Our Reference:	DLA:MH: 1942758
Your Reference:	SSD-21854025
Contact Name:	Donna Ausling

Attention: Karen Harragon & Tuong Vi Doan

Planning and Assessment
NSW Department of Planning, Industry & Environment
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PARRAMATTA NSW 2124

By Email: tuongvi.doan@planning.nsw.gov.au

Wednesday 22 December 2021

RE: Narrabri Shire Council Submission – Wee Waa High School (SSD-21854025)

Thank you for the opportunity to provide comments on the above matter. Please find enclosed a copy of Council's Submission Report in this regard.

Council trust that the above advice provides the necessary assistance and should you have any further questions, or require any further clarification on the contents of Council's submission, please contact Ms Donna Ausling, Council's Manager Strategic Planning on (02) 6799 6866 or via council@narrabri.nsw.gov.au.

Kind Regards,

Andrew Brown

Director Planning, Strategy & People

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NARRABRI SHIRE
DISCOVER THE POTENTIAL

WEE WAA HIGH SCHOOL

SSD-21854025

NARRABRI SHIRE COUNCIL

SUBMISSION REPORT

Contents

Introduction & Background

A Development Application (DA) has been submitted to the NSW Department of Planning, Industry and Environment (DPIE) pursuant to the provisions of Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act), and commensurate approval for the following works are sought:

- Consent for the construction of a new two-stream high school with a capacity of 200 students (with future growth potential for up to 300 students, subject to funding and service need); and
- Site preparation, earthworks and remediation works;
- Construction of:
  - A new two-storey school building arranged in a U-shaped courtyard, incorporating teaching spaces, library/administration, staff facilities, and a multi-purpose gymnasium/hall;
  - A Covered Outdoor Learning Area (COLA);
  - One (1) grass sporting field with a perimeter running track and asphalt playing courts;
  - A standalone single-storey Agricultural and Environment Centre building;
  - A standalone single-storey Aboriginal Cultural Centre;
  - Internal vehicular access from George Street running east-west through the site;
  - Two (2) at-grade car parking spaces with a total of 40 parking spaces;
- Augmentation to the road network, including a dedicated drop-off/pickup area and bus bay along George Street, and a new pedestrian crossing on Mitchell Street.
- Removal and retention of trees as required;
- Installation of landscaping, additional tree planting and fencing;
- Installation of signage and public art; and
- Installation and augmentation of associated service infrastructure.

Furthermore, early works, to be conducted in accordance with the provisions of Part 5 of the *Environmental Planning and Assessment Act 1979* will be completed in relation to the following:

- Flood management works;
- Infrastructure services (electricity network augmentation); and
- Upgrades to the former school agricultural plot.

As a key stakeholder, Narrabri Shire Council (NSC) has been invited to make a submission in relation to the project proposal. The following feedback is therefore provided:

Local Context

Narrabri Shire is a local government area in the North West Slopes region of NSW with an Estimated Resident Population (ERP) of 13,049 persons (REMPLAN, 2020). The primary population centre within the LGA is Narrabri, and Wee Waa, located approximately 42 km to the west, is the second most populated settlement comprising a total of 2,080 persons at the 2016 census. Approximately 20% of the Wee Waa community identify as being Aboriginal and/or Torres Strait Islander descent, compared to the broader Narrabri LGA at 12.2%. Therefore, any major government-driven investment will be operating within a culturally sensitive and important community.

Narrabri Shire Council's vision is articulated in the Community Strategic Plan as follows:

"Narrabri Shire will be a strong and vibrant regional growth centre providing a quality living environment for the entire Shire community."

Narrabri has been recently announced as a special activation precinct (SAP) location. The master planning process for Narrabri is currently underway by NSW DPIE. Through the SAP process it is anticipated that energy-intensive industries and manufacturers, such as plastics, fertilisers and construction material producers will be able to confidently set up in Narrabri with access to commercial quantities of domestic market gas, enabled by the Narrabri Gas Project.

The precinct will also leverage key infrastructure such as the Inland Rail, the Narrabri West Walgett Railway line and the proposed Narrabri Industrial and Logistics Hub to give investors access to global supply chains and markets.

The SAP categorisation denotes a "dedicated area in a regional location identified by the NSW government to become a thriving business hub," and will enable fast-tracked planning investment, and government-led development in the precinct.

