12 July, 2022.

Minarah College,
Planning Portal,
Dept of Planning & Environment.

Attention: Nahid Mahmud.

Re: Minarah College concerns –
https://www.planningportal.nsw.gov.au/major-projects/projects/minarah-college

I strongly to the Minarah College and below are some of my concerns;

Document- **Environmental Impact Statement**

SEARs 9. Traffic, Transport & Accessibility

I do not believe that the SEARs requirements of 9. Traffic, Transport & Accessibility have been met due to Ason Group's "Surveyed Traffic Volumes" being conducted during a 'pandemic event'. They themselves state on pages 24-25 "This has a potential impact on the integrity and consistency of any traffic surveys undertaken during this period"

I believe this report does not accurately represent 'completeness, accuracy, quality and clarity' of the information in the EIS.

On this basis I Object

SEARs **11. Noise & Vibration**

I do not believe that the SEARs requirements of 11. Noise and Vibration have been met due to Day Design Pty Ltd's "Measured Ambient Noise Level' firstly being conducted during Covid lockdown and secondly due to their admission of a missing noise logger at 'Location A' for 18 days out of the 25 days. Therefore, I deem this report to be inaccurate and incomplete.

I believe this report does not accurately represent completeness, accuracy, quality and clarity of the information in the EIS.

On this basis I Object.

SEARs **13. Stormwater and Wastewater**

I do not believe that the Overland Flow Report meets the requirements of the SEARs to "Provide an Integrated Water Management Plan for the development that avoids adverse impacts on any downstream properties".

Firstly, Considering Martens only did a 'general walkover' on 22.9.2021, 22.11.2021 and 30.11.2021 which were days that Catherine Field had zero to light rainfall I do not believe that the site has been thoroughly examined during all weather conditions. Perhaps if they attended the site during heavy rainfalls in either December 2021, February 2022, March 2022 and most recently in July their data would be more accurate.

Martens Preliminary Overland Flow Assessment" page 8. "MA has iteratively designed the bus parking accessway, south western carpark, diversion pipes and swale along the southern boundary of the site to **capture and redivert the upstream overland flows to Catherine Fields Road**." With the capturing and rediverting of the overland flow to Catherine Fields road and the proposed installation of 525mm diameter diversions pipes, I believe this will cause major flooding to any neighbours downstream as the water will flow much faster. This will prevent flooding on the site of the school but

Martens have offered no solution to "avoid adverse impacts on any downstream properties" as outlined in SEARs requirements, if anything, their plans will increase impacts on downstream properties.

I believe this report does not accurately represent 'completeness, accuracy, quality and clarity' of the information in the EIS.

On this basis, I Object

Page 45 **3.2 Detailed Description** 3.2.3.5 Works to Catherine Fields road

The proposal also involves works within Catherine Fields Road to allow for a right-turn bay from Catherine Fields Road and bus bays on the eastern side of Catherine Fields Road.

▪ A channelised right-turn bay designed per Austroads Part 4A for 80km/hour speed zones and have storage of 55m.

My question is, how many cars can fit within the 55metres? Estimating the average car length can range from 3metres to 5metres, I estimate that less than 20 cars will fit in the left turn lane to queue to turn right into the school. Therefore backing up traffic along Catherine Fields road for normal road users. ***Also, this will affect neighbours by 110% in the immediate vicinity not being able to turn right out of their own driveways.***

Page 47 **3.2 Detailed Description** 3.2.3.6 Transport and Parking

Bus Stops and Bus Parking

A bus stop servicing the school will be situated on Catherine Field Road and exist as a dedicated shoulder. In addition, provision of private bus parking will be provided on-site catering for the school's private buses.

What size are these buses? Are they 12 seaters or a larger capacity much like a coach? This is not mentioned. Also, I don't see anywhere on the plans that accommodate bus parking on site

Page 52 **3.2 Detailed Description** 3.2.4 Development Timing and Staged Construction

Construction:

Timeframes:
- Phase 1: Demolition of existing buildings – expected timeframe 2 weeks
- Phase 2: Excavation and earth moving – expected timeframe 4 weeks
- Phase 3: Construction (Stage 1 to 5) – Stage 1 expected timeframe 52 weeks
  – Stage 2 expected timeframe 40 weeks
  – Stage 2 expected timeframe 40 weeks
  – Stage 2 expected timeframe 52 weeks
  – Stage 2 expected timeframe 40 weeks

The total construction time frame is 230 weeks, which calculates to almost 4.5 years that Catherine Field will have construction vehicles, trucks, traffic controllers and constant noise in our usually quiet town. Not too mention the stress on neighbouring properties during this time

Page 59 5. **Community Engagement** 5.1 Engagement Carried Out

The community and stakeholder engagement undertaken has sought to address the requirements of the SEARs and includes:

▪ Information about the proposal and an invitation to online community sessions were shared with the community through flyers letterbox dropped to 945 residential dwellings and 8 commercial premises surrounding the site.

