ETHOS URBAN

22 June 2022

2210246

Karen Harragon
Director, Social and Infrastructure Assessments
NSW Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta 2150

ATTN: Tuong Vi Doan

Dear Vi,

RE: NEW WEE WAA HIGH SCHOOL (SSD-21854025)
REQUEST FOR ADDITIONAL INFORMATION

1.0 Introduction

This letter has been prepared by Ethos Urban on behalf of NSW Department of Education (DoE) in response to the Department of Planning's (DPE) Request for Information (RFI) in relation to the New Wee Waa High School (SSD-21854025), dated 29 April 2022 as well as DPE's follow up request sent by email on 20 May 2022. This letter provides a response to the issues raised by DPE and is accompanied by the following:

- Amended Architectural Drawings and Design Report prepared by SHAC (**Attachment A**).
- Amended Landscape Drawings and Landscape Report prepared by Moir (**Attachment B**).
- Amended Arboricultural Assessment prepared by McArdle and Sons (**Attachment C**).
- Flood Statement and Flood Impact Assessment Addendum prepared by Lyall and Associates (**Attachment D**).
- Traffic and Transport Statement prepared by TTW (**Attachment E**).
- Sanitary Drainage and Sewer Main Statement prepared by JHA (**Attachment F**)
- Water Service Storage Statement prepared by JHA (**Attachment G**).
- Geotechnical Investigation Report prepared by Douglas Partners (**Attachment H**).
- Amended Biodiversity Development Assessment Report prepared by EcoLogical (**Attachment I**).
- Amended Civil Engineering Drawings prepared by Warren Smith and Built (**Attachment J**).

Also provided under separate cover directly to DPE are the Part 5 Flora and Fauna Assessment prepared by EcoLogical and the Part 5 Flood Impact Assessment prepared by Lyall and Associates.

Responses to each issue raised are provided in **Section 2.0** below.

We would like to re-iterate the urgent nature of this project and request your continued assistance in expediting the assessment and determination of the SSD Application. Please do not hesitate to contact us with any further questions or clarifications as needed.

2.0 Response to RFI

2.1 Part 5 works

Issue

DPE and BCS requested that the environmental assessment (particularly for flooding and biodiversity impacts) associated with the separate but related Part 5 Flood Mitigation Works be provided. This is required so DPE can complete their assessment of the flooding and biodiversity impacts associated with the SSD Application.

Response

The Part 5 environmental assessment has been completed and was determined by DoE on 19 May 2022. A copy of the associated Flora and Fauna Assessment and Flood Impact Assessment has been provided to DPE separately to this response.

The Flora and Fauna Assessment provides an assessment of all vegetation removal to be undertaken under Part 5 in accordance with the *Biodiversity Conservation Act 2016* (BC Act) and the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). All areas of the proposed school site that were not assessed in the BDAR that accompanies the SSD Application have been assessed in the Flora and Fauna Assessment (see **Figure 1**). An updated BDAR is provided at **Attachment I** which makes slight adjustments to the boundary of its assessment to ensure all areas within the site are appropriately assessed between both applications. The Flora and Fauna Assessment concludes that there will not be a significant environmental impact on species. It is worth noting that replacement tree planting exceeding the number being removed is proposed as part of the Part 5 works (through landscaping within the flood mitigation channels) and additional tree planting will take place as proposed in the SSD Application.

The Part 5 Flood Impact Assessment considers an 'interim' configuration for the site that provides appropriate flood mitigation characteristics and would allow the site to be redeveloped at a future time – in this instance that future development is the new school as proposed in this SSD Application. The SSD Flood Impact Assessment has considered the Part 5 Flood Mitigation Works in their final configuration and assesses the cumulative impact of both the Part 5 Flood Mitigation Works and the proposed new school. The result is improved flooding conditions at the school site (allowing for safe development of the school) as well as benefits to nearby surrounding properties. Further discussion of flooding impacts is provided at **Section 2.3** of this letter.

Further consultation has been undertaken with Narrabri Shire Council and their specialist consultants in relation to the flood mitigation works and all notification requirements to government agencies, non-government agencies and adjoining landowners under *State Environmental Planning Policy (Transport and Infrastructure) 2021* have been met, with the required notifications issued in November 2021.

At the Council meeting of 24 May 2022, Narrabri Shire Council resolved to accept, in principle, supporting infrastructure assets associated with the New Wee Waa High School, subject to the satisfaction of the General Manager and staff's detailed design concerns being addressed.

Any additional approvals or authorisations required to undertake the Part 5 works will be acquired by DoE prior to the commencement of the relevant works (such as for works located within the road reserve). DoE will liaise directly with Council in relation to the detailed engineering design for the flood mitigation works to ensure that Council is satisfied concerning the design, construction and future maintenance requirements of the works.

