DOC21/479698-5

28 June 2021

Industry Assessments
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124
Email: rebecca.sommer@planning.nsw.gov.au

Attention: Rebecca Sommer

Dear Ms Sommer,

Thank you for your request for the Environment Protection Authority's (EPA) requirements for the Environmental Impact Statement (EIS) for the proposed new Wee Waa High School, 105-107 Mitchell Street, Wee Waa (SSD-21854025) on Thursday 10 June 2021.

The EPA understands the proposal involves the construction of a new high school with a capacity of 300 students consisting of several buildings along with associated sporting facilities and infrastructure.

The EPA has considered the details of the proposal as provided by the Department of Planning, Industry and Environment (DPIE) and has identified the information it requires to issue its general terms of approval in **Attachment A.**

In summary, the EPA's key information requirements for the proposal include an adequate assessment of:

1. **Air issues, including odour** - air quality including dust and odour generation from the construction and operation of the development on the surrounding landscape and/or community. The proponent must, as far as practical, prevent or minimise the generation of air emissions, including dust generation from the site. The EPA expects dust mitigation measures to be identified and implemented as standard practice;

2. **Waste** – a Construction and Demolition Waste Management Plan and Operational Waste Management Plan for the project needs to detail proposed waste and recycling practices and procedures;

3. **Noise and Vibration** - proximity to sensitive receptors and the impact of any noise sources associated with the construction and operational noise from the project. The proponent should identify the construction hours for the project, should works be proposed outside of the standard construction hours (7:00am-6pm, Monday to Friday and 8am-1pm on Saturday) justification for extended hours needs to be included in the Project Application. Activities to be carried out need to be identified and associated community consultation and/or notification process needs to be detailed; and

4. **Water and Soils** - sediment and erosion controls during construction and operation phases and the protection of surface and groundwater from contaminated runoff.

5. **Contamination** – the proponent conducts a detailed site assessment across the proposed area and provide conclusions on suitability of the site for the intended use and recommendations for remediation and management of any encountered contamination.

In carrying out the assessment, the proponent should refer to the relevant guidelines as identified in Attachment A and any relevant industry codes of practice and best practice management guidelines.

For the purposes of the *Protection of the Environment Operations Act 1997* ("the Act"), the EPA will be the appropriate regulatory authority for construction activities associated with the school development. However, on the information provided to the EPA, the proposed development is not a scheduled activity and the proponent will not require an Environment Protection Licence from the EPA.

To assist the EPA in assessing the EIS it is requested that the EIS document follow the format of DPIE's EIS guidelines and addresses the EPA's specific requirements outlined in the following attachments.

If the necessary information is not adequately addressed in the EIS then delays in the development assessment process may occur. The Proponent should be made aware that any commitments made in the Environmental Impact Statement (EIS) may be formalised as approval conditions and may also be placed as formal licence conditions.

The EPA requests that the proponent provide one (1) electronic copy of the EIS when lodging it application with the EPA. These documents should be sent to the EPA's Armidale office by email to: armidale@epa.nsw.gov.au.

If you have any queries regarding this matter, please contact myself on (02) 6773 7000 or by email to armidale@epa.nsw.gov.au.

Yours sincerely,

LINDSAY FULLOON

Manager Regulatory Operations

Regulatory Operations Regional - West

ATTACHMENT A: Environmental Assessment Requirements

NEW WEE WAA HIGH SCHOOL, 105 – 107 MITCHELL STREET, (SSD-21854025)

1. Environmental impacts of the project.

1.1. Impacts related to the following environmental issues need to be assessed, quantified and reported on:

- **Air Issues, including odour**: air quality including dust and odour generation from the construction and operation of the development on the surrounding landscape and/or community. The proponent must, as far as practical, prevent or minimise the generation of air emissions, including dust generation from the site. The EPA expects dust mitigation measure to be identified and implemented as standard practice;
- **Noise and vibration impacts:** proximity to sensitive receptors and the impact of any noise sources associated with the construction and operational noise from the project. The proponent should identify the construction hours for the project, should works be proposed outside of the standard construction hours (7:00am-6pm, Monday to Friday and 8am-1pm on Saturday) justification for extended hours needs to be included in the Project Application. Activities to be carried out need to be identified and associated community consultation and/or notification process needs to be detailed;
- **Waste** including hazardous materials and radiation. Consideration needs to be given to disposal options for general waste, sanitary waste as well as hazardous materials and radiation, where relevant.
- **Water and Soils** sediment and erosion controls during construction and operation phases and the protection of surface and groundwater from contaminated runoff.
- **Contamination** the proponent conducts a detailed site assessment across the proposed area and provide conclusions on suitability of the site for the intended use and recommendations for remediation and management of any encountered contamination. The proponent ensures any site investigations undertaken, and subsequent reports are prepared in accordance with relevant guidelines made or approved by the EPA under section 105 of the Contaminated Land Management Act 1997.

The Environmental Impact Statement (EIS) should address the specific requirements outlined under each heading below and assess impacts in accordance with the relevant guidelines mentioned.

SPECIFIC ISSUES

2. Air issues

2.1. The EIS must include an air quality impact assessment (AQIA). The AQIA should:

2.2. Assess the risk associated with potential discharges of fugitive and point source emissions for all stages of the proposal. Assessment of risk relates to environmental harm, risk to human health and amenity.

2.3. Justify the level of assessment undertaken on the basis of risk factors, including but not limited to:

- proposal location;
- characteristics of the receiving environment; and
- type and quantity of pollutants emitted.

2.4. Describe the receiving environment in detail. The proposal must be contextualised within the receiving environment (local, regional and inter-regional as appropriate). The description must include but not be limited to:

- meteorology and climate;
- topography;
- surrounding land-use; receptors; and
- ambient air quality.

2.5. Include a detailed description of the proposal. All process that could result in air emissions must be identified and described. Sufficient detail to accurately communicate the characteristics and quantity of all emissions musty be provided.

2.6. Include a consideration of 'worst case' emission scenarios and impacts at proposed emission limits.

2.7. Account for cumulative impacts associated with existing emissions sources as well as any currently approved developments linked to the receiving environment.

2.8. Include air dispersion modelling where there is a risk of adverse air quality impacts, or where there is sufficient uncertainty to warrant a rigorous numerical impact assessment. Air dispersion modelling must be conducted in accordance with the: *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (2016) https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/air/approved-methods-for-modelling-and-assessment-of-air-pollutants-in-nsw-160666.pdf;

2.9. Demonstrate the proposal's ability to comply with the relevant regulatory framework, specifically the *Protection of the Environment Operations (POEO) Act 1997* and the *POEO (Clean Air) Regulation 2010*. Particular consideration should be given to section 129 of the POEO Act concerning control of "offensive odour".

