assessment and approvals under the Act. Specifically, Section 7.7 – Biodiversity assessment for Part 4 development (Other than State Significant Development or Complying Development) relates to this application.

Section 7.7 (2) states:

‘If the proposed development is likely to significantly affect threatened species, the application for development consent is to be accompanied by a biodiversity development assessment report.’

The site is mapped as having biodiversity values within the coastal wetlands area. A Biodiversity Development Assessment Report (BDAR) has been prepared by Eco Land Consulting (**Appendix J**) and identifies the vegetation, plant community type and biodiversity offsets required for the proposed development. Refer **Section 4.3.1**.

A Total of 21 biodiversity offsets are required for the proposed development.

4.4.4 State Environmental Planning Policy (Resilience and Hazards) 2021

Chapter 2: Coastal Management

Section 2.7 relates to Development on certain land within coastal wetlands and littoral rainforests area.

(1) The following may be carried out on land identified as “coastal wetlands” or “littoral rainforest” on the Coastal Wetlands and Littoral Rainforests Area Map only with development consent—

- (a) the clearing of native vegetation within the meaning of Part 5A of the Local Land Services Act 2013,*
- (b) the harm of marine vegetation within the meaning of Division 4 of Part 7 of the Fisheries Management Act 1994,*
- (c) the carrying out of any of the following—*
 - (i) earthworks (including the depositing of material on land),*
 - (ii) constructing a levee,*
 - (iii) draining the land,*
 - (iv) environmental protection works,*
- (d) any other development*

This application seeks development consent for works within the Coastal Wetland area relating to tree removal, landscaping, pathways, new substation and fire hydrant.

Chapter 4: Remediation of Land

Chapter 4 of SEPP RH provides for the remediation of contaminated land and requires, amongst other things, investigations to be undertaken as part of the development assessment process, to determine whether the subject land is likely to be contaminated and if so, what remediation work is required.

Douglas Partners prepared a letter, referencing previous Reports of Geotechnical Investigations for the whole Narrabeen Education Precinct. Whilst the previous reports identify a high probability of Acid Sulphate Soils between 1-3m it is noted in the covering letter that any recommendations and procedures do not significantly affect the Coastal Wetlands area. An Acid Sulphate Soils Management Plan is recommended for the wider NNPS development. There is

4 Statutory Context

minimal disturbance to natural surface as part of this application and will not exceed 1m below natural ground. Therefore, there will be no disturbance of Acid Sulphate Soils within the Coastal Wetlands area.

A Remediation Action Plan has been recommended for the NNPS, however, Douglas Partners considers contamination does not significantly impact the Coastal Wetland area.

The Remediation Action Plan and Acid Sulphate Soil Management Plan should be reviewed and where appropriate, measures implemented prior to, and during construction.

4.4.5 State Environmental Planning Policy (Transport and Infrastructure) 2021

Chapter 2 Infrastructure

Chapter 2 of the Transport and Infrastructure SEPP provides for the effective delivery of infrastructure. This SEPP sets out development controls for specified types of infrastructure, including Development in or adjacent to road corridors and road reservations.

Section 2.120 relates to development for, amongst other things, an educational establishment on land in or adjacent to a road corridor for freeway, tollway, transit way or any other road and have an average daily traffic volume of more than 20,000 vehicles (based on the traffic volume data published on the website of TfNSW) and that the consent authority considers is likely to be adversely affected by road noise or vibration.

The nature of the proposed works, being predominantly minor landscaping and infrastructure works will not be affected by road noise or vibration.

Chapter 3 Educational establishments and child care facilities

Chapter 3 of SEPP TI sets out planning approval pathways and other provisions to facilitate the effective delivery of educational establishments in the State.

The proposed works are ancillary to the approved NNPS works (under separate Planning Pathways) and therefore Chapter 3 of the T&I SEPP are not relevant to the assessment of the proposed ancillary works of this Designated Development application.

4.4.6 State Environmental Planning Policy (Biodiversity and Conservation) 2021

Chapter 2 of SEPP BC relates to vegetation in non-rural areas and provides that a council can issue permits for the clearing of such vegetation in accordance with the requirements of a development control plan. The DCP prescribes the trees and vegetation which may be removed without Council approval (exempt species).

Consent is sought from Council for the removal of eight (8) trees.

Chapter 4 of SEPP BC relates to Koala Habitat Protection. This chapter is relevant as the site is located within Northern beaches Local Government Area (LGA) pursuant to Schedule 2 of SEPP BC.