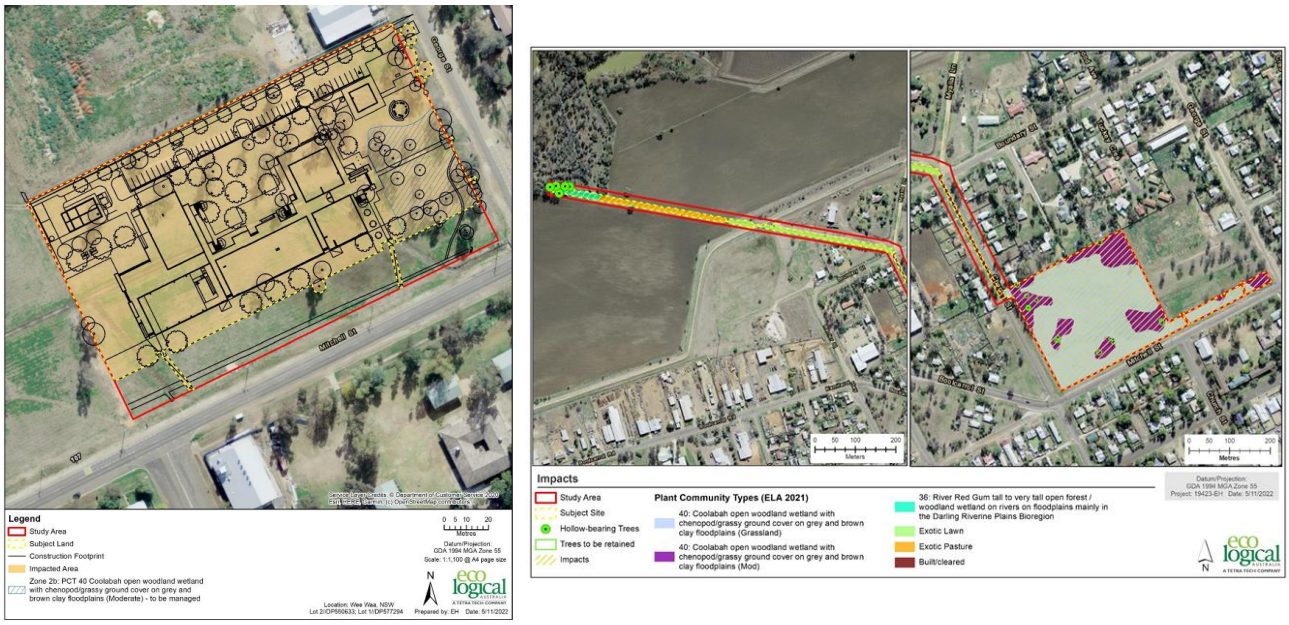

Figure 1 Study area and area of impact assessed under BDAR (left) and Flora and Fauna Assessment (right)

Source: EcoLogical

Issue

DPE requested clarification of whether the stormwater channel along the northern and north-eastern boundary of the sports fields was to be included in the Part 5 scope or the SSD scope. DPE requested updated architectural drawings be provided as necessary.

Response

The stormwater channel running along the eastern and northern boundaries of the proposed sports fields is included in the Part 5 scope since it is required to convey localised flood and storm water to the primary flood conveyance channel. The Part 5 Review of Environmental Factors includes an assessment of these works and shows no significant impact on the school or surrounding land. Amended Architectural Drawings are provided at **Attachment A**. Also refer to **Figure 2**.

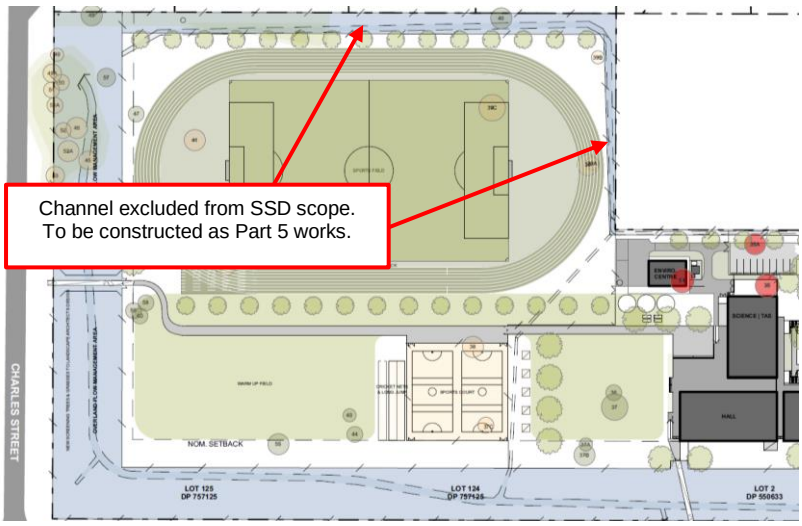

Figure 2 Amended site layout plan showing excluded stormwater channel

Source: SHAC

2.2 Pedestrian zebra crossing

Issue

DPE noted that TfNSW and Council retained their opposition to the proposed zebra crossing at Mitchell Street. DPE requested that the crossing be removed from the proposal and the alternative proposal by TfNSW be incorporated.

Response

While it remains DoE's preference that a zebra crossing be installed for the safety of students, parents, staff and visitors to both the existing public school and the proposed new high school, the crossing is formally removed from the application. Kerb blistering will be installed as required by TfNSW and Council. DoE request that the design of the localised kerb extensions be conditioned to be provided to TfNSW for approval prior to their installation.

If warrants are met once the school is constructed and operational, Council and TfNSW may wish to explore implementation of a pedestrian crossing at that time. It is noted that at Narrabri Shire Council's meeting of 24 May 2022, Council resolved to reconsider their position of objecting the crossing once the new school has been opened.

2.3 Flooding

Issue

DPE requested that the Flood Impact Assessment be updated to assess the design changes made to the proposal under the previously submitted Submissions Report, as detailed in Council's comments.

Response

DoE's flood consultant, Lyall and Associates, discussed the content of Council's submission with Council's external flood consultant/peer reviewer on 9 May 2022. The outcomes of this discussion are provided in the Flood Statement at **Attachment D** and summarised in **Section 2.4** of this letter. DoE acknowledge that for completeness, an update or addendum to the Technical Working Paper submitted with the SSD Application is required by DPE, which incorporates the final configuration of the flood mitigation works as amended in the Submissions Report and as per the final Part 5 approval.

Lyall and Associates have provided an Addendum Flood Impact Assessment at Attachment D, which provides the results of the updated flood modelling reflecting changes to the design as per the Response to Submissions and the final Part 5 Flood Mitigation Works Approval. The changes modelled include:

- Updated (more accurate) ground survey data.
- Shifting the primary flood channel out of the Mitchell Street and Charles Street road reserves, to be contained fully within the school site.
- Minor modifications to the civil engineering design to reflect the SSD detailed engineering design and the approved Part 5 engineering design.
- Updates to the fencing strategy to match the SSD architectural drawings and the Part 5 Approval.

