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LAND USE CONFLICT RISK ASSESSMENT (LUCRA) 268-278 CATHERINE FIELDS ROAD, CATHERINE FIELD

Prepared for
MINARAH COLLEGE
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URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

Director	Alaine Roff
Associate Director	Erin Crane
Assistant Planner	Thomas Baird
Project Code	P0033387
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1. INTRODUCTION

1.1. PURPOSE AND SCOPE OF ASSESSMENT

Urbis have been commissioned by Minarah College (**the Applicant**) to prepare a Land Use Conflict Risk Assessment (LUCRA) to support the Environmental Impact Statement (**EIS**) prepared as a part of the State Significant Development Application (SSDA) for a new school, Minarah College.

The LUCRA has been prepared to address the Department of Planning and Environments (**DPE**) Response to Submission (**RTS**) – Key Issues letter dated 17 August 2022, which requests:

The RtS must include a LUCRA that considers the potential impact of the proposal on surrounding areas of land zoned RU4 Primary Production Small Lots. The LUCRA must outline how the proposal is consistent with the RU4 zone objectives to enable sustainable primary industries and other compatible land uses, and to minimise land use conflicts with surrounding land. The LUCRA must be prepared having considered the Land Use Conflict Risk Assessment Guide prepared by the NSW Department of Primary Industries and include appropriate mitigation measures where impacts are identified.

This LUCRA has been prepared in accordance with the Land Use Conflict Risk Assessment Guide (NSW Department of Primary Industries, 2011) (**'the guide'**) and satisfies the above request from DPE.

The purpose of a LUCRA is to identify land use compatibility and potential conflict between neighbouring land uses, and the identification of conflict avoidance or mitigation measures. A LUCRA aims to:

- accurately identify and address potential land use conflict issues and risk of occurrence before a new land use proceeds or a dispute arises;
- objectively assess the effect of a proposed land use on neighbouring land uses;
- increase the understanding of potential land use conflict to inform and complement development control and buffer requirements; and
- highlight or recommend strategies to help minimise the potential for land use conflicts to occur and contribute to the negotiation, proposal, implementation and evaluation of separation strategies.

In order to achieve those aims, a four-step assessment process is undertaken:

1. information gathering – gather information about the proposed land use change and associated activities, surrounding land uses and the site's environmental characteristics.
2. risk level evaluation – each proposed activity is recorded and potential land use conflict level is assessed. The higher the risk level, the more stringent the mitigations measures that would be required.
3. identification of risk mitigation strategies – mitigation strategies are identified which assist in lowering the risk of potential conflict.
4. record results – key issues, risk level and recommended management measures are recorded and summarised.

This LUCRA is supported by a Biosecurity and Agricultural Land Use Conflict Risk Assessment (BA LUCRA), prepared by Peritus Ag Advisory. The BA LUCRA specifically identifies surrounding agricultural land uses and identifies possible biosecurity risks and mitigation measures.

1.2. PROJECT BACKGROUND

A SSDA (SSD-30759158) was lodged with the Department of Planning and Environment (**DPE**) on the 2 June 2022. The SSD sought consent for the construction of a co-educational establishment (Minarah College) accommodating 1,580 students. The proposal was placed on public exhibition for 35 days between the 28 June 2022 and the 1 August 2022. During this period a total of 297 community submission and 8 Government agency submissions were received.

A Response to Submissions Report (**RtS**) was prepared and submitted on the 20 March 2023 which provided a formal response to the submissions received, detailed the consultation that had occurred with stakeholders since public exhibition, and provided further information to support the project. This LUCRA was prepared to supplement and support the findings of the RTS.

Since the submission of the RtS Report, further additional information and suggested design refinements have been requested by DPE in an RFI dated the 3 May 2023. The key matters raised in this RFI related to suitability of the site and the lack of essential services and infrastructure to support the scale of the development proposed. In response to DPE's RFI the proposal has been amended to reduce the scale of the development.

The amended proposal seeks consent for the construction of a co-educational establishment (Minarah College) accommodating 980 students. The school will comprise an Early Learning Centre (ELC) for 60 students, a School for Specific Purpose (SSP) for 30 students, a primary school accommodating 505 students and a high school for 385 students. The new school is to be constructed in four stages, growing in line with growth in the local population.

1.3. STRATEGIC CONTEXT

The site is located on currently underutilised land in a highly strategic location within the South West Growth Area (SWGA). As addressed in the EIS, Catherine Fields is located in the South West Priority Growth Area, as identified in the *State Environmental Planning Policy Precincts – Western Parkland City* under Appendix 5 Camden Growth Centres Precinct Plan. However, the site is mapped within the South West Priority Growth Area as 'unreleased' in the Catherine Field Precinct.

Urbis have consulted with Camden Council and DPE prior to the preparation of the LUCRA. Both agencies are involved in the rezoning of the SWGA, they specifically advised:

- DPE (Western Parkland City Team) advised on 23 September 2022 they are not undertaking precinct planning in the SWGA. Rezoning should be initiated by site specific Planning Proposals. DPE also commented that precinct planning was not being prioritised due to fragmented private ownership making it more challenging for precinct planning.
- Camden Council advised on 6 October 2022 that Council is not undertaking precinct planning in the SWGA. Rezoning is being initiated by site specific Planning Proposals. Until recently, DPE had responsibility to plan and rezone precincts within the SWGA, in collaboration with Council as a principal stakeholder. Once a SWGA precinct was rezoned, Council was responsible for assessing subsequent Planning Proposals and Development Applications. Council's website outlines the status of each precinct in the SWGA, **Figure 1** illustrates the status of Catherine Fields as of March 2025.

Figure 1 Status of Catherine Fields

Catherine Fields			
SWGA Precinct	No. of Dwellings (approx.)	Status	Project Lead
Catherine Fields	TBD	Not Released	N/A

Source: Camden Council

The current exclusion of Catherine Field from precinct planning should not impede the development of critical infrastructure such as a new school, which will serve the immediate and surrounding communities, many of which have been released and experiencing considerable growth. Appropriate studies have been undertaken to ensure that negative impacts of the proposal will be minimal.

