

22 August 2022

Director, Social and Infrastructure Assessments
Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

RE: Notice of Exhibition – New School - Minarah College (SSD 30759158)

**PROPERTY: 268-278 Catherine Fields Road, CATHERINE FIELD
LOT: 1001 DP: 1234527**

I refer to the above State Significant development application (DA) currently being assessed by your department and thank you for the opportunity to comment.

Council staff made a submission on the proposal on 25 July 2022 and as part of that submission noted that a further submission, or amendments to the submission, may be lodged following formal consideration of the matter by Council on 9 August 2022.

Please be advised that at the Ordinary Council meeting on 9 August 2022 Council resolved to:

- i. endorse the Council officer's submission objecting to the State Significant Development Application to construct a new school (Minarah College) at 268-278 Catherine Fields Road, Catherine Field;*
- ii. forward a letter of endorsement of the Council officer's submission (objection) to the Department of Planning and Environment for consideration as part of its assessment of the Development Application;*
- iii. forward a copy of the submission and Council's endorsement of the objection to Mr Peter Sidgreaves MP, Member for Camden; and*
- iv. consider a supplementary submission to deal with the omissions, inaccuracies and contradictions in the reports provided in support of the proposed development.*

In relation to points *i* and *ii*, please find attached a copy of the Council officer's submission objecting to the proposed development, as endorsed by Council.

In relation to point *iv*, please find attached resident submissions that outline identified omissions, inaccuracies and contradictions in the reports provided in support of the

proposed development. Council requests that the issues outlined in the resident submissions be carefully considered in the assessment of this State Significant DA.

Should you have any enquiries in relation to this matter, please do not hesitate to contact the undersigned on 02 4645 5631.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Jamie Erken", with a long, sweeping horizontal stroke extending to the right.

Mr Jamie Erken
Manager Statutory Planning
(Planning and Environmental Services)

25 July 2022

Director, Social and Infrastructure Assessments
Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

RE: Notice of Exhibition – New School - Minarah College (SSD 30759158)

**PROPERTY: 268-278 Catherine Fields Road, CATHERINE FIELD
LOT: 1001 DP: 1234527**

I refer to the above State Significant development application (DA) currently being assessed by your department and thank you for the opportunity to comment.

Council officers have undertaken a review of the DA and supporting information. This letter provides feedback on the DA for your consideration.

Of note, as the submission deadline concludes on Monday 25 July 2022, this submission has not been reported to the elected Council for formal consideration and endorsement. A further submission or amendments to this submission may be lodged from the elected Council following their consideration of this submission at their meeting on 9 August 2022.

Camden Council objects to the proposed development on the following grounds:

- The proposal is inconsistent with the public interest based on the number of objections received and substantiated concerns raised by the community.
- The proposal is an inappropriate use of a rural / unsewered property.
- The proposed development will result in unacceptable impacts on the amenity of the area and fails to meet the objectives of the RU4 Primary Production Small Lots zone.
- The site is affected by flooding and there is a lack of flood free evacuation routes.
- A school of this size / intensity should not be considered / approved prior to any precinct planning / re-zoning for this portion of the South West Growth Area. The inappropriateness of the proposal is evidenced by the inconsistency with the current zone objectives; the lack of applicable developer contributions; the lack of services (especially suitable roads and sewer); and the inconsistency with the matters for consideration in clause 3.21 of the State Environmental Planning Policy (Precincts-Western Parkland City) 2021.

- The proponent is seeking to develop relatively cheap rural land prior to precinct planning / rezoning. This provides a private benefit for the proponent at the expense of the wider community.
- A school of this size / intensity is not a planned or desirable use on land zoned RU4 Primary Production Small Lots.
- Catherine Fields Road is a rural road that is not designed to cater for a development of this size / intensity.

These key matters are outlined in further detail in this letter.

1. Planning

1.1 Public Interest

Camden Council, whilst not the consent authority or the body responsible for the assessment of the DA, has received a significant number of letters, emails and phone calls from concerned residents in relation to this proposal. All of the residents have expressed their strong objection to this proposal. Camden Council respects the views of its residents and it is clear that the public interest will not be served if this development is approved.

The community has raised the following key concerns with the proposed development:

- The site is an inappropriate location for a school;
- The proposal will result in unacceptable traffic impacts;
- Catherine Fields Road is a rural road that is not designed to cater for the level of traffic (both vehicle and pedestrian) that will result from this proposal;
- The site and surrounding area is not serviced by sewer;
- There will be significant water runoff and there is a lack of established drainage system to cater for the runoff;
- The site and Catherine Fields Road are subject to flooding;
- Being a rural area there is a lack of infrastructure to support a school;
- There are no footpaths / bike paths for the use of students;
- The proposed school will have an unreasonable impact on the rural amenity of the area;
- The proposed school does not cater for the local community and yet results in significant / unreasonable impacts for surrounding residents;
- The poor local infrastructure (rural road with no lighting) will result in safety issues for vehicles and pedestrians; and
- The approval of this school will have a significant impact on future planning within the Catherine Fields Precinct.

Given the significant and substantiated concerns approval of the application would not be in the public interest.

1.2 Site Suitability

The proposed school site is currently zoned RU4 Primary Production Small Lots and is located on a rural road with no shoulder, formed kerb and gutter, footpath, lighting or piped underground stormwater system. The land is also not served by reticulated sewer.

No road upgrades are proposed beyond the provision of turning facilities directly in front of the school at a late stage in its development (Stage 4).

A rural site of this nature is not suitable for the proposed school.

1.3 Zone Objectives

The objectives of the RU4 Primary Production Small Lots zone are:

- *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 proposed development is not compatible with primary industry; does not encourage or promote employment opportunities in relation to primary industry enterprise; and does not minimise conflict between land uses within this zone.

A school of this scale (or any scale) effectively alienates any potential primary industry on adjoining or nearby sites due to conflicts in terms of amenity for school children.

1.4 Matters for Consideration in Growth Centres

Clauses 3.21 and 3.26 of the State Environmental Planning Policy (Precincts-Western Parkland City) 2021 contains a number of matters for consideration until finalisation of precinct planning for land. As Catherine Field is still in the very early stages of precinct planning these matters must be taken into consideration.

In particular, Council submits that the proposed development precludes future urban and employment development land uses from this site and that the development will hinder the orderly and co-ordinated provision of infrastructure that is planned for the Growth Centre.

The extent of the investment and the operational and economic life of the proposed development means that the school (if approved) would need to be 'planned around' rather than forming part of the precinct planning process itself. Schools are a critical piece of infrastructure for Growth Centres which often have ramifications for the

placement of collector roads, playing fields, recreation spaces and neighbourhood centres. By approving the location of the school ahead of any precinct planning, the consent authority would be 'putting the cart before the horse' rather than planning the location of a future school within the Catherine Fields Growth Centre in an orderly and co-ordinated fashion.

1.5 Contributions

The Camden Contributions Plan applies to the site. No contributions are applicable to the development. As such the school is not required to contribute to any of the future road upgrades or other infrastructure works which may be planned as a result of precinct planning for this area of Catherine Fields.

It is noted that the Growth Area Contributions Plan in Camden require contributions based on net developable area (NDA) rather than land use and as such the school would be required to contribute towards the infrastructure for which it will directly benefit. Approval of this application, prior to the finalisation of any precinct planning / development of a Contributions Plan, will provide a private benefit to the proponent to the detriment of the wider community.

The proposed school, with a capacity of up to 1500 students, will clearly generate a demand for public infrastructure (road, stormwater drainage etc) and yet the proposed school will make no contribution to the provision of this infrastructure.

The proponent is seeking to develop relatively cheap rural land prior to precinct planning / rezoning. This provides a private financial benefit for the proponent at the expense of the wider community.

1.6 Shared Use

The application claims to be beneficial for the community of Catherine Fields however it is difficult to determine what, if any, use of school facilities is proposed to be shared with the community. It is noted that subclause e3.36(6) State Environmental Planning Policy (Transport and Infrastructure) 2021 requires the consent authority to take this into consideration.

1.7 Sewer / Pump Out System

Council understands that the proposal will rely on either on-site wastewater disposal or a pump out system for Stage 1 and 2. The development will be unable to proceed to Stage 3 until the connection of reticulated sewer. Camden Council does not support the reliance on pump out systems due to the potential for failure and reliance of transport vehicles to pump them out. This combined with the lack of flood free access means that pump out vehicles may be prevented from accessing the school in the event of a flood.

Given the uncertainty as to the timing of any reticulated sewer, it is considered inappropriate to approve a development that relies on the provision of this essential infrastructure (past Stage 2).

1.8 Sewer / Onsite Disposal

The alternate to a pump put system for the school's first two stages is on-site disposal. The capacity for this system and planned redundancies in the event of a failure should be carefully considered in the assessment of the application. Strict measures will need to be put in place to prevent any primary or secondary contact by future users of the school and the disposal areas.

1.9 Staging and Road Works

The staged road works in front of the school are not supported by Council. If the development is approved (despite the objections of Council), the road works, including channelised intersection and median, should be delivered with Stage 1 to reduce the impact on the community and to reduce the impact on school users who would be impacted by construction works later down the track when the future stage triggers their requirement.

2. Noise and Vibration

2.1 Operations

The noise from children participating in outdoor play will exceed Council's Environmental Noise Policy (2018) criteria of background +10dB(A) by up to +8dB(A) when students / children participate in play under "scenario 2" (that restricts high school students participating at the same time as primary school and childcare). This exceedance will be ongoing and impact at least four adjoining residential properties. Under "scenario 1" (restricting primary school students participating at the same time as high school and childcare) there is an exceedance of +4dB for the same properties / residents.

The above exceedance will occur despite recommended acoustic walls around the high school and primary school outdoor play areas and a further acoustic boundary fence around the school property boundary (i.e. two acoustic fences).

Council does not support the level of exceedances from students/children participating in outdoor play where noise levels could be up to 14-18dB(A) above known background levels during the day (background being 36dB). Furthermore, it is not appropriate to attempt to resolve the noise issues with the use of acoustic walls as this has an unreasonable impact on the rural landscape character of the area.

The noise exceedance demonstrates that the proposal is an overdevelopment of the site / inappropriate use for the locality.

2.2 Operations Gap – Traffic Noise

No discussion or modelling of the vehicles accessing the site for pick up and drop off, staff or sewer pump out trucks was presented in the application. An assessment should be undertaken of the existing residences along Catherine Fields Road affected by additional traffic generated by this development.

2.3 Construction

Noise levels from demolition, earthworks and construction activities are predicted to exceed criteria by up to +40dB(A) impacting at least nine adjoining residential properties. This exceedance occurs despite attempts to mitigate and manage noise from various activities.

Council recommends, in addition to the noise control recommendations in the acoustic report, that (if the development is approved) suitably sized temporary noise barriers be placed around the perimeter of the site as a further measure to assist in reducing construction noise. The temporary barriers should remain in place until works for each stage of development is completed.

3. Traffic

3.1 Rural Road

Catherine Fields Road is a rural road with no shoulder, formed kerb and gutter, footpath, lighting or piped underground stormwater system. A road of this nature is not designed to cater for the level of traffic proposed as part of the subject development application.

3.2 Bus Shelter

The Environmental Impact Assessment (EIS) states that a bus shelter will not be provided by the developer but rather that Council should provide it. The bus stop seeks to accommodate students that may use public buses. The report includes a transport plan which seeks to encourage modes other than private cars as modes of transport, ensuring facilities accommodate for the needs of users is an effective way to achieve this. The proponent should be required to provide any bus shelter / facilities.

