

Our ref: Minarah College (SSD-30759158)

Mr Jay Halai
Principal, Green Valley Islamic College Ltd
264 Wilson Road
Green Valley NSW 2168

17 August 2022

Subject: Response to Submissions – Department’s Key Issues

Dear Mr Halai

The exhibition of the development application and Environmental Impact Statement (EIS) for Minarah College (SSD-30759158) ended on 1 August 2022.

We have placed all submissions on the NSW planning portal at <https://www.planningportal.nsw.gov.au/major-projects/projects/minarah-college>.

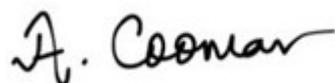
We now require a written response to issues raised in the submissions, as required under section 59(2) of the Environmental Planning and Assessment Regulation 2021.

As advised in the Department’s correspondence dated 3 August 2022, you are required to provide a response to key issues raised by the Department in its preliminary assessment of the EIS. The Department’s key issues are provided at **Attachment 1**.

Please lodge your response by progressing the application on the NSW planning portal at <https://majorprojects.planningportal.nsw.gov.au/>.

If you have any enquiries, please contact Brent Devine on (02) 9995 5667 or via email at Brent.Devine@planning.nsw.gov.au.

Yours sincerely,



Aditi Coomar
Team Leader
School Infrastructure Assessments

as delegate for the Planning Secretary

ATTACHMENT 1

Key Issues

1. Site suitability

The Department recognises the need for new schools to meet the demand of a growing population in Greater Sydney and particularly in areas identified for future housing supply, such as the South West Growth Area.

The gradual release of greenfield land in the South West Growth Area occurs in precincts that have been subject to strategic land use planning and coordinated infrastructure delivery in consultation with local councils and the community. The precinct planning process ensures that future urban development occurs sustainably and that infrastructure is properly funded through development contributions and linked to the sequence of land being released.

The Department requests the Response to Submissions (RtS) provide further justification in response to the suitability of the site to accommodate the scale of development proposed. This is requested on the basis that:

- the site it is not within a land release precinct, and therefore, a coordinated approach to land use planning and infrastructure provision to support future urban growth is yet to be undertaken in this part of Catherine Field.
- the site is not connected to reticulated sewerage and Sydney Water has advised that the delivery of wastewater services in this location is not planned within the next five years.
- there is limited water servicing capacity to accommodate future urban growth.
- there is no natural gas infrastructure available at the site.
- there is no connection to piped underground stormwater drainage infrastructure.
- Catherine Fields Road is a rural-standard road and is not currently designed to support the scale of development proposed. Significant road upgrades would likely be required to accommodate the volume of traffic generated by the completed development.
- there are no pedestrian footpaths, cycling infrastructure or safe crossing points along Catherine Fields Road to provide connectivity or to encourage the use of active transport. The site is also not located in proximity to public transport.
- Camden Council has advised in its submission that the development may hinder the orderly and co-ordinated provision of infrastructure as this part of Catherine Field is in the early stages of the precinct planning process.

The Department requests each of the above matters be addressed in detail in the RtS.

The RtS must also address the relevant matters for consideration under Section 3.21 of State Environmental Planning Policy (Precincts – Western Parkland City) 2021 which applies to development applications in growth centres where precinct planning is yet to be finalised.

2. Land use zone objectives

The RtS must provide further justification demonstrating that the proposal is consistent with the objectives of the RU4 Primary Production Small Lots zone under the Camden Local Environmental Plan 2010.

As an example, an objective of the zone is to encourage and promote diversity and employment **in relation to primary industry enterprises**. This objective has not been adequately addressed in the Environmental Impact Statement (EIS). Further consideration must also be provided on how conflicts would be minimised between the proposed school use and surrounding land that is also zoned RU4.

3. Flooding

The Preliminary Overland Flow Assessment at Appendix P of the EIS confirms that the development area of the site is flood free in the 1% AEP flood event. While the proposed school buildings would be sited outside of the 1% AEP flood extent, the flood mapping provided in the EIS indicates that the school's southern car park, vehicle egress point and Catherine Fields Road at the site frontage would be impacted by low flood hazard.

In addition, the Biodiversity and Conservation Division has advised that access roads to the site are subject to high hazard flooding in extreme flood events and has recommended a Flood Emergency Response Plan (FERP) be prepared to ensure the safety of the school community.

In consideration of the above, the Department requests that a FERP be prepared and submitted as part of the RtS. The FERP must demonstrate that school can be closed with adequate notice, prior to the site and the surrounding road network being cut-off by flood waters, for a range of flood events up to and including the Probable Maximum Flood.

4. Traffic generation

The Transport and Accessibility Impact Assessment (TAIA) has relied on travel mode surveys from nearby Green Valley Islamic College (GVIC) and trip generation surveys for various NSW metropolitan and regional schools (GTA Consultants, 2014) to determine an expected trip generation rate for the proposal. A rate of 0.496 trips per student (AM and PM peak school periods) was subsequently established in undertaking the traffic impact assessment.

The Department considers the survey data from GVIC as the most reliable measure in establishing the expected trip generation rate of the proposed school due to their relative close proximity, location in south-western Sydney and comparable population demographics. The survey found that almost 90% of students travel to and from GVIC via private vehicle and a high percentage of these (75%) of these did not carpool with another student.