2.10. Detail emission control techniques/practices that will be employed by the proposal.

3. Noise and Vibration

The EIS must assess the following noise and vibration aspects of the proposed development

3.1 Construction noise associated with the proposed development should be assessed using the *Interim Construction Noise Guideline (*DECC, 2009). These are available at:https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/interim-construction-noise-guideline

3.2 Vibration from all activities (including construction and operation) to be undertaken on the premises should be assessed using the guidelines contained in the *Assessing Vibration: a technical guideline* (DEC, 2006). These are available at: https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/assessing-vibration

3.3 If blasting is required for any reasons during the construction or operational stage of the proposed development, blast impacts should be demonstrated to be capable of complying with the guidelines contained in *Australian and New Zealand Environment Council – Technical basis for guidelines to minimise annoyance due to blasting overpressure and ground vibration* (ANZEC, 1990). These are available at: https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/interim-construction-noise-guideline

3.4 Operational noise from all industrial activities (including private haul roads and private railway lines) to be undertaken on the premises should be assessed using the guidelines contained in

the *NSW Noise Policy for Industry* (EPA, 2017), available at: https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/noise-policy-for-industry-(2017)

3.5 Noise on public roads from increased road traffic generated by land use developments should be assessed using the guidelines contained in the *NSW Road Noise Policy* and associated application notes (EPA, 2011), available at: https://www.epa.nsw.gov.au/your-environment/noise/transport-noise

4 Waste, chemicals and hazardous materials and radiation

4.1 The EIS must assess all aspects of waste generation, management and disposal associated with the proposed development.

4.2 The EIS must demonstrate compliance with all regulatory requirements outlined in the POEO Act and associated waste regulations.

4.3 The EIS must identify, characterise and classify the following in accordance with the EPA's *Waste Classification Guidelines (2014)* and associated addendums:

(i) all waste that will be generated onsite through excavation, demolition or construction activities, including proposed quantities of the waste;

(ii) all waste that is proposed to be disposed of to an offsite location, including proposed quantities of the waste and the disposal locations for the waste. This includes waste that is intended for re-use or recycling.

Note: The EPA's W*aste Classification Guidelines (2014)* and associated addendums are available at: https://www.epa.nsw.gov.au/your-environment/waste/classifying-waste

4.4 The EIS must outline contingency plans for any event that may result in environmental harm, such as excessive stockpiling of material, or dirty water volumes exceeding the storage capacity available on-site.

4.5 The EIS must demonstrate that appropriate spill containment will be provided for storage, filling and loading of all fuels and other chemicals to be used on site, in accordance with the relevant Australian Standard.

5 Water

5.1 The EIS must demonstrate how the proposed development will meet the requirements of section 120 of the POEO Act.

5.2 The EIS must include a water balance for the development including water requirements (quantity, quality and source(s)) and proposed storm and wastewater disposal, including type, volumes, proposed treatment and management methods and re-use options.

5.3 If the proposed development intends to discharge waters to the environment, the EIS must demonstrate how the discharge(s) will be managed in terms of water quantity, quality and frequency of discharge and include an impact assessment of the discharge on the receiving environment. This should include:

- Description of the proposal including position of any intakes and discharges, volumes, water quality and frequency of all water discharges.

- Description of the receiving waters including upstream and downstream water quality as well as any other water users.

- Demonstration that all practical options to avoid discharge have been implemented and environmental impact minimised where discharge is necessary.

5.4 The EIS must refer to Water Quality Objectives for the receiving waters and indicators and associated trigger values or criteria for the identified environmental values of the receiving environment. This information should be sourced from the ANZECC (2018) Guidelines for Fresh and Marine Water Quality, available at: https://www.waterquality.gov.au/anz-guidelines

5.6 The EIS must describe how stormwater will be managed in all phases of the project, including details of how stormwater and runoff will be managed to minimise pollution. Information should include measures to be implemented to minimise erosion, leachate and sediment mobilisation at the site. The EIS should consider the guidelines *Managing urban stormwater: soils and construction,* vol. 1 (Landcom 2004) and vol. 2 (A. Installation of services; C. Unsealed roads; D. Main Roads; E. Mines and quarries) (DECC, 2008).

5.7 The EIS must describe any water quality monitoring programs to be carried out at the project site. Water quality monitoring should be undertaken in accordance with the *Approved Methods for the Sampling and Analysis of Water Pollutant in NSW* (2004) available at: https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/water/approvedmethods-water.pdf

6 Contamination

6.1. Assess any contamination and demonstrate that the area is suitable or can be made suitable for the proposed use in accordance with the processes outlined in State Environmental Planning Policy 55 - Remediation of Land (SEPP55).

6.2. Where detailed assessment and/or remediation is required, the EIS must document the assessment and/or how the remediation will be undertaken in accordance with relevant guidelines made or approved under section 105 of the *Contaminated Land Management Act* 1997, having regard to ecological and human health risks posed by the contamination in the context of past, current and proposed land uses.

6.3. Ensure any site investigations undertaken, and the subsequent report/s, are prepared in accordance with relevant guidelines made or approved by the EPA under section 105 of the *Contaminated Land Management Act 1997.*

6.1. Where remediation is required to make the site suitable for the proposed use, ensure that a NSW accredited Site Auditor will be engaged to oversee the appropriate management of the contamination remediation works. Where an auditor is engaged, an appropriate site audit type must be agreed with the EPA and a Site Audit Statement and associated Site Audit Report produced before the State Significant Infrastructure is used.

6.2. The following guidelines should be followed in completing the processes outlined above:

- *Managing Land Contamination: Planning Guidelines SEPP 55 –Remediation of Land*, (DUAP & EPA, 1998) available at https://www.epa.nsw.gov.au/your-environment/contaminated-land/managing-contaminated-land/role-of-planning-authorities;
- *Contaminated Land Guidelines: Consultants Reporting on Contaminated Sites* (EPA, 2020) available at https://www.epa.nsw.gov.au/your-environment/contaminated-land/statutory-guidelines;

- *Guidelines for the NSW Site Auditor Scheme (3rd Edition)* (EPA, 2017) available at: https://www.epa.nsw.gov.au/your-environment/contaminated-land/statutory-guidelines;
- *Guidelines on the Duty to Report Contamination under the Contaminated Land Management Act 1997* (EPA, 2015) available at https://www.epa.nsw.gov.au/your-environment/contaminated-land/managing-contaminated-land/duty-report-contaminated-land; and
- Other guidelines made or approved under section 105 of the *Contaminated Land Management Act 1997*

Crown Lands

Public Authority Response

Friday, 25 June 2021 9:24:28 AM AEST

Notes:

Crown Lands has the following comments for this proposal:-

Three of the four sites where the New Wee Waa High School is proposed to be built is Crown land. The Department of Education currently holds a Crown land licence for site investigation for those parcels of Crown land. This licence will need to remain in place until finalisation of the purchase of the Crown land by the Department of Education. The Department of Education should note that there is a current Native Title claim registered for the Gomeroi People that affects the proposed Crown land sites for the New Wee Waa High School. Further information regarding Native Title can be found at the following link:-
https://www.industry.nsw.gov.au/__data/assets/pdf_file/0015/143061/Native-title-applications-and-options-for-interest-holders-fact-sheet.pdf.
If the Department of Education requires further information or guidance, please contact Kirstyn Goulding at lands.ministerials@dpie.nsw.gov.au or 4920 5058.