The EIS also states that the school proposes a covered waiting area adjacent to the pedestrian access – the covered waiting area is not depicted clearly on the architectural plans and this should be further considered in the assessment of the DA.

3.3 Staged Road Works

The traffic report states that channelised right turn entry is not required until Stage 4. Council disagrees with this conclusion and if the application is approved Council requests that this be required as part of Stage 1.

3.4 Footpath Width

Indented bus bays are proposed on the eastern side of Catherine Fields Road at the western frontage of the school. A 1.8m wide footpath is proposed adjacent to the indented bus bay. Council has had to widen several paths surrounding schools to 3m as narrower paths proved insufficient to accommodate the needs of pedestrians. In some cases overflow onto roads has been observed. It is recommended that the footpath width be increased to 3m.

3.5 Bicycle Parking

48 bicycle spaces are proposed where Austroad requires 216. The reduction is stated to be due to lack of facilities to cycle to the school. Whilst this is certainly the case at present, Council would submit that this is evidence that the site is not suitable for the proposed school. Once the area is rezoned, through appropriate precinct planning, there will be far greater bicycle access to the site (or the site identified to be most suitable for a school through the precinct planning exercise).

3.6 Speed Bumps Required

If approved, speed bumps should be placed along the kiss and ride. AS2890.1-2004 requires parking aisles which exceed 100m to include traffic control devices such as speed humps.

4. Flooding

Flood maps indicate that the Catherine Field Road will be inundated from frequent events like 20% AEP (1 in 5 years) restricting evacuation to both northern and southern directions and the road subject to high hazard during rarer floods, such as the Probable Maximum Flood (PMF).

Considering the school activities, assessing a range of flood events including rare events up to PMF, a flood response procedure, including road signs must be prepared.

In accordance with Council's Flood Risk Management Policy, the applicant is required to provide the Emergency Management Plan in line with the SES Camden Local Flood Plan.

5. Public Health

The proposed development should ensure compliance with (but not limited to) the following:

- Food Act 2003;
- Food Regulation 2015;
- Food Standards Code; and
- AS4674: Design, construction and fit out of food premises.

Non compliances with the above have been noted in the proposal.

6. Conditions of Consent

For the reasons outlined in this letter the proposed school is an inappropriate use for the site and the application should be refused. That said, if the Department disagrees with Council's assessment and considers the application warrants approval, Council requests the opportunity to provide feedback on potential / proposed conditions of consent.

7. Conclusion

For the reasons outlined above, Camden Council objects to the proposed development.

The subject site is zoned RU4 Primary Production Small Lots and is located on a rural road with no shoulder, formed kerb and gutter, footpath, lighting or piped underground stormwater system. The land is also not served by reticulated sewer. The land is unsuitable for the proposed development and will result in unacceptable impacts for residents of adjoining/surrounding properties.

The proponent is seeking to develop relatively cheap rural land prior to precinct planning / rezoning. This provides a private financial benefit to the proponent at the expense of the wider community. The proposed development, if approved, would also hinder the orderly and co-ordinated provision of infrastructure in the Catherine Fields Growth Centre.

Should you have any enquiries in relation to this matter, please do not hesitate to contact the undersigned on 02 4645 5631.

Yours sincerely,



Mr Jamie Erken
Manager Statutory Planning
(Planning and Environmental Services)

Good evening Councillors,

I would like to take this opportunity to express my gratitude to you for allowing me to speak on behalf of the Catherine Field community.

The hundreds of people that have come together to express their concerns in relation to Minarah College really need to be congratulated on their time and efforts spent on this matter.

We are pleased to see that Council have listened to our concerns and are supporting the community to oppose this application.

We would like to highlight just a few of the major points.

1. Firstly, there has been a lack of Community Engagement from the applicant. A perfect example of this is that well over 150 people have confirmed that they were never invited or included in the Community Engagement program. The method of delivery of the said flyers is questionable. The opportunity of only one zoom meeting held mid week was a poor decision. Perhaps a second weekend zoom meeting option may have sparked more attendees.

Not to mention the inability for some to physically log on to the zoom session, causing the hosts to create a second software option last minute. We must also mention the large number of elderly or non English speaking residents who may not have access to a computer and therefore were not even given an opportunity to hear about the proposal in another manner.

2. Most people are shocked that a great big development like this could go ahead with no sewer. Further to this is a serious concern that in the documentation, the developers say in their EIS dated 2nd June 2022 that 'the project team has had initial discussions with Sydney Water around the provision of sewerage services'. Yet in the document from Sydney Water, it thanks the Department for notification of the development on 1st August 2022. This community want to know How can this be possible? Is the EIS misleading or is the Sydney Water response misleading?

3. The community have great concern about the contents of a letter from the Department of Planning Biodiversity Conservation Division stating that the school site IS NOT impacted by mainstream or overland flow. This is simply NOT TRUE. If you live there, you would have witnessed the overland flow during heavy rainfall. How can this letter from the Department dated 19th July possibly be true when the exhibition of the flood plain commenced the day after this report was written?

The community ask, How can there be any integrity if the letters from the Department of Planning Biodiversity Conservation Division are written before the flood study is exhibited?

4. In relation to the Aboriginal Cultural Heritage Assessment, the community were alarmed to read that the archaeological survey was carried out on not only the two subject lots but a third adjacent lot. A member of the community were advised that there may be future plans for a prayer centre. The community want to ask, why was this third property included in the archaeological assessment and later withdrawn. What plans do the applicant have that they are yet to reveal?
5. The community support council's view on this business proposal taking advantage of a rural community. It should be noted that the Department of Planning have also proposed a rural rezoning Capture Tax. To allow this proposal would further disadvantage the existing community as they will have to make up the shortfall of developments like this.
6. The community would like to mention that there was no physical address listed on the Department of Planning's Notice of Exhibition letter. A resident attended the Department's offices in Parramatta to hand deliver submissions on behalf of residents. These submissions were initially refused by staff. Some residents had issues creating accounts to try to send their submission online. We also had discussions among the community that the contact person listed on the Notice of Exhibition letter, rarely answered his phone and in one instance hung up on a resident mid sentence.

7. The community would like to draw your attention to the State Significant Development Guidelines dated July 2021. Reference 1.4 Supporting Material, I quote “The guidelines are supported by detailed guidance on requiring an EIS for SSD projects to include a declaration in respect of completeness, accuracy, quality and clarity of the information in the EIS before it is submitted to the Department”.

The community have agreed that this Guideline set out by the State Government has not been met. The application includes reports that are based on missing noise loggers, traffic counts conducted during a pandemic event that did not include key intersections. Not to mention only 3 brief site visits during dry weather to conduct an Overland Flow Assessment. The application has glaring faults throughout each document of which contradict each other.

The community support the council’s view showing each report associated with the application to be unbelievable by everybody in the community. They are incomplete and inaccurate.

We question the actual integrity of each report. If they have no integrity, how can the community believe any of it?

Taking into consideration all of the false and misleading reports and the lack of integrity, how can the community be sure that this Business expansion Proposal will benefit the children instead of furthering the cause of the business using the children as a product.

I oppose the proposed development and staged construction of a;

Early learning center as listed,

And commercial operations of an education center to be staged on a school site.

Owned and operated by the applicant Green Valley Islamic College who promote the business upon their website as “More specifically, the company was established to provide general pre-school, primary, secondary and higher education including trade and vocational education, of a high standard and quality in an Islamic environment”. Page4

The companies charter key function is the development of “an appropriate culture” page4.

The chairman’s message states, “the school is committed to providing a unique educational experience, from every class room and learning space and at the SAME TIME valuing Islamic ethos”.

Many members of the local community believe the reason this application and its proposal for the staged construction of;

- Early Learning Centre

Instead of describing it under the correct description of the Act and Camden LEP, that lists this proposal as.

- Child based care facility, because of its staging;

(a) building or place used for the education and care of children

(i) long day care

(ii) out of school care

(iii) preschool care

(b) but does not include;

(g) a service that is concerned primarily with providing lessons or providing for participation in religious or sporting activity.

As stated in the boards charter of providing a high standard and Islamic environment and providing at the same time a valuing ethos, the community belief is, the applicant has purposely misled upon the public information, as the proper definition under the Act, would mean a Legitimate child care facility that does not include a service concerned with providing for participation in religious or sporting activity.

The application as presented does not fall under the proper definition of a Centre-based child care facility as the proposed business model is for (g) in their code of conduct information a service primarily providing Islamic religious learning activities.

If the proposal stated there would be fee free places to the local community or welcoming non-Muslims to day care, the community would believe the application


But the application contains more misleading information such as this.

I have not made or received any reportable donations.

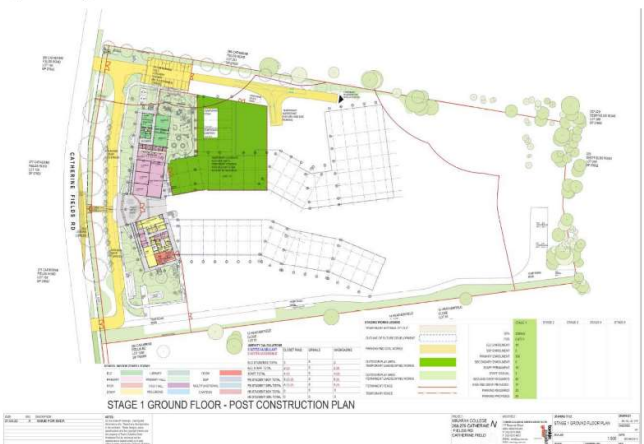
Yours.....

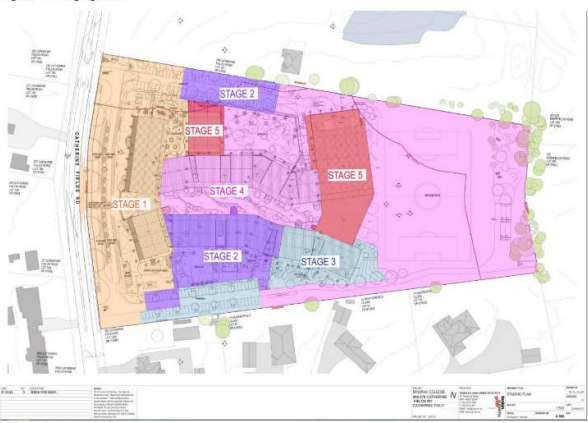
Environment Impact Assessment prepared by Urbis

I am seeking clarification of the statements in the report.