Wee Waa's proximity to the Narrabri SAP, acknowledging the freight connections between both centres, is likely to catalyse population growth as a direct result of increased employment opportunities in the Region.

Further information is relation to the Narrabri SAP is available via:
https://www.nsw.gov.au/snowy-hydro-legacy-fund/special-activation-precincts/narrabri

Project Need

1. Council acknowledges that students and staff were relocated from the current Wee Waa High School due to ongoing health issues in late 2020. Students are currently co-located within the adjacent Wee Waa Primary School. A Ministerial announcement made on 3 June 2021 committed to the expeditious construction of a new high school at Wee Waa on existing Department of Education owned land and Crown Land. It is understood that the Crown Land is in the process of being acquired. The community has also communicated the importance of this project throughout the pre-lodgement consultation phase.

Design Considerations

2. Council has reviewed the architectural designs and the selected colour palette and is generally supportive of the design concept. It is understood that some amendments may be required following the EIS consultation process. The proponent should continue to engage with Council and the local Aboriginal community around any project design amendments.

3. The submitted design plans have been reviewed and a range of inconsistencies across the submitted documentation has been identified. Further clarification is therefore requested.

Consideration of Alternate Options

4. The submitted EIS contains limited detail on the consideration of alternate siting options and the process for the strategic selection of the proposed site, particularly given the prevailing site constraints (flooding, partial site contamination, land tenure and traffic management considerations). It is further noted that the alternate site presented by Council's technical staff, considered to have a range of beneficial attributes, has not been sufficiently addressed.

Native Title Claim

5. The land selected for the new high school includes the acquisition of Crown Land lots which fall within a more extensive native title claim which may not be resolved for some time Schools Infrastructure NSW (SINSW) should therefore ensure that appropriate mechanisms are in place to continue to proactively engage with the Wee Waa Aboriginal Community and the Wee Waa Local Aboriginal Land Council (LALC) to minimise any overarching project risks and ensure overall community aspirations are met.

Flooding

6. The submitted Environmental Impact Statement (EIS) and supporting Flood Impact Statement (Lyall and Associates, 2021) was forwarded to Council's appointed flood management consultants, WRM for review. A summary of the corresponding technical feedback is provided herewith:

    - The report presents the results of the local catchment stormwater investigations by comparing the existing flooding conditions to the proposed flooding conditions including the Wee Waa High School. Technical details of how these results were derived have not been provided. On this basis, Council cannot determine whether the proposed stormwater mitigation measures are technically adequate. This is considered to be a significant shortcoming in the documentation. Notwithstanding, comments have been made on the information that has been provided. Further to this, review is based on an assessment of this proposal only as alternative locations for the proposed school have not been assessed, as detailed in item 1 on the preceding page.

    - ***Existing drainage system***: The proposed school is located in a low-lying area that functions as the main stormwater drainage channel for Wee Waa. Stormwater drains from the surrounding streets at multiple locations onto the site to a series of open swales. The swales cross the site to twin 650 mm diameter pipes that extend for about 200 m along Charles Street to Boundary Street. A constructed open channel (engineered channel) then drains the stormwater towards the town levee where it is piped to the Namoi River.

    - During significant storm events, water will pond on the site before it overflows and drains onto Charles Street and through the residential areas towards the town levee.

    - ***Proposed drainage system:*** The proposed drainage works are summarised as follows:
        - Extension of the existing transverse drainage structure which crosses George Street about 50 metres to the north of its intersection with Mitchell Street.
        - Construction of a channel which would run along the southern and western boundaries of the proposal site.
        - Installation of twin 1350 mm diameter pipes along Charles Street commencing in the north-west corner of the proposal site and ending on the northern side of Boundary Street for a distance of about 200 m.
        - The lowering of the invert level of the existing engineered channel which runs in a northerly direction from the northern side of Boundary Street to the Namoi River.

- The upgrade of the existing pipe beneath the Town Levee to twin 1500 mm diameter pipes.
- The installation of a duplicate flood evacuation pump on the Town Levee.
- The upgrade of the existing pipe which presently conveys flow in the engineered channel beneath an existing access track, which is located external to the Town Levee, to twin 1500 mm diameter pipes.
- The installation of scour protection measures in the form of dumped rock riprap at the confluence of the engineered channel and the Namoi River.
- The placement of excavated material on Crown land internal to the proposal site for later use in the construction of the school.
- The remainder of the site will be filled to improve the flood immunity of the new buildings and playing areas.