The Site is located within the Central Coast Koala Management Area. Eco Land Consulting BDAR notes there are 16 records of Koalas within a 10km radius of the site with recent recording being in 2020 4.3kms from the Site. No recorded sightings of Koalas were noted within the subject Site.

4.4.7 Pittwater Local Environmental Plan 2014

As indicated at **Section 4.2**, the site is zoned SP2 Infrastructure (Educational Establishment) under *Pittwater Local Environmental Plan 2014*. (the LEP) and educational establishments are permissible with development consent in the SP2 zone.

A detailed assessment of the proposal against the relevant provisions of the LEP is provided at **Appendix C**.

4 Statutory Context

4.4.8 Pittwater Development Control Plan 21

A detailed assessment of the proposed development against the provisions of this DCP is provided in **Appendix C** wherein it is assessed that the proposal is generally consistent with the provisions of the DCP.

5 Engagement

5.1 General

In accordance with the SEARs issued by the Department of Planning and Environment, the project team has carried out consultation with the following stakeholders:

- Northern Beaches Council
- Registered Aboriginal Parties

In addition to consultation undertaken, The Preliminary Construction Management Plan requires the appointed contractor to submit a Construction Traffic Management Plan (once completed) to relevant stakeholders being:

- Transport for New South Wales
- Northern Beaches Council
- NSW Police
- Emergency Services
- State Transit Authority

5.2 Community Engagement

5.2.1 Community Engagement Channels and Activities

The NSW Department of Education uses a range of standard community engagement channels, tools, and activities on an as-needs basis across all projects as shown in **Table 9**.

Table 9 Community Engagement approaches	
Activity	Strategic intent
School community engagement (project review group, meetings, workshops, school tours, and design user group sessions)	<ul style="list-style-type: none"> • Discuss aspects of the design, consultation and construction approach and seek feedback and input from members. • Design user groups seek input from end users including staff and students about the proposed design and its applicability
Community information sessions	<ul style="list-style-type: none"> • Provide an opportunity for face-to-face engagement between residents, school community, staff, and members of the project team. Allow for Q&A and concerns to be raised. • Information sessions are widely advertised through the communication channels listed in this table. • May be virtual, with the same materials available and feedback/question forms (depending on public health advice)
Communications (project webpage, information pack, project updates and works notifications)	<ul style="list-style-type: none"> • Distribution of project information to stakeholders delivered via letterbox drop and school newsletter.
Contact channels (emails and project information number)	<ul style="list-style-type: none"> • Direct responses to stakeholder and community contact.
School community communication (newsletter input, Parents and Citizens' Association meetings)	<ul style="list-style-type: none"> • Ongoing updates as required and direct responses to questions.

In relation to the works within the NEP, the following community information sessions have been held:

- Narrabeen Sports High School – 16 August 2022 (separate sessions for staff and parents);
- Narrabeen North Public School – 23 August 2022 (separate sessions for staff and parents); and
- Virtual information sessions for both schools running live from 22 August – 5 September 2022.

5 Engagement

5.2.2 Stakeholder Consultation

A key factor of the project is the governance provided through the Project Reference Group (PRG) and supported by the Technical Support Group (TSG).

The PRG is comprised of the Director Educational Learning; the School Performance Executive Director; senior SINSW officers from Asset Utilisation, Commissioning & Temporary Schools, and Asset Management units; the project directors and manager of the project; a teacher representative; a parent representative and the project architect. The PRG provides feedback on critical design elements and the overall project direction.

The TSG is comprised of technical specialists within SINSW in the areas of design, heritage, disability access and standards, sustainability, IT services, safety, and school transport. The TSG ensures the project design meets education facility standards and operational needs.

Additional stakeholder groups include:

- **Design Advisory:** A group of advisors who advise on Educational Facilities Standards and Guidelines (EFSG) compliance of the project. The EFSG is a suite of information to aid in the planning, design, and use of NSW Department of Education school facilities. The information includes:
 - NSW Department of Education school types with content on educational principles, accommodation recommendations, design intent on rooms and spaces, relationships between accommodation components and associated technical data.
 - Technical Design Guide
 - Technical Specification Guide
 - Links to relevant industry design and specification information

The design and construction of DoE schools will be required to comply with the EFSG.

- **Expert Review Group (ERG):** A panel of experts who advise across all SINSW projects in regard to design, buildability, compliance etc.
- Residents and local community members.

A summary of consultation is provided in the **Table 10**.