Impact on adjacent properties, is not clearly identified by the plan	<p><u>Impacts on the southern and northern boundary on the neighbouring properties</u></p> <p>Figure 2 Proposed Site Plan</p>  <p>Source: Tonkin Zulakha Greer</p>
This is not the most suitable location for a school (and it is not identified in any strategic planning document)	<p><u>Not in a nodal location the catchment ?</u></p> <p><u>Not near a town centre or other amenity ?</u></p> <p><u>No public transport</u></p> <p><u>Not on a major road for access</u></p>
Incorrect statement made in the EIS and also conflicting as it raises that the school is an expansion from Green Valley ? which is in a different LGA ?	<p>“The proposed development will provide a new school facility that is necessary <u>to support the growth of the south west region</u>. The proposal is in a strategic and currently underutilised area that will catalyse future growth in the Camden local government area”</p>
Incorrect statement , how ?	<p>“The built form outcome and landscape design embraces the incorporation of Islamic cultural expression and Australian Indigenous cultural forms as an integrated design aesthetic.”</p>
It is not clear from any strategic documents when ?	<p>A new revitalised community is planned for Catherine Field, where up to 3,200 new homes and local amenities will be delivered?</p>
The existing school is 18klm from the subject site, a different LGA and is not in within the catchment identified in the Social Impact Assessment	<p>“18klm from the existing school “</p>
Incorrect statement	<p>“The proposal will provide an educational establishment to service the growing demand of Minarah College Green Valley and will also support the growth of the population within the South West Growth Area” page 12 EIS</p>

There is no evidence in the EIS that this has happened ? there are no other facilities within the area ?	<p>Council will work with the Department of Education to <u>investigate the co-location and shared used of facilities ?</u></p> <p>Page 23 EIS</p>
There is only one sporting field in the proposal, is this enough facilities for the students ?	<p>Council acknowledges that, "Co-locating schools, health and aged care facilities, and sporting and cultural facilities will deliver a healthy and socially connected community."</p> <p><u>Page 24 EIS</u></p>
Issues already identified in the EIS which are not clearly addressed ?	<p>The site is located along Catherine Fields Road, which is a single lane, sealed road that runs in both directions.</p> <p>The site is not situated within walking station of a train station.</p> <p>No sewer and no gas Storm water Threatened communities aboriginal heritage</p> <p>Page 27 EIS</p>
Incorrect statement ? this is not in the catchment from the Social Impact Assessment ?	<p>The consequences of not carrying out the project are far reaching and include failure to support the growing demand of Minarah College Green Valley</p> <p>Page 28 EIS</p>
<p>Clear constraints on the site that are not being addressed ?</p> <p>Incorrect statements</p>	<p>The site however has numerous constraints including bush fire, ecology, and the <u>rural residential interface to the southern boundary</u>. The proposed design was determined to respond to the constraints and rural landscape most appropriately, whilst also meeting the needs of the school ?</p> <p>Upgrading of the existing Minarah College Green Valley to cater for the growing school population was also considered. The current campus has reached capacity with limited scope for significant upgrades to accommodate the growing school population and demand in Western Sydney ?? different LGA ?</p> <p>The proposal will provide an educational establishment to service the growing demand of Minarah College Green Valley and will also support the growth of the population within the South West Growth Area???</p> <p>Page 29 EIS</p>
There is no economic impact or benefit assessment ?	<p>Economic benefits ??</p> <p>page 30 EIS</p>

<p>Clear issues with the plan in relation to the distance between drop off bay and the ingress / egress ?? page 43</p> <p>Blind corner with the road running north and south ??</p>	<p>Figure 11 Stage 1 Ground Floor Plan</p>  <p>STAGE 1 GROUND FLOOR - POST CONSTRUCTION PLAN</p> <p>Source: Tonkin Zulaika Greer</p>
<p>Weekend use is not clear ? school sport ?</p>	<p>Page 44 EIS</p>
<p>Limited student parking ?</p> <p>How are impacts from deliveries / waste being managed ? it is not clear there is a plan ?</p>	<p>Limited student parking is proposed in the northern car park</p> <p>All major deliveries and waste collection will occur in the designated loading area north of the hall through the student carpark. Delivery times will be strictly managed, whereby regular services are subject to strict timelines that to ensure the minimum movements possible and these occur outside of the school peak periods. Deliveries will be managed by the school's administration and management staff...</p> <p>Page 44 EIS</p>
<p>How do the kids get to school safely using a bike if there are no cycleway connections ???</p> <p>There is no clear agreement for a public bus service and what route it is taking ? i.e. where are the students coming from ?</p>	<p>No cycleway connections currently exist to the school, and none are planned to be built by TfNSW or Council. However, a preliminary assessment of the Planning Guidelines for Walking and Cycling 2004 and the Austroads Guide to Traffic Management Part 11 has been undertaken and will inform the future provisioning of bicycle parking spaces if required. Regardless of the lack of bicycle routes to the school, 48 bicycle spaces in the form of 24 double racks have been proposed.</p> <p>"A bus stop servicing the school will be situated on Catherine Field Road"</p> <p>Page 45 EIS</p>

<p>There are no sporting facilities in the early stage of the development staging ? what are the students going to use ? will this increase traffic movements ?</p> <p>There is no timing of the ELC ?</p>	<p>Figure 12 Staging Plan</p>  <p>Picture 9 Staging Plan</p> <p>Source: Tonkin Zulaikha Greer – Design Report</p>
<p>Incorrect statement</p>	<p>The site is mapped within the South West Priority Growth Area; however, the site falls within the ‘unreleased’ Catherine Field precinct.</p> <p>So this is not a growth area ???</p> <p>Page 53 EIS</p>
<p>There is no evidence on how this statement is true ? where do the current staff come from ? how many local residents have the right qualifications ?</p>	<p>The new Minarah College development will provide both education and employment opportunities for local residents</p> <p>Page 54 EIS</p>
<p>How is this statement correct if the report is saying “ the site falls within the ‘unreleased’ Catherine Field precinct. “...??</p>	<p>Future stages would be delivered over the next 20 years to align with growth in the local community. Specific timeframes for these stages are not currently known as they will be dependent on local population growth.</p> <p>Page 58 EIS</p>
<p>When are Camden Council going to address this issue ?</p> <p>There is no mention of public transport connection ? only a private bus ?</p> <p>Car parking numbers are not confirmed and conflicting through the reports ?</p> <p>Details around how sports facilities could be shared with the community will form part of the</p>	<p>Catherine Fields Road has an 80km speed limit in front of the school, which drops to 60km just to the south. This matter would need to be given further consideration by Camden Council as it is a local road, and there may be a requirement for the introduction of a school zone for reduced speed during specified hours.</p> <p>Page 59 EIS</p>

part of the State Significant process ? how	
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Social Impact Assessment prepared by Sarah George Consulting

I am seeking clarification of the statements in the report.

<p>Why has a 10klm catchment been used ?</p> <p><u>why does it not include Green Valley with the existing school which what is being referenced throughout the EIS</u></p>	<ul style="list-style-type: none"> • Cobbity – Leppington (SA2 in which the subject site is located); • Camden - Ellis Lane • Elderslie – Harrington Park; • Mount Annan – Currans Hill; • Claymore – Eagle Vale – Raby; • Ingleburn – Denham Court; • Austral – Greendale; • Hoxton Park – Carnes Hill – Horningsea Park; • West Hoxton – Middleton Grange; and • Prestons – Edmondson Park.
<p>The report is saying the area is only earmarked for Growth ? but not approved ?</p>	<p>The Catherine Field area is an area earmarked for future growth as part of the South West Growth Area Precinct and estimates prepared by Profile id estimate the number of dwellings in Catherine Field Precinct will increase by an average of 123 dwellings per annum to 3,101 in 2041 and the number of dwellings in Catherine Field North Precinct will increase by an average of 189 dwellings per annum to 5,723 in 2041</p> <p>Page 6 SIA</p>
<p>The research is highlighting there are no children in the area ?</p>	<p>As can be observed, the population of the immediate vicinity and the suburb of Catherine Field are generally slightly older, more likely to be a couple with dependent children, earning higher incomes and residing in large, separate dwellings.</p> <p>Page 13 SIA</p>
<p>The data shows that residents would not be able to afford this type of school</p>	<p>SEIFA index</p> <p>Based on data from the 2016 Census, the Leppington-Rossmore-Catherine Field area had a SEIFA score of 1024.0 and a percentile of 60%, indicating that the area has a greater proportion of the population who might be considered to be at a greater level of disadvantage to other residents within the</p>

	Camden LGA, but less disadvantage than in Greater Sydney and NSW.																				
	Page 14 SIA																				
<p><u>The data being used is not current.</u></p> <p>NSW Department of Planning projections are up to date 2022. <u>Which show a very different outcome. There is no need for school</u></p> <p>2022 NSW Common Planning Assumption Projections - Local Government Areas (ASGS 2020) Projections for year ending 30 June.</p>	<p>The population data does not relate the catchment identified.</p> <p>3.2 Population projections</p> <p>Population project data compiled by the <i>NSW Department of Planning</i>, indicates consistent growth in the population of the Camden LGA, particularly in school aged children aged 5-14 years.</p> <table><tr><th>Age</th><th>2026 Number</th><th>2031 Number</th><th>2036 Number</th><th>2041 Number</th></tr><tr><td>5-14 years</td><td>22,962</td><td>28,029</td><td>37,498</td><td>44,735</td></tr><tr><td>20-39</td><td>43,564</td><td>46,650</td><td>62,450</td><td>82,566</td></tr><tr><td>Total population</td><td>153,299</td><td>180,071</td><td>236,255</td><td>307,727</td></tr></table> <p><small>Source: 2019 NSW Population Projections – NSW Department of Local Government</small></p>	Age	2026 Number	2031 Number	2036 Number	2041 Number	5-14 years	22,962	28,029	37,498	44,735	20-39	43,564	46,650	62,450	82,566	Total population	153,299	180,071	236,255	307,727
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Catherine Field Community Submission: July 2022

Submission relating to Minarah College: SSD-30759158

Based on the information provided in the EIS and Supporting Appendices, **the Catherine Field Community object to the development.**

1 Social Impact Assessment:

According to the information provided in the Social Impact Assessment Appendix AA of the Minarah

1.1 Community Consultation:

The community believes the community consultation referred to on Page iii has been inadequate and underwhelming, with little follow up. The report overstates the engagement with community and is false and misleading to state that adequate community consultation has taken place. The community consultation was inadequate based on:

- No one reporting to have received a flyer of which 945 were said to have been delivered.
- The link to the online session was changed in the last minute, resulting in only 28 attendees from 35 registered to attend.
- None of the 17 adjacent neighbours were invited to a “dedicated online session”. This is backed up by the fact that the report states that no one attended which proves the effort to invite adjacent neighbours failed completely.
- The references to stakeholder meetings and briefings is not backed up by the details of the discussions held or the outcomes of those meetings.

On Page 20, the issues identified during the consultation process did not include issues raised on the call with the Project Team. The issues from the community were:

- The current road condition and poor infrastructure would not support additional traffic.
- The danger of having an 80k zone used by large trucks and peak hour traffic with no allowance for turning lanes.
- Current dangerous conditions of traffic travelling along Catherine Fields Road at speed, has eventuated in multiple serious accidents and fatalities.

Section 5.7 in relation to Decision making systems (Page 39) seems to mislead the public into thinking the engagement with community was adequate to inform development. This is merely a box ticking exercise and the community do not feel they “have power to influence project decisions, including elements of project design.”

In Section 5.8 “Issues raised during consultation” the community feels the list of issues raised by the community is much more extensive than is stated on page 40. This leaves the community feeling powerless and misled. The community is therefore taking the opportunity to produce this submission in writing to ensure our issues are documented and demand that each issue is addressed thoroughly.

1.2 Way of Life and Surroundings

Page 2 refers to “Way of Life”. The community believes their way of life, being a quiet rural lifestyle, including keeping on animals on properties, will be affected considerably. The main points being:

- Despite raising questions about how “privacy, peace and quiet enjoyment” and “traffic/parking demands on noise levels”, neither of these questions have been addressed. The report merely

asserts that there will be minimal impact without backing up the claim, and then providing contradictory advice that noise due to traffic and parking will increase, and then dismissing this issue as a step in the direction for the future development of Catherine Field. Catherine Field has no town plan for development, unlike neighboring Leppington precinct which has a development plan.