The results of the modelling show that the levels of inundation for all flood events remain very similar to those modelled under the previous arrangement (as lodged with the EIS). A comparison of the indicative depth of inundation within and surrounding the site, for the as-lodged configuration and the amended configuration are provided at **Figure 3** to **Figure 5**.

As can be seen from these figures, the difference in impacts to the subject site and surrounding properties is minimal. Generally speaking, there is a minor increase in the depth of inundation within the eastern portion of the site within the area of retained native grassland, as well as on the eastern side of George Street. To the west and north of the site, there is generally a minor reduction in the amount of inundation, particular for properties to the north of the school site.

The school building area and playing fields remain flood-free for up to the 1% AEP event, meaning the school will remain safe during most flooding events, with flood waters being directed into the flood conveyance channel. Therefore, the amended modelling demonstrates that the revised design results in acceptable flood impacts within and surrounding the site.

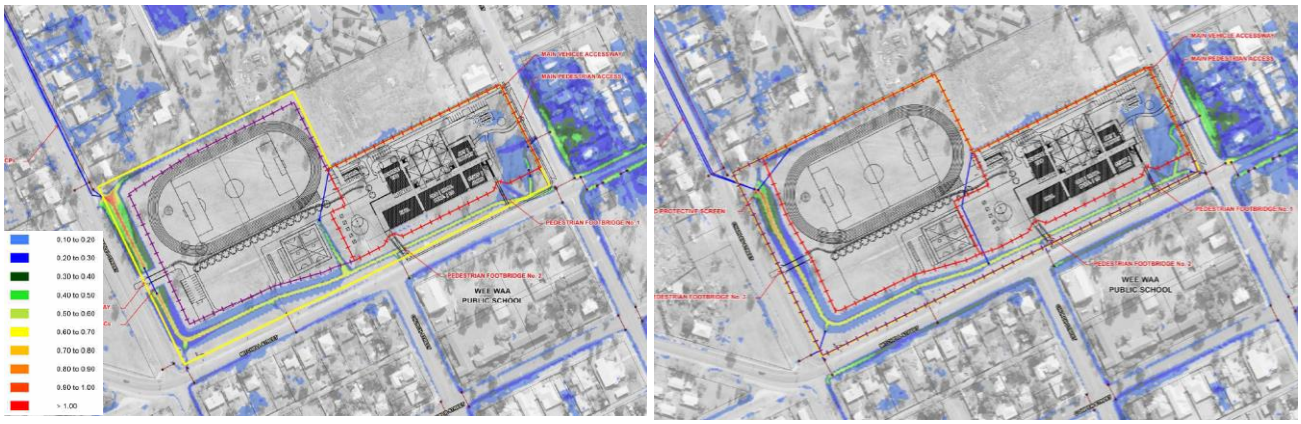

Figure 3 Indicative depth of inundation, 20% AEP event as lodged with EIS (left) and updated (right)

Source: Lyall and Associates

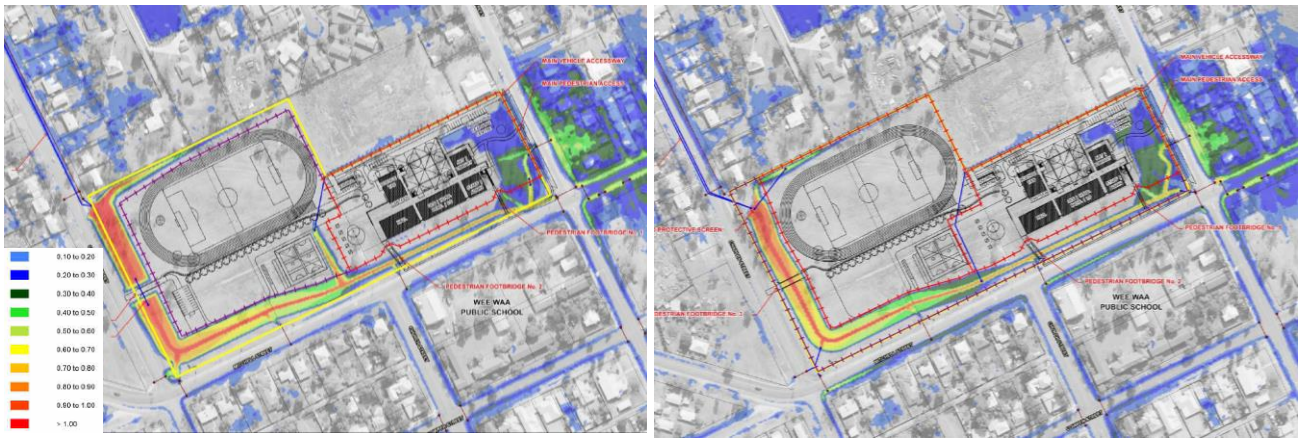

Figure 4 Indicative depth of inundation, 5% AEP event as lodged with EIS (left) and updated (right)