OUT21/7661

Rebecca Sommer
Planning and Assessment Group
NSW Department of Planning, Industry and Environment

Rebecca.Sommer@planning.nsw.gov.au

Dear Ms Sommer

New Wee Waa High School (SSD-21854025)
Comment on the Secretary's Environmental Assessment Requirements (SEARs)

I refer to your email of 28 June 2021 to the Department of Planning, Industry and Environment (DPIE) Water and the Natural Resources Access Regulator (NRAR) about the above matter.

The following recommendations are provided by DPIE Water and NRAR.

The SEARS should include:

- The identification of an adequate and secure water supply for the life of the project. This includes confirmation that water can be sourced from an appropriately authorised and reliable supply. This is also to include an assessment of the current market depth where water entitlement is required to be purchased.
- A detailed and consolidated site water balance.
- Assessment of impacts on surface and ground water sources (both quality and quantity), related infrastructure, adjacent licensed water users, basic landholder rights, watercourses, riparian land, and groundwater dependent ecosystems, and measures proposed to reduce and mitigate these impacts.
- Proposed surface and groundwater monitoring activities and methodologies.
- Consideration of relevant legislation, policies and guidelines, including the NSW Aquifer Interference Policy (2012), the Guidelines for Controlled Activities on Waterfront Land (2018) and the relevant Water Sharing Plans (available at https://www.industry.nsw.gov.au/water).

Any further referrals to DPIE Water and NRAR can be sent by email to landuse.enquiries@dpie.nsw.gov.au. or to the following coordinating officer within DPIE Water:

Alistair Drew, Project Officer
E: Alistair.drew@dpie.nsw.gov.au
M: 0417 626 567

Yours sincerely

Alistair Drew
Project Officer, Assessments
Water – Knowledge Office
18 June 2021

Our ref: DOC21/516729
Senders ref: SSD-21854025

Rebecca Sommer
Principal Planning Officer
Infrastructure Assessments
Department of Planning, Industry & Environment
rebecca.sommer@planning.nsw.gov.au

Dear Ms Sommer

New Wee Waa High School – Secretary's Environmental Impact Assessment Requirements

I refer to your email dated 10 June 2021 seeking input into the Department of Planning, Industry and Environment Secretary's Environmental Assessment Requirements (SEARs) for the preparation of an Environmental Impact Assessment (EIS) for the new Wee Waa high school (SSD-21854025).

The Biodiversity, Conservation and Science Directorate (BCS) has considered your request and provides SEARs for the proposed development in **Attachments A** and **B**.

BCS recommends the EIS needs to appropriately address the following:

1. Biodiversity and offsetting
2. Water and soils
3. Flooding

A biodiversity development assessment report (BDAR) may be required

The scoping report for the project indicates that a BDAR waiver will be sought for the development. BCS advises that, as the site contains native vegetation, a BDAR waiver is unlikely to be granted and a BDAR will be required.

Please note the following;

The Biodiversity Assessment Method 2020 came into effect on 22 October 2020. There are transitional arrangements in place to minimise the impacts that amendments to the BAM may have on proponents and landholders. **Attachment A** provides details of the transitional arrangements.

If you have any questions about this advice, please do not hesitate to contact Liz Mazzer, Senior Conservation Planning Officer, via liz.mazzer@environment.nsw.gov.au or (02) 6883 5325

Yours sincerely,

Samantha Wynn
Senior Team Leader Planning North West
Biodiversity, Conservation and Science Directorate

23 June 2021

Attachment A - Environmental Assessment Requirements

Attachment B - Guidance Material

Standard Environmental Assessment Requirements

OEH	Office of Environment and Heritage (now Biodiversity, Conservation and Science Directorate)
BCS	Biodiversity, Conservation and Science Directorate of the NSW Department of Planning, Industry and Environment
The Department	NSW Department of Planning, Industry and Environment
NPWS	National Parks and Wildlife Service

Transitional arrangements for the *Biodiversity Assessment Method 2020*

Clause 6.31 of the *Biodiversity Conservation Regulation 2017* provides that when the BAM is amended, a BAR may be prepared based on the prior version of the BAM for the following designated periods;

- 12 months for a BDAR in respect of SSD/SSI or standard biocertification,
- 12 months or longer if approved by the Minister for a BDAR in respect of strategic biocertification,
- 6 months for BARs in respect of all other development or stewardship applications

A BAR prepared under these arrangements must state that it has been prepared based on the prior version.

This means that from 22 October 2020 until the end of the relevant designated transition period a BAR may be prepared using **either** the BAM 2017 **or** the BAM 2020, but not a combination of both.

If an Accredited Assessor has commenced preparing a BAR in accordance with the BAM 2017, it is recommended that they discuss the transition options with the proponent/landholder. If opting to continue using the BAM 2017, the BAR must be prepared within the relevant designated period and must include a statement that it has been prepared based on the BAM 2017. In addition, because BOAMs has been updated to reflect the BAM 2020 settings, an assessor continuing to prepare a BAR under the BAM 2017 should consult the Release Notes to ensure the correct BAM-C settings are applied.

Where an assessor proposes to apply BAM 2017 to a scattered tree (formerly paddock tree) or small area streamlined assessment, the assessor must contact BAM Support for guidance on how to use the BAM Calculator to apply the transitional arrangements. However, if the applicant or assessor proposes to apply BAM 2017 to a BSSAR, the applicant or assessor must contact the Biodiversity Conservation Trust to discuss use of this option.