Page 3 refers to “Surroundings” which has not been addressed. Especially in relation to impact on to public open space, public facilities and streets and public safety during construction.

Page 8 also states that typical impacts associated with schools include noise emissions, noise intrusions and increased traffic on local streets, particularly around peak pick up and drop off times but fails to include the interruption associated with weekend and outside school hours opening of the hall and sports field and light pollution from having the site lit 7 days per week till 9pm. The report also fails to mention the light pollution associated with having the school lit all through the night, which is common practice in schools for security reasons.

Pages 22 and 23 flip flops between stating that the impact on privacy will be minimal however there will be significant noise issues in relation to children playing outdoors, PA systems and school bell times leading to “potential social impacts for residents and tenants of the properties immediately surrounding the subject site”.

Of Major concern to the Catherine Field community is the disruption to the local area beyond school opening hours. The development is giving itself the opportunity to remain open for the Multi-purpose Hall to be 5pm to 9pm M-F and 9am to 10pm Saturday and Sunday (page 41). This is not just a school, this is a 7 day a week community operation, potentially operating for commercial reasons. Those open slather operating hours will cause disruption to any community, let alone the quiet rural Catherine Fields community.

1.3 Stating there are no schools in Catherine Field is false and misleading

The report on 6 is trying to overstate the lack of school in and near Catherine Field in an attempt to highlight the need for a school in Catherine Field and raise the profile of Minarah college as a “needed asset” to the community of Catherine Field. This is false and misleading:

- Firstly, the report is correct that there are 3 Primary schools are named which include Barramurra, Gledswood Hills Public School and St Justin’s Catholic Parish Primary. The report however failed to name Oran Park Public, Oran Park Anglican, Rossmore Public School and Leppington Public school on the list.
- Secondly although the report mentioned St Benedicts Catholic College as a nearby high school, the report failed to mention Narellan Vale High School, Oran Park High School, Oran Park Anglican and MacArthur Anglican
- Thirdly, the need for a Muslim school in the area will not service the local demographic which has a small number of people who identify with Islam and who are not from a Fijian background. There are several schools nearby which service people of the Islamic faith namely, especially the community which is served by the current campus in Green Valley. These schools are:
 - Irfan College Cecil Park,
 - Amity College Prestons,
 - Malek Fahd Hoxton Park,
 - Al Faisal College Austral,

- Unity Grammar Austral,
- Bellfield College Rossmore and
- Amity College campus in Leppington (under planning and construction).

1.4 Traffic and Noise

Pages 27 to 29 provide details on traffic and this is concerning to the Catherine Field Community:

- The reports states 80% to 90% of children will be travelling to and from school using private vehicles in:
 - 2 peak windows of 15 min periods am and pm
 - with 30 spaces for kiss and drop.
 - that analysis of the capacity of the 30 kiss and drop spaces would be sufficient to manage the private vehicle drop offs,
 - the expected arrival and departure profile show that it is capable of accommodating the trips generated without impacting the adjoining Catherine Fields Road.

The community believes the traffic outcomes in this study are false and misleading compared to the actual situation that will arise. The actual situation has been understated and is likely to result in extensive traffic along Catherine Fields Road, causing massive disruption to local roads and access to private property. The number of vehicle movements are unlikely to be adequately serviced by the road plan, especially:

- The report does not address the potential queues waiting to turn into the single entry/single exit traffic plan
- There is no alternate options for traffic should there be an accident or traffic blockage
- With 1580 students and potentially 85% travelling using private vehicles, assuming an average of 2 students per vehicle, that would mean 1343 students would be dropped off in **672 cars** in a **one-hour** window morning and afternoon.
 - This equates to an average of **11.2 vehicles per minute** on average or,
 - **5.3 seconds allowed per vehicle**. This is completely unrealistic to expect kids to jump out of a car safely in 5 seconds.

The assertion (page 29) that “the proposal is supportable on traffic planning grounds and is not anticipated to result in any adverse impacts on the surrounding road network” is false and misleading

1.5 Community:

Section 5.2 Community speaks of the community impact and states a temporary increase in population of the suburb is expected during school hours. According to census data, the increase in population is not trivial. The population increase associated with the school will more than double the population of the suburb. This is further evidence that the school is not going in to service Catherine Field but to service a community which resides outside of Catherine Field.

Page 30 of the report goes on to say that it will change the existing character, which is of major concern to the Catherine Field community. The community is a rural residential area, it has not been rezoned there is no town plan for schools or development, and there is no infrastructure to support increased traffic and people coming to the area.

The report does not explain how it can have a positive social impact, only demonstrating that the school will service people from other areas, without demonstrating how Catherine Field residents will benefit from the development.

1.6 Heath & Wellbeing

On Page 36 two questions posed by the guidelines remain unanswered in relation to potential impacts to health and wellbeing.

- “Will community health be improved by public access to school facilities, eg sport facilities?”
- Will there be benefits from better active transport and the ability of local children to live near the school.?”

Neither of these questions have been adequately addressed and attempts at responding to these questions is misleading and deceptive, including:

- *Recreation areas for students* – the question in this section relates to the community not the students of the school
- *Multi-purpose hall and sport fields will be available for hire by the broader community.* There are already existing sports fields, and a community hall which services the community. It is false to assert that a hall on school grounds will be available to the local community. By “broader community” we assume it is meant the “Fijian Muslim community” which is not the local Catherine Field community. This assertion that the “community” will benefit is attempting to **mislead and deceive** the public into thinking the local “Catherine Field community” will benefit from the multi-purpose hall. In actual fact the “broader community” that the hall will service the is the Fijian Muslim community who will be visiting Catherine Fields from afar. The local community will not benefit from this hall.
- The report does not address the impacts of having a school in a rural residential area and the impacts to health and well-being for the residents, once the school has been built.
- The report again attempts to mislead the public by asserting the development won’t generate any negative impacts in terms of health and wellbeing without providing evidence to support this conclusion.
- Although Page 23 of this report highlighted potential social impacts to the properties immediately surrounding the site, there are no detail on the distances or number of properties that will be impacted.

1.7 Surroundings

On Page 39 The report asserts without justification or evidence that there will be no safety issues, even though there are no foot paths, no cycle ways, increased traffic from trucks during construction which is ongoing owing to the planned stages, to an already busy road. No consideration is given to the area being rural where people walking in the area riding horses and walking dogs will be impacted.

1.8 Public Interests

Although page 44 refers to a list of public interest benefits. All of these so-called benefits are subjective, and none of them are deemed benefits by the local Catherine Field community given they do not provide benefit to the local Catherine Field community. Catherine Field area is a low-density area with an ageing population. A large school will be borrowing our community for their own interest, and will serve little benefit to our local community.

1.9 Section 7 “Conclusion”

The address in this section for the property is incorrectly stated as 368-378 Catherine Fields Road. This false and inconsistent with other documents in the EIS information package.

Also, the report conclusion attempts to assert that minimal impact is expected on the surrounding residential properties, despite the many issues raised and omitted from the report and raised in this submission. It is false and misleading to provide such a simple conclusion despite the complexity of the project and the significant impact and disturbance on the quiet rural Catherine Field community.

2 SEARs 3. Design Quality: Good design in accordance with the seven objectives for good design in “Better Placed”.

2.1 Background:

With reference to “Better Placed” on Page 12 warns about indicators of poor design outcomes, specifically:

“POOR ‘FIT’ AND NOT RESPONDING TO CONTEXT: A community’s sense of place can be undermined and existing attractors devalued when: Design has little sense of the ‘local’ character, materials or landscape”.

Page 19 also mentioned that:

“Good design in the built environment is informed by and derived from its location, context and social setting. It is place-based and relevant to and resonant with local character, heritage and communal aspirations”.

2.2 Response:

The development applicant has failed to engage the local community on the design of the school and has therefore rendered the development out of context of the local character. The evidence for this statement is basically that the development has failed to engage the local community, has failed to understand the local heritage and has opted for a design that is foreign to the culture and heritage of the local community. For example:

Page 64 of the EIS states with respect to design: “Consideration of the three cultures (Aboriginal, Islamic and Fijian) with a key relationship with the school”

- The design of the school is not in keeping with the local community. No effort has been made to design the school to fit into a feature or the heritage of the local community, which is not Fijian/Islamic. According the ABS census 2021¹, over 70% of Catherine Field has an ancestry that is (in descending order) Australian, English, Italian, Maltese and Chinese. The development does not consider a design that is consistent with the nearby historic "Oran Park house" and there has been no effort to study any heritage in the local community, especially Raby House in Catherine Field which has a pioneering agricultural history dating to the early 1800's.
- No attempt has been made to recognise the significance and architecture of Raby² House, a Heritage listed homestead in Catherine Field, dating back to c.1820 for the original house and c. 1875 for the main house. We request the architecture reflect the rural heritage and rural nature of Catherine Field, to compliment the aboriginal heritage architecture.

¹ <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL10855>

² https://en.wikipedia.org/wiki/Raby,_Catherine_Field

- According to 2021 census data published by ABS³: In Green Valley, Fijian is represented as the third highest country of birth (excluding Australian). Fijian is not listed as an ancestry from anyone in Catherine Field⁴. In fact, over 70% of Catherine Field has an ancestry that is, in descending order, Australian, English, Italian, Maltese and Chinese.
- There is also a contrast with the religious composition across the two areas, where Islam makes up 14% of Green Valley, this figure is below 6% in Catherine Field, and based on the ABS ancestry in the point above, none of the 6% of people that identify as Islamic are from a Fijian descent.

2.3 Conclusion:

Clearly, the applicant has failed to engage the local community, has failed to provide a design that is consistent with “Better Placed” by putting forward a design that is the polar opposite to the local colonial heritage and rural lifestyle and ancestral demographic of Catherine Field.

3 Sears 20: Social Impact:

3.1 Background:

EIS page 10 mentions that “The intended outcomes of the project are to:

- reflect Islamic and Fijian and indigenous cultural beliefs
- provide educational opportunities to the local community”

3.2 Response:

As mentioned in 1.2 above, according to the ABS Census 2021 data, how does it serve the community by providing an educational institution for a Fijian Muslim community that does not exist in Catherine Field? Clearly the Catherine Field rural community is being asked to tolerate a development to serve a community that resides outside of Catherine Field. There is no benefit to the local community for this school and for that reason there will be persistent objection. The local community will benefit none from this school.

3.3 Conclusion:

The social impact of this school development on the local community is all downside. There is no benefit to the local community and the demographic of the local community will not demand the school of a Fijian and Islamic focus.

4 Sears 20: Social Impact:

4.1 Background:

The EIS on Page 11 lists the scenarios which were investigated. One of which is “Do nothing option resulting in site remaining predominantly rural, unplanned and unserved.”

4.2 Response:

The Catherine Field community supports the Do-Nothing approach, which leaves the site “predominantly rural”. The community has chosen Catherine Field as their home for this reason. Although the EIS attempts to list “rural, unplanned and unserved” as a disadvantage, the Catherine Fields community feels the development of the school will erode the main asset of Catherine Field which makes it such a great place to live being “rural”. By the EIS own admission, this project is opposed to the

³ <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL11762>

⁴ <https://www.abs.gov.au/census/find-census-data/quickstats/2021/SAL10855>

community desire to see it remain rural. We live in Catherine Field to enjoy a quiet rural lifestyle for our parents, our children and our grandchildren.