Table 10 Stakeholder Consultation	
Activity	Summary of consultation
Design Advisory	<ul style="list-style-type: none"> • Updated design register discussed with the developing Schematic Design, including services and transport access, general learning spaces, acoustics, and outdoor learning areas. • Discussion of the particular characteristics and relationships of spaces. • Review of design, detailed discussions on hall, bicycle parking and end-of-trip facilities, security and fencing, Support Unit, specialist unit storage requirements and acoustic separation. • Discussion on project staging, EFSG guidelines for specific learning spaces, floor, and height guidelines. • Preview of developing design to check compliance with EFSG guidelines.
Technical Support Group (TSG)	<ul style="list-style-type: none"> • Design consultation on gym, hall, canteen, administration, library, and office spaces. • Detailed discussion on general learning spaces. • Interconnection between general learning spaces and, supervision • Flexibility of internal furniture and fittings • Perimeter fencing and security considerations in design • Cabling and Comms Room provisions • Cleaning facilities allowances

5 Engagement

Table 10 Stakeholder Consultation

	<ul style="list-style-type: none"> Ongoing discussions on developing design, feedback, and advice on SINSW expectations and requirements
Project Reference Group	<p>Introduction, governance, terms of reference, PRG membership / invitees roles and responsibilities. Overview of project phases and status.</p> <p>Ongoing discussions on developing design, feedback and advice on School expectations and requirements</p>

5.3 Registered Aboriginal parties

Kayandel have undertaken consultation with seven (7) Registered Aboriginal Parties:

- Metropolitan Local Aboriginal Land Council;
- Waliwan Aboriginal Group;
- Didge Ngunawal Clan (2 representatives);
- Butucarbin Aboriginal Corporation;
- Barking Owl Aboriginal Corporation;
- A1 Indigenous Services

Comments received from the RAP's on the draft ACHAR related to:

- Advice that no Aboriginal archaeological sites or objects have been recorded within the study area;
- Request to include unexpected find protocol as part of development process;
- Respect cultural significant objects if found during works.

An unexpected finds protocol will be included in the Cultural Heritage Management Plan.

5.4 Public Authority Engagement

5.4.1 Northern Beaches Council

A pre-lodgement meeting (PLM) was held with Council officers on 14 July 2022 for the overall Narrabeen Education Precinct proposal (Council reference PLM2022/0125). Matters discussed with Council at the PLM have been identified in **Table 2**.

Table 11 Pre-Lodgement Meeting

Matter	Comment	Reference
Specific issues raised by applicant for discussion		
New extension to Block A at Narrabeen Sports High	Not relevant to this application	N/A
New buildings at Narrabeen North Public School	Not relevant to this application	N/A
Height breach at Narrabeen North Public School Hall and Admin Block	Not relevant to this application	N/A
Designated Development (Coastal Wetlands Area)	On 4 August 2022, an application for Secretary's Environmental Assessment Requirements (SEARs) was made to the NSW Department of Planning and Environment (DPE) in relation to the development located on the part of the site mapped as coastal wetlands under Chapter 2 of <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> (R&H	Sections 4.3.1, 4.4.2, 4.4.3, 4.4.4, 4.4.6, 6.1, 6.2 and Appendix A and C.