Source: Lyall and Associates

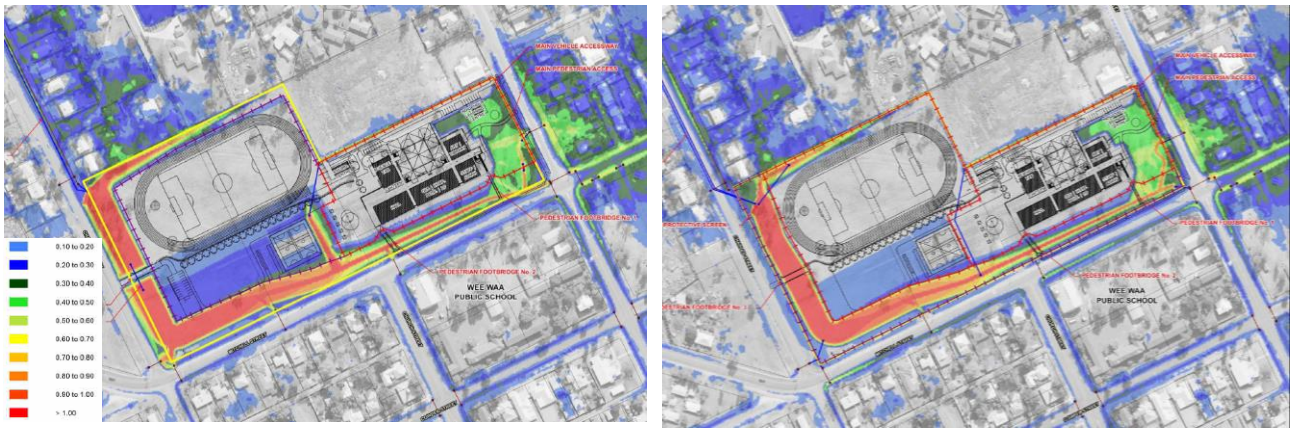

Figure 5 Indicative depth of inundation, 1% AEP event as lodged with EIS (left) and updated (right)

Source: Lyall and Associates

Issue

DPE requested that a Flood Emergency Plan be prepared in consultation with Council and the SES.

Response

DoE in their Submissions Report committed to preparing and implementing a Flood Emergency Plan. Due to the operational nature of the plan and the requirement to consult with SES and Council in its preparation, it is requested that the plan be provided prior to operation of the school. We note that the contents of the plan will relate to the operation of the school (and not influence its detailed design or construction) and that consultation with Council and the SES will take some time to ensure a satisfactory outcome is provided. Since provision of the school is an urgent priority and is now behind schedule, and none of the emergency plan consultation requirements will impact the resolution of final construction details, it is requested that this plan be prepared and finalised prior to operation of the school and that an appropriate condition of consent be imposed to this effect. The impacts of flooding have been considered in detail as per the Flood Impact Assessment and subsequent flood information provided with this RFI response.

2.4 Outstanding Council comments

DPE request that Council's comments on outstanding issues be addressed, in particular: traffic and parking, kerb, gutter and footpath works, flooding, transport and accessibility, sewer, water quality and supple, and geotechnical considerations and site fill. Responses to these items and others are provided below.

Issue

Council raised concerns that: their previous issues had not been adequately addressed (in particular the adequacy of on-street parking and safety for pedestrians in lieu of kerb and guttering being provided around the entire site), insufficient consultation with bus operators had occurred, no swept path analysis for heavy rigid vehicles (HRVs) had been provided for entry to the internal access road, and that community concern had been raised regarding the single-lane entry to the access road possibly not being wide enough.

Response

A response to Council's concerns is provided in the Traffic Statement at **Attachment E**.

40 car parking spaces are proposed internal to the new school, which is an increase on the original 20 proposed to be provided (increased in response to Council's original advice at SEARs stage). Only approximately 15 informal spaces are provided at the existing site, with the residual parking provided on-street. As such, and based on previous site inspections and travel mode survey results, there is not anticipated to be a significant overflow of parking onto the adjacent residential streets with demand for staff parking being accommodated on-site.

While the on-site parking is adequate for staff, the on-street parking arrangement is also considered to be safe for use in the case that there is some overflow parking (as assessed by TTW at **Attachment E**). An Operational Transport Access Management Plan will be prepared and implemented prior to operation of the school, which in accordance with DPE's requirements (as a condition of consent) will include:

- Detailed pedestrian analysis including the identification of safe route options to identify the need for management measures such as staggered school start and finish times to ensure students and staff are able to access and leave the Site in a safe and efficient manner during school start and finish.
- The location of all car parking spaces on the school campus and their allocation (i.e. staff, visitor, accessible, emergency, etc.).
- The location and operational management procedures of the drop-off and pick-up parking.
- The location and operational management procedures for the drop-off and pick-up of students by buses and coaches.
- Delivery and services vehicle and bus access and management arrangements.
- Management of approved access arrangements.

- Potential traffic impacts on surrounding road networks and mitigation measures to minimise impacts, including measures to mitigate queuing impacts associated with vehicles accessing drop-off and pick-up zones.
- Car parking arrangements and management associated with the proposed use of school facilities by community members.

In addition to the above, DoE will also prepare an implement a plan for the management of community uses. The plan will include arrival and departure times and modes of transport, measures to encourage non-vehicular transport to the school and measures to minimise localised traffic and parking impacts.

Council's concerns about consultation with bus providers is noted. As described in **Attachment E**, on-site consultation was undertaken during drop-off/pick-up. Since then, further consultation has been attempted with Forest Coachlines on multiple occasions between January and March 2022, including phone calls, emails and door knocking of their office. No response was received. The school confirmed that the bus operator was the appropriate contact. No submission was received from Forest Coachlines during exhibition of the EIS. DoE has attempted to undertake additional consultation with Forest Coachlines with no response.

Buses will turn from Mitchell Street into George Street and utilise the new 48.5m dedicated bus drop-off zone to drop-off and pick-up children. Safe procedures for the drop-off and pick-up of children will be detailed in the Operational Transport Management Plan, which will minimise the risk of any unsafe conflicts between vehicles and pedestrians. Buses will then depart north along George Street, turning left onto Boundary Street, left again onto Charles Street, and finally left or right onto Mitchell Street to continue their route. At **Attachment E**, a swept path analysis shows that a 12.5m HRV bus can pass a standard passenger vehicle safely at the intersections of George Street/Boundary Street and Charles Street/Boundary Street. Therefore, it is considered that the proposed bus route is viable and safe.