Biodiversity

1. Biodiversity impacts related to the proposed project are to be assessed in accordance with Section 7.9 of the Biodiversity Conservation Act 2017 the Biodiversity Assessment Method and documented in a Biodiversity Development Assessment Report (BDAR). The BDAR must include information in the form detailed in the *Biodiversity Conservation Act 2016* (s6.12), *Biodiversity Conservation Regulation 2017* (s6.8) and Biodiversity Assessment Method, unless the Department determine that the proposed development is not likely to have any significant impacts on biodiversity values.
2. The BDAR must document the application of the avoid, minimise and offset framework including assessing all direct, indirect and prescribed impacts in accordance with the Biodiversity Assessment Method.
3. The BDAR must include details of the measures proposed to address the offset obligation as follows;
   - The total number and classes of biodiversity credits required to be retired for the development/project;
   - The number and classes of like-for-like biodiversity credits proposed to be retired;
   - The number and classes of biodiversity credits proposed to be retired in accordance with the variation rules;
   - Any proposal to fund a biodiversity conservation action;
   - Any proposal to conduct ecological rehabilitation (if a mining project);
   - Any proposal to make a payment to the Biodiversity Conservation Fund.

   If seeking approval to use the variation rules, the BDAR must contain details of the reasonable steps that have been taken to obtain requisite like-for-like biodiversity credits.
4. The BDAR must be submitted with all spatial data associated with the survey and assessment as per Appendix 11 of the BAM.
5. The BDAR must be prepared by a person accredited in accordance with the Accreditation Scheme for the Application of the Biodiversity Assessment Method Order 2017 under s6.10 of the *Biodiversity Conservation Act 2016*.

Water and soils

6. The EIS must map the following features relevant to water and soils including:
   a. Rivers, streams, wetlands, estuaries (as described in s4.2 of the Biodiversity Assessment Method).
   b. Wetlands as described in s4.2 of the Biodiversity Assessment Method.
   c. Groundwater.
   d. Groundwater dependent ecosystems.
   e. Proposed intake and discharge locations.

7. The EIS must describe background conditions for any water resource likely to be affected by the project, including:
    a. Existing surface and groundwater.
    b. Hydrology, including volume, frequency and quality of discharges at proposed intake and discharge locations.
    c. Water Quality Objectives (as endorsed by the NSW Government http://www.environment.nsw.gov.au/ieo/index.htm) including groundwater as appropriate that represent the community's uses and values for the receiving waters.
    d. Indicators and trigger values/criteria for the environmental values identified at (c) in accordance with the ANZECC (2000) Guidelines for Fresh and Marine Water Quality and/or local objectives, criteria or targets endorsed by the NSW Government.
    e. Risk-based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions

8. The EIS must assess the impacts of the project on water quality, including:
    a. The nature and degree of impact on receiving waters for both surface and groundwater, demonstrating how the project protects the Water Quality Objectives where they are currently being achieved, and contributes towards achievement of the Water Quality Objectives over time where they are currently not being achieved. This should include an assessment of the mitigating effects of proposed stormwater and wastewater management during and after construction.
    b. Identification of proposed monitoring of water quality.

9. The EIS must assess the impact of the project on hydrology, including:
    a. Water balance including quantity, quality and source.
    b. Effects to downstream rivers, wetlands, estuaries, marine waters and floodplain areas.
    c. Effects to downstream water-dependent fauna and flora including groundwater dependent ecosystems.
    d. Impacts to natural processes and functions within rivers, wetlands, estuaries and floodplains that affect river system and landscape health such as nutrient flow, aquatic connectivity and access to habitat for spawning and refuge (e.g. river benches).
    e. Changes to environmental water availability, both regulated/licensed and unregulated/rules-based sources of such water.
    f. Mitigating effects of proposed stormwater and wastewater management during and after construction on hydrological attributes such as volumes, flow rates, management methods and re-use options.
    g. Identification of proposed monitoring of hydrological attributes.

Flooding
10. The EIS must map the following features relevant to flooding as described in the Floodplain Development Manual 2005 (NSW Government 2005) including: a. Flood prone land. b. Flood planning area, the area below the flood planning level. c. Hydraulic categorisation (floodways and flood storage areas). d. Flood hazard
11. The EIS must describe flood assessment and modelling undertaken in determining the design flood levels for events, including a minimum of the 5% Annual Exceedance Probability (AEP), 1% AEP, flood levels and the probable maximum flood, or an equivalent extreme event.
12. The EIS must model the effect of the proposed project (including fill) on the flood behaviour under the following scenarios: a. Current flood behaviour for a range of design events as identified in 14 above. This includes the 0.5% and 0.2% AEP year flood events as proxies for assessing sensitivity to an increase in rainfall intensity of flood producing rainfall events due to climate change.
13. Modelling in the EIS must consider and document: a. Existing council flood studies in the area and examine consistency to the flood behaviour documented in these studies. b. The impact on existing flood behaviour for a full range of flood events including up to the probable maximum flood, or an equivalent extreme flood. c. Impacts of the development on flood behaviour resulting in detrimental changes in potential flood affection of other developments or land. This may include redirection of flow, flow velocities, flood levels, hazard categories and hydraulic categories. d. Relevant provisions of the NSW Floodplain Development Manual 2005.
14. The EIS must assess the impacts on the proposed project on flood behaviour, including: a. Whether there will be detrimental increases in the potential flood affectation of other properties, assets and infrastructure. b. Consistency with Council floodplain risk management plans. c. Consistency with any Rural Floodplain Management Plans. d. Compatibility with the flood hazard of the land. e. Compatibility with the hydraulic functions of flow conveyance in floodways and storage in flood storage areas of the land. f. Whether there will be adverse effect to beneficial inundation of the floodplain environment, on, adjacent to or downstream of the site.

g. Whether there will be direct or indirect increase in erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses.
h. Any impacts the development may have upon existing community emergency management arrangements for flooding. These matters are to be discussed with the NSW SES and Council.
i. Whether the proposal incorporates specific measures to manage risk to life from flood. These matters are to be discussed with the NSW SES and Council.
j. Emergency management, evacuation and access, and contingency measures for the development considering the full range or flood risk (based upon the probable maximum flood or an equivalent extreme flood event). These matters are to be discussed with and have the support of Council and the NSW SES.
k. Any impacts the development may have on the social and economic costs to the community as consequence of flooding.

