

29 April 2022

Ms Alejandra Rojas
Manager Strategic Planning, Business Enablement
Department of Education
Level 8, 259 George Street
Sydney NSW 2000

Dear Ms Rojas

New Wee Waa High School (SSD-21854025)
Request for additional information

I refer to the assessment for the New Wee Waa High School (SSD-21854025). The Department of Planning and Environment (Department) has reviewed the Submissions Report received on 31 March 2022 and referred it to Narrabri Shire Council (Council), Transport for NSW (TfNSW) and the Department's Biodiversity, Conservation and Science (BCS) Directorate. The Submissions Report has failed to adequately address a number of key issues as detailed in Council's, TfNSW and BCS' comments on the Submissions Report (**Attachment 2**).

The Department cannot complete its assessment of the application based on the level of information/documentation provided. The Department requires additional information that effectively addresses the issues detailed in **Attachment 1**. The assessment of the application will not progress until the key issues have been adequately resolved and all of the requested additional information is provided to a standard deemed acceptable by the Department.

Please provide the information, or notify us that the information will not be provided, by **15 May 2022**. If you cannot meet this deadline, please provide and commit to an alternative timeframe for providing this information.

If you have any questions, please contact Tuong Vi Doan, on (02) 9995 6706 at Tuongvi.Doan@planning.nsw.gov.au.

Yours sincerely,



Karen Harragon
Director, Social And Infrastructure Assessments
Social & Infrastructure Assessments

Enclosed:

Attachment 1 – Key Issues

Attachment 2 – Council, TfNSW and BCS Submission Report comments

Attachment 1 – Key issues

1. Part 5 works

- a) As previously outlined in BCS' EIS advice, there is an overlap between the footprint of the flood mitigation works proposed to be carried under Part 5 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and the SSD footprint. The submitted BDAR has been prepared on the assumption that biodiversity impacts within the portion of the SSD footprint overlapping the Part 5 flood mitigation works have been assessed under Part 5 of the EP&A Act. Similarly, the Flood Report submitted with the EIS has been prepared on the basis that the flood mitigation works would be approved under Part 5 of the EP&A Act.

It was requested that the environmental impact assessment (EIA) documentation for the approved Part 5 flood mitigation works be provided to enable the Department to carry out an assessment of biodiversity and flood impacts of the proposal. The requested EIA documentation was not provided with the Submissions Report.

The Department cannot complete its assessment of the biodiversity and flood impacts of the proposal in accordance with the *Biodiversity Conservation Act 2016* and EP&A Act until the approved EIA documentation is provided. The Department requests that the EIA documentation is provided as soon as possible to enable referral to relevant agencies (even if this occurs before the finalisation of the other issues raised in this letter).

- b) Clarify whether the stormwater channel north and east of sports field forms part of the Part 5 works or is part of this SSD application. Civil plans indicate it forms part of the Part 5 works, however the architectural plans show it as part of the SSD application and the Submissions Report has not included a statement about this channel in Section 3.1.10.

2. Pedestrian zebra crossing

TfNSW and Council have reiterated that they do not support the location of a pedestrian crossing across the Kamilaroi Highway (Attachment 2). To resolve this outstanding issue, the pedestrian zebra crossing must be removed from the proposal in accordance with TfNSW and Council's advice. The proposal should be amended to include the installation of kerb extensions in accordance with TfNSW and Council's recommendations.

3. Flooding

- (a) Update the Flood Impact Assessment to assess the design changes made to the proposal under the Submissions Report, as detailed in Council's comments (Attachment 2).
- (b) Provide a Flood Emergency Plan prepared in consultation with Council and SES.

You are advised that following submission of the EIA documentation and subsequent review by the Department, further information may be requested in respect to flooding.

4. Outstanding Council comments

Address Council's comments (Attachment 2) on outstanding issues, particularly the following:

- a) traffic and parking
- b) kerb, gutter and footpath works
- c) flooding
- d) transport and accessibility
- e) sewer, water quality and supply
- f) geotechnical considerations and site fill.

5. Landscaping and tree removal

- a) Provide an updated Arborist Report to support the changes (additional trees to be removed) as stated in the Submissions Report.
- b) The list of trees for removal in the Submissions Report are not the same as the trees recommended in the Arborist Report.
- c) Ensure all civil, architectural and landscape plans are consistent. Provide updated plans to be consistent with the number of trees proposed to be removed and replaced. These plans need to be consistent with the updated Arborist and/or the Submissions Report. Notably the inconsistencies in the plans include:
 - i. the location of George Street pedestrian entrances and pedestrian pathways in the eastern part of the site (which, depending on their location would impact trees)
 - ii. Architectural drawing CD1102 ZP and WD1104 F
 - iii. Architectural drawing WD 1104 F identified trees within the sports field and play courts to be removed under a separate approval. This is inconsistent with other plans which indicates tree removal.
- d) The Submissions Report (pg.6) also includes an additional 11 trees that 'are at risk of removal due to potential civil works'. The civil works involved, and the risk posed has not been assessed in the Submissions Report or Arborist Report.
- e) Clarify the details regarding the potential to remove tree 6. It is unclear whether it refers to the removal of tree #6 or one/all of 6A to 6D.

- f) Provide further assessment on the impacts associated with the proposed topsoil removal and its impacts on tree retention. The Submissions Report (pg.27) proposes the removal of between 200mm-300mm of topsoil across the site as part of site earthworks and this is likely to have significant impact on tree retention.
- g) The Landscaping Plan as part of the Submissions Report includes a significant reduction in the number of proposed replacement trees (by 94 trees, from 172 to 78 trees) when compared to the EIS landscaping plans. Provide additional information to justify this significant reduction in tree planting.

6. Western pedestrian footbridge

- a) Clarify the purpose of the western pedestrian footbridge, including:
 - i. its intended use (school student access, field access and/or community access)
 - ii. when gates at the pedestrian bridge would be open
 - iii. access to and from the bridge across the school site.
- b) Consider extending the pedestrian footpath along the Mitchell Street site boundary to connect to the western pedestrian bridge on Charles Street. It is noted that in Appendix I of the EIS (Transport and Accessibility Impact Statement) (pg.36) it states that “additional pedestrian walkways are to be implemented to the north of Mitchell Street and around the proposed development site.” However, the plans only indicate a pathway that extends from the bus bay on George Street to the access gate on Mitchell Street. Extending the footpath along the site’s full southern (Mitchell Street) and western (Charles Street) frontage would be consistent with the promotion of active transport modes as detailed in the EIS.

7. BDAR assessment

If any design refinements or landscape changes are required to address the issues above alter the assessment and findings of the BDAR, the BDAR is required to be updated accordingly.

8. Construction start date

The Submissions Report has not responded to Council’s request to confirm the likely construction start date and whether the demolition of the old high school will be undertaken in parallel with the current proposal.

9. Clarification

Clarify the name of the ‘alternative park site’ identified in the Submissions Report. The Submissions Report site selection commentary (pg.47) refers to an ‘alternative park near the existing school site’.