Vehicles that require access to the school via the internal access road include:

- A 7.5m waste collection vehicle as specified in the Construction & Operational Waste Management Plan.
- An 11-seater mini-bus currently owned by Wee Waa High School as advised by the school principal.
- A gas supply truck as photographed below on the Wee Waa Public School site.

Turning paths for the abovementioned vehicles have been previously provided. As such, no access by HRVs is required on the proposed access road and turning paths of a HRV have not been provided. HRVs including 12.5m buses will drop-off and pick-up students from George Street in the dedicated bus bay. Fire trucks will access the booster located on the George Street frontage.

The driveway to the internal access road has been widened in response to Council's concerns, which will provide more room for safe manoeuvring and entry/exit to the school. Refer to **Attachment E** for further details.

Issue

Council noted that a section 138 approval will be required prior to works in the road reserve being undertaken. Council requested that the proposed kerb gutter and footpath works be extended to accommodate increased demand and to mitigate impacts to surrounding landowners.

Response

The proposed new school is the result of a business case made to and approved by NSW Treasury and is funded with NSW Government money. The school is designed to accommodate the expected population, future demand (if required) and modern, fit-for-purpose facilities to support the education of its students. As such, there is ultimately a limited amount of funding allocated to the school. The proposed school and separate flood mitigation works under Part 5 (being undertaken by DoE) includes a significant amount of upgrades to local public infrastructure in addition to the provision of the new school. This includes road widening for dedicated pick-up/drop-off and bus bay, significant and costly upgrades to the flood and stormwater infrastructure within the site and further downstream throughout the township, a new sports field and ball courts available for community use, as well as new kerb and gutter with footpaths at the key required areas around the boundary of the site. The site has a very large perimeter,

and it is simply not feasible to provide full kerb and guttering around the entire perimeter of the site. Approximately 270m of new footpaths with kerb and guttering is being provided along the George Street frontage (which is the main school entrance) and Mitchell Street to provide access to the new bridges for secondary access to the school.

As described in the Transport Accessibility Impact Assessment provided with the EIS, the proposed pedestrian pathways are located to provide access between the George Street and Mitchell Street entry points to the school, including connection to the pick-up/drop-off and bus bay. The mode share targets set in the Green Travel Plan provided with the EIS indicate that 65% of students will arrive via pick-up/drop-off or bus, with 15% currently walking to school (target 20%). The findings of a mode share study undertaken for the EIS indicated that for existing high school students, 11% of those walking to school will arrive from the north-west, with a further 28% from the south-west. Applying these percentages to a school with capacity of 200 students means that there will be a very small number of students walking to and from school from the west and being required to utilise the areas of street with no kerb or footpath. Refer to Section 2.5.1 of the EIS Transport and Accessibility Impact Statement for the results of this survey.

For the students who do walk from the west, the existing grass verges are wide and can accommodate walking in addition to the on-street parking (if utilised). During wet weather, the proposed flood mitigation works at the school site and further downstream will reduce the ability for localised water to pool within the road verge. The existing open stormwater channel along the Charles Street road reserve currently results in water pooling and may provide unsafe walking conditions for students. With the implementation of the proposed flood mitigation works and construction of the new school, this open channel will be removed and replaced with safe, fenced flood and stormwater conveyance channels internal to the site boundary. This will result in safer walking conditions for students during and after rainfall along both Charles Street and Mitchell Street.

Section 138 approvals will be sought as required post determination of the SSD Application, before any works or activities commence in the road reserves. We note that under Section 4.42(1)(f) of the EP&A Act, a section 138 approval under the *Roads Act 1993* must be applied consistently with the SSD consent.

As described above and at **Attachment E**, parking and pedestrian arrangements in areas without the kerb and gutter are considered appropriate and safe.

Issue

Council's external flood consultant provided comments on the flood impact assessment, stating that updated modelling had not been provided to reflect the changes made in the Submissions Report, that an appropriate blockage assessment had not been undertaken, and that a chain-wire fence should be clarified and modelled appropriately. Council also requested that they be engaged in the preparation of the Flood Emergency Plan.

Response

As described in **Section 2.3**, DoE's flood consultant discussed the submission with Council's external flood consultant and an in-principle agreement was reached about how to address the consultant's concerns. Responses based on the outcome of this discussion, as well as an addendum Flood Impact Assessment are provided at **Attachment D**. In summary:

- An updated Flood Impact Assessment is provided at **Appendix D**, which includes any design changes made as part of the Response to Submissions and the determined Part 5 Flood Mitigation Works. The results of the amended modelling are discussed at **Section 2.3**.
- A blockage analysis was undertaken in the EIS assessment, accordance with the procedures set out in the 2019 edition of *Australian Rainfall and Runoff* (Geoscience Australia, 2019), the findings of which are set out in Section 6.7 of the Technical Working Paper provided with the EIS. An L_{10} factor of 1.5m was adopted as part of the assessment and the provision of a screen on the inlet of the twin 1350mm diameter pipes does not increase the blockage factor from the adopted value of 25%.
- The terminology of 'chain-wire' in the Submissions Report was misleading and should instead be considered as a series of vertical posts (similar to a light-duty tubular handrail) that would be installed across the channel, linked by a series of horizontal chains.

Also as described in **Section 2.3**, DoE has committed to preparing a Flood Emergency Plan in consultation with Council and the SES. This plan will be prepared and finalised prior to operation of the school.

Issue

Council retained their opposition to the proposed Mitchell Street pedestrian crossing and re-iterate their preference for a kerb blister/extension configuration.

Response

As described in **Section 2.2**, while it is DoE's preference that a zebra crossing be provided for safety reasons, the crossing is formally removed from this application. The design of kerb blistering at Mitchell Street will be subject to agreement with TfNSW post determination of the SSD Application. If warrants are met once the school is constructed and operational, Council and TfNSW may wish to explore implementation of a pedestrian crossing at that time. Council resolved at their meeting on 24 May 2022 to reconsider their opposition to the crossing once the school is operational.