Guidance Material

Title	Web address
Relevant Legislation	
Biodiversity Conservation Act 2016	https://www.legislation.nsw.gov.au/view/html/inforce/current/act-2016-063
Commonwealth Environment Protection and Biodiversity Conservation Act 1999	https://www.legislation.gov.au/Details/C2014C00140/Download
Environmental Planning and Assessment Act 1979	https://www.legislation.nsw.gov.au/view/html/inforce/current/act-1979-203
Fisheries Management Act 1994	https://www.legislation.nsw.gov.au/view/html/inforce/current/act-1994-038
National Parks and Wildlife Act 1974	https://www.legislation.nsw.gov.au/view/html/inforce/current/act-1974-080
Protection of the Environment Operations Act 1997	https://www.legislation.nsw.gov.au/view/html/inforce/current/act-1997-156
Water Management Act 2000	https://www.legislation.nsw.gov.au/view/html/inforce/current/act-2000-092
Wilderness Act 1987	https://www.legislation.nsw.gov.au/view/html/inforce/current/act-1987-196
Biodiversity	
Biodiversity Assessment Method (OEH, 2020)	https://www.environment.nsw.gov.au/research-and-publications/publications-search/biodiversity-assessment-method-2020
BAM 2020 Operational Manual Stage 1	https://www.environment.nsw.gov.au/research-and-publications/publications-search/biodiversity-assessment-manual-2020-operational-manual-stage-1
BAM Operational Manual Stage 2	https://www.environment.nsw.gov.au/research-and-publications/publications-search/biodiversity-assessment-method-operational-manual-stage-2
BAM 2020 Operational Manual Stage 3	https://www.environment.nsw.gov.au/research-and-publications/publications-search/biodiversity-assessment-method-operational-manual-stage-3
BAM Calculator User Guide	https://www.environment.nsw.gov.au/research-and-publications/publications-search/biodiversity-assessment-method-user-guide
Serious and irreversible impacts of development on biodiversity	https://www.environment.nsw.gov.au/topics/animals-and-plants/biodiversity/biodiversity-offsets-scheme/serious-and-irreversible-impacts
Practice Note - Guidance for assessors and decision makers in applying modified benchmarks to assessments of vegetation integrity: Biodiversity Assessment Method	https://www.environment.nsw.gov.au/research-and-publications/publications-search/guidance-assessors-decision-makers-applying-modified-benchmarks-to-assessments-vegetation-integrity
Guidance and Criteria to assist a decision maker to determine a serious and irreversible impact (OEH, 2017)	https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Animals-and-plants/Biodiversity/guidance-

Title	Web address
	decision-makers-determine-serious-irreversible-impact-190511.pdf
Accreditation Scheme for Application of the Biodiversity Assessment Method Order 2017	https://www.legislation.nsw.gov.au/view/pdf/asmade/sl-2017-471
Ancillary rules: Biodiversity conservation actions	https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Animals-and-plants/Biodiversity/ancillary-rules-biodiversity-conservation-actions-170496.pdf
Ancillary rules: Reasonable steps to seek like-for-like biodiversity credits for the purpose of applying the variation rules	https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Animals-and-plants/Biodiversity/ancillary-rules-reasonable-steps-like-for-like-biodiversity-credits-170498.pdf
Ancillary rules: Impacts on threatened species and ecological communities excluded from application of variation rules	https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Animals-and-plants/Biodiversity/ancillary-rules-impacts-on-threatened-entities-excluded-from-variation-170497.pdf?la=en&hash=C38840BFF49F012433532DF72E3D90C741E4DAC1
The Department's Threatened Species Website	https://www.environment.nsw.gov.au/topics/animals-and-plants/threatened-species
NSW BioNet (Atlas of NSW Wildlife)	www.bionet.nsw.gov.au/
Surveying Threatened Plants and their Habitats - NSW Survey Guide For The Biodiversity Assessment Method (DPIE 2020).	https://www.environment.nsw.gov.au/research-and-publications/publications-search/surveying-threatened-plants-and-their-habitats-survey-guide-for-the-biodiversity-assessment-method
Threatened Biodiversity Survey and Assessment: Guidelines for Developments and Activities - November 2004	https://www.environment.nsw.gov.au/surveys/BiodiversitySurveyGuidelinesDraft.htm
Threatened species survey and assessment guidelines: field survey methods for fauna – amphibians	https://www.environment.nsw.gov.au/research-and-publications/publications-search/threatened-species-field-survey-methods-for-fauna-amphibians
NSW Survey Guide for Threatened Frogs	https://www.environment.nsw.gov.au/research-and-publications/publications-search/nsw-survey-guide-for-threatened-frogs
Surveying 'species credit' threatened bats and their habitats – NSW survey guide for the Biodiversity Assessment Method	https://www.environment.nsw.gov.au/research-and-publications/publications-search/species-credit-threatened-bats-nsw-survey-guide-for-biodiversity-assessment-method
Bat calls of NSW - region-based guide to the echolocation calls of Microchiropteran bats	https://www.environment.nsw.gov.au/surveys/Batcalls.htm
Community Biodiversity Survey Manual	https://www.environment.nsw.gov.au/surveys/CommunityBiodiversitySurveyManual.htm
BioNet Vegetation Classification - NSW Plant Community Type (PCT) database	www.environment.nsw.gov.au/research/Vegetationinformationsystem.htm
The Departments Data Portal (access to online spatial data)	http://data.environment.nsw.gov.au/
Fisheries NSW policies and guidelines	https://www.dpi.nsw.gov.au/fishing/habitat/publications/pubs/fish-habitat-conservation

Title	Web address
List of national parks	https://www.nationalparks.nsw.gov.au/conservation-and-heritage/national-parks
Revocation, recategorisation and road adjustment policy (OEH, 2012)	https://www.environment.nsw.gov.au/topics/parks-reserves-and-protected-areas/park-policies/revocation-recategorisation-and-road-adjustment
Guidelines for consent and planning authorities for Developments adjacent to National Parks and Wildlife Service Land (NPWS, 2020)	https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Parks-reserves-and-protected-areas/Development-guidelines/developments-adjacent-npws-lands-200362.pdf
Water and Soils	
Flooding	
Floodplain development manual	https://www.environment.nsw.gov.au/topics/water/floodplains/floodplain-manual
Floodplain Risk Management Guidelines	http://www.environment.nsw.gov.au/topics/water/coasts-and-floodplains/floodplains/floodplain-guidelines
NSW Climate Impact Profile	http://climatechange.environment.nsw.gov.au/
Climate Change Impacts and Risk Management	https://www.environment.gov.au/climate-change/adaptation/publications/climate-change-impact-risk-management
Water	
Water Quality Objectives	http://www.environment.nsw.gov.au/ieo/index.htm
ANZECC & ARMCANZ (2000) Water Quality Guidelines	https://www.waterquality.gov.au/anz-guidelines/resources/previous-guidelines/anzecc-armcanz-2000
Applying Goals for Ambient Water Quality Guidance for Operations Officers – Mixing Zones	http://deccnet/water/resources/AWQGuidance7.pdf
Approved Methods for the Sampling and Analysis of Water Pollutant in NSW (2004)	http://www.environment.nsw.gov.au/resources/legislation/approvedmethods-water.pdf

Hunter New England Local Health District
Hunter New England Population Health
Direct Contact Details
Phone: (02) 67648000 Mobile 0428668041
fidelis.jaravani@hnehealth.nsw.gov.au

NSW GOVERNMENT Health
Hunter New England
Local Health District

24 June 2021

Peter McManus
Planning Officer
Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Dear Mr McManus

Wee Waa High School Request for SEARs SSD _21854025

I refer to the Request for SEARs exhibited on the NSW Department of Planning & Infrastructure web site in relation to the Wee Waa High School Development (SSD_21854025) for 300 students at 105-107 Mitchell Street, Wee Waa.