As the subject site is located within an 'unreleased' area, the provisions of the principal planning controls in the Camden LEP 2010 apply rather than the provisions of the *State Environmental Planning Policy Precincts – Western Parkland City*. Under the Camden LEP 2010, the proposed development is not expressly prohibited and is therefore permissible with consent.

The RU4 zone is identified as a prescribed zone under *State Environmental Planning Policy (Transport and Infrastructure) 2021*. Development for the purpose of a new educational establishment in a prescribed zone is permitted with consent under Part 3.4 clause 3.36(1) of *State Environmental Planning Policy (Transport and Infrastructure) 2021*. The development is therefore permitted with consent, and NSW planning policy expressly intends for schools to be located in the RU4 zone.

The *State Environmental Planning Policy (Transport and Infrastructure) 2021* overrides the Camden LEP 2010 as it is a higher order planning instrument. The *State Environmental Planning Policy (Transport and Infrastructure) 2021* recognises RU4 land as a “prescribed zoned,” inferring schools (subject to demonstrating alignment with section 4.55 of the EP&A Act 1979) are appropriate in rural areas.

2. INFORMATION GATHERING

2.1. SITE LOCATION AND ZONING

The site is located at 268-278 Catherine Fields Road, Catherine Field, NSW and is legally described as Lot 11 in DP 833983 and Lot 12 in DP 833784. The site is located within Camden local government area (LGA) and has a site area of approximately 4.50ha.

Catherine Field is situated within Sydney's South West Growth Centre (refer to **Figure 2**), and is located between Oran Park and Leppington, both of which are undergoing significant transformation with numerous new residential subdivisions. The closest town centres are Gledswood Hills and Oran Park.

The site has a frontage of approximately 192 metres with Catherine Fields Road to the west. To the north of the site are large rural residential properties, with single dwellings and ancillary structures. Directly to the east of the site is a vegetated area separating the subject site from rural residential properties. To the south of the site are smaller residential lots which are zoned R5 Large Lot Residential.

The site is in a typical large lot rural residential subdivision area. The site has a gentle fall from the east to west with a minor ridgeline along the east to west axis. Diagonal falls lead to the southwest and north west areas of the site. The northern and eastern boundaries adjoin rural residential land with remnant vegetation.

Figure 2 Regional Context



Source: Urbis

2.1.1. Zoning

The subject site is zoned RU4 Primary Production Small Lots under the Camden LEP 2020. The proposed development is for a new "Educational Establishment". Educational Establishments are not expressly prohibited in the zone and are therefore permissible with consent under the Camden LEP 2010.

The zone objectives for the RU4 zone are as follows:

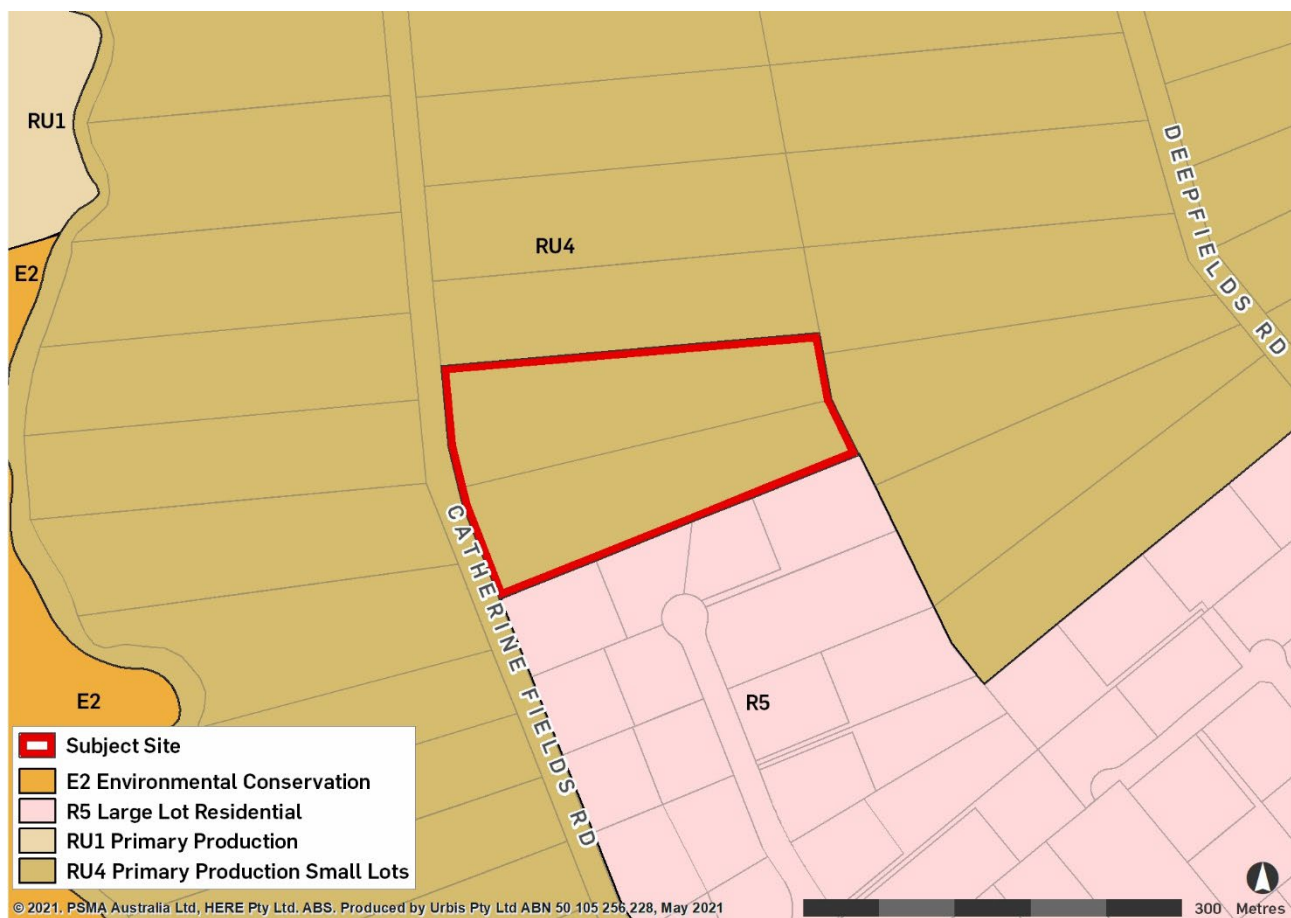
- To enable sustainable primary industry and other compatible land uses.