Issue

Council raised concerns that their previous issues regarding sewer and water quality supply were not adequately addressed. In particular, this included the details of the water services required to service the school, calculations to support increasing the size of the receiving sewerage network, and the flow/pressure tests use to inform the fire and potable water systems (as well as corresponding storage and pumping arrangements).

Response

Further design detailing and consultation with Council has been undertaken since the Submissions Report was provided.

In relation to sewer connections, the sanitary drainage system will comprise a collection tank and pump system. The system will gravity drain to a collection tank and be pumped periodically to a new connection to the sewer main at the north-west corner of the property. It is understood that a new branch line will be required at the existing manhole. The reason for the collection tank and pump design is that the index length of drainage system from furthest fixture to proposed connection point to sewer main is over 450m and has minimal grade. Calculations and the resulting design criteria and size is described at **Attachment F**. The design has been agreed in-principle with representatives from Narrabri Shire Council.

Flow tests confirmed that the flow rate for potable water in Mitchell Street is low for the intended use. As such, a new 50mm connection extended from the existing water main located in Mitchell Street and will extend to water meter with backflow prevention in the form of reduced pressure zone device. A break tank is proposed to be supplied with water from the water main via backflow prevention and metering and then to provide pumps to supply pressure and flow to the school. The required design criteria and storage volume are described at **Attachment G** and have been agreed in-principle with representatives from Narrabri Shire Council.

Since the existing flow rates are low, in accordance with AS2419 two water tanks must be provided on-site with a four-hour duration, for fire-fighting purposes. This equates to 144,000L storage as described at **Attachment G**.

Since the proposed hydrant and sprinkler tanks have increased in size compared to that submitted in the EIS and Submissions Report, the tanks have been moved further internal to the school grounds, at the end of the access road. This will reduce their visual impact to neighbours and when viewed from the street. Boosters remain located at the George Street frontage of the site with pipes.

Issue

Council re-iterated their concern that on-site spoil may not be suitable for re-use as fill on-site.

Response

Council's concerns are noted. On-site spoil from the excavation of the flood mitigation channel has been assessed under a Geotechnical Investigation prepared by Douglas Partners as part of the Review of Environmental Factors undertaken under Part 5 of the EP&A Act. The results of the Geotechnical Investigation state that material won from excavation is expected to be suitable for use on-site, pending implementation of the recommended mitigation measures.

Issue

Council raised and re-iterated several other concerns including development contributions, waste management (including separate streams for cardboard), visual privacy, acoustics, light spill and separate approvals (Part 5).

Response

The following responses are provided to Council's other concerns:

- DoE reiterate their previous response in relation to the payment of development contributions. Since the school is considered an essential piece of community infrastructure and significant upgrades to Council's flood and stormwater system are being undertaken, an exemption from paying local development contributions is sought.
- The separation of cardboard waste is accepted and DoE request that this be conditioned as required.
- Visual privacy concerns have been subject to consultation with surrounding neighbours including the resident of 41 George Street. As part of this RFI Response, the hydrant and sprinkler tanks have been moved away from the interface with the neighbour at 41 George Street, which will improve their outlook and visual privacy.
- As noted in Council's comments, light spill and acoustic impacts will be mitigated as described in the EIS and Submissions Report specialist studies and reflected in the school's final operational management plan as appropriate.
- A description of the separate Part 5 works and environmental assessment is provided in **Section 2.1**. Consultation with Council will continue in relation to the detailed design and ongoing maintenance of the flood and stormwater infrastructure that is subject to the separate Part 5 approval. DoE will provide a period of maintenance of the infrastructure while agreement with Council is reached. Note that this is subject to the Part 5 approval and consultation with Council and does not form part of the SSD Application.

2.5 Landscaping and tree removal

Issue

DPE requested that an updated Arborist Report be provided to support the landscape changes.

Response

An Amended Arboricultural Report has been prepared at **Attachment C**. The Arboricultural Report has been co-ordinated with the amended Architectural Drawings, Landscape Plans and BDAR.

Issue

DPE raised concerns that the list of trees proposed for removal in the Submissions Report did not match the Arborist Report.

Response

There are 31 trees proposed to be removed under this SSD Application: Tree 6, 6D, 7C, 7D, 8, 9, 9B, 10, 10A, 11, 12, 13, 14, 14A, 14B, 14C, 14D, 14E, 14F, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 35A, and 54. Amended Architectural Drawings, Arboricultural Impact Assessment, Landscape Plans and BDAR have been co-ordinated and are provided as attachments to this RFI Response. A Tree Removal Plan prepared by SHAC is shown at **Figure 6**, which details all trees proposed to be removed in red.

Tree removal will also be undertaken under Part 5 approval as described in **Section 1.1** and has been assessed separately in a Review of Environmental Factors undertaken by DoE.