The Catherine Field community supports the Do-Nothing approach which leaves the site “unplanned”. The construction and operation of Minarah college will not change the “unplanned” nature of Catherine Field given the development is being proposed without any zoning or allocation for a school as can be observed in nearby Leppington precinct. Leppington precinct has plans for schools. We are opposing Minarah college as there is no town plan for our community to accommodate a school. The construction of the school will still leave Catherine Field “unplanned”.

The Catherine Field community supports the Do-Nothing approach which leaves the site “unserved”. The construction and operation of Minarah college will not change the “unserved” nature of our Catherine Field given the development:

- Will not result in better roads. There are no upgrades to the roads proposed beyond the foot print of the school.
- Will lead to more traffic almost tripling the local traffic compared to current. The population of Catherine Field will nearly double on any given day given there are just over 1600 local residents and the school population will be almost 1600 people once Stage 5 is complete.
- Offers no water or waste water improvement that would benefit the community. There is no improvement to stormwater amenity. There is no commitment for a sewer to serve the community.
- The architecture is centered around a community that is not in keeping with the local heritage or rural nature of the area
- The local community will not be purchasing education from the school, given they come from a different cultural and religious background to the one that Minarah college will serve.

The proposed development should not go ahead given the development will not change from being “rural, unplanned and unserved”. It will simply become “rural, unplanned and unserved” with a big school to accommodate people from outside our community.

4.3 Conclusion:

Please leave our community “rural, unplanned and unserved” without a big school in it. We prefer it this way compared to remaining rural, unplanned and unserved with a big school that we don’t have a need for.

5 SEARs 20: Social Impact

5.1 Background

The EIS page 11 fails to consider a fourth scenario, where the development takes place outside of our rural Catherine Fields community and located in an area planned for development and for schools, including road, stormwater and waste water sewer infrastructure. One such location is in the Leppington precinct

5.2 Response:

A scenario that has not been investigated is to locate the school in an area that has been rezoned where allotments for schools has already been provisioned. The Leppington⁵ precinct has plans for 5 school locations. Complete with services and a local plan that accommodates schools (for example, schools are located within walking distance of public sporting fields that can be utilized by schools and local

⁵ https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/Indicative+Layout+Plan+--+Leppington+Stages+2+and+5.PDF

residents. See Figure below extracted from the Leppington Precinct indicative layout plan June 2021. The colored arrows show the location of 5 allotments which are named “indicative school locations”.

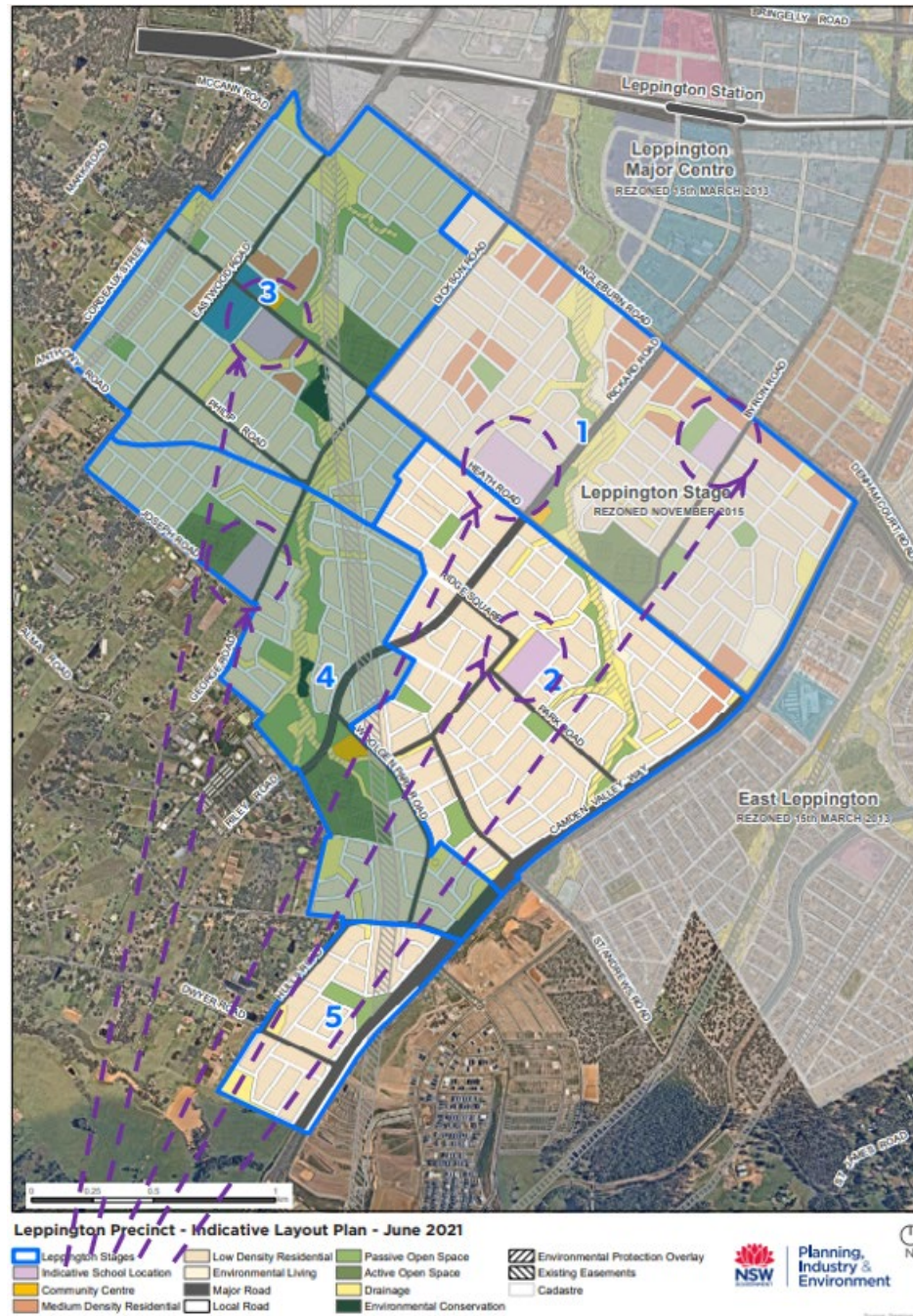


Figure 1: Leppington Precinct- Indicative layout plan⁶ showing 5 possible locations for schools

5.3 Conclusion:

The development should seek a location that has plans for schools in their design, complete with infrastructure which will support the school and that the local community will benefit from.

⁶ https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/Indicative+Layout+Plan+--+Leppington+Stages+2+and+5.PDF

6 SEARs 13 Stormwater and Wastewater

6.1 Background

Although individual reports have been provided for “Overland Flow” and “Waste Water” there is no Integrated Water Management plan attached to the EIS. This point will predominantly focus on “Appendix U Waste Water”.

6.2 Response to Appendix U Waste Water

Point Raised in EIS or Appendix	Submission
Appendix U Page 15: Design assumes 5 days of site use and wastewater generation and 7 days of effluent irrigation as we are advised there is not site use which generated wastewater on the weekend.	How can the "Flow balancing system" work? Irrigation should be designed on the day of generation not an average of 5 out of 7 days? It seems misleading and advantageous to the applicant that the flow from 5 days of school operation is evened out over 7 days to save on waste water irrigation design.
Appendix U Page 19: Subject to ongoing flow monitoring at the site it may be possible that Stage 3 EMAs are able to be accommodated in the design if per person flow data for the site is lower than the adopted design values.	<p>It is misleading to assume that Stage 3 may go ahead without sewage infrastructure in place. The community demands that a condition of consent which limits the number of students and teachers allowed on the site until such time that a sewer connection is put in place. This is to prevent “development creep” and provide transparency regarding what is to take place.</p> <p>On one hand the report talks of effluent irrigation being a temporary measure until a sewer is connected prior to Stage 3, and on another hand, the system may be used under stage 3 pending a review of daily flow usage.</p> <p>Also, the development should not proceed until there is a commitment from Sydney Water on the date that a sewer connection will be made available and that the sewer connection will be available to all residents of Catherine Fields.</p>
Appendix U Page 14: The school would not be used on weekends during Stage 1 to Stage 3.	The community requests that a condition be put on the site that precludes it from being used on weekends, to comply with the design of the irrigated waste water system. The use of the school site on weekends would render it operating outside of its development consent conditions.

Point Raised in EIS or Appendix	Submission
<p>Appendix U Page 19: Preliminary timing of stages advised by the client, together with advice regarding availability of reticulated sewer services to the site, indicate that by the end of Stage 2 connection to Sydney Water sewer services would be available.</p>	<p>It is not clear whether Stage 3 development would be predicated on the fact that a sewer connection will be provided, or whether Stage 3 will be allowed to proceed, even without a sewer connection.</p> <p>Page 19 mentions that a sewer connection is available from stage 2, but point 5.1 mentions that it may be possible to accommodate Stage 3. This appears to be misleading, and we request a condition of consent for school expansion to Stage 3 be placed on the fact that a sewer connection is in place. The rest of the community has to put up with restrictions on their properties based on the lack of a sewer connection, so why shouldn't the school</p>
<p>Appendix U Page 23: The Effluent management area listed in Table 10 are too small when compared to the requirements imposed on residents in Catherine Field.</p>	<p>According to our calculations, the irrigation area is undersized by 4.2-4.6 times. Areas of 1.2Ha for stage 1 and 2.6Ha for stage 2 would need to be provided as irrigation area to be consistent with the requirements imposed on residents in Catherine Field.</p> <p>In the 2016 census⁷, there is recorded 499 dwellings in Catherine Field. 2016 is assumed to pre-date any medium density development on the western periphery of Catherine Field, as this is prior to the availability of a sewer connection. The population data is therefore referring to a rural density of land sizes from 4000m² (approx. 1 acre) and up. The census data shows that 1657 people live in 499 households, an average of 3.5 people per household. Many properties have approx. 500m² set aside as effluent application area for irrigation. This is approximately 143m² of irrigation area available per person.</p> <p>Assuming a school attendee produces 25% of the water that a household resident produces (as they are only at school for 25% of the day), the irrigation area required for the school, in order to be consistent with the requirement of the local residents, is 12,000m² for Stage 1 and 26,000m² for stage 2. The development proposes to provide 2,738m² and 6,138m² for effluent irrigation, for stages 1 and 2 respectively. By our calculations the irrigation area needs to be made 4-5 times larger.</p>

⁷ <https://www.abs.gov.au/census/find-census-data/quickstats/2016/SSC10856#:~:text=In%20the%202016%20Census%2C%20there%20were%201%2C657%20people%20in%20Catherine%20Field.>