- To encourage and promote diversity and employment opportunities in relation to primary industry enterprises, particularly those that require smaller lots or that are more intensive in nature.
- To minimise conflict between land uses within this zone and land uses within adjoining zones.

The RU4 zone is identified as a prescribed zone under *State Environmental Planning Policy (Transport and Infrastructure) 2021*. Development for the purpose of a new school in a prescribed zone is permitted with consent under Part 3.4 section 3.36(1) of the SEPP. The SEPP prevails over the Camden LEP 2010, nevertheless efforts have been made to respect the objectives of the zone especially in regard to minimising conflict between adjoining land uses.

The proposed development is not to impact on the functioning of surrounding primary industries as they do not exist in the immediate context. Primary industry is defined as *an industry that produces energy or basic materials, such as coal, oil, metals, crops, etc.* (Cambridge Dictionary). The existing use of the site is for rural-residential purposes. Additionally, neighbouring properties, are now primarily solely residential uses and are not used for industry. The site also directly adjoins R5 Large Lot Residential to the south, refer to **Figure 3**. The surrounding context is a mix of rural residential to the north, east and west, and residential to the south. More broadly, the site is 400 metres from R1 General Residential land to the west in Oran Park.

Figure 3 Land use zoning map



Source: Urbis

Considering this, the proposed development is not inconsistent with the zone objectives and emerging character of the SWGA as:

- The proposed school will not impact upon existing primary industry uses given surrounding land uses are primarily residential and not utilised for primary industries. This is evidence that the existing land use zoning is not reflective of the changing character of the area, as reinforced by the strategic planning vision for the SWGA.
- The proposed land use is compatible with the desired future character and will not create adverse impacts or prevent primary industries in the immediate area from being established.

- The proposal will not promote diversity and employment opportunities in relation to primary industry uses, however it will provide broader long-term employment opportunities for construction workers and school staff. The proposed development represents a significant investment in Catherine Field, that will provide significant construction jobs, approximately 434 jobs, and on-going education and education support jobs once operational (approximately 99 operational jobs, directly and indirectly). Further, there will be some stimulation of employment from purchases of primary produce by teachers and students. It is estimated that by 2037 ongoing annual staff wages and salaries generated by the development will approximately \$25 million.

As expressed above, the proposed development is not to impact on the functioning of surrounding primary industries as they do not exist in the immediate context. Nevertheless, the proposal has been carefully designed to consider potential impacts to R5 zoned land to the south of the site. The proposal has been carefully designed to minimise amenity impacts to residents adjoining the site through, setbacks, siting and orientation and landscaping. Specifically, the layout and design of the proposal has been developed to minimise impacts on local residents to the south and maximise the relationship of the building to the streetscape, providing enhancements to the local context and respecting the rural context.

2.2. SITE HISTORY AND SURROUNDING LAND USE

The site and its surrounds have been used for rural residential purposes since at least 1965 and this continues to be the dominant land use. A timeline of land uses as determined by Geotechnique in their Preliminary and Detailed Site Investigation attached as **Appendix V** to the Environmental Impact Statement for the Minarah College Application (SSD-30759158) is summarised in **Table 1** below.

The site currently contains rural residential dwellings with ancillary farm structures including numerous sheds, farm buildings and water tanks. Lot 11 contains two prominent dams. The site is in a typical large lot rural residential subdivision area. The site has a gentle fall from the east to west with a minor ridgeline along the east to west axis. Diagonal falls lead to the southwest and northwest areas of the site. The northern and eastern boundaries of the site are characterised by remnant regenerating bushland, whilst majority of the site is former pastureland with sparsely scattered trees. Both lots contain rural residential dwellings with ancillary farm structures including numerous sheds, farm buildings and water tanks. Lot 11 contains two prominent dams.

To the north of the site are large rural residential properties, with single dwellings and ancillary structures. Directly to the east of the site is a pocket of bushland separating the subject site from rural residential properties. To the south of the site are smaller residential lots which are zoned R5 Large Lot Residential.

A Biosecurity and Agricultural Land use Conflict Risk Assessment (BA LUCRA) has been prepared by Peritus Ag Advisory as part of the Response to Submissions process for the amended proposal. As part of the BA LUCRA, the following was identified from consultation with neighbouring residents to the site and review of existing land uses on these sites.

- Of the four properties zoned as R5 Large Lot Residential located to the south of the site, no site is large enough to conduct commercial farming operations and do not support agricultural operations, and were therefore not considered in potential conflicts relating to agricultural land use.
- There are three properties zoned as RU4 Primary Production Small Lots to the east and north of the site. Of these sites, the following was noted about each property
 - Property 1 – Located along the northern boundary of the site: No evidence of agricultural operations being conducted on the site were evident. Based on the existing conditions of the site, the BA LUCRA identified that it is unlikely that an agricultural enterprise will be conducted on this property in the future.
 - Property 2 – Located to the northeast of the site, along the eastern boundary of the site: During consultation it was noted that the existing landowner of the site is retired and operates a hobby farm that produces Asian vegetables and chickens for egg production. The current landowner does not intend to grow more crops beyond that currently grown for personal use or to supply family and friends. The BA LUCRA also noted that based on the existing condition of the property, it is unlikely that a commercial agricultural enterprise will be conducted on this property in the future.
 - Property 3 – Located to the southeast of the site, along the eastern boundary of the site: No evidence of agricultural use is evident on the site, which is currently being used as a pallet recycling and restoration facility. The property is currently being put up for sale as the current owner of the property has passed away. The BA LUCRA noted that based on the current land use, condition of the

property and area, it is unlikely that a commercial agricultural enterprise will be conducted on this property in the future.

- There are four properties located to the west of the site on the western side of Catherine Fields Road. The BA LUCRA identifies that no visible signs of agricultural farming operations are visible on any of these properties, and based on the current land use, condition of the properties and their area, it is unlikely that a commercial agricultural enterprise will be conducted on this property in the future.