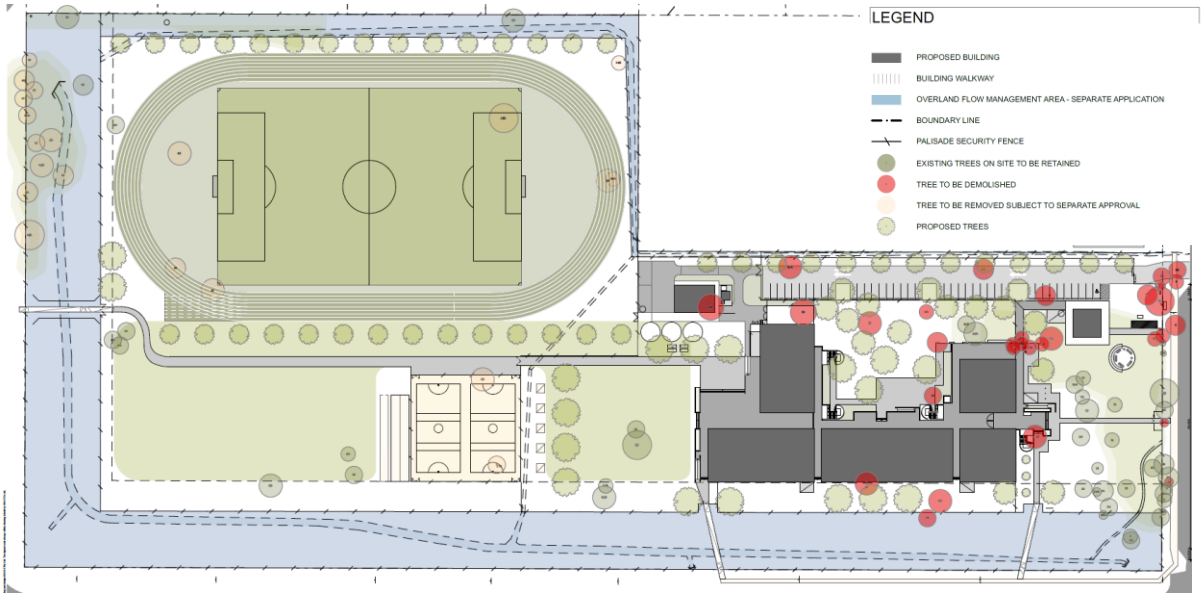

Figure 6 Proposed tree removal plan

Source: SHAC

Issue

DPE requested that all civil, architectural and landscape plans be updated to be consistent and that whether removal of tree 6 means removal of just tree 6 or removal of one/all of trees 6A to 6D.

Response

As described above, amended documentation has been provided as attachments to this RFI Response. The documents have been co-ordinated to ensure the same tree removal is described in each. Tree 6 is separate to trees 6A-6D. The amended proposal seeks removal of tree 6 and tree 6D. Trees 6A-6C are proposed to be retained.

Issue

DPE raised concerns that 11 trees were identified as being at risk of removal due to detailed civil engineering design within the site which had not been assessed within the Arboricultural Assessment.

Response

An updated Tree Removal Plan has been prepared by SHAC and provided at **Attachment A**. This shows all trees that are proposed to be removed under the SSD Application. An amended Arboricultural Assessment is provided at **Attachment C** which assesses the requirement for each tree to be removed. No trees are considered 'at risk of removal' beyond those identified for removal in this RFI Response. Of the trees described as being 'at risk' in the Submissions Report, seven are now proposed to be removed (trees 6, 28, 29, 31, 32, 33 and 34) and four are proposed to be retained (trees 24, 25, 32A and 32B).

Issue

DPE raised concerns that the impact of removing 200mm-300mm topsoil as required by the Geotechnical Report on tree removal had not been fully considered.

Response

An updated Geotechnical Investigation Report has been prepared by Douglas Partners and is provided at **Attachment H**. The updated report includes additional investigations undertaken to a greater depth than previous investigations to confirm the screw-pile design of building footings as proposed is appropriate. The report confirms there are three options for the detailed design of the footings, including placement of low reactivity material at the site, using piles below the 'active' soil zone to support the buildings (approximately 4m below the surface), or installation of sleeved piles within the upper portion of the reactive soils. The proposed structural design of footings is to use screw piles to below the 'active' soil zone depth. It is no longer proposed to remove the topsoil as proposed in the Submissions Report. The trees proposed to be removed are those described above, which has considered the civil design and any other design or landscape changes that have taken place.

Issue

DPE requested additional information to justify the reduction in number of replacement trees compared to the EIS Landscape Plans.

Response

The landscape design was amended during the Response to Submissions and included a reduction in the number of new trees to be planted. Amended Landscape Plans are provided at **Attachment B**, which include minor design changes since the Submissions Report including co-ordination of tree removal and retention and other minor design changes.

Since lodgement of the EIS, the required flood mitigation works have been designed in detailed and fully costed, the landscape design associated with the flood mitigation works has been detailed, and the builder has been engaged. Detailed design of both the proposed school buildings and the landscape has been undertaken, and to balance the required speed of construction, cost, functionality of design and buildability, the landscape design was amended. The core principles of the landscape design remain, but the number of trees has been reduced and many of the seating elements have been amended. Note that there will still be a significant increase in canopy coverage when compared to the existing site and the Connecting with Country workshops will continue to inform the detailed landscape design before construction is completed. Landscaping works will also be undertaken as part of the Part 5 flood mitigation works which will increase the number of trees within its site boundary. Overall, while there is a reduction in the number of trees compared with the EIS submitted design, the result remains a significantly improved landscape with increased canopy above the existing site, with a landscape design that is functional and appropriate for the proposed new school that is urgently required to service students and staff currently co-located with the public school.

2.6 Western pedestrian footbridge

Issue

In relation to the western pedestrian footbridge, DPE requested that its purpose, intended use, timing for opening gates, and access to and from the bridge across the school site be clarified.

Response

The following clarifications are made in relation to the western pedestrian footbridge:

- The western footbridge will be used for school use by students arriving at site from the west and leaving school in the afternoons. It will also provide access for the community to the sports fields outside of school hours. The footbridge is located so that it provides access to the fields without providing full access to the school site, with the secondary security line located near the main school buildings.
- The gate to the footbridge will be open for student access before and after school but closed during school hours. The method of control for these gates in for community access will be subject to operational arrangement in accordance with the Operational Management Plan to be prepared and implemented prior to operation of the school.

- A pedestrian path has been included internal to the school grounds which will connect pedestrians to from the gates to the secondary line of security at the main school buildings. Refer to the Amended Architectural Drawings (**Attachment A**).

Issue

DPE requested that the proposed pedestrian footpath along George Street and part of Mitchell Street be extended along the remainder of Mitchell Street and Charles Street to connect with the western pedestrian footbridge.