Point Raised in EIS or Appendix	Submission
Appendix U Page 14: "The weekend use of the school would only occur from Stage 4 onwards once the multi-purpose hall and sports fields are constructed and to align with infrastructure upgrades including road upgrades to Catherine Fields Road and sewer upgrades."	<p>There must be a condition of consent which limits the number of students and teachers allowed on the site until such time that a sewer connection is put in place.</p> <p>Also, the community requests that a submission be provided by Sydney Water confirming their commitment, or lack thereof, for a sewer connection to the site AND, that any sewer connection will also service the residents of Catherine Field.</p>
Appendix U Page 23: "The effluent irrigation system will be operated so that: 1. Irrigation does not occur when EMA is over wet. A rain sensor is proposed to control this irrigation."	<p>The conceptual control systems around the irrigation of EMA and prevention when it is "over wet" lacks the detail required to make this successful. We have no confidence that irrigation will not occur after the rain has stopped.</p> <p>A rain gauge does not determine when the "EMA is over wet". What amount of rain would determine when the "EMA is over wet" and when would the irrigation be allowed to resume following the rain event? Please confirm if rain in excess of 1.8 or 1.7mm will prevent irrigation to the EMA on that day. If so, the system should never run, as the average rainfall for Catherine Field (based on Historical BOM data for Maryland Bringelly, from 1867 to 2022) is 767.9mm. Over a year of 365 days, the average rainfall is 2.1mm/day. Therefore, there is no capacity, on average, to irrigate on site.</p>
Appendix U Page 23: 5.4.5 Effluent Reuse Management Requirements. Point 2 talks about average loading rates of 1.8 and 1.7 mm/day (stage 1 and 2 respectively, but point 3 mentions peak rates of 3.0mm/day	<p>The modelling for the irrigation of waste water for EMA is confusing and misleading. It appears that average irrigation rates will not exceed 1.8 and 1.7mm/day on average, but peak daily irrigation rates of 3.0mm/day may be applied. Which one it is?</p> <p>At 3.0mm/day, for stage 2, this equates to 18,400 L of water in a single day irrigated over 6138m² or 1.5 acres. There is nothing stopping the development from irrigating this much per day. A rain sensor won't stop it, unless more detail is provided on how it will work at restricting irrigation.</p>
Appendix U Page 10: Table 2 shows the June Rainfall surplus to be "-5.9mm" for the month.	<p>How can the "Flow balancing system" work? Irrigation should be designed on the day of generation not an average of 5 out of 7 days?</p> <p>The weather data in Table 2 of Appendix U, shows conditions of the school are such that the -5.9mm surplus rainfall would be exceeded within 4 days for the month of June (at 1.7mm per day). This means the remaining 26 days in the month of June would rely on seepage of waste water into the ground and overflow of waste water into the stormwater system or directed to pump out. This further emphasises that the loading rates are too high for this small foot print of irrigation area.</p>

Point Raised in EIS or Appendix	Submission
Appendix U Page 28: "We recommend an ongoing environmental monitoring plan..."	Please detail the environmental monitoring program that will need to be implemented.
Appendix U Page 25: Pump out system requirements: A tanker standing bay to be located adjacent to the collection well and within the car parking area to allow for pump out tankers to stand during pump out without adversely affecting traffic.	Can you please provide the size of the tanker that will be used and at what frequency the pump out will occur? Also please confirm that pump outs will occur between 9-5pm and not on weekends. It is understood that pump outs occur using a vacuum tanker which is noisy. Please confirm the noise requirements from the pump out and the impact on the school participants and the local community.
Appendix U: Page 19, 34 and 39: "Subject to ongoing flow monitoring at the site it may be possible that Stage 3 EMAs are able to be accommodated in the design if per person flow data for the site is lower than the adopted design values."	<p>How can the Stage 2 irrigation area accommodate stage 3 if construction of stage 3 will be built on part of the area marked as stage 2 irrigation area?</p> <p>The attention to detail in Appendix U is a concern. There is no clarity if Stage 3 will only go ahead once a sewer connection is in place. There is commentary that "pending reviews of actual waste water production", that Stage 3 irrigation may be able to be accommodated, presumably on Stage 2 irrigation area. And then part of the irrigation area on Page 34, which shows where stage 2 irrigation area is located, sits on the site where stage 3 is shown on page 39.</p>
Appendix U Page 53-55: Eastwest Geoag Enviro Analysis soil report seems to be for a different site in Denham court.	The soil test report is invalid and the conclusion of the report cannot be relied upon as the soil tested is cited as being from Denham Court. Again, the attention to detail for the design and assumptions of waste water, being an environmental, human health and amenity issue, is a concern to the local community.
Appendix U, Page 13, Table 4: "The land form is of a convex slope"	<p>The convex slope suggests the surface water on the site has the potential to flow outwards towards the boundaries. The community requests that all water that falls on this school site is captured and directed towards the stormwater system via the On-site detention (OSD).</p> <p>The convex shape could lead to leakage of water from the site to the neighbours. This would cause a detriment to the community and is therefore unacceptable. There appears to be a lack of detail in Appendix P Overland Flow to provide assurance that no water that enters the school site will leave the site apart from through the on-site detention and surface water system. Contaminated stormwater entering the neighbours' properties during high rainfall is considered unacceptable.</p>

Point Raised in EIS or Appendix	Submission
Appendix U Page 50: The chart shows monthly rainfall, evaporation and effluent applied, but the effluent applied figures seem wrong	Presumably February have the lowest Effluent applied as it is the shortest month? Why is every other month over 300,000L applied per month? The earlier part of the report discusses 5,000L/day (with flow balancing, but the chart of page 50 shows more than 10,000L/day. Please confirm the design assumptions and provide more detailed and consistent waste water report. The community cannot effectively assess the impact with inconsistent information and lack of detail.
Appendix U Page 17: "However, based on initial correspondence from Sydney Water we understand that connection to town sewer option is not feasible for the site within the next five years minimum..."	<p>Please provide certainty from Sydney Water:</p> <ul style="list-style-type: none"> a) if sewer connection is on the horizon for Catherine Field and when that is likely to take place b) that such a sewer connection will be provided to the whole Catherine Field community c) if the development will not go beyond Stage 2 if a sewer connection is not put in place. <p>Given wastewater is a major consideration, a commitment from Sydney Water that a sewer connection be put in place before the commencement of construction of Stage 2 in 2034 is required. At the moment the only certainty from Sydney water, is that a sewer connection is at least 5 years away, and this could be 10 years or 15 years. Perhaps there is no certainty from Sydney water on sewer connection and the applicant is attempting to mislead the public in the EIS. An advantage to the community would be to provide a sewer connection to the whole of the Catherine Field, thereby providing a benefit to the school and the local community.</p>

6.3 Conclusion:

The waste water plan provided in Appendix U if the EIS:

- Lacks the detail required to adequately assess the impact on the local community,
- Inconsistencies on the commitment from Sydney water, lack of clarity on timeframes for the connection to sewer infrastructure which seems vague and “blue sky” at best.
- Actual management of waste water is not clear

The community believes that the fundamentals of the waste water assessment is flawed and unnecessary, given the school should be located in the adjoining Leppington Precinct where sewer infrastructure is already planned.

7 Noise And Vibration

This response relates to Appendix FF “Report 7280 – 1.3R Construction Noise & Vibration Management Plan (14th April 2022 Prepared by Day Design Pty Ltd)”.

7.1 Section 1.2 The Proposal

- *Section 1.2* (page 6) refers to the various stages being “*aligned to the growth in population*”. We contend this is false and misleading as all discussions with the proponents’ representatives (Midson’s) has clearly indicated on multiple occasions that the staged development reflects the growth of the school in terms of early enrolments in the lower grades, expanding the stages to the later school years as the kids move through the following years. It therefore has nothing to do with population growth of Catherine Field.
- In the same section under “*site access*”, there is a direct reference to a bus zone which is not on the site and therefore requires significant civil works on public land. They will need council approval to do this and be assured that the ratepayers will oppose public land being given over to a private enterprise for the operation of a business.
- Also within *Section 1.2* is a reference to *138 parking spaces* and depending on which report you read is insufficient under current school development rules (1 space for every FTE plus student parking requirements). The Social report states that there are 106 full time staff plus 12 casual so total parking spaces should be 158 **plus** visitor parking.

7.2 Review of Executive Summary

- In Executive Summary on (p7) “proposed hours of construction are standard working hours” This is very loose and open to interpretation. The document further states on P17 section 5.4.1 that “normal construction hours as defined by the EPA are 7.00am to 6.00pm Monday to Friday and 8.00 to 1.00pm on Saturday”.
- On P8 in the “Executive Summary” there is a direct admission (that there is potential at least on some occasions for noise emissions from construction works to exceed the noise management level at some residences during various stages of the works”. Whilst these are weasel words to minimise the impact of what will inevitably happen, I note that in all of the noise and vibration tables, the worst affected is labelled R4. The residents of R4 feel the consultation has been inadequate.

7.3 Development Description Section 4.2

- (*Page 12 section 4.2 Development Description Phase 1*) Demolition will take 2 weeks. Phase 2 Earthworks is estimated to take 4 weeks and phase 3 states; the time frames for construction of the five stages of construction Expected timeframe of 52 weeks, 40 weeks, 40 weeks, 52 weeks and 40 weeks for each of Stage 1 to 5 respectively. This totals to 224 weeks of construction and a further 6 weeks of demolition and earthworks. All up 230 weeks or 4.42 years of work over approximately 20 years total time frame. This is totally unacceptable to all of the neighbours and surrounding properties and is a violation of our right to quiet enjoyment of our homes. At present we have farmland over our back fence which is currently zoned RU4 primary production – small holding and that is precisely why we bought here on the boundary of a small village with all of those rural surroundings to enjoy.

7.4 Noise Criteria Section 5.

- *Section 5 Noise Criteria* and specifically 5.1 talks about the sound data loggers used to establish the background noise levels in locations A and B
- We note at the bottom of P13, 5.1 there is a reference to the data logger in position A being removed and never recovered containing data between Wednesday 25th August and 2nd September.
- Table 3 on p14 shows results for that same period, and due to the layout of the table, it seems that data is shown for Point A during a period when the logger was not present.

- The information is therefore either false or misleading. How can you show data that you supposedly don't have?
- We also note that there is data in Table 3 purporting to be between 15th September and 22nd September but there is no supporting data in Appendices B1, B2, B3, B4 for these dates also.
- At the bottom of p14 referring to Table 3 a statement about meteorological conditions appears contradictory as it talks about "where applicable rain or wind affected data has been removed from the assessment period" Given that the data in Appendices B1-B4 has a mixture of rain affected days and clear days it is confusing at best. Dates not covered in Table 3 also have a mixture of wet and dry days causing one to wonder if the dates used have been selected to achieve a desirable outcome for the development?

7.5 EPA Construction Noise guideline

- *Table 4 on p18 (Noise Management Levels from Construction Activities)* and included commentary seems to be worded in such a way as to minimise the importance of the information regarding the effects of noise on neighbours. The same can be said for Tables 5 and 6 which refer to the EPA vibration Guidelines. Table 5 refers specifically to preferred and **maximum** levels and *Table 6 - Transient Vibration Guide Values for Cosmetic Damage* actually refers to peak component particle velocity in frequency range of predominant pulse. This appears to be the maximum pulse speed in a particular range for cosmetic damage to result on near neighbours. The report then states that "in our opinion" the likely levels of intermittent vibration will not result in cosmetic damage to our homes.
- The affected neighbours find no comfort in the lack of professionalism with this study, relying on "our opinion" and "likely levels".
- The report states that it is unknown if any rock will be encountered during the earthworks, which will have a major effect on both noise and vibration.

The community feels it is being misled to believe noise and vibration is a "non-issue" despite a lack of study to quantify the issue. A detailed geotechnical survey is required in order to better inform the likely presence of rock during construction and the effect of excavating rock on vibration on homes and dwellings. The revised assessment must:

- Establish if rock will be present during construction
- Quantify the effect of encountering this rock during construction
- Identify the properties that will be affected by this noise and vibration.
- Provide a pre-construction assessment in order to establish baseline cracking or damage to the properties that may occur as a result of vibration from the construction work. Section 7.4 recommends "dilapidation reports" but this needs further detail and commitment.