During the stakeholder engagement program undertaken as part of the BA LUCRA, properties situated in the area surrounding the subject site were identified to include the following relevant activities:

- Current: market garden agricultural enterprises active on four properties and no market garden agricultural enterprises active on three properties.
- Future: current market garden agricultural enterprises are either continuing or most likely declining due to the age demographic of owners and declining profitability.

It was also noted that from the landowners contacted via the stakeholder engagement program, no one expressed a concern regarding whether the proposed development on the site would impact their agricultural land use.

The BA LUCRA therefore identifies neighbouring land uses to the site and any potential land use conflicts and confirms that all adjacent properties are not considered to be a land use conflict risk.

Table 1 Site and Surrounding Site History

Date	Description
1965	The site was rural residential land. A dam was observed north of the site. Catherine Field Road has already been formed, with the surrounding properties either consisting of vacant land or rural residential properties. Market garden activities can be observed in the surrounding areas.
1975	The site and surrounding properties remain essentially unchanged; however there seems to be an increase in the number of buildings in the surrounding properties. The southern portion of the site seems to be used for market garden purposes.
1983	The site and surrounding activities are essentially unchanged.
1990	The site and surrounding activities are essentially unchanged; however, there seems to be more structures.
2002	The site and surrounding properties are essentially unchanged. There has been the construction of a new residential building towards the northwest portion of the site. New dams can be observed near the centre of the site.
2009	The site and surrounding properties are essentially unchanged.
2020	The site and surrounding properties remain essentially unchanged.

Source: Preliminary and Detailed Site Investigation prepared by Geotechnique

2.3. CONSULTATION UNDERTAKEN

As part of the BA LUCRA prepared to address the Department of Planning, Housing and Infrastructure's Key Issues Letter dated 18 November 2024, detailed consultation was undertaken with neighbouring residents and agricultural businesses in the area to understand existing land uses and plans for future permitted land uses in proximity to the site. As detailed in the BA LUCRA prepared by Peritus Agriculture, the following consultation was undertaken:

Stakeholders were identified who were classified as follows:

- Properties adjacent to or sharing a boundary with the Project site
- Properties that currently/recently operate a market garden enterprise or have the potential to in the future

Following the identification of stakeholders, a stakeholder engagement strategy was implemented, which included:

- (a) Tracked letterbox drop to each property using the service of the company, DanD.
- (b) Doorknock on select properties, including:
 - (i) Properties adjacent to or sharing a boundary with the Project site
 - (ii) Seven properties that currently operate a market garden that are close to the Project site
- (c) Direct contact details for Malcolm Frick of PeritusAg (mobile number and email) were provided in all correspondence provided to each stakeholder

Further, as part of the stakeholder engagement strategy, a door-knocking program was conducted by Malcolm Frick of PeritusAg on Monday 17 February 2025. During this activity, a total of 14 properties were directly approached, with an attempt to engage with the property owner/occupant.

If an owner/occupant was home, following a short discussion, a handout was provided that included details of the proposed Project. During the doorknocking program, if an occupant wasn't home, a "sorry we missed you" document and a handout were left in the property's letterbox. Copies of these documents are provided in the appendices of the BA LUCRA.

Results of consultation undertaken as part of the BA LUCRA are detailed in Section 2.2 of this document which identifies that no properties in proximity to the site contain a current land use (agricultural or not) that would likely be adversely affected by the proposed development. The results of the consultation also indicate no future land uses or activities in the immediate proximity of the site which will be adversely affected by the proposed development, with agricultural activities being generally minimal and not of a large-scale commercial nature.

2.4. DEVELOPMENT PROPOSAL

The revised SSD seeks consent for the construction of a co-educational establishment school (Minarah College) accommodating 980 students. The school will comprise an Early Learning Centre (ELC) for 60 students, a School for Specific Purpose (SSP) for 30 students, a primary school accommodating 505 students and a high school for 385 students.

It is proposed to alter the existing primary land use of the site from rural residential land to an Educational Establishment. It is not proposed to change the land use zoning (RU4), as the development is permissible in the existing land use zoning, as discussed in **Section 2.1.1**. The new school will be constructed in stages, growing in line with the growth in the local population. The proposal seeks consent for:

- Demolition of the existing dwellings and ancillary structures on-site;
- Bulk earthworks across the site;
- The construction of the following:
 - One-storey early learning centre.
 - Two-storey administration building, with attached outside school hours care (OSHC), and wellbeing room.
 - Two-storey primary school building comprising of primary school classrooms,
 - SPP classrooms,
 - Primary school hall;
 - Two-storey high school building comprising high school classrooms;
 - Two-storey high school hall;
 - Shared one-storey canteen adjoining the high school building; and

- Shared library located on the second storey above the ELC and Food and Textiles building below.
- A full-sized sports field.
- Site access from Catherine Fields Road at two points;
- 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;
- Removal of 230 trees and replacement planting and landscaping;
- Associated site landscaping and public domain improvements;
- On-site car parking; and
- Construction of ancillary infrastructure and utilities as required.

3. LAND USE CONFLICT RISK ASSESSMENT

3.1. INTRODUCTION

The LUCRA process uses a “probability and consequence” matrix to estimate the potential for land use conflict. It assesses the environmental, public health and amenity impacts according to the:

- Probability of occurrence
- Consequence of the impact.

The risk ranking matrix used by the Land Use Conflict Risk Assessment Guide has been reproduced below in **Table 2**. The risk ranking matrix provides a risk ranking from 25 to 1. It covers each combination of five levels of ‘probability’ (a letter A to E as defined in Table 3) and five levels of ‘consequence’ (a number 1 to 5 as defined in Table 4) to identify the risk ranking of each impact. For example, an activity with a ‘probability’ of D and a ‘consequence’ of 3 creates a risk rank of 9.

Table 2 Risk Rating Matrix

Probability	A	B	C	D	E
Consequence					
1	25	24	22	19	15
2	23	21	18	14	10
3	20	17	13	9	6
4	16	12	8	5	3
5	11	7	4	2	1

Source: NSW Department of Primary Industries 2011

A rank of 25 is the highest magnitude of risk, i.e., a highly likely and very serious event. A rank of 1 represents the lowest magnitude of risk, i.e., an almost impossible and very low consequence event. Priority is given to those activities listed as high risk. This will help rank multiple effects and provide a priority list when developing management strategies.