Response

The proposal remains to provide a footpath along George Street, which is the main frontage and entry point for the school, as well as along the eastern portion of Mitchell Street to connect to the secondary pedestrian footbridges. Refer to **Section 2.4** for a discussion of why this extent of footpath is proposed. As described in the Transport Accessibility Impact Assessment provided with the EIS, the pedestrian pathways are located to provide access between the George Street and Mitchell Street entry points to the school, including connection to the pick-up/drop-off and bus bay. Kerb Blistering at Mitchell Street will allow pedestrians to cross to the southern side of Mitchell Street to the public school and its pedestrian pathway, if required. The promotion of active and public transport modes will still be a focus of the school through implementation of the Green Travel Plan and future Operational Transport Management Plan. Note that the mode share targets set in the Green Travel Plan, which are developed with consideration of the existing mode shares, still result in a majority of students arriving at school by either drop-off/pick-up or bus. Therefore, in lieu of being able to provide a complete footpath around the site, the pedestrian infrastructure was prioritised in the locations near the bus bay and drop-off/pick-up, as well as near the existing Public School and kerb extensions for the crossing of Mitchell Street. Additional pedestrian footpaths could be investigated in the future, depending on the operational outcome at the site and subject to additional funding.

2.7 BDAR assessment

Issue

DPE requested that if any changes to the design, landscape or tree removal were made, an updated BDAR would be required.

Response

An Amended BDAR is provided at **Attachment I**. The Amended BDAR has considered the proposed design changes including the amended scope of tree removal. As described in **Section 2.1**, a Flora and Fauna Assessment has been undertaken for the Part 5 flood mitigation works which assesses the biodiversity impacts associated with vegetation removal outside the scope of the BDAR. All vegetation removal has been adequately assessed either within the Flora and Fauna Assessment or the BDAR.

2.8 Construction start date

Issue

DPE requested that the likely construction start date be provided in response to Council's previous comment. DPE also requested clarification of whether the demolition of the old high school will be undertaken in parallel with the current proposal.

Response

The project, which is required to urgently provide a new and safe school for students currently co-located within the overcrowded primary school site, is currently behind schedule and works should have already commenced on-site to meet the school's opening date initially provided by the Minister for Education. As such, works will commence as soon as possible. Flood mitigation works will commence as soon as possible once pre-construction requirements associated with the Part 5 Approval have been completed. These works are expected to commence in June 2022. DoE require the school to be complete by the end of 2022.

Demolition of buildings on the existing school site and upgrades to the agricultural facilities are being progressed via a separate planning pathway and do not form part of the SSD Application. The works to the existing school site are expected to be complete before occupation of the main new school. DoE will remain responsible for the site and will provide security as per their standard requirements to reduce the possibility of vandalism at the site.

2.9 Clarification

Issue

DPE requested that the name of the 'alternative park site' identified in the Submissions Report be provided in response to Council's request.

Response

The name of the site will be provided to DPE under a separate cover.

2.10 Additional Requests for Clarification

A number of additional requests for clarification were made by DPE via email. Responses to these requests are provided below.

Arboricultural Assessment

DPE requested clarification on whether the trees identified to be removed in the Arborist Report were to be replanted or not. DPE also requested that clarification be made in Section 3 of the report, which identified trees being removed under the Part 5 Approval as being 'retained' under the SSD Application.

In response, an Amended Arboricultural Impact Assessment has been provided at **Appendix C**. The assessment confirms at Section 7 that removed trees 'must include a tree planting programme to replace the trees of the same species that are being removed in a suitable area of the site to maintain the biodiversity of the site.' Therefore, it is not intended that the trees will be removed and relocated/replanted – instead they will be replaced by planting of the same/similar species, as per the landscape plan. Wording in the Arboricultural Assessment has been updated to clarify this approach.

Further, Section 3 (as well as the introduction and conclusion) of the Arboricultural Assessment has been updated to clarify that trees approved to be removed under the separate Part 5 approval are not labelled 'retain'. Instead, they have been labelled 'Tree to be removed under separate approval (if not removed retain)'. This indicates that the trees are to be removed under the Part 5 approval, but that if they are not removed, they will be retained with appropriate tree protection measures.

Civil Engineering Drawings

DPE requested that the Civil Engineering Drawings be updated to take into account the change in earthworks proposed, the amended route for Stormwater Channel #2 and exclusion of the northern and north-eastern stormwater channels being constructed under the Part 5 approval from the SSD scope.

Amended Civil Engineering Drawings have been provided at **Appendix J**. The civil engineering design has progressed to a more detailed design than that what was submitted in the proponent's Response to Submissions and has been undertaken by Warren Smith Engineers in consultation with the project's contractor and builder, Built. All changes to the design and DPE's requests have been included in the amended drawings and these represent the intended layout to be constructed. The alignment of Stormwater Drainage Channel #2 was amended to meander around trees, allowing them to be protected and retained. The civil design also responds to the approved Part 5 civil design.

Landscape Drawings

DPE requested that the Landscape Drawings be amended to reflect the updated route for Stormwater Drainage Channel #2. Amended Landscape Drawings and an Amended Landscape Report are provided at **Appendix B**, showing the amended alignment of Stormwater Drainage Channel #2 to meander around some existing trees.

3.0 Conclusion

A response to each item raised in your RFI letter and subsequent email has been provided in **Section 2.0**. We trust the responses and attachments have adequately addressed your request and will allow for a rapid assessment and formulation of draft conditions of consent. We thank you for your co-operation and request that you continue to assist us in expediting the issue of draft conditions as soon as possible, so that the urgently required school can be constructed as soon as possible.

Please do not hesitate to get in touch with the Statutory Planning representative of DoE for the project, David Lewis, at david.lewis83@det.nsw.edu.au with any further questions or queries.

Yours sincerely,

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