5 Engagement

Table 11 Pre-Lodgement Meeting		
Matter	Comment	Reference
	SEPP). SEARs were issued by DPE on 9 September 2022 (DPE Application Number SEAR 1718).	
Traffic and Parking	It is noted that the proposed development does not seek to increase staff or student numbers.	N/A
Flooding	The site is located within the Narrabeen Lagoon Catchment and has been identified as containing flood prone land. A Flood Risk and Impact Assessment report has been prepared by BMT that provides an assessment of the potential impacts of the proposed development on existing flood behaviour.	Section 6.7.1
Separate tree removal application	On 3 August 2022, a separate tree removal and replacement DA (DA/2022/1259) was lodged with Council. The DA was publicly notified between 19 August and 16 September 2022. DA/2022/1259 approved by Council. DA/2022/1259 does not include the eight (8) trees sought for removal in this application.	Sections 3.1, 3.2.1 and 6.3.1
Pittwater Local Environmental Plan 2014		
Zoning and Permissibility	The site is zoned SP2 Infrastructure (Educational Establishment) under the LEP. Educational establishments are permitted with consent in the SP2 zone under the LEP. The SP2 zone is also a prescribed zone for schools under section 3.34 of <i>State Environmental Planning Policy (Transport and Infrastructure) 2021 (T&I SEPP)</i>	Sections 4.2, 4.4.7 and Appendix C
Clause 4.6 – Exceptions to Development Standards	Not relevant to this application	N/A
Pittwater 21 Development Control Plan		
Urban Design	Not relevant to this application	N/A
Heritage	Narrabeen North Public School (NNPS) is identified as a local heritage item under schedule 5 of the LEP (Item 2270341). Building A (single binishell dome) and Building B (double binishell dome) are listed on the Department of Education’s Section 170 Heritage and Conservation Register. Building B is identified as an item on the State Heritage Register (SHR #02037 “Binishell Collection (Department of Education)”). A Heritage Impact Statement has been prepared by CityPlan Heritage that provides an assessment of the impacts of the proposed development on the heritage significance of the NNPS site. The HIS concludes that the proposed development is deemed acceptable from a heritage perspective and is consistent with the relevant heritage controls under the LEP and DCP.	Sections 4.3.2 and 6.11
Flooding	A Flood Risk and Impact Assessment report has been prepared by BMT.	Section 6.8.1
Traffic Engineer	A Preliminary Construction Traffic Management Report has been prepared by Ason Group that assess the construction traffic impacts related to the proposed works. No additional parking or traffic generation will result from the proposed works; therefore a Transport Assessment report has not been prepared for this application.	Sections 6.6 and 6.16.2

5 Engagement

Table 11 Pre-Lodgement Meeting

Matter	Comment	Reference
Bushland and Biodiversity	An BDAR has been prepared by Eco Land Consulting and an Aquatic Ecology report by ADE Consulting Group that assesses the impact of the proposed development on the biodiversity values of the site.	Sections 4.3.1, 4.4.2, 4.4.3, 4.4.4, 4.4.6, 6.1, 6.2 and Appendix A and C
Landscape	Landscape Plans and a Landscape Design Report have been prepared by DesignInc that address the required provisions of the DCP.	Sections 3.2.2 and 6.3.2
Coast and Catchment	An assessment against the relevant provisions of Chapter 2 of R&H SEPP is provided in Section 4.4.4 of this EIS.	Section 4.4.4
Riparian Corridor and Water Management	Civil and stormwater plans and reports have been prepared by Enstruct Group, including sediment and erosion control plans. The proposed stormwater system has been designed in accordance with the relevant provisions of the DCP and Council's Water Management for Development Policy. Geotechnical reports have been prepared by Douglas Partners that include an assessment of the presence of groundwater on the site. Civil Report by enstruct notes that surface water and groundwater are impacted negligibly through the proposed development.	Sections 6.8.2 and 6.9
Development Engineering	Concept stormwater plans have been prepared by Enstruct in accordance with Council's Water Management for Development Policy.	Section 6.8.2
Documentation to accompany the Development Application	Noted	See EIS including all Appendices A to X

6 Assessment and Mitigation of Impacts

6.1 Coastal Wetland

The site is mapped as 'Coastal Wetlands' pursuant to R&H SEPP.

The BDAR report prepared by Land Eco Consulting notes:

- *The proposed works will maintain habitat links through the coastal wetland area;*
- *There will be no net loss of native canopy trees within the coastal wetland;*
- *The proposed works will not substantially impact the water quality or hydrological processes of the coastal wetland.*

6.2 Biodiversity and Aquatic Ecology

Land Eco Consulting prepared a Biodiversity Development Assessment Report (BDAR) for the proposed Designated Development works. The BDAR states that 1,712m² (0.17ha) of native vegetation requires removal (including overhanging tree canopy). The area of native vegetation represents 33% of the overall school area. The area of clearing does not meet the Biodiversity Offset Scheme (BOS) trigger of 0.5ha, however, the native clearing within a Biodiversity Values Mapped area triggers the BOS.

Chalinolobus dwyeri (large-eared Pied Bat) is known as a matter of national significance – EPBC listed as vulnerable, was assumed present within the subject site, however, Land Eco Consulting considered it unlikely that the proposed development would significantly impact the species and as such a referral to the Commonwealth is not recommended.

Vegetation on the site is mapped as Plant Type Community (PCT) 4028: Estuarine Swamp Oak Twig-rush Forest, however, Land Eco Consulting identified the vegetation as PCT 3638: South Coast Sands Bangalay Forest, which appears consistent with the “Bangalay Sand Forest of the Sydney Basin and South East Corner Bioregions” Threatened Ecological Community (TEC). PCT is not a candidate for the previously mentioned TEC.