Table 3 Probability table descriptions

Level	Descriptor	Description
A	Almost Certain	Common or repeating occurrence
B	Likely	Known to occur, or ‘it has happened’
C	Possible	Could occur, or ‘I’ve heard of it happening’
D	Unlikely	Could occur in some circumstances, but not likely to occur.
E	Rare	Practically impossible

Source: NSW Department of Primary Industries 2011

Table 4 Consequences table description

Level	Measure of Consequence
Level: 1	Descriptor: Severe
Description	<ul style="list-style-type: none"> Sever and/or permanent damage to the environment Irreversible Sever impacts on the community. Neighbours are in prolonged dispute and legal action involved.
Example/Implication	<ul style="list-style-type: none"> Harm or death to animals, fish, birds or plants Long-term damage to soil or water Odours so offensive some people are evacuated or leave voluntarily. Many public complaints and serious damage to Council's reputation <p>Contravenes Protection of the Environment & Operations Act (POEO Act) 1997 and the conditions of Council's licences and permits. Almost certain prosecution under the POEO Act 1997.</p>
Level: 2	Descriptor: Major
Description	<ul style="list-style-type: none"> Serious and/or long-term impact to the environment Long-term management implications Serious impact on the community Neighbours are in a serious dispute
Example/ Implication	<ul style="list-style-type: none"> Water, soil or air known to be affected, probably in the long term Harm to animals, fish or birds or plants Public complaints. Neighbour disputes occur. Impacts pass quickly Contravenes conditions of Council's licences, permits, POEO Act 1997 Likely prosecution
Level: 3	Descriptor: Moderate
Description	<ul style="list-style-type: none"> Moderate and/or medium-term impact to the environment and community Some ongoing management implications Neighbour disputes occur
Example/ Implication	<ul style="list-style-type: none"> Water, soil or air known to be affected, probably in the short term No serious harm to animals, fish, birds or plants Public largely unaware and few complaints to Council

Level	Measure of Consequence
	<ul style="list-style-type: none"> May contravene the conditions of Council's Licences and the POEO Act 1997 Unlikely to result in prosecution
Level: 4	Descriptor: Minor
Description	<ul style="list-style-type: none"> Minor and/or short term- impact to the environment and community Can be effectively managed as part of normal operations. Infrequent disputes between neighbours
Example/ Implication	<ul style="list-style-type: none"> Could affect the environment or people but no impacts noticed No complaints to Council Does not affect the legal compliance status of Council
Level: 5	Descriptor: Negligeable
Description	<ul style="list-style-type: none"> Very minor impact to the environment and community Can be effectively managed as part of normal operations Neighbour disputes unlikely
Example/ Implication	<ul style="list-style-type: none"> No measurable or identifiable impact on the environment No measurable impact on the community or impact is generally acceptable

3.2. POTENTIAL LAND USE CONFLICT

The proposed development would change the character of the existing land use from rural residential to an educational establishment, and it is typical for educational establishments to collocate nearby residential land uses as they support the community. However, it should be noted that a lack of consistency with the surrounding land uses does not mean that the land use is incompatible with other land uses, and that the two land uses cannot co-exist without conflict.

To understand the compatibility of the proposed educational establishment with surrounding land uses in this location, it is important to understand the relevant environmental and amenity issues arising from the school that have the potential to affect adjacent land uses. These factors have been considered below.

3.2.1. Noise

The impact of construction and operational noise on the amenity of the surrounding area was a common cause for concern during the exhibition period of the State Significant Development Application.

Day Design Pty Ltd who were responsible for preparing the Construction Noise & Vibration Management Plan and the Environmental Noise Impact Assessment Report (ENIAR) that accompanied the SSDA were re-engaged by the applicant to respond to the issues raised in the Response to Submissions period, this Response to Submissions Report.

The ENIAR considers the amenity to adjacent development and the local neighbourhood via noise level predictions, noise control recommendations and an Offensive Noise Test in Section 6.1.7.1, 6.2.8.1, 6.3.8.1, 6.4.8.1, 8.1, 8.2, 9.1, 9.2 and 9.3 for the use of the outdoor play areas. As such, the proposal has met the requirements of the Transport and Infrastructure SEPP (2021) Schedule 8, Principle 5 to consider the amenity of the development.

Mitigation Measures:

The following mitigation strategies have been implemented to reduce conflict:

- Acoustic walls have been proposed to limit the acoustic impact of the development to surrounding properties.
- The impact of the additional traffic generated by this proposed development on the existing residences along Catherine Fields Road have been assessed in detail in the ENIAR, with the assessment showing compliance with the noise criteria at all critical receiver locations.
- Day Design has implemented engineering and practical noise control recommendations as detailed in Section 7.0 of the Construction Noise and Vibration Management Plan to reduce construction noise. These include:
 - Locating mechanical plant near the centre of the construction area so that it is as far as practically possible from the residences to the north and south.
 - Constructing acoustical enclosures around items of mobile plant such as generators is recommended where extended use for long periods of time is expected.
 - All plant and machinery should be selected with consideration to low noise options where practical and available.
 - No more than one item of plant is operating simultaneously.
- Day Design encourage the implementation of noise management controls as detailed in Section 7.2 of the Construction Noise and Vibration Management Plan to reduce construction noise, such as: encouraging periods of respite and work practices that minimise noise emissions.
- Day Design accept the implementation of reasonable Conditions of Consent in regard to restriction of sewer pump out and waste removal to normal daytime hours.
- A community liaison officer is to be appointed by the contractor to consult with neighbouring residents about the expected works.
- Restricting the times that sewer pump trucks are allowed on the site to normal day time hours (7am – 6pm) Monday to Friday, which can be imposed as a condition of the project.
- Recommendation that Minarah College adopt a comprehensive Noise Management Plan that should include but not be limited to the preparation and consideration of noise control measures relating to General noise management strategies and permissible outdoor play area scenarios.
- Construct sound barrier walls in accordance with the specifications identified in Section 8.2 of the Environmental Noise Impact Assessment.
- Constructing the proposed school hall and associated glazing with consideration to the recommendations provided in Section 8.3 of the Environmental Noise Impact Assessment.
- Day Design encourage that following the finalisation of the mechanical plant and its location, that a detailed acoustic assessment should be made prior to the issue of a Construction Certificate.
- Ensuring that the maximum sound pressure level of the speakers associated with the public address system and school bell be no greater than the levels indicated in Section 8.5 of the Environmental Noise Impact Assessment.