▪ In addition to the letterbox dropped flyer, letters were delivered along with the flyer to 17 adjacent neighbours inviting them to a dedicated online information for near neighbours only.

▪ Updates to the community and stakeholders as the proposal progresses through the planning process, including reporting back to the community and stakeholders on issues raised and how the project team has responded through a community question and answers document.

I strongly disagree with the first point here. According to CoreLogic, there are only 563 homes in Catherine Field, come of which are actually located within Catherine Park estate. Secondly, I didn't receive a flyer in my letterbox. Lastly, regarding point 3, I have never heard anything further since the online zoom meeting in November, at no point did I receive any follow up email or call.

Page 69 6.3 **Environmental Amenity** 6.3.1 Existing Environment

The site is located within a semi-rural setting within the suburb of Catherine Field. The surrounding context of the site includes large-lot rural residential subdivisions that may be impacted by the proposed development.

This 'will definitely be impacted' not 'may be''!

Page 80 **6.7 Traffic and Transport**

As Minarah College will be a new school, there is not an existing student or staff cohort. Where required comparison has been drawn to the Minarah College - Green Valley Campus. The reports identify that the overall traffic impacts of the proposal are considered acceptable.

Catherine Field and Green Valley are two different suburbs in two different LGA's. How is a comparison of the school in Green Valley accurate to predict traffic impacts?

Page 80-81 **6.7 Traffic and Transport** 6.7.1 Existing Environment

The surrounding road networks includes a mix of state, regional and local roads, Catherine Fields Road is a local road serviced by Camden Council. Given the rural context, the site is not connected to pedestrian or cyclist pathways and pedestrian movements in this area is not typical. The proposed school location is not situated within walking distance of a train station. A single bus stop location exists south of the site along Catherine Fields Road and provides serviceability to two routes to and from, Narellan, Liverpool and Minto.

Nor do we foresee Catherine Field road having safe pedestrian or bicycle pathways anytime in the near future. I wouldn't allow my child to walk or ride their way to school along any road within Catherine Field.

Page 81 **6.7 Traffic and Transport** 6.7.2 Potential Impacts

Site Access

All parking and access arrangements are for the completed of Stage 5 of the school. Site access for the different site users will be as follows at Stage 5:

▪ Staff car parking is located on the northern and southern side of the school. Access to the staff parking areas will occur via the northern crossover on Catherine Fields Road. Staff accessing the southern car park will proceed through the kiss and ride area.

▪ Student and ELC parking is proposed in the northern car park. Access to the student and ELC parking areas will occur via the northern crossover on Catherine Fields Road, and to exit the site students and ELC users will proceed through the kiss and ride area to the southern access point.

▪ A total of 30 spaces are provided for Kiss & Ride access, divided between two lanes. These spaces are accessed via the northern crossover and exit via the southern crossover.

▪ The school has proposed to arrange for the services of five private chartered buses for exclusive school use with the buses parked on school grounds when not in use. The buses will utilize the eastern lane in the school kiss and ride area to drop off / pick up students then proceed to the back of the school to be parked. Chartered bus drop off/ pick up time will be staggered outside of main kiss and ride times to minimise impact.

Regarding points 1, 2 & 3: So any vehicle that wants to enter the carpark can only do so in one direction via the Kiss & Ride access of only 30 spaces, I could only imagine the congestion that this will cause to the flow of traffic not only in the Kiss & ride zone but flowing out onto Catherine Field road.

Regarding point 4: Five private chartered buses? Again, what size are these? Where exactly will these five buses be parked when not in use? I don't see any mention of these in the car space report.

Page 82 **6.7.2 Potential Impacts** 6.7.2 Potential Impacts

Public and Active Transport:

There are opportunities to capitalise on public transport use to reduce the dependency of private vehicle travel. There is an opportunity for ancillary serviceability (via shuttle or a similar chartered service) from Leppington Station, which is located 5km north-east or to Minto Station, approximately 8km to the south-east to Minarah College. This option would reduce dependency on private vehicle travel and decrease traffic congestion. Having regard for the above, it is demonstrated that part of Catherine Fields Road is adequately dimensioned to provide bus serviceability. As part of the school development, potential school bus routes will be explored to further service the future student population.

Currently there are no provisions or anticipated future provisions for footpaths or cycling paths along the Catherine Fields Road frontage in either direction. This has been determined in consultation with both TfNSW and Camden Council and outlined above. However, as the Catherine Field North Precinct expands to accommodate new residential development, it is expected that the current footpath network will grow to provide adequate connectivity through the locality.