Noting the information above, it is unclear how a trip generation rate of 0.496 trips per student was established in the TAIA. The Department considers the potential traffic impacts of the proposal may be understated and further justification is required in the RtS.

The Department has engaged an independent traffic consultant to peer review the TAIA and further information may be requested once the peer review is complete.

5. Shuttle buses

The TAIA indicates that the school proposes the services of five private chartered buses for exclusive school use with services operating to and from Leppington Station and Minto Station. The RtS must confirm the frequency of bus trips to and from each station and the school site during the AM and PM peak school periods. The RtS must also provide information on the routes taken to and from each station and the school site.

6. Hydraulic infrastructure

The Services Infrastructure Report at Appendix BB of the EIS states that a Water Servicing Coordinator was engaged to apply for a feasibility study with Sydney Water regarding future sewer infrastructure at the site. The RtS should include the information obtained from Sydney Water as part of this feasibility study.

7. Land Use Conflict Risk Assessment (LUCRA)

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.

8. On-site wastewater collection

The Wastewater Management Assessment (WMA) states that a standing bay is required to be located adjacent to the collection well and within the car parking area to allow tankers to stand during pump out activities, without adversely affecting traffic entering the site. The RtS must confirm if a dedicated vehicle bay is incorporated as part of the proposal (similar to the dedicated vehicle bay proposed adjacent to the LPG storage tank). The RtS must also detail the frequency of wastewater collection required in Stages 1 and 2.

The Department has engaged an independent wastewater management consultant to peer review the WMA and further information may be requested once the peer review is complete.

9. Odour

The Department requests the RtS include an Odour Impact Assessment 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. The assessment must be prepared by a suitable qualified consultant and include appropriate mitigation measures where impacts are identified.

10. Stormwater drainage

The EIS states that overland flow paths would direct stormwater away from buildings and ultimately discharge to the Catherine Fields Road reserve drainage system. As noted in Camden Council's submission, there is no piped underground stormwater drainage infrastructure provided along Catherine Fields Road. Therefore, there is a risk that flows from the site may impact on downstream properties and/or find its way to nearby watercourses such as South Creek during high rainfall events.

The RtS must confirm that the proposed stormwater drainage regime would not adversely impact on any downstream properties, nearby watercourses or riparian land. Mitigation measures should be proposed where potential impacts are identified.

11. On-site liquefied petroleum gas (LPG) storage

The RtS must confirm that the on-site LPG storage tank would be sited and designed in accordance with the requirements of AS 1596:2014 – The storage and handling of LP Gas and the Educational Facilities Standards and Guidelines.

The RtS must also indicate the timing and frequency that the storage tank would need to be re-filled using a LPG bulk tanker.

12. Ecologically sustainable development (ESD)

The ESD Report at Appendix K of the EIS states that rainwater harvesting would be incorporated as part of the proposal to maximise non-potable water re-use on the site. The RtS must provide further information on how the proposed development would collect and store rainwater from the site, including methods of collection and where on-site storage would occur (i.e. location and capacity of rainwater tanks, etc.).

13. Landscaping and tree replacement

The Department requests that additional landscaping be provided along the northern and southern site boundaries to adequately screen the proposed development and to reduce the visual impact in its rural residential setting. In particular, additional landscaping is required along the northern site boundary to screen future built form from the adjoining rural residences.

In regard to tree replacement, the EIS indicates that 230 trees are proposed to be removed from the site to accommodate the completed development. The Department requests the RtS identify the total number of replacement trees that would be provided at each stage of the development.

14. Civil works plans

The Civil Works Plan at Appendix Q of the EIS includes earthworks grading plans, cut and fill plans, drainage plans and on-site detention plans for the ultimate development and Stage 1 only. As the SSD application seeks consent for all development stages, the Civil Works Plan must be revised as part of the RtS to include the relevant plans that correspond with each stage of construction proposed as part of the application (i.e. development Stages 1 to 5).

15. Elevation and landscape plans

The RtS must include elevation and landscape plans that correspond with each individual stage of the proposed development. The EIS has only provided elevations and landscape plans that relate to the completed development (i.e. at Stage 5). The additional plans are requested given the extended lifespan of the development and ongoing works that are not proposed to be completed until at least the year 2040.

16. Architectural plans for Stages 1 and 2

The architectural plans for Stages 1 and 2 do not show the proposed sewage treatment plant and associated storage tank on the site (the location of this infrastructure is shown in Appendix A of the WMA). The RtS must provide amended plans for Stages 1 and 2 that show the location and layout of the wastewater infrastructure.

17. State Design Review Panel

Please ensure the RtS addresses the advice provided by the Government Architect NSW State Design Review Panel in relation to Connection to Country, landscaping, master planning and built form. Amendments made to the proposal in response to the advice should be demonstrated in revised architectural and landscape plans submitted with the RtS.

18. Student and staff numbers

There are minor inconsistencies in the EIS and the TAIA relating to the proposed student and staff numbers. For example, the EIS proposes 300 students in Stage 1 and 650 students in Stage 2 (Table 3). However the TAIA indicates there would be 318 students in Stage 1 and 652 students in Stage 2 (Table 12).

There are also minor inconsistencies in the documents relating to the number of full-time equivalent staff. The RtS must confirm the total student and staff numbers that are proposed at each stage of the development.