3.2.2. Odour

An Odour Impact Assessment was requested by the Department in the RTS stage, that considers potential odour impacts of the on-site wastewater management system, including the temporary sewage treatment plant and effluent management areas on the surrounding properties.

An Odour Impact Assessment was prepared by Todoroski Air Science Pty Ltd, which presents an assessment of the potential air quality (odour) impacts associated with the operation of the wastewater management system for Minarah College.

Todoroski have identified in their report that there is potential for odours to be generated on-site, with these odours typically occurring from the collection, storage and treatment of the wastewater. These odour

emissions are below the applicable criteria at receiver locations and are at or below the applicable criterion onsite. Therefore, the proposal will not lead to an unacceptable level of odour.

Nevertheless, Todoroski have also confirmed that the collection well and sewage treatment plant is to be equipped with appropriate ventilation stacks and odour scrubbers to mitigate odorous emissions. The sewage treatment plants will also be enclosed to further improve control of potential odour emissions.

Mitigation Measures:

The following mitigation strategies have been implemented to reduce conflict:

- Collection well and sewage treatment plant is to be equipped with appropriate ventilation stacks and odour scrubbers to mitigate odorous emissions.
- Dense landscaping (bunds and vegetation) around the sewage treatment plant is to assist with odour dispersion;
- Tall vegetation is to be considered for the landscaping to add dispersion and dilution of odour emissions and floral/ fragrant trees to assist with masking odour, and;
- Vegetation should be oriented to provide adequate air flows and encourage air flow in a particular direction to disperse any odour.

3.2.3. Visual Impact

The visual impact of the proposal has been assessed as a part of the SSD Application. A view analysis was prepared by Tonkin Zulaikha Greer Architects and forms part of the Design Report attached at **Appendix I** of the EIS. It is also noted that as part of the Return to Submissions for the amended SSDA, additional photomontages/renders of the proposal have been included at **Appendix I** to provide additional analysis regarding the visual impacts of the proposal. The analysis assesses the likely visual effects of the built form through a visual analysis of the development from key viewpoints from the public domain. The visual catchment is predominately restricted to close views from the north, south and west including a short section of approach views from Catherine Fields Road. Given the rural character, the proposal is visible from the north and south approach, which are captured in the adjacent view analysis.

The view analysis considers the proposal to be acceptable in terms of visual impact. The built form of the proposed school was carefully considered to limit conflict with the existing low-density rural residential character of the surrounding area as well as to comply with the prescribed 9.5m height limit. Whilst it is acknowledged that the density of the proposal is not consistent with the surrounding character of the area, the design has thoughtfully considered ways to provide integration and compatibility with the adjacent rural-residential properties.

The staged construction of the development will enable the school to grow in line with the development of the Catherine Fields Area, reducing the overall visual bulk of the development. The proposed two storey-built form is sympathetic to the low-scale surrounding development, whilst also maximising the area of the site available for landscaping and play. Generous setbacks to the side and rear will allow for the planting of trees to screen the development from adjacent residential properties.

The built form and urban design outcomes as assessed by Tonkin Zulaikha and Greer in their design report were considered acceptable and generally consistent with the development anticipated for the site in accordance with the relevant controls.

Following on from the Response to Submissions period, additional landscaping is proposed along the northern and southern boundaries of the subject site to provide additional screening to adjacent properties. This is captured in the Response to Submission Design Statement prepared by Taylor Brammer.

Mitigation measures:

The following mitigation strategies have been implemented to reduce conflict:

- Compliance with statutory built form controls
- Façade articulation.
- Additional landscaping along the boundaries to adjacent properties to provide screening.
- Appropriate setbacks to adjacent properties.

- A 1.8m fence will be installed along the boundary of the school.

3.2.4. Traffic and Transport

The impacts of increased transport and traffic associated with the site was a major concern for neighbouring residents during the Response to Submissions stage due to the impact that additional traffic associated with the proposal could have to existing rural character of the area and surrounds. Ason Group were engaged to prepare a Transport and Accessibility Impact Assessment (**TAIA**) and a Preliminary Construction Traffic Management Plan that were submitted alongside the SSDA. Ason was also engaged by the applicant to revise the issues raised during the Response to Submissions period. The Revised report was submitted alongside the Response to Submissions Report. The main concerns surrounded the capacity of the road network to support additional traffic associated with the proposal, however, Ason have confirmed that the proposal is supportable on traffic planning grounds and that it is not anticipated to result in any adverse impacts to the surrounding road network.

Mitigation Measure:

The following mitigation strategies have been implemented to reduce conflict:

- Private chartered buses for exclusive school use are to provide services to and from Leppington Station every 30-minutes during the School's AM and PM peak hours. This will reduce the reliance of private vehicles for up to 250 students, reducing congestion associated with the project.
- School start and finish times will be staggered to reduce vehicle congestions and queuing of vehicles.
- A channelised right turn lane is proposed along Catherine Fields Road to provide access to the school and reduce queuing.
- Indented bus bays are to be provided along Catherine Fields Road.
- A right-turn ban is to be introduced at the school's egress point to improve safety and circulation.
- The projected traffic growth at the signalised intersection of Catherine Fields Road and Camden Valley Way is expected to exceed capacity, with or without the school.
- The School proposes roadworks between 43m north of the northern boundary and the southern boundary with a channelised right-turn at the School entry point to ensure minimal interruption on the northbound traffic flow on Catherine Fields Road. The proposed improvements will be satisfactory noting that that these traffic conditions are generally expected to occur for a short period of time immediately before and after the school start and finish times.
- As Catherine Fields Road is not classified as a State/ Regional Road, the responsibility falls to Camden Council to ensure that the road is sufficiently maintained.
- SIDRA modelling of the surrounding road network including Chisolm Road/ Catherine Fields Road and Chisolm Road/ Deepfields Road intersections has confirmed that both intersections will operate acceptably.
- A Construction Pedestrian Traffic Management Plan is to be provided to the consent authority prior to the issue of a construction certificate.
- Carpooling is to be encouraged to further reduce traffic impacts.