The proposed development will result in five (5) Ecosystem credits and 16 Species credits being retired.

The proposed development is unlikely to exacerbate biodiversity impacts beyond the current impacts from the school development.

ADE Consulting Group undertook field surveys on 1st December 2021 and 6 July 2022 to assess aquatic ecology. All aquatic fauna species seen or heard on site were recorded as well as any scats or scratches found. ADE Consulting Group notes that “*no aquatic fauna habitats were identified on the site*”.

6.3 Trees and Landscaping

6.3.1 Tree removal

Independent Arboricultural Services have prepared an Arboricultural Impact Assessment (AIA) report and Tree Management Plan.

A total of eight (8) trees are proposed to be removed to facilitate the proposed works the subject of this Designated Development application. **Table 8** identified each tree to be removed, its tree retention value and the reasons for removal.

Of the trees proposed to be removed:

- Five (5) trees have been identified as having high tree retention value;
- Two (2) trees have been identified as having medium tree retention value; and
- One (1) tree has been identified as having low tree retention value.

6 Assessment and Mitigation of Impacts

A further 13 trees have been identified as being able to be retained subject to the recommendations of the arborist and final detailed design (Trees 18, 20, 21, 25, 28, 31, 36., 37, 44, 172, 177, 179 and 184).

6.3.2 Landscaping

A landscape strategy and landscape plans has been prepared by DesignInc and includes vegetation to be retained, seating (sandstone benches with timber batten tops), timber boardwalk, accessible ramps, walkways, learning areas, permeable paving, fencing, gates, retaining walls and new vegetation/ tree planting (12) within the area subject to this Designated Development Application.

The following vegetation is proposed:

- 12 trees;
- 537 shrubs;
- grasses;
- 656 groundcovers.

A new entry with 1:20 concrete ramp is to be located west of the existing entry. The existing entry is to be removed (including stairs) and replaced with concrete and with a 1 in 40 concrete ramp.

Existing trees proposed for retention are to be protected during the works. The AIA report provides recommendations in relation to the establishment of appropriate Tree Protection Zones (TPZ) for the trees to be retained and the mitigation of construction impacts on the retained trees in accordance with the requirements of *AS 4970(2009) Protection of trees on development sites* and *AS 4373 (2007) Pruning of amenity trees*.

6.4 Visual impact

Visual aesthetics along Namona Street will be improved through additional landscaping and a new accessible pedestrian pathway entry including an improved view corridor to the heritage listed Bini Domes.

The proposed works will not negatively impact on views from adjoining residential properties (2 and 4 Oak Street) as the primary outlook from the dwellings are to the east and not towards the school. Current views to the NNPS from the rear of these properties are of the existing vegetated area which will remain.

6.5 Ecologically Sustainable Development

The principles of ESD as set out under Section 193 of the *Environmental Planning and Assessment Regulation 2021* are addressed below:

- **The Precautionary Principle:** Sustainability measures have been incorporated comprising the efficient use of resources (energy, water, and materials) and minimising ecological impacts. The head contractor will implement an Environmental Management Plan (EMP) and a climate change risk assessment will be undertaken.
- **Inter-Generational Equity:** The works demonstrate a strong commitment to the preservation of environmental health. Universal design principles will be implemented to provide equitable and safe access.
- **Conservation of Biological Diversity and Ecological Integrity:** The proposal has considered design strategies to improve the ecological value of the site such as retention of native trees and additional landscaping including native vegetation.
- **Improved Valuation, Pricing, and Incentive Mechanisms:** Operational savings will be achieved through sustainable energy, water and waste requirements taking into

6 Assessment and Mitigation of Impacts

consideration whole-of-life costing. The economic cost benefits will be achieved through a long-term view to deliver the best environmental and use benefits on budget.

6.6 Traffic, Transport and Accessibility

There is no change to vehicular access or carparking as part of this application.

The pedestrian entry is proposed to be moved west of the existing pedestrian entry to the NNPS and it will be an accessible pathway.

6.7 Noise and Vibration

6.7.1 Construction Noise and Vibration

A Construction Noise and Vibration Impact Assessment (CNVIA) report was undertaken by Acoustic Studio. Refer **Appendix I**.

The report recommends that a Construction Noise and Vibration Management Plan (CNVMP) be prepared by the Contractor when final details of the vibration management controls required for the works have been determined.