- ***Assessment of impacts:*** The report does not provide the technical details of the flood modelling undertaken. On this basis, a review of the adequacy of the proposed drainage strategy cannot be provided.

- Assuming that the modelling has been undertaken correctly, the Report shows that:
  - the relevant state government legislation and council regulations in relation to flooding impacts has been considered and adequately addressed;
  - the proposed drainage works would reduce flood impacts to neighbouring properties; and
  - the likelihood of water ponding behind the town levee to inundate the town would reduce.

- ***Safety in design****:* A safety in design assessment of the proposed drainage works has not been provided. In particular, a risk assessment should have been undertaken for the proposed drainage channel (located adjacent to a school) and the Charles Street culverts.

  The report defines the drainage channel as a floodway under the criteria given in the NSW Floodplain Development Manual (DIPNR, 2005) and with a H4 flood hazard vulnerability category under the Australian Disaster Resilience Guidelines (AIDR, 2017).

  A H4 flood hazard is unsafe for people. The proposed channel significantly changes the existing risk from a H2 hazard category (generally safe for people) to an unsafe hazard category (H4). It also increases the number of vulnerable population (children) next to the unsafe area, which has increased the potential consequences. No measures have been provided to mitigate the increased risk (or consequence).

More importantly, the proposed culvert upgrade along Charles Street, as designed, is an extreme hazard. The likelihood of a child either falling into the channel (or playing in the channel) would be relatively high during a summer storm event. The likelihood of that child being sucked into the Charles Street culverts would also be relatively high given that velocities appear to increase as the flows drain into the culverts. The culvert invert is also located at the same bed level as the channel, meaning it is directly accessible. The consequence of a child or even an adult entering the culvert would be extreme as they would be unlikely to survive being sucked along a 1350 mm pipe flowing full for over 200m.

The proponent has not demonstrated how this extreme risk can be managed.

It is possible that exclusion screens could be used to reduce the likelihood of a person entering the pipe. However, the maximum clear spacing between the exclusion bars would significantly increase the likelihood of a blockage, which has the potential to increase flooding of neighbouring properties. Exclusion bars would also be required on the downstream side.

7. ***Summary:*** A review of the adequacy of the proposed drainage strategy cannot be provided as there is no technical information on the modelling in the report. Assuming that the modelling has been undertaken correctly, the report shows that:

    - the relevant state government legislation and council regulations in relation to flooding impacts has been considered and adequately addressed;
    - the proposed drainage works would reduce flood impacts to neighbouring properties; and
    - the likelihood of water ponding behind the town levee to inundate the town would reduce.

Notwithstanding the above, the proponent has ***not*** adequately assessed the safety aspects of the proposed works. This is a significant shortcoming of the assessment. The proposed drainage channel would increase the safety risk from low to high. The proposed Charles Street culverts would increase the safety risk from low to extreme. The proponent needs to demonstrate how these risks can be managed.

Historic Heritage

8. Matters pertaining to Historic Heritage in the submitted EIS were referred to Council's Heritage Advisor for review. A summary of the technical feedback is provided herewith:

    - This seems to be a rather cursory review of the development site and is too succinct. It appears to be focused almost entirely on archaeology and the existence of relics on the site. It contains no evidence of any attempt to understand the history of the affected property or its role in the development of Wee Waa.

    - There is only a fleeting assessment of the structures identified on the site. This Report assesses the cultural heritage significance of the site as having no cultural heritage significance but contains no evidence of referral to the seven assessment criteria published by Heritage NSW as the basis for such assessments. It is therefore difficult to assess the validity of this report.

    - Regardless, the standing structures referenced by the report appear to have been demolished prior to its completion. As a result, further assessment of historic heritage appears pointless.

9. Council notes that the Environmental Impact Statement makes reference to Appendix N in the documentation as containing an assessment of Aboriginal Cultural Heritage. In this regard Council is satisfied that the consultants have sought input from all relevant stakeholders, including Wee Waa Local Aboriginal Land Council and Gomeroi Land Title claimants. It is also noted that the Aboriginal Cultural Heritage Assessment will be reviewed separately in accordance with established legislation.