7.6 Noise Emission Section 6

The second paragraph claims that readings presented will represent worst case scenario being, all equipment operating on the nearest boundaries unless otherwise stated. However, contrary to the worst-case scenario:

- Concrete breaking work, which will exceed the 46dBA limit, will likely go beyond 15-minute periods, given the "time is money" aspect of contracting work and equipment hire. It is false and misleading the minimise the noise effects on neighbours for breaking concrete.
- *Table 7 in 6.1* purports to represent sound power levels for each machine likely to be used in the demolition. There are 7 different types of equipment listed and each single piece of equipment and each individual type far exceed the noise levels recommended (46.dBA). Demolition work by

its nature requires multiple types of equipment operating during each part of the operation. Therefore, it is false and misleading to minimise the noise issue. The study needs to be realistic and then develop a plan to address the community issues, not minimise the issue and pretend there is no issue to address.

- Section 6.2 Phase 2 refers to excavation and earth works and again specifically excludes worst case scenario stating *"it is unlikely that this activity will take place at the same time as any other activity"*. It should be noted that again recommended sound levels are well and truly exceeded at **all** adjoining residential receptors during this phase. Further to this as the underground rock formations are unknown, how can they state with any certainty as to what the likely readings will be as the worst affected residential neighbours (R3 to R7 on the southern boundary) are likely to have significant earthworks right on this boundary in the known overland flood zone. This boundary is also the closest boundary that the buildings will be adjacent to. It should be further noted that only one piece of equipment in the excavation works list operates at under 100.dBA This whole section is again therefore misleading and deceptive in all aspects.
- Section 6.3 Phase 3 Construction. Table 11 of this section purports to represent sound power levels for typical construction equipment. The explanatory note below the table talks about the work being more dispersed across the site and therefore less concentrated but further claims that the resultant calculated noise levels are "worst case scenario". This is confusing and potentially misleading.
- Section 6.4 Is a summary of preceding sections and shows exceedance on all adjoining properties except R3 which has been deemed by Day Design to be an industrial property and subject to a different set of noise/vibration levels.
- The exceedance levels are above acceptable levels in all of the residential properties surrounding the site, many as high as 40 dBA above the acceptable levels. This is not acceptable to any of the neighbouring properties, and the number of affected properties won't be limited to R1 to R11. There are others close by that will also be affected.
- On P28 in the last paragraph notes that the rock breaking is not considered cumulatively as it is unknown at this stage if it will be required. This is double speak for it has been left out of the summary data in the report. On that basis the whole summary is misleading and deceptive.
- Section 6.5 Vibration Emission, Para 1. The following statement is made: *"It is difficult to accurately predict levels of ground borne vibration at remote location as there are many variables to consider including the surrounding terrain, strata, rock density, etc.* Given the earlier statement that the rock density etc. is unknown then all previous statements on vibration are effectively null and void and all comments on this matter is clearly misleading and deceptive. This must be addressed by assessing the extent of rock using a geotechnical core drilling survey of the site. The community must know what the impact will be.

7.7 Noise Control Recommendation Section 7

This section is an admission that the whole development does not meet the noise levels established in Section 5.5 and contains recommendations to control noise. Table 15 refers to possible control methods as being:

- Distance: reducing noise by 6 dB for each doubling of distance. – How do you reduce the noise by moving the work away from its planned position or relocation all of our houses until the construction is finished? This is an attempt to minimise the issue rather than address the problem with practical solutions.
- Enclosure: The noise assessment has been conducted on the noisiest items, and although enclosures can address specific equipment noise, it is not a solution for the bulk of the mobile

equipment that will be in use. A better solution than enclosed generators would be to establish electricity to the site early during construction so generators can be eliminated from use.

- Silencing: It is possible to get plant that is silenced more than others but how to you quieten the actual operation. You can fit a silencer to a rock breaker exhaust system, but that won't stop the noise of the rock breaker on the rock.
- It is reasonable to assume that contractors and their equipment will be chosen firstly on cost and then productivity. To suggest that the administrative control of first priority is silencing is both fanciful as well as misleading and deceptive.
- How will the development put in place controls to ensure only one machine at a time is operating? The community suspects you can't do this practically so this is an attempt to mislead without truly trying to address the noise issue. Tell us how it will work practically, not hypothetically.
- Periods of respite: contractors and machine hire generally operate on an hourly basis. To suggest that machinery will operate in 2 to 3-hour blocks is fictional and hypothetical. To suggest that all other construction activity will cease when a rock breaker is operating is also suspected to be fictional and impractical, attempting to minimise the issue without actually addressing with practical engineering solutions.
- Work Practices: All of these recommendations are administrative controls, which are at the bottom of the hierarchy of controls⁸. It is disrespectful to the community of Catherine Field to assume that minimal noise impacts will be experienced as a result of these soft administrative controls. The community demands a plan to address the ongoing noise that will result from construction and operation of the school.
- Heavy Vehicles and Staff Vehicles: The recommendations are impractical. Experienced logistics operators from the community believe that truck drivers won't follow these recommendations and will intentionally park incorrectly in order to be at the "front of the queue". Some trucks will also park as close as possible and take their rest break. A more formal plan is required.
- Community Relations: The community relations officer appointed must be available to take calls 24 hours per day, 7 days per week. If the local community is awoken at 2am by a rouge truck driver or earthmoving float, then the Community Liaison Officer must know about it contemporaneously.
- Section 7.5 Is a disclaimer to any knowledge of building construction and as such, all the recommendations for noise attenuation should be viewed in the light of this disclaimer. Many of the recommendations contained within, attest to that lack of knowledge and experience.

7.8 Noise and Vibration conclusion

The conclusion (section 8) states in part that "provided all of the recommendations in Section 7 are implemented then the noise and vibration will be minimised as far as reasonably practical". Given the community feels the recommendations are soft, administrative, fictional, hypothetical and impractical we are concerned that the noise and vibration exposure is also understated. The lack of understanding of the underlying presence of rock also demonstrates the exposure to vibration has not been adequately assessed to properly predict the vibrations likely to be experienced by all or any of the local community.

The comprehensive sections on noise showed in summary that exceedance of statutory noise limits will be experienced on a daily basis for at least 230 weeks. There is no guarantee anywhere in this document that noise and vibration statutory levels will be complied with. The report clearly shows that

⁸ <https://www.safetyandhealthmagazine.com/articles/16790-the-hierarchy-of-controls>

the local community is being condemned to years of unacceptable noise and no clarity on the effect of vibration damage to their homes.

7.9 Community demands:

- How will the development actively address the ongoing noise and vibration exposure as a result of construction and demolition on the Catherine Field community?
- The development must be clear how many properties will be affected by noise and which ones they will be (i.e the greater neighborhood and not just the properties adjacent to the site).
- Administrative controls are unacceptable at practically addressing the issue and at best hypothetically minimise the noise and vibration, with minimal to no practical outcome to the lives of the affected community. What will you do practically to reduce noise and vibration to acceptable levels?
- That an assessment of the presence of rock be surveyed and the vibration analysis completed
- That all potentially affected properties by vibration damage be assessed prior to construction. This assessment should go beyond what is expected for affected properties in case vibration travels in an unknown way
- That damage insurance is taken out by the development to repair any damage associated with vibration on property. Damage to homes, outbuildings, pools, fencing, concrete, paving etc should be covered.

Based on the details in the Martens overflow assessment. I object.

As a local who has lived in the area for decades I know and have seen the amount of overland flow that actually affects the site. Not a quick walk over of the block in Sept 2021, Nov 2021 and incomplete council studies.



The site is captured in the section 94 Contributions plan Trunk drainage 22/2/93 Map A which is captured under the correct Camden plan for the construction of drainage systems within the tributaries of Rileys creek.

The Overland Flow assessment by Martens concludes the only way to mitigate the natural tributary is “diversion pipes and a swale along the southern boundary of the site to capture and redivert the upstream overland flows to Catherine Fields road”

This is an incredibly stupid idea of rediverting tributary flows to the drainage system on Catherine Fields road (shown on the map). Firstly won't be capable of containing the water. More worrying and dangerous it will create a Niagara falls flow onto the neighbours and downstream locality of the new water pathway. This idea puts neighbouring properties and their families at danger of flood and general safety of people from this design.



The photos included show the extreme overland flow during heavy or lengthy rain periods. In 2022, this type of water over the road has occurred on three occasions.

To re-confirm, I object the prospect of a large scale school on Catherine Field road.

Name

Dear planner:

Re SSD 30759158

Regarding this proposal I object you to the false and misleading information provided to the community, to justify this proposal on rural land.

Firstly, on the department's website on the statutory compliance table it lists:

Development control plan: Relevance: See details under DCP, Appendix C of EIS.

However, there is no appendix C attached to the EIS. So it fails the statutory requirements of this table

Further on, it lists objectives of the Camden LDP. It lists a statutory reference as:

Noise from child care centres on educational establishments.

The relevance here is this application is made for and described as on p 12 of the EIS. For

“Consent for a Co educational establishment” and will comprise an “early learning centre”.

Described in the social impact statement, from a survey of staff and students who will use

“the expanded commercial activity of Minarah college as being from outside the local area”.

Under the Camden LEP and its terminology description, there is no listing of

“Co educational establishment” under the act? The community's opinion is that closest description under the act is “Information and educational facility”, as there is nothing in this application showing it will be used or open to the local community as a school or provide service to any fee-free members of the local community as a regular school would. So its not a school.

Also, under the LEP and act the application for a “Early learning centre” is it fails to be captured in the dictionary or the act.

In fact a child care centre based upon Muslim (religious) teaching is not permitted under the LEP act or guidelines. (g)religious purposes,

Considering the amount of misleading terminology trying to hide the commercial use of the site described as a school to the community, the amount of false information displayed should be sufficient grounds to reject the application.

I declare I have not made or received any political donations.

Your sincerely,

Attached:

Appendix C of the EIS

Camden Local Environment Plan 2010

Appendix C of the EIS

STATUTORY COMPLIANCE TABLE

Statutory Reference	Relevant Considerations	Relevance	Section in EIS
Environmental Planning and Assessment Act			
Section 1.3	<p><i>To promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources</i></p> <p><i>To facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,</i></p> <p><i>To promote the orderly and economic use and development of land</i></p>	<p>The proposal seeks to develop land located within a strategic location in Sydney's South West Growth Centre for the purpose of a new school, namely Minarah College, which will provide necessary employment and educational opportunities in a projected growth area. The proposal will deliver social and economic benefits to the region, with potential environmental impacts appropriately mitigated, managed, and minimised to avoid unacceptable impacts on the local community and the environment.</p> <p>The proposal addresses the principles of ESD including the precautionary principle, intergenerational equity, conservation of biological and ecological integrity and improved valuation, pricing and incentive mechanisms in accordance with the requirements of the <i>Environmental Planning and Assessment Regulation 2021</i>.</p> <p>The proposed development will provide a new educational establishment on currently underutilised land. The project will be appropriately staged to accommodate the projected growth of the region.</p>	Throughout EIS