As far as I am aware, the only station that public buses travel to and from on Catherine Field road is Minto Station. With regards to the footpaths and cycling paths, this would entail Camden Council upgrading the whole of Catherine Field Road to remove the dangerous culverts that catch the excessive rain water along with widening of the road itself. Which I don't see happening for decades.

Page 87 **6.10 Ground and Water Conditions** 6.10.1 Overview and Methodology

A Geotechnical Assessment has been prepared by Martens Consulting Engineers and is attached at Appendix O. Field investigations conducted on 25 November 2021

This Assessment was conducted prior to the excessive rain and flooding we experienced and may not be an accurate assessment.

Pages 87-88 **6.10 Ground and Water Conditions** 6.10.2 Assessment

Martens Consulting Engineers conclude that the proposed development is inferred to be impacted by the following geotechnical constraints: ▪ High shrink /swell potential due to soil moisture changes.

Again, this was prior to heavy rainfall and flooding.

Page 88 **6.10 Ground and Water Conditions** 6.10.3 Mitigation Measures

▪ Appropriate surface and sub-surface drainage should be provided to divert overland flows and limit ponding of water near footings and foundations.

Considering there is a natural Overland Flow toward the Heatherfield side of this site, where do they plan to divert the water to if they want it diverted away from the schools' footings and foundations?

Page 89 **6.10 Ground and Water Conditions** 6.11.3 Existing Environment

Details of the existing servicing provisions are provided in the Services Infrastructure Report prepared by JHA. This revealed the following elements of the existing wastewater system:

▪ *There is currently no Sydney Water sewer infrastructure available for the site. JHA have therefore engaged a Water Servicing Coordinator (WSC) to apply for a feasibility study with Sydney Water.*

This feasibility study is to determine if a new authority sewer network is expected within the area to service the site as the subject site is identified within a "strategic planning" zone on the Sydney Water Waste-water growth servicing plan 2020-2025.

Pages 89-90 **6.10 Ground and Water Conditions** 6.11.4 Assessment

In short, Martens and Associates explored three options to handle wastewater at the school. Their findings are below:

Option 1: Pump to Sydney Water Reticulation Sewer This option involves the collection of all site wastewater to a single pumpstation and transfer of wastewater to the nearest Sydney Water reticulated sewer. A feasibility study of the potential for this scheme was undertaken by Qalchek. **The feasibility study has determined that at this stage**

Sydney Water is unable to accommodate the proposed development, as there is not currently spare capacity in the existing local reticulated sewer system to allow for additional connections from new developments not already allowed for within the next 5 years. It was recommended by Sydney Water that a pump out arrangement be explored.

Option 2: Pump out This option involves the collection and storage of generated wastewater in a dedicated storage tank which is pumped out by a licenced contractor for offsite disposal. An assessment of the site topography and proposed 88 ASSESSMENT OF IMPACTS URBIS ENVIRONMENTAL IMPACT STATEMENT - MINARAH COLLEGE CATHERINE FIELDS - FINAL layout shows that it is possible to drain all waste generating fixtures to a central storage tank located in the north western corner of the site and adjacent to the proposed car parking area. The key advantages of such a system are that the wastewater generated on the site would be managed (i.e. treated and

reused or disposed) offsite and system capital costs are generally lower than for an onsite wastewater treatment and reuse system. The key disadvantages for this type of system are that long term pump out costs can be significantly higher than for an onsite wastewater treatment and the benefit of reusing effluent for irrigation would be lost.

Option 3: Onsite treatment and irrigation This option involves the collection of all site wastewater to an onsite sewage treatment plant (STP) with treated effluent reused onsite through surface or subsurface irrigation. An assessment of the site has determined that it is possible to drain all waste generating fixtures to collection well in the north- western corner of the site and adjacent to the proposed car parking area which is then pumped to a STP located in the south -western corner of the site and adjacent to the bus parking area. Should site irrigation be adopted it should be shallow subsurface irrigation of secondary treated effluent to minimise the risk of contact between site users and irrigated effluent and to mitigate the impact should this occur. The key advantages to this scheme would be the ongoing benefit of reduced potable water use for irrigation and lower system operational cost. The key disadvantages of this scheme would be the higher capital costs to construct and the necessity for periodic maintenance of the wastewater management system.

I understand that whichever system is selected, Camden Council have the final say and approval as to which they can operate and only when is it approved by Council can the school be occupied.

Page 91 **6.10 Ground and Water Conditions** 6.12.3 Assessment
The testing has provided the following results in relation to the proposed development:
▪ The flood hazard on Catherine Fields Road has been lowered from H2 to H1 which is safe for pedestrian and vehicle access.
Since when? How can they report this using the Upper South Creek Flood Study dated 2013 and Camden Council's floor risk precinct maps dated 2019. Neither taking into account once again the extensive flooding that Catherine Field received within the last 6 months.

Yours sincerely,

[redacted]*m.au*