Construction Noise

Noise relating to the proposed works will primarily be from construction traffic and plant material. The CNVIA report proposes mitigation measures including but not limited to:

- Schedule noisy activities to less sensitive times of the day for each nominated receiver (i.e., daytime hours).
- Access routes should be limited to main roads and avoid local residential streets. Engine braking should be avoided, speed limits strictly observed, and heavy braking and accelerating avoided.
- Including Respite Periods where activities are found to exceed the 75 dB(A) Highly Affected Noise Level at receivers, such as 3 hours on and 1 hour off.

Construction Vibration

Acoustic Studio anticipate the potential vibration impacts of the proposal to be low, however, to minimise impacts, consideration should be given to, but not limited to:

- Modifications to excavation and construction equipment used.
 - Avoid the use of large excavators – use the smallest size practicable;
 - Avoid the use of vibratory rollers – switch off vibration mode, or use the smallest size practicable if vibration must be employed;
 - Avoid the use of tracked vehicles on site, where practicable, particularly large, tracked excavators and cranes – use vehicles with tyres.
- Modifications to methods of excavation and construction.
 - Saw cutting can be considered for rock removal rather than conventional rock hammering techniques to limit vibration when close to vibration sensitive locations.
- Rescheduling of activities to less sensitive times.

A register of complaints should be set up by the contractor with each item remaining open until the complaint has been appropriately dealt with.

6.8 Flooding and Stormwater Drainage

6.8.1 Flooding

A Flood Risk Assessment report was undertaken by BMT. Refer **Appendix K**. A small area along the western boundary of the site is identified as being affected by 1 in 100-year flood.

6 Assessment and Mitigation of Impacts

Whilst the proposed works are proposed within the Coastal Wetlands area, this is not all subject to flood impacts. Landscaping works propose no adverse impacts in a 1 in 100-year flood event and negligible impacts in a Probable Maximum Flood (PMF) event.

The new pedestrian entry ramp is located outside of the 1 in 100-year flood extent and will have no impact on flood conditions. The proposed substation and fire hydrant booster are also located outside of the 1 in 100-year flood extent and will have no impact on the flood conditions including the PMF.

6.8.2 Stormwater Drainage

No stormwater drainage works are proposed as part of these works. Stormwater drainage will connect to the existing network within the NNPS site.

6.9 Contamination and Remediation, Geotechnical & Acid Sulphate Soils

Douglas Partners prepared a letter, referencing previous Reports of Geotechnical Investigations for the whole Narrabeen Education Precinct (refer **Appendices L and M**). Whilst the previous reports identify a high probability of Acid Sulphate Soils between 1-3m it is noted in the covering letter that any recommendations and procedures do not significantly affect the Coastal Wetlands area. An Acid Sulphate Soils Management Plan is recommended for the wider NNPS development. There is minimal disturbance to the natural surface as part of this application and the proposed works will not exceed 1m below natural ground levels. Therefore, there will be no disturbance of Acid Sulphate Soils within the Coastal Wetlands area.

A Remediation Action Plan has been recommended for the wider North Narrabeen Public School, however, Douglas Partners considers contamination does not significantly impact the Coastal Wetland area.

The Remediation Action Plan and Acid Sulphate Soil Management Plan should be reviewed and where appropriate, measures implemented prior to, and during construction.

6.10 Waste

No change in ongoing waste volumes, storage or collection is proposed as part of this application.

Demolition and construction waste has been calculated by MRA Consulting group with waste to be sorted into general, recyclable and re-use on site before being re-used on site or transported to local waste facilities.

6.11 Heritage

The site is identified as containing an item of local heritage significance pursuant Schedule 5 of Pittwater LEP 2014 being, Item number 2270341 (Concrete geodesic domes – North Narrabeen Public school). This Item is also under consideration for a State Heritage listing Refer **Figure 10**.

The concrete Bini domes are not located within the mapped 'Coastal Wetlands' area, where the proposed works are located.

The proposed works are located to the south of the proposed heritage curtilage of the concrete Bini domes and will have no impact on the local listed heritage item.

6.12 Aboriginal Cultural Heritage

An ACHA was prepared by Kayandel and included an AHIMS search. Refer **Appendix F** No AHIMS sites were recorded within the subject site. A site survey undertaken by Kayandel did not find any Aboriginal cultural material within the subject area. No sensitive landforms were identified within the subject area.

6 Assessment and Mitigation of Impacts

If, during the course of development works, suspected Aboriginal cultural heritage material is uncovered, work should cease in that area immediately. Heritage NSW should be notified and works only recommence when an approved management strategy has been developed.