Engineering - General

10. Overall, the reports regarding a specific subject matter appear to provide suitable information regarding the current stage of this development (although limited in content), however the reports referring to generalised material (e.g. the EIS report) do not appear to have adequately acknowledged the material provided by the subject experts.

11. The EIS addresses the presentation to the Councillors multiple times throughout the report and gives the impression that Council has already accepted/approved this development.

12. The EIS notes an anticipated construction start date of March 2022. Based on staff's observations, and having regard to the comments provided within this submissions report, it is considered that this timeframe may not be achievable.

13. Given the lack of sufficient detail in the tabled reports previous comments of a technical nature submitted to SINSW on 29/06/2021 remain applicable:
    - EIS acknowledges the demolition of the old school and that it will be undertaken as a separate project - It is recommended that both projects should be running in parallel.
    - EIS identifies that a portion of the new site is currently under a Native Title Claim. As with most developments, this matter should be satisfactorily resolved prior to any other approvals being issued.

Potable Water

14. A review of the Report submitted by Marline Newcastle Pty Ltd, has been undertaken by Council's Infrastructure Delivery and Planning Teams.

15. It is noted that the report has identified the locations of the potable water mains; however, they have noted several key points that will need to be undertaken prior to any approvals being issued:
    1. *"Further correspondence to Narrabri Shire Council will determine what water main is applicable for connection."*
    2. *"A water pressure/flow test is to be conducted on the existing water mains to inform us if potable water pumps and tanks are required to service the property."*

16. Marline has made a specific note on page 5 of the report, stating:
    "Note: The Probable Simultaneous Flow (outlined within AS3500.1-2018) for the school has not been determined at this stage due to insufficient architectural information."

17. A similar note is repeated on page 6 regarding the Fire Protection Services, stating:
    "Note: The Probable Simultaneous Flow for the school has not been determined at this stage due to insufficient architectural information. If the council main fails to deliver the portable simultaneous demand, fire hydrant pumps and tanks would be required to serve fire services."

    Therefore, the recommended engineering conditions for Potable Water are detailed as follows:

    - 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.

Sewer

18. A review of the Report submitted by Marline Newcastle Pty Ltd, has been undertaken by Council's Infrastructure Delivery and Planning Teams. A summary of the comments provided are presented as follows:

- It is noted that the report has identified the locations of the sewer mains; however, they have noted several key points that will need to be undertaken prior to any approvals being issued: *"…require further consultation with local authority for a possible sewer upgrade to serve the school."*

  Furthermore, Marline have made a specific note on page 7 of the report, stating:
  "Note: The daily total sewer discharge is the product of the number of students and the average daily discharge per students. Therefore, the final sewer load, storage volume and inground pipe calculation will be based on the number of students and the building usage. This could be identified during detailed design phase."

  A similar note is repeated on page 9 regarding the Sewer Pump Station, stating:
  "Note: This will require further consultation with local authority for a possible sewer upgrade to adequately size the sewer pump station to serve the school. Marline suggest an early conversation with council during concept design phase for sewer requirements."

19. The developer may be able to use a gravity connection for the development given the depth of sewer mains within the vicinity of the site. Using a sewer pump station to pump into the sewer

system is not Council's preferred option where adequate natural fall is available to the site. Therefore, the recommended engineering conditions for Sewer Mains are:

- 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 Tucket 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; And
  - 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 developer.

20. A Trade Waste Application should also be submitted to Council for approval, as detailed on page 8 of the Infrastructure Services Report prepared by Marline Newcastle (29/10/2021, MN12159).

Stormwater

21. Council's Infrastructure Delivery and Planning Teams have reviewed information pertaining to stormwater and concur with the observations and recommendations presented by WRM as detailed within preceding subsection "Flooding".

22. The recommended engineering conditions for Stormwater are detailed as follows:

- 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 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).