The proposed development is for the purpose of a new school with the construction of a number of the school buildings and of new facilities. The Scoping Report describes the site and project, identifies the relevant strategic and statutory context, identifies the likely environmental and planning issues, and outlines the proposed approach to assessment and community engagement.

Hunter New England Population Health (HNE Health) has reviewed the Scoping Report paying particular attention to the management of air quality, noise, land contamination, and water issues which may have an impact on public health. The following points are discussed and should be considered in the EIS.

General

The EIS should provide evidence that the proposed school facilities will comply with all relevant local council and government legislation. The EIS should have documented policies to assess and monitor the standard and state of repair of proposed premises and buildings, making reference to the current building code requirements with emphasis on provision of adequate ventilation, lighting and building space occupancy. It is highly recommended that the EIS describes criteria for the following issues:

- healthy airflow and ventilation.
- measures to ensure the exclusion of pests, including pigeons, from internal areas and roof spaces

Hunter New England Local Health District
ABN 63 598 010 203

Hunter New England Population Health
Locked Bag 10
Wallsend NSW 2287
Phone (02) 4924 6477 Fax (02) 4924 6490
Email HNELHD-PHEnquiries@hnehealth.nsw.gov.au
www.hnehealth.nsw.gov.au/hneph

Air quality

Airborne particulate matter is a key air quality issue. HNE Health notes that the proposed project would cause an increase in particulate matter concentration at residential receptors. The health effects of particulate matter are well established. The EIS should indicate air quality as an issue due to heavy traffic along Mitchell Street and Kamilaroi Highway. The EIS should consider air quality as an issue during the construction process considering that the development is in the centre of a residential area. The EIS should describe reasonable and feasible control measures to minimise and monitor particulate matter emissions on the surrounding residences and the Public School.

Noise and vibration

Evidence concerning the adverse health effects of environmental noise is detailed in a number of publications, for example, the World Health Organization *Night Noise Guidelines for Europe* (2009) and the WHO *Guidelines for Community Noise* (1999). Environmental noise can have negative impacts on human health and well-being and trigger ongoing community complaints about annoyance, sleep disturbance and stress.

The school will be centrally located in the residential area of the town next to Wee Waa Public School. Mitchell Street is a key movement corridor, particularly during harvest season when B-Double trucks and combine harvesters need to pass through Wee Waa and past the site. The EIS should consider transport and construction noise, and provide mitigation measures to minimise the impact to sensitive receivers, including residents surrounding the proposed school and the neighbouring school. The EIS should also consider noise from Mitchell Street into the school buildings. Compliance noise monitoring should occur at identified localities to indicate exceedances. Consultation with the community is important.

Land Contamination

The EIS should describe detailed land contamination assessments and mitigation measures including potential lead and asbestos. Assessment of school playing fields for contaminated fill should also be conducted as part of the long term site management.

Surface Water

The EIS should ensure there is minimal impact from the proposed development on the water quality of surrounding natural waterways, particularly from stormwater runoff. All disturbed areas of contamination and stockpiles of earth should be contained so as to limit runoff. Erosion and sediment control measures are to be implemented.

Ground Water

The EIS should identify a groundwater management plan to prevent groundwater contamination.

Flooding

The Scoping Report briefly discusses flooding. Wee Waa town is prone to flooding. Flooding may inundate school grounds and buildings resulting in land contamination. The EIS should discuss in detail, flood mitigation in the school premises.

Waste management

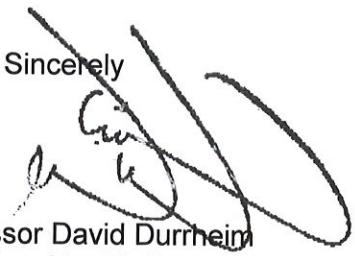
The EIS should describe both Onsite and Offsite waste management particularly construction waste and contaminated excavation soils. Any excess material requiring offsite disposal should be classified with reference to NSW EPA Waste Classification Guidelines (2014) and disposed to a licensed facility. The EIS should also discuss the proposed school's operational waste management strategies.

Community consultation

It is recommended if not conducted already, that the EIS describe the plan for ensuring robust community engagement and consultation.

If you require any further information please feel free to contact Fidelis Jaravani, Environmental Health Officer on (02) 67648020

Yours Sincerely



Professor David Durrheim
Director- Health Protection
Hunter New England Population Health

28/06/2021

SF2021/156932 | WST21/00166

The Manager
School Infrastructure Assessments
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Rebecca Sommer

Dear Ms Sommer

SSD21854025: Lot124 & 125 DP 757125, Lot 2 DP 550633 and Lot 1 DP 577294, Mitchell Street, Wee Waa, Wee Waa High School
Request for Secretary's Environmental Assessment Requirements (SEARs)

Thank you for the referral requesting input to the Secretary's Environmental Assessment Requirements (SEARS) for the abovementioned development proposal received via the NSW Major Projects Planning Portal on 10 June 2021.

The SSD Scoping report has been reviewed. Transport for NSW (TfNSW) notes the proposal is for the development of a new school accommodating 300 secondary students.

TfNSW has reviewed the submitted documentation and identified the following key points to be addressed in the Environmental Impact Statement being prepared in support of the project:

- The masterplan proposes a drop off pick up area along Mitchell Street which is the Kamilaroi Highway (HW 29). The proposal includes "traffic calming" structures on the highway to manage potential traffic impacts associated with the school and the drop off area. TfNSW does not support the identified location of the pickup/drop off area on the Kamilaroi Highway or the associated traffic calming structures as there is likely to be an increased safety risk to vulnerable road users, implications to the efficiency of the Kamilaroi Highway as a major transport route for oversize, overmass and heavy vehicles.

  The proponent should consider in consultation with TfNSW and Narrabri Shire Council as a part of the design process alternative locations for the pickup/drop off area preferably within the site boundary with access gained from a local road.

- The masterplan proposes a pedestrian crossing on the Kamilaroi Highway. An assessment of daily and peak hour pedestrian trips generated by the proposal, the

road and pedestrian safety adjacent the proposed development and the Austroads Warrants for pedestrian crossings should be carried out to determine the need to facilitate pedestrian movements safely across the Kamilaroi Highway.

The location and design of any crossing on the Kamilaroi Highway should ensure the safety of pedestrians and any impact on the efficiency of the highway is minimised including that the ability for heavy vehicles, including wide and over mass loads, to be accommodated is not reduced.