3.2.5. Flooding

The site is located within the Upper South Creek Catchment, as such an Overland Flow Assessment was undertaken by Martens & Associates Pty Ltd for the proposed development and is included at Appendix P of the EIS. The site is located within the Upper South Creek catchment; however, it is located outside of a mainstream flood risk precinct. The southern portion of Lot 11 is categorised as a 1% AEP overland flow risk precinct, meaning that there is a risk of overland flow flooding occurring within the existing depression running along the southern boundary of the site.

During the RTS period, some submissions raised concern about the impact of the development on the flood patterns to adjacent properties. The assessment confirms that the proposed development will have a net positive benefit to the flood affection of residential properties downstream of Catherine Fields Road, due to the proposed road upgrade works.

To ensure the safety of students and staff during extreme flooding events, a Flood Emergency Response Plan has been prepared. The FERP has considered the Department's Draft Shelter in-place Guidelines. Section 4.6.2 Table 5 of the FERP demonstrates that all shelter-in-place considerations have been addressed. The FERP confirms that the school is able to be closed with adequate notice, prior to the site and the surrounding road network being cut off by flood waters, for a range of events up to and including the Probable Maximum Flood. The FERP has been informed by Camden Council's latest flood study.

3.2.6. Biosecurity and Agricultural Land Use Risk

The site is located on and is within proximity to land zoned as RU4 Primary Production Small Lots and land zoned as R5 Large Lot Residential. As such, there is a risk of the proposal to impact agricultural activities operating in proximity to the site.

The BA LUCRA prepared by Peritus Agriculture considers the potential risks that the project site poses based on the nature of existing agricultural activities operating in proximity to the site and the sources of biodiversity risks that farming operations manage.

The BA LUCRA outlines the impacts of the proposed development on Poultry Farms and Vegetable Farms, both of which are agricultural/primary land uses that are present in the immediate and general proximity of the site.

Specifically, the BA LUCRA states the following in relation to the proposal:

- The Project site is not likely to create a biosecurity risk for poultry farms in the region for the following reasons:
 - Poultry and domestic animals are not being brought to or kept on the site
 - The site is not located close to a commercial poultry operation
- The Project site is not likely to create a biosecurity risk for vegetable farms in the region for the following reasons:
 - The site is not located adjacent to commercial farming operations
 - Vegetable farming is not being conducted on the site
 - Any soil or plant material brought to the location should be retained on the site and managed according to appropriate dust, sediment and runoff management plans in both the construction and operational phases. The risk that soil or plant material will be a biosecurity risk is low.
 - The most common source of biosecurity risk in a vegetable farming operation is via plant/plant part movement, human or soil movement on and off the farming property. This is within the control and management of the landowner of the market garden.

Based on the lack of conflict associated with the proposal on surrounding biosecurity and existing agricultural land uses, it is considered that these activities will also not present any adverse effects on the operation of the proposed school.

Further, the BA LUCRA provides mitigation measures relevant to any biosecurity risks associated with the project. The mitigation measures below aim to ensure that the Project does not create or pose a biosecurity risk to the region or surrounding properties. To ensure these risks are mitigated, the BA LUCRA identifies that a Biosecurity Management Plan should be developed for both construction and operation phases.

During the construction phase, key areas of the plan should relate to:

- The Movement of soil (on and off site)
- Source of soil or bulk organic materials
- Creation of dust
- Off-site movement of water and sediment
- Containment of potential contaminants such as fuel and building materials.

During the operational phase, key areas of the plan should relate to:

- Movement of soil (on and off the site)
- Source of soil or bulk organic materials
- Off-site movement of water and sediment

It is noted by the BA LUCRA that a Biosecurity Management Plan is a document that should be reviewed and updated regularly by the landowner of the site (Minarah College). For example, if the school decides to have farm animals on the site (either periodically or permanently), then the Biosecurity Management Plan must be updated to include the activity, identify the risks and ensure that appropriate mitigations and safeguards are put in place to avoid a biosecurity hazard.

3.3. RISK REDUCTION CONTROLS

As per the Land Use Conflict Risk Assessment Guide (Department of Primary Industries, 2011) the process of risk reduction aims to identify management strategies that affect the probability of an event occurring, such as the implementation of certain procedures; new technology or scientific controls that might lower the risk probability values.

It is also appropriate to look at management strategies which affect consequences. Such matters can sometimes lower negative consequences. The objective of risk reduction controls is to lower the risk ranking score to 10 or below.

A revised risk evaluation for the potential sources of conflict arising for the project is provided below in **Table 5**.

Table 5 Land Use Conflict Risk Assessment – Minarah College SSD-30759158

Hazard	Identified Potential Conflict	Risk Score	Mitigation Strategy	Revised Risk Rating
Noise	Impact to the amenity of the surrounding rural area due to construction noise and ongoing operational noise.	A2-23	<p>Acoustic walls have been proposed to limit the acoustic impact of the development to surrounding properties.</p> <p>The impact of the additional traffic generated by this proposed development on the existing residences along Catherine Fields Road have been assessed in detail in Sections 4.2, 5.2.2, 5.5.1.3, 6.6 and 6.8.8 of the ENIAR, with the assessment showing compliance with the noise criteria at all critical receiver locations.</p> <p>Day Design has implemented engineering and practical noise control recommendations as detailed in Section 7.0 of the Construction Noise and Vibration Management to reduce construction noise. These include:</p> <p>Locating mechanical plant near the centre of the construction area so that it is as far as practically possible from the residences to the north and south.</p> <p>Constructing acoustical enclosures around items of mobile plant such as generators is recommended where extended use for long periods of time is expected.</p>	C4-8