Traffic & Transport

23. The Traffic & Accessibility Impact Statement from Taylor Thomson Whitting Pty Ltd (05/11/2021, 211022), has been reviewed. As a large portion of this relates to the impact on the Kamilaroi

Highway, Council concurs with the comments raised by Transport for NSW. Some of the key points noted in respect of this Report are:

- Page 31 states *"…the construction of a new two-stream high school with a capacity of 200 students, with the potential to grow to 300 students…"*
- Page 31 states *"…school will continue to operate at approximately 150 students and 50 staff on opening, however the site has been future proofed for an additional 50 students, extending to an additional 150 students…"*

24. These two statements differ by a factor of 50 students (300 v 350).

- Page 36 states *"…pedestrian walkways are to be implemented to the north of Mitchell Street and around the proposed development site."*
- The Civil plans only indicate a pathway that extends from the bus bay on George Street to the access gate on Mitchell Street. This differs from the architectural 3D imagery of the proposed development which indicates a shared path (and kerb and guttering) around the entire site.
- Council therefore requests that a concrete shared pathway, and kerb and guttering be constructed around the full perimeter of the site (i.e. George Street, Mitchell Street and Charles Street).
- Page 36 states *"An on-grade pedestrian crossing is proposed with kerb blistering across Mitchell Street…"*
- Council will not accept a painted (zebra) pedestrian crossing on Mitchell Street (Kamilaroi Highway).
- Similar to what Council has previously constructed on the eastern side of the Mitchell/George Street intersection, a kerb extension/blister would be acceptable only.
- Page 37 states *"Narrabri Shire Council is currently undertaking road upgrades of Culgoora Road to provide an alternate road train route that will reduce road train movements on Mitchell Street"*. Please be advised that these works are considered to be long term and are not currently funded. Detailed engineering designs are also yet to be prepared.
- Page 38 states *"Based on site inspection, two buses were required to queue at any one time."* There does not appear to be any consultation undertaken with local bus companies, and Council had previously been requested to extend the bus zone at the old High School due an increased number of buses queuing (in particular during the afternoon).
- Page 39 states *"…at any one time 7 vehicles would be required to be accommodated within the pickup and drop off area"*. With both the bus zone and pickup area being located within

the same area, this may result in vehicles queuing back onto the Kamilaroi Highway. It is recommended that an off-street parking area for students and parents be constructed to prevent any safety issues with traffic on the Kamilaroi Highway.

- Page 40 states *"Parking within the site is to be divided into two carparks each consisting of 20 spaces and will be reserved for staff or employee parking."*
  Although this a welcome increase in parking from the original proposal, the second parking area is isolated on the western side of the school grounds, with no suitable pathway linking the parking area to the school buildings. It is recommended that a suitable pathway be constructed to connect to this secondary parking area.
- At no stage throughout the report does it mention parking for students and visitors.
- Page 40 states *"Some community use of the school hall and sports field is anticipated to occur. During these events onsite parking will be available for visitors with potential for overflow to the south of the Charles Street car park if required."*
  Given that the previous statement identifies that the off-street parking is only large enough to accommodate teachers and staff, it is currently unclear how visitors and students for other events will be accommodated. It is therefore recommended that the Department of Education pursue additional off-street parking – this may be achieved via purchasing the adjoining vacant lot which can occur in parallel with the construction of the school.
- Page 48 states *"It is also noted that Narrabri Shire Council has future plans to relocate road train vehicles from Mitchell Street which will increase safety for active transport modes in the area."* Similar to the statement on page 37, this is an incorrect statement and assertion which needs to be removed.
- Page 53 states *"An Operational Transport and Access Management Plan (OTAMP) is a way to identify, and plan for, the regular transport and access requirements of the site…. It is anticipated that this preliminary OTAMP will be developed into a more comprehensive and final OTAMP prior to commencement of operations of the new development."* This is considered to be a key document in regard to the safety of motorists and pedestrian regarding the impacts the new school will create.
- Page 53, Section 6.2.3 School Buses – does not mention the route which school buses will now be required to travel when accessing and leaving the school. This may impact local residential streets (e.g. Boundary Street), with access onto the highway not being considered.

25. Consequently, the recommended engineering conditions for Traffic and Transport are:

- The developer shall make all efforts in acquiring the adjacent vacant lot to create additional off-street parking for students and visitors.
- The developer must engage a Chartered Professional Engineer to develop an Operational Transport and Access Management Plan (OTAMP), which shall include the proposed bus routes.