- TfNSW requests that the Environmental Impact Statement be supported by a Traffic Impact Assessment prepared by a suitably qualified person in accordance with the Austroads Guide to Traffic Management Part 12, TfNSW Supplements to Austroads and the RTA Guide to Traffic Generating Developments. The TIA is to address the following.
    - Accurate details of the current daily and peak hour vehicle, public transport, pedestrian and cycle movement and existing traffic and transport facilities provided on the road network located adjacent to the proposed development.
    - An assessment of the operation of existing and future transport networks including the bus network and their ability to accommodate the forecast number of trips to and from the development.
    - An estimate of the total daily and peak hour trips generated by the proposal, including vehicle, public transport, pedestrian and cycle trips.
    - The adequacy of public transport, pedestrian and bicycle networks and infrastructure to meet the likely future demand of the proposed development. Including safety measures to ensure safety for students walking or cycling to school.
    - The proposed access arrangements, including car and bus pickup/drop-off facilities, and measures to mitigate any associated traffic impacts and impacts on public transport, pedestrian and bicycle networks, including pedestrian crossings and refuges and speed control devices and zones. Consideration should be given to designing the drop off area within the site boundary including access gained from a local road.
    - The impact of the proposed development on existing and future public transport infrastructure within the vicinity of the site in consultation with TfNSW and identify measures to integrate the development with the transport network.
    - The impact of traffic generation on the public road network including nearby intersections, in particular Mitchell and Charles Streets and Mitchell and George Streets, with consideration of the cumulative impacts from other approved developments in the vicinity, and any improvements/measures employed to ensure traffic efficiency and road safety during the construction and operation of the project.
    - Details of any upgrading or road improvement works required to accommodate the proposed development.
    - The proposed active transport access arrangements and connections to public transport services.
    - Details of proposed school bus routes along bus capable roads (i.e. travel lanes of 3.5 m minimum) and infrastructure (bus stops, bus layovers etc.).
    - Measures to maintain road and personal safety in line with CPTED principles.
    - The proposed car and bicycle parking provision, including end of trip facilities, which must be taken into consideration of the availability of public transport and the requirements of Council's relevant parking codes and Australian Standards, including wayfinding strategies.

- Details of the proposed number of car parking spaces and compliance with appropriate parking codes and justify the level of car parking provided on-site.
- Details of emergency vehicle access arrangements.
- Service vehicle access, delivery and loading arrangements and estimated service vehicle movements (including vehicle type and the likely arrival and departure times).
- An assessment of road safety at key intersection and locations subject to heavy vehicle construction traffic movements and high pedestrian activity.
- Details of construction program detailing the anticipated construction duration and highlighting significant and milestone stages and events during the construction process.
- Details of anticipated peak hour and daily construction vehicle movements to and from the site.
- Details of access arrangements of construction vehicles, construction workers to and from the site, emergency vehicles and service vehicle.
- Details of temporary cycling and pedestrian access during construction.
- Traffic and transport impacts during construction, including cumulative impacts associated with other construction activities, and how these impacts will be mitigated for any associated traffic, pedestrian, cyclists, parking and public transport, including the preparation of a draft Construction Traffic Management Plan to demonstrate the proposed management of the impact.
- Access locations and treatments need to be identified and in accordance with Austroads Guide to Road Design and relevant TfNSW supplements, including safe intersection sight distance (SISD).

TfNSW appreciates the opportunity to contribute to the SEARs and requests that a copy of the SEARs be forwarded to TfNSW at the same time they are sent to the applicant. If you wish to discuss this matter further, please contact the undersigned on 02 6861 1530.

Yours faithfully

Howard Orr
Team Leader
Development Services West
Regional and Outer Metropolitan

WaterNSW

Public Authority Response

Thursday, 17 June 2021 9:41:58 AM AEST

Notes:

Thank you for requesting WaterNSW's input for the New Wee Waa High School SEARs. Please note that as the subject site is not located in close proximity to any WaterNSW land or assets, and as an SSD any flood works or licensing approvals will be assessed by others, the risk to water quality is considered to be low and WaterNSW has no comments or particular requirements.

Our Reference:	1870945:CS/DLA
Your Reference:	1870945
Contact Name:	Donna Ausling

Ms. Rebecca Sommer
NSW Department of Planning, Industry & Environment

Emailed: Rebecca.Sommer@planning.nsw.gov.au

Thursday, 1 July 2021

RE: New Wee Waa High School - State Significant Development (SSD-21854025)

Dear Ms Sommer,

Thank you for the opportunity to provide feedback in relation to the above project.

The proposal is State significant infrastructure and is subject to approval by the NSW Minister for Planning and Public Spaces. It is understood that this SEARs submission relates to the relocation and construction of a new High School at 105-107 Mitchell Street, Wee Waa.

Council's feedback is provided as follows:

1. General

The submitted EIS should appropriately demonstrate general site suitability and review of project and siting alternatives in line with standard SEARs considerations under Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*, and as detailed in sections 3.10, 3.12 and 3.6.4 of the draft NSW Department of Planning and Environment *Guidelines for Preparing an Environmental Impact Statement (2017)*.

2. Planning & Land Use Matters for Consideration

It is acknowledged that the draft project Master Plan identifies agricultural plots in proximity to residential dwellings. It should be noted that the subject land is zoned R1 General Residential under the Narrabri Local Environmental Plan 2012 (NLEP) and 'agriculture' is identified as a prohibited land use within this zone. Appropriate regard should therefore be given to potential land use conflicts and associated mitigation measures, and if other siting alternatives are available for this component of the development.

The preliminary design documentation indicates that the site will be effectively raised to 800mm above natural ground level to address site drainage issues. It is unclear whether fill will be imported to the whole of the site, or to only key infrastructure locations. In this regard, consideration should be given to potential interface issues with surrounding residential development. This includes management of drainage, potential flooding afflux, impacts on the amenity of the neighbourhood, overlooking and potential overshadowing impacts.

Narrabri Shire Council
46 - 48 Maitland Street
PO Box 261, Narrabri NSW 2390

P. (02) 6799 6866
F. (02) 6799 6888

E. council@narrabri.nsw.gov.au
www.narrabri.nsw.gov.au

The quality and source of any imported fill for earthworks should also be adequately addressed in the submitted EIS. It should be acknowledged that a range of competing infrastructure projects, including the Inland Rail Project, may create pressure on existing resource availability. Construction impacts should also be adequately detailed in the submitted documentation acknowledging potential cumulative impacts with other significant infrastructure projects. This includes, but is not limited to, provision of accommodation and commensurate impacts on local services.