Hazard	Identified Potential Conflict	Risk Score	Mitigation Strategy	Revised Risk Rating
			<p>All plant and machinery should be selected with consideration to low noise options where practical and available.</p> <p>No more than one item of plant is operating simultaneously.</p> <p>Day Design encourage the implementation of noise management controls as detailed in Section 7.2 of the Construction Noise and Vibration Management to reduce construction noise, such as: encouraging periods of respite and work practices that minimise noise emissions.</p> <p>Day Design accept the implementation of reasonable Conditions of Consent in regard to restriction of sewer pump out and waste removal to normal daytime hours.</p> <p>A community liaison officer is to be appointed by the contractor to consult with neighbouring residents about the expected works.</p>	
Odour	Release of odour associated with the use of the on-site sewage treatment plant	B2-21	<p>Collection well and sewage treatment plant is to be equipped with appropriate ventilation stacks and odour scrubbers to mitigate odorous emissions.</p> <p>Dense landscaping (bunds and vegetation) around the sewage treatment plant is to assist with odour dispersion;</p> <p>Tall vegetation is to be considered for the landscaping to add dispersion and dilution of odour emissions and floral/ fragrant trees to assist with masking odour, and;</p> <p>Vegetation should be oriented to provide adequate air flows and encourage air flow in a particular direction to disperse any odour.</p>	C4-8
Visual Impact	Impact of the proposed development to the predominantly rural and residential context.	A2-23	<p>Compliance with statutory built form controls</p> <p>Façade articulation</p> <p>Additional landscaping and fencing along the boundaries to adjacent properties to provide screening.</p> <p>Appropriate setbacks to adjacent properties.</p>	C4-8

Hazard	Identified Potential Conflict	Risk Score	Mitigation Strategy	Revised Risk Rating
Traffic	Impact of the proposed development to traffic generation	B3-17	<p>Private chartered buses for exclusive school use are to provide services to and from Leppington Station every 30-minutes during the School's AM and PM peak hours. This will reduce the reliance of private vehicles for up to 250 students, reducing congestion associated with the project.</p> <p>School start and finish times will be staggered to reduce vehicle congestions and queuing of vehicles.</p> <p>A channelised right turn lane is proposed along Catherine Fields Road to provide access to the school and reduce queuing.</p> <p>Indented bus bays are to be provided along Catherine Fields Road.</p> <p>A right-turn ban is to be introduced at the school's egress point to improve safety and circulation.</p> <p>The projected traffic growth at the signalised intersection of Catherine Fields Road and Camden Valley Way is expected to exceed capacity, with or without the school.</p> <p>The School proposes roadworks between 43m north of the northern boundary and the southern boundary with a channelised right-turn at the School entry point to ensure minimal interruption on the northbound traffic flow on Catherine Fields Road. The proposed improvements will be satisfactory noting that that these traffic conditions are generally expected to occur for a short period of time immediately before and after the school start and finish times.</p> <p>As Catherine Fields Road is not classified as a State/ Regional Road, the responsibility falls to Camden Council to ensure that the road is sufficiently maintained.</p> <p>SIDRA modelling of the surrounding road network including Chisolm Road/ Catherine Fields Road and Chisolm Road/ Deepfields Road intersections has confirmed that both intersections will operate acceptably in the Year 2040.</p> <p>A Construction Pedestrian Traffic Management Plan is to be provided to the consent authority prior to the issue of a construction certificate.</p>	C4-8

Hazard	Identified Potential Conflict	Risk Score	Mitigation Strategy	Revised Risk Rating
			Carpooling is to be encouraged to further reduce traffic impacts.	
Flooding	The site is located within the Upper South Creek Catchment and the site is subject to shallow flooding along the western Boundary.	B3-17	<p>The proposed upstream overland flow diversion system effectively renders the site development area flood free in the 1% AEP and PMF events.</p> <p>There are several isolated areas of shallow and generally low hazard water shown across the site in both the 1% AEP and PMF events. These isolated areas are not considered to be flood affected but rather are only shallow ponding, and will be removed from the site during the final grading and stormwater design at the CC stage.</p> <p>The proposed development area of the site is flood free in the 1%AEP flood and PMF events. This allows for the safe implementation of a shelter-in-place strategy as the emergency response plan.</p> <p>Compliance with Council flood planning level requirements for building levels are achieved.</p> <p>Whilst the surrounding road network is affected by flood hazards during the PMF event, a site specific FERP have been prepared to ensure that the site can operate safely in the floodplain environment.</p>	C4-8
Biosecurity and Agricultural Land Use	The site is located in proximity to land zoned as RU4 Primary Production Small Lots and RU5 Large Lot Residential and is located in the vicinity of agricultural land uses.	D3 - 9	<p>The implementation of a Biosecurity Management Plan will ensure that the proposed school does not create or pose a biosecurity risk to neighbouring properties or the region during the construction and operation.</p> <p>Adherence to this plan will ensure that the lack of conflict associated with the proposal on surrounding biosecurity and existing agricultural land uses can continue to be maintained, if the plan is to include the following measures:</p> <p>During the construction phase, key areas of the plan should relate to:</p> <ul style="list-style-type: none"> ▪ The Movement of soil (on and off site) ▪ Source of soil or bulk organic materials ▪ Creation of dust ▪ Off-site movement of water and sediment ▪ Containment of potential contaminants such as fuel and building materials. 	D4 - 5

Hazard	Identified Potential Conflict	Risk Score	Mitigation Strategy	Revised Risk Rating
			<p>During the operational phase, key areas of the plan should relate to:</p> <ul style="list-style-type: none"> ▪ Movement of soil (on and off the site) ▪ Source of soil or bulk organic materials ▪ Off-site movement of water and sediment <p>Continual reviews and updates to the Biosecurity Management Plan will ensure that conflicts can be avoided if new activities are introduced on the site which may pose a biosecurity hazard.</p>	

4. SUMMARY

This Land Use Conflict Risk Assessment has been prepared to support the amended State Significant Development Application for Minarah College (SSD-30759158), located at 268-278 Catherine Fields Road, Catherine Field.

The risk assessment has identified and responded to the identified potential land use conflict that the proposed education establishment could have on the surrounding residential and primary industry uses.

The proposal will alter the existing rural residential character of the area, however the proposed mitigation measures outlined in Section 3 will significantly reduce conflict between the project and surrounding land uses. With the implementation of these mitigation measures it is expected that the proposed development can be supported on the basis that all attempts to minimise conflict have occurred.

The proposal is therefore considered to have an acceptable impact to the surrounding environment and community.

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