Aboriginal & Historic Heritage

26. Although no items of Aboriginal Cultural Heritage or Historic Heritage value were identified within the disturbance area, management of heritage matters should continue in accordance with the submitted Cultural Heritage Management Plan(s).

Developer Contributions

27. As detailed on page 100 of the submitted EIS, the relevant contribution plan applying to the site is Narrabri Shire Council *Section 7.12 Fixed Development Consent Levies Contribution Plan 2011* (the Contribution Plan). It is further noted in the EIS that the proposed new High School is not implicitly categorised as exempt from the Contributions Plan.

28. It is requested that DPIE consider this proposal as ***not exempt*** for the purposes of the Plan for the following reasons:

- Council would be required to meet the corresponding demands and community expectations, and the request represents a form of cost-shifting to local government;
- Current and ongoing resourcing impacts of the Wee Waa High School proposal, generally;
- Narrabri Shire Council has been recently declared a natural disaster area on account of a major flooding event which has ongoing resourcing and financial impacts; and
- Council's consistent application of the provisions of the Section 7.12 Plan, and the commensurate potential to create an undesirable local planning precedent.

Geotechnical & Earthworks

29. The Geotechnical Report prepared by Pacific Geotech (21/10/2021, PG-6504, 2021-10-14, GR) has been reviewed. It is noted that the site contains soils that are classified as being highly reactive.

30. Page 2 of this report states "*Earthworks are expected to comprise of a minor cut to fill operation from front to rear, combined with an imported filling operation of up to 0.5m.*"

31. Page 3 of this report states *"The natural soils are typically highly to extremely reactive and would generally not be suitable for reuse as structural fill around the building and under the proposed paths."*

32. Page 3 of the report states *"Imported fill should be of fair to good quality with a minimum Soaked CBR value of 10%, a maximum Iss=0.5%, a maximum particle size of 75mm, a maximum Plasticity Index of 10%, a maximum Liquid Limit of 35% and a minimum 80% of material passing the 19mm sieve and 20% minimum passing 0.075mm sieve."*

33. Page 3 of the Pacific Geotechnical Report makes reference to imported fill. Contradictory information currently exists across the documents. It should be noted that the EIS report makes mention of a "cut to fill balance" and will only be using existing on-site material contrary to the Pacific Geotech Report. Reference is also made to Council's previous advice in respect of challenges with sourcing appropriate fill locally.

34. The appended Geotechnical Investigation Report prepared by Barnson (24/05/2021, 35754-GR02_B) has also been reviewed and the following is noted:

- Page 16 of this report states *"The soft upper layers of topsoil and clay for a depth of 500mm should be stripped and removed from site…"*
- Page 16 states *"The existing subgrade can NOT be used as bulk fill, due to its extreme reactivity."*

35. Therefore, the recommended engineering conditions for Earthworks are:

- The developer must engage a Chartered Professional Engineer to design the earthworks management plan. The Engineer must submit calculations and plans that:
  - Detail the true cut to fill balance.
  - Identify the volume of material to be removed from the site and where this material is to be placed/spread.
  - Identify the volume of material that will be required to be imported to the site and where this material (meeting the specifications identified in the report) will be sourced.
  - It should be noted that Council will not be able to assist in the provision of suitable quarry material as this is already in high-demand with an increasing road maintenance program due to extreme flooding.

- Given the dispersive nature of the soils on the site, appropriate measures should be put in place to ensure that sediment cannot be tracked onto adjacent roadways.

Construction Impacts

36. The management of construction workforce impacts (anticipated to be 150 construction jobs) should be further considered in any future CEMP. Wee Waa is currently experiencing an accommodation shortage, particularly given the influx of seasonal workers and ongoing flood recovery efforts.

37. Construction impacts are not considered to be clearly articulated in the submitted documentation and some contradictory information currently exists. Further clarification should therefore be sought surrounding the potential impacts, particularly in respect of construction hours.

Public Domain

38. The submitted documentation references the installation of security fencing, however, the extent and location of such fencing is unclear throughout the documentation. Additionally, the photomontages contained in the Concept Design Report (SHAC, November 2021 Revision M) do not clearly display the proposed fencing arrangements and associated visual impacts, including potential impact on neighbouring landholders.