Given the community interest in the proposal, potential social and economic impacts of the development should also be adequately addressed. It is noted that the demolition of the existing High School will not form part of this particular proposal, however, appropriate context should be provided as to the rationale for this decision-making. It should be further acknowledged that the current site is situated in a gateway location and has potential to be a significant legacy issue. There is a community expectation that demolition of the existing structure should proceed without delay.

3. Engineering & Infrastructure Matters for Consideration

The following engineering and infrastructure comments relating to the proposed development at 105-107 Mitchell Street are as follows;

Potable Water

A potable water main is available for connection along George Street, Mitchell Street and Charles Street. Given the size and nature of this development (and the potential increase in demand from the existing town water service) the developer must engage a Chartered Professional Engineer to investigate the requirements on potable water supply. The Engineer must submit calculations and detailed design plans that;

- Are designed in accordance with;
    - AS3500.1 – Water Services
    - WSA03 – Water Supply Code of Australia
    - Narrabri Shire Council Design Specifications
- Indicate pipe size, material & class
- Identify depth of service to finished surface levels
- Identify meter locations to property boundaries
- Indicate location of other services (existing and proposed)
- Identify fittings (type and size)
- Identify Fire Services and detail hydrant booster arrangement.

Sewerage

The site currently has access to the town gravity sewer main at several points of connection being;

- Corner of Mitchell Street and Charles Street
- North-western corner on Charles Street
- Northern boundary within the neighbouring property on Tuckey Crescent

Given the size and nature of this development (and the potential increase in demand on the existing town sewerage service) the developer must engage a Chartered Professional Engineer to investigate the requirements on the existing sewerage infrastructure. The Engineer must submit calculations and detailed design plans that;

- Are designed in accordance with;
    - AS3500.2 – Sanitary Plumbing and Drainage
    - WSA02 – Sewerage Code of Australia
    - Narrabri Shire Council Design Specifications
- Indicate location of other services (existing and proposed)
- Identify ties to property boundaries for maintenance holes
- Identify sewer junction locations to the nearest downstream maintenance hole
- Junction details (where non-standard junctions are used)
- Submit a longitudinal section which must include;
    - Chainages to maintenance holes
    - Existing and proposed surface levels
    - Pipe invert levels
    - Depth to invert
    - Pipe size, material, and class
    - Pipe grades
    - Location of other service crossings

Given the available points of connection (and pending submitted calculations to prove suitable use of the existing sewer network), Council does not consider any new sewer works to form part of the Council sewer network (i.e. will not become a Council asset) and maintenance and ownership of this infrastructure will be the responsibility of the proponent.

Stormwater

Given the size of the development and the increase in impermeable ground (i.e. roof drainage and hardstand areas), a stormwater management plan will be required to be submitted to Council for approval. The developer must engage a Chartered Professional Engineer to design the stormwater system. The Engineer must submit calculations and plans that,

- Are designed in accordance with;
    - AS3500.3 – Stormwater Drainage
    - Narrabri Shire Council Design Specifications
- Indicate location of other services (existing and proposed)
- Identify overland flow paths
- Identify surface drainage and catchment areas
- Identify connections to the existing stormwater network
- Pit size and type
- Pit details
- Submit a longitudinal section which must include;
    - Chainages to stormwater pits
    - Existing and proposed surface levels
    - Pipe invert levels
    - Depth to invert
    - Pipe size, material and class
    - Pipe grades
    - Location of other service crossings

It should be noted that any proposed use of detention/retention basins must include calculations of discharge flowrates and identify the safety provisions being implemented (e.g. fencing).

Vehicle Access

The masterplan submitted with this submission lacks sufficient detail to adequately make comment regarding the impacts to traffic and transport. The plan appears to cater for ten (10) off-street parking spaces (none of which are suitable for disabled access), two (2) emergency spaces and parking provision for the school shuttle bus. All other parking requirements appear to require on-street parking usage.

Given the size and nature of the development, a detailed car parking plan will be required to be submitted to Council. The developer must engage a Chartered Professional Engineer to design the carpark. The Engineer must submit plans that;

- Are designed in accordance with,
    - AS2890.1 – Car Parking Facilities
    - AS2890.2 – Commercial Parking Facilities
    - Narrabri Shire Council's Design Specification
- Indicate proposed line marking and signposting in accordance with AS.1742.11 – Parking Controls
- Identify proposed vehicle movements
- Indicate the location/s for deliveries and/or garbage pickups
- Indicate the lead-in and lead-out grade of the gutter crossing (i.e. road shoulder and driveway)
- Identify the proposed grades and direction of the pavement

- Indicate the pavement design

As mentioned above, the submitted plan indicates a total of ten (10) proposed parking spaces. The RMS Guide to Traffic Generating Developments states that the development requires;

- Provision must be made for buses (including a set down area)
- Parking facilities for approximately 40 vehicles on a regular basis, in addition to the demands of the school staff

Therefore, there will be a lack of available off-street parking for this development during peak times for both staff and parents/students. The use of on-street parking (overflow parking) will need to be determined by Council.

The RMS Guide to Traffic Generating Developments also states;

> *"In addition to regular parking demand, special occasions at a school attract additional traffic. While it may not be necessary to provide a special car park for these occasions it is important to note where people are likely to park outside the school precinct on such occasions. Such irregular demand for external parking emphasises the significance of satisfactory footpath standards."*

Since the implementation of the temporary Wee Waa High School within the Public-School grounds, Council has noticed a large increase in on-street parking on both sides of Mitchell Street. Prior to this temporary measure, there were minimal (if any) vehicles parked along this section of road.

As Mitchell Street forms part of the Kamilaroi Highway, there is extensive heavy vehicle movements, especially during peak harvest times. Therefore, this makes Mitchell Street unsuitable for on-street parking. This is evident from the numerous calls made to Council from heavy vehicle operators stating the dangerous conditions with the unsafe interaction between pedestrians, parked vehicles, and heavy vehicle movements.

Therefore, the proponent must engage a suitably qualified consultant to develop a detailed Traffic and Transport study. This report must take into consideration the impact of the school generated traffic and pedestrian movements, local traffic, and heavy vehicle traffic. The report should focus on maximising the use of off-street parking to mitigate these safety concerns, as well as limiting/restricting the use of the highway shoulder for any parking/drop-off zones.

Council expects that the assessment of the project will be carried out pursuant to all applicable legislative requirements and that these comments will be considered in the continued assessment of this development.

Council trust that the above advice provides the necessary assistance. If you require any further information, or wish to discuss these matters further, please contact Council's Manager Strategic Planning, Ms Donna Ausling on (02) 6799 6866 or council@narrabri.nsw.gov.au.

Kind Regards,

Stewart Todd
General Manager