In the unlikely event that skeletal remains are identified, work must cease immediately in the vicinity of the remains and the area must be cordoned off. The Proponent must contact the local NSW Police who will make an initial assessment as to whether the remains are part of a crime scene, or possible Aboriginal remains. If the remains are thought to be Aboriginal, Heritage NSW must be contacted by ringing the Enviroline 131 555. A Heritage NSW officer will determine if the remains are Aboriginal or not; and a management plan must be developed in consultation with the relevant Aboriginal stakeholders before works recommence.

6.13 Social Impact

The proposal is unlikely to generate any long term negative social impacts. Temporary negative impacts are likely to be associated with construction of the proposed works. Traffic, parking, and noise impacts on surrounding residential properties can be addressed through specific design and construction measures.

The visual impact of the proposal is considered to be low given there is only direct interface to two adjacent properties and the main frontage is to Namona Street and the NSHS.

The proposal will have positive social impact through students being provided a new accessible entry and additional landscaped area.

6.14 Infrastructure Requirements and Utilities

Erbas prepared an Infrastructure Management Plan to address #14 of the SEARs in relation to existing utility infrastructure, upgrades required (if any) and an infrastructure delivery and staging plan (if required). The report identified that there is no major infrastructure traversing the site that would require relocation. Natural gas available via a 300mm medium pressure main located at the southern boundary is sufficient. Available sewer connections actively serving the site have sufficient capacity. Water available to the site is connected to a water main within Namona Street and sufficient for the proposed works.

External Hydrant does not provide sufficient coverage and is not compliant with current Australian Standards, therefore a new hydrant booster with backflow protection is proposed along the Namona Street frontage. The new hydrant booster will be connected to the authority main.

A new 66kVA 'L' type substation is proposed along Namona Street, within the Coastal Wetland area, to cater for the electrical needs of the wider NNPS development.

Existing telecommunication systems are sufficient for the wider development, however, they will require some augmentation.

6.15 Contributions and Public Benefit

Section 7.12(1) of the EP&A Act states that:

*A consent authority **may** impose, as a condition of development consent, a requirement that the applicant pay a levy of the percentage, authorised by a contributions plan, of the proposed cost of carrying out the development.*

Noting the upgrades that would be provided to the NNPS by the proposal, and noting the works are wholly associated with an existing school where contributions would be required under other developments for the Site, it would not be considered reasonable to impose a Section 7.12 contribution condition on an approval for this Designated Development Application.

6 Assessment and Mitigation of Impacts

6.16 Construction, Operation and Staging

6.16.1 Staging

No staging of works is proposed.

6.16.2 Construction Management

Construction hours are proposed at:

Monday – Friday – 7am to 5pm

Saturday – 8am to 1pm

No works on Sunday or Public Holidays.

Supervision is required by an authorised traffic controller for all movements of vehicles that would cross the footpath. Truck movements will be via Pittwater Road and Namona Street. No trucks will be queued on local roads.

On-site parking will not be available for contractors and the NNPS will be operational throughout construction. Contractors are to park on-street or arrive/ depart by public transport. Contractors are to be advised of and comply with restrictions on the surrounding road network. A tool drop off/ storage area will be available on site to assist contractors travelling by public transport.

6.16.3 Operational Management

There is no change proposed to the operational management of the NNPS as part of this proposal.

6.17 Other Environmental Issues

Table 12 Assessment of Other Environmental Issues

Issue	Assessment Findings
Accessibility and Building Code of Australia (BCA)	Philip Chun Accessibility has reviewed the documentation for the proposed development and noted the proposed development is capable of complying with the BCA as it relates to accessibility requirements.
Bushfire	Grounds within the subject property continue to be maintained as an Asset Protection Zone (Inner Protection Zone). New landscaping is to comply with Section 3.7 'Landscaping' under Planning for Bushfire Protection 2019.
Crime Prevention Through Environmental Design	The proposed works includes the following crime prevention initiatives: <ul style="list-style-type: none"> • Territorial re-enforcement – The new entry, pathway and additional landscaping provide a distinct entry to the NNPS and delineate the public domain from the school development. • Surveillance – Landscaping has been designed to ensure there are no concealment opportunities. Proposed pathways are at close to ground level and visible and provide opportunity for passive surveillance by pedestrians of the coastal wetland area, streetscape, and school entry. • Access control – The new school pedestrian entry is visible from Namona Street. The proposed new entry pathway has been designed as an accessible pathway. • Space/ Activity Management – The coastal wetland area and school entry is fenced along Namona Street. Any damage to the school entry or walkways will be fixed in a timely manner, including graffiti removal. Vegetation with the coastal wetland area will be maintained by the school to ensure a safe and presentable space interfaces with the public domain.
Air Quality	The potential risks to receptors from air emissions from the construction of the proposed development is considered to be low and can be managed by appropriate mitigation measures.
Earthworks	Earthworks are minimal due to the proposed works being landscaping and walkways being raised to minimise impact to the wetland and floods.