39. Council has previously communicated concerns regarding the ongoing maintenance and appearance of the drainage channel which has not been adequately addressed in the submitted EIS nor the supporting documentation. These issues are summarised herewith:

    - Ongoing maintenance requirements/arrangements for the drainage channel;
    - Potential for the drainage channel to be a vermin and litter harbourage; and
    - Safety considerations (refer also commentary in subsection "Flooding").

Utilities – Electricity

40. Wee Waa High School is the community's designated Evacuation Centre under the adopted EMPLAN. This matter has not been addressed in the submitted documentation.

41. Item 5.5 of the Infrastructure Services Report (page 11), as prepared by Marline Newcastle (14/10/2021, MN12159), makes note of generator back-up requirements and the need for further

clarification. Given the comparative remote nature of the school and history of outages within the community, provision for a back-up generator is recommended.

Operational Management Plan (OMP)

42. It is considered that the OMP lacks sufficient detail and should be updated to reflect the response to submissions and any design amendments.

Contamination

43. The Detailed Site Investigation report prepared by Barnson (28/09/2021, 35754 ER02) has been reviewed. The Report makes a range of recommendations including the need for a Remediation Action Plan (RAP) to be developed. The RAP would also inform the removal of the fibre cement fragments from the surface of the site and provide recommendations for the appropriate application of fill as barrier over the contaminated soil.

44. The Detailed Site Investigation report also makes recommendation that a Preliminary Long-term Environmental Management Plan (LEMP) be developed to provide recommendations for the long-term management of the containment.

45. A Remedial Action Plan (RAP) was subsequently prepared by EMM (08/11/2021, E211085 RP1). Page 23 of the document reviews a range of contaminated soil remediation options and *Option 3: Off-site disposal to landfill* has been identified as the preferred approach. In this regard close and ongoing consultation will be required with Council regarding the proposed disposal of waste at Council's landfill during both the construction and operational phase, particularly with respect to Asbestos Containing Materials (ACM), to ensure that Council's landfill licensing conditions are complied with, and waste is lawfully disposed of and managed.

46. Council is concerned that demolition works and site waste removal has occurred without the requisite prior approvals, as detailed in Figure 4.1 of the Detailed Site Investigation Report, particularly given that ACM (or other contaminants) may have existed within the removed material(s). To ensure transparency surrounding chain of custody arrangements, and to ensure Council's licensing obligations are met, information regarding the location, date(s) and quantities of disposal of this material is urgently requested from the proponent. The proponent is also requested to cease any such activities until project approval is granted pursuant to Part 4 and/or Part 5 of the EP&A Act.

47. Given the site history and community perceptions surrounding the legacy contamination issues with the former Wee Waa High School site it is strongly recommended that a Long-term Environmental Management Plan (LEMP) be developed.

48. If project approval is granted, a Construction Environmental Management Plan (CEMP) should be prepared prior to any earthworks being commenced to ensure appropriate management and classification of contaminated soils.

49. Given the community contamination legacy issues described in item 47 above, the proponent should seek to engage an NSW EPA accredited site auditor.

Building Code of Australia (BCA)

50. The BCA compliance report prepared by Group DLA (29/10/2021, GDL210338.1) has been reviewed and the DtS recommendations are generally concurred with:

    - Provision of a letter or email confirming the date Tenders are issued to the market for the construction works to enable confirmation of the BCA version applicable to the project;
    - Performance Solution required by Architect/Façade consultant for external wall water proofing design; and
    - Consolidation of all site allotments prior to the issue of the ***Occupation Certificate****.

    ***Note:** suggested amendment.*

Site Landscaping

51. The Landscape Architecture Concept Design Report prepared by Moir has been reviewed. The reliance on non-endemic species including *Ulmus parvifolia* (Chinese Elm) should be further justified given potential deleterious impacts of planting on utility infrastructure and buildings.

Conclusion

NSC expects that SINSW has, and will continue to, adhere to all conditions of approval, and all applicable legislative requirements they are bound by.

NSC appreciates the opportunity to review the documentation in support of the Wee Waa High School and that these comments will be considered as part of the corresponding determination process.

I trust that this information provides the necessary assistance and should you require any further clarification in this regard, please contact Council's Manager of Strategic Planning, Ms Donna Ausling on (02) 67996855 or council@narrabri.nsw.gov.au.