6 Assessment and Mitigation of Impacts

Table 12 Assessment of Other Environmental Issues

Issue	Assessment Findings
Structural	Retaining walls along the new entry are proposed to a maximum height of 1.8m are proposed. Engineering details including subsoil draining are provided in Appendix H .
Sediment, Erosion and Dust Control	Erosion and sediment control include siltation fences, catch drains, and sandbag sediment traps as detailed in the civil plans (Appendix H)

6.18 Public Interest

In accordance with Section 4.15(1)(e) of the EP&A Act, the proposed development is in the public interest as it:

- Is permissible in the land use zones and is consistent with relevant planning controls and legislation;
- Will minimise the potential for environmental amenity impacts through both the construction and operational phases;
- Achieves appropriate environmental performance outcomes in relation to acoustic amenity, traffic movements and stormwater drainage;
- Protects biodiversity on site where practicable;
- Will be provided with adequate connection to necessary infrastructure; and
- Is capable of meeting the intent of the Designated Development Application and SEARS requirements.

7 Project Justification

This section of the report provides justification and evaluation for the project as a whole having regard to the potential economic, environmental, and social impacts of the project and the principles of ecological sustainable development.

7.1 Summary of Assessment of Potential Impacts

7.1.1 Environmental Impact

The environmental impact of the proposal has been assessed in detail in **Section 6** of this report.

7.1.2 Economic Impact

The proposal will directly create eight (8) construction jobs.

7.1.3 Social Impact

The proposal is unlikely to generate any long term negative social impacts. Temporary negative impacts are likely to be associated with construction of the proposed works. The visual impact of the proposal is considered to be low given there is only direct interface to 2 adjoining residential properties (within the area of proposed work) and the frontage is to Namona Street and the NSHS.

The proposal will have positive social impact through students being provided an accessible pedestrian entry, additional outdoor learning areas and landscaped areas and upgraded substation and fire booster services facility.

7.2 Mitigation of Impacts

Environmental impacts of the proposal have been assessed and are capable of mitigation to achieve acceptable levels of impact subject to a number of measures being adopted, as set out in the assessment material supporting this EIS. Mitigation measures proposed under this project are provided at **Appendix E**

7.3 Consistency with Strategic Context

An assessment of the proposal against the relevant strategic plans are summarised in **Section 2.2** of this EIS. The proposal is consistent with the relevant strategic plans.

7.4 Compliance with Statutory Context

An assessment of the proposal against the relevant statutory planning considerations is summarised in **Appendix C** and in **Section 4.3** of this EIS.

7.5 Consultation

The project team has carried out consultation in accordance with the SEARs including with community and public authorities. The process and outcome of this consultation is provided in **Appendix D** and **Section 5** of this EIS.

7.6 Compliance Monitoring

Subject to the implementation of the mitigation measures in **Appendix E** there is no specific need for this project for any ongoing compliance monitoring.

7.7 Impact Assessment Uncertainties and Resolution

The EIS and supporting documentation respond in full to the SEARs. The potential impacts of the proposal have been documented and Council has sufficient information to be able to assess and determine the Designated Development Application.

7 Project Justification

The proposed works have been designed to, and will be carried out in, the interests of the public. The works will meet the project objectives to provide ancillary development to Narrabeen North Public School comprising accessible pedestrian pathways, tree removal, landscaping works including planting native vegetation, a substation and fire hydrant booster services.

Accordingly, it is requested that the Council grant approval to the proposed Designated Development Application as set out in this EIS.

8 References

Northern District Plan, Greater Sydney Commission, 2018.

Greater Sydney Region Plan: A metropolis of three cities, Greater Sydney Commission, 2018.

Northern Beaches Local Strategic Planning Statement.

Northern Beaches Environment and Climate Change Strategy 2040.

Northern Beaches Climate Change Action Plan.

State Heritage Register.

Central Coast Koala Management Area.