Statutory Reference	Relevant Considerations	Relevance	Section in EIS
New and Upgraded Roads/ Railway Lines and Traffic generating development near residential and other sensitive land uses	1. Where new and upgraded roads or traffic generating developments are proposed near residential and other noise sensitive land uses, acoustic assessments are to be undertaken in accordance with the NSW EPA Road Noise Policy.	An assessment against NSW EPA's <i>Road Noise Policy</i> has been undertaken by Day Design and is included in the Environmental Noise Impact Assessment.	Appendix N, Appendix FF and Section 6.9
Noise from Child Care Centres and Educational Establishments			
	1. Development applications for child care centres and educational establishments must be accompanied by an acoustic report.	The proposed development is for a new educational establishment that includes an Early Learning Centre. As such an Environmental Noise Impact Assessment has been prepared by Day Design Pty Ltd.	Appendix N, Appendix FF and Section 6.9
	2. Child care centres and educational establishments are to be designed to not exceed the following noise levels: LAeq (15 minutes) noise level from children in the outdoor areas of the site must not exceed the background LA90 sound level by more than 10dBA when measured at the boundary of the nearest or most affected residential premises (or if the boundary is more than 30 metres from a residential dwelling, at the most affected point within 30 metres of a residence).	An assessment of the LAeq noise level was undertaken by Day Design and is depicted in the Environmental Noise Impact Assessment.	Appendix N, Appendix FF and Section 6.9

Statutory Reference	Relevant Considerations	Relevance	Section in EIS
	<p>The zone objectives are as follows:</p> <ul style="list-style-type: none"> 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. 	<p><i>Environmental Planning Policy (Transport and Infrastructure) 2021.</i></p> <p>The proposed development is consistent with the RU4 zone objectives as it aims to encourage and promote diversity and employment opportunities and is designed in a way to minimise conflict between adjoining residential dwellings. The proposed development has been carefully designed to minimum amenity impacts to residents to the surrounding the site through, setbacks, siting and orientation, 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.</p> <p>Furthermore, the proposal seeks to meet the objectives of the project through delivering an inclusive educational establishment in a rapidly growing part of Sydney, delivering 1,580 student spaces and significant employment opportunities. The proposal will deliver a built-for-purpose school on currently underutilised land in the South West Growth Area.</p>	

Statutory Reference	Relevant Considerations	Relevance	Section in EIS
	<p>State Environmental Planning Policy (Biodiversity and Conservation) 2021</p> <p>State Environmental Planning Policy (Precincts – Western Parkland City) 2021</p> <p>Camden LEP 2010</p>		
	<p>Draft environmental planning instruments:</p> <p><i>None relevant to the proposed development</i></p>	N/A	
	<p>Relevant planning agreement or draft planning agreement</p> <p><i>None relevant to the proposed development</i></p>	N/A	N/A
	<p><i>Environmental Planning and Assessment Regulation 2021 – Part 8 Division 5</i></p>	<p>This EIS has been prepared in accordance with Part 8 Division 5 of the Environmental Planning and Assessment Regulation 2021.</p>	Noted.
	<p>Development control plans:</p> <p>Camden Development Control Plan 2019 (CDCP 2019)</p>	<p>See detail below under development control plan.</p>	Appendix C
	<p>The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality.</p>	<p>The likely impacts of the development including the environmental impacts on the natural and built environments, and social and economic impact on the locality are assessed in detail within the EIS.</p>	Section 6
	<p>The suitability of the site for the development</p>	<p>The suitability of the site for the proposed development is demonstrated in the EIS</p>	Section 3 and Section 7

- Associated site landscaping and public domain improvements;
- An on-site car park for 138 parking spaces; and
- Construction of ancillary infrastructure and utilities as required.

The key objectives for the proposed development and the way in which these have been achieved are summarised in **Table 3**.

Table 3 Project Objectives

Project Objective	Proposed Development
Deliver an educational establishment that caters for students of the Catherine Field community and neighbouring areas, and is staged to accommodate growth	<p>Minarah College will accommodate 1,580 students, 840 in primary school and 680 in high school. Also included in the proposal is an Early Learning Centre (ELC) for 60 students and a School for Specific Purpose (SSP) for 20 students.</p> <p>New schools are urgently needed, with the NSW Government estimate that 77,798 student places are needed by 2036.</p> <p>The new school will be constructed in stages, growing in line with growth in the local population. It is anticipated that the school will be delivered in the following stages:</p> <ul style="list-style-type: none"> - Stage 1 will be delivered in 2025 and accommodate 300 students - Stage 2 will be delivered in 2031 and accommodate 650 students - Stage 3 will be delivered in 2035 and accommodate 980 students - Stage 4 will be delivered in 2038 and accommodate 1,280 students - Stage 5 will be delivered in 2040 and accommodate 1,580 students <p>Minarah College will meet a fraction of the demand. Families of Western Sydney deserve the highest standards of education, and the proposed new school would offer the latest, Science, Technology, Engineering, Art and Math (STEAM) and Vocational, Educational and Training (VET) opportunities, to prepare students for a diverse range of university and vocational careers.</p>
Provide a safe and inclusive educational establishment that accommodates people of all creeds and has strong ties with the local community	<p>Minarah College – Catherine Field will be an inclusive school welcoming all students and families from the community and leverage the teaching expertise of Minarah College – Green Valley.</p> <p>The educational rationale for Minarah College is to provide an exciting and inclusive curriculum, meeting</p>

Camden Local Environmental Plan 2010 - NSW Legislation

NSW legislation

Camden Local Environmental Plan 2010

Current version for 30 June 2022 to date (accessed 19 July 2022 at 14:12)

[Back](#) - [pl-cg1.Zone_RU4](#)

Zone RU4 - Primary Production Small Lots

- Objectives of zone**
 - 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.
- Permitted without consent**

Home occupations
- Permitted with consent**

Aquaculture; Bed and breakfast accommodation; Cellar door premises; Dual occupancies (attached); Dwelling houses; Extensive agriculture; Farm buildings; Farm stay accommodation; Garden centres; Home-based child care; Home businesses; Home industries; Intensive plant agriculture; Landscaping material supplies; Plant nurseries; Roads; Roadside stalls; Rural workers' dwellings; Secondary dwellings; Stock and sale yards; Any other development not specified in item 2 or 4
- Prohibited**

Agriculture; Air transport facilities; Amusement centres; Animal boarding or training establishments; Camping grounds; Car parks; Caravan parks; Commercial premises; Correctional centres; Crematoria; Eco-tourist facilities; Entertainment facilities; Exhibition homes; Exhibition villages; Extractive industries; Freight transport facilities; Function centres; Heavy industrial storage establishments; Highway service centres; Home occupations (sex services); Industrial retail outlets; Industries; **Information and education facilities**; Local distribution premises; Mortuaries; Port facilities; Recreation facilities (indoor); Recreation facilities (major); Residential accommodation; Restricted premises; Rural industries; Service stations; Sex services premises; Storage premises; Tourist and visitor accommodation; Transport depots; Vehicle body repair workshops; Vehicle repair stations; Warehouse or distribution centres; Waste or resource management facilities; Wharf or boating facilities; Wholesale supplies

https://legislation.nsw.gov.au/view/html/inforce/curr/inforce/pl-cg1.Zone_RU4

the production, processing or sale (whether by retail or wholesale) of only those goods that have been manufactured on the land on which the industrial or rural industry is located.

but does not include a warehouse or distribution centre.

Note—

see clause 5.4 for controls relating to the retail floor area of an industrial retail outlet.

industrial training facility means a building or place used in connection with vocational training in an activity (such as forklift or truck driving, welding or carpentry) that is associated with an industry, rural industry, extractive industry or mining, but does not include an educational establishment, business premises or retail premises.

industry means any of the following—

- (a) general industry,
- (b) heavy industry,
- (c) light industry,

but does not include—

- (d) rural industry, or
- (e) extractive industry, or
- (f) mining.

information and education facility means a building or place used for providing information or education to visitors, and the exhibition or display of items, and includes an art gallery, museum, library, visitor information centre and the like.

intensive livestock agriculture means the keeping or breeding, for commercial purposes, of cattle, poultry, pigs, goats, horses, sheep or other livestock, and includes any of the following—

- (a) dromedaries (restrained),
- (b) feedlots,
- (c) pig farms,
- (d) poultry farms,

but does not include extensive agriculture, aquaculture or the operation of facilities for drought or similar emergency relief.

Note—

intensive livestock agriculture is a type of **agriculture**—see the definition of that term in this Dictionary.

intensive plant agriculture means any of the following—

- (a) the cultivation of irrigated crops for commercial purposes (other than irrigated pasture or fodder crops),
- (b) horticulture,
- (c) turf farming,
- (d) viticulture.

Note—

intensive plant agriculture is a type of **agriculture**—see the definition of that term in this Dictionary.

jetty means a horizontal docked walkway providing access from the shore to the waterway and is generally constructed on a piered or piled foundation.

I object to D.A: SSD-30759158.

In the Planning Secretaries Environmental Assessment Requirements Part 13 Stormwater and Wastewater says the application should;

- Provide an integrated water management plan
- In consultation with local council and other authorities
- Detail designs for the site onsite/ offsite treatment
- Demonstrate compliance with local council and water authority requirements and downstream impacts
- Provide full hydraulic details and detailed plans for proposed works, that comply with relevant standards of council or water authority.

In the EIS page 43 the applicant has “discussed with Camden Council” this application.

In the D.A, the expert report from Martens Consulting Appendix U states “Estimated design wastewater generation rates based upon proposed site usage numbers provided by client” page 8, and a site field investigation on 25/11/2021.?

The application even in stages to a common person is for:

- a child care centre and associated canteen and commercial food preparation area of approx. 1000sqm. Including nappies, sanitary products and wipes, which in this proposal ,can only be disposed of in the wastewater system.
- An administration building, hall and outside school hours care facility using this proposal
- A single storey commercial canteen and food preparation area of approx. 1000.sqm servicing 1,580 students plus 150 staff as well as community uses and sports functions on weekends as shown in the architectural plans

Appendix B.

- A number of science laboratories with dedicated technician using a full range of chemicals and resultant chemicals from experimentation, that without other listed methods of disposal can only be disposed of through the wastewater system.

Page 14 of the report “Generation is calculated based on occupation during each stage with the following assumptions;”HOW?

“1. Site use is limited to students and teachers on weekdays”

These certainly don’t meet the SEARs requirements to “provide full hydraulic details”. In fact, this report doesn’t provide any relevant details of Inflow. Probably because the client has kept them confidential.

Sect 4. Brief Wastewater Options Assessment

4.2 – Connection to Sydney Water system states “Initial correspondence from Sydney Water”. Is not feasible within the next five years. Where is this documentary evidence? Concurrence is a critical requirement, yet this Martens report does not provide reliable evidence, even if it did exist, Sydney Water would probably refuse concurrence to the proposal.

Sect 4.3 – Pump Out

Would require daily trucking of stored onsite effluent, creating greenhouse gas emissions from anaerobic activity in the tank and excess emissions from large trucks transporting the waste across Sydney to the North Head treatment plant.

Camden Council has refused several Child Care, Day Care and commercial applications in the area for pump out applications. E.g the child care centre application on Byron road Leppington was rejected by Council for temporary pump out while waiting for sewer mains to be installed. If this application was approved, the community members previously affected would have reasonable grounds to ask why has this application received preferential approval! The question would be why were other applicants denied and discriminated against?

Sect 4.4 – Onsite Treatment Plant

The Martens report fails to provide hydraulic details of the system as listed above and the volumes created by the administration and commercial food preparation area of 1000sqm

It fails to show how it complies with the relevant standards or the view of Sydney Water.

It also fails to report the site is flood affected and has overland flow of stormwater which it is proposing to place the treatment plant and irrigation area within.

Resulting in the school's sewerage in rainfall events flowing downstream into other properties and the Hawkesbury Nepean catchments.

The idea of wet weather storage will be entirely incorrect based upon this years rainfall patterns on the site and the Bureau of Meteorology forecasts for continuing above average rainfall patterns on the area.

Sect 7 – Further Approvals

The Martens report states “Prior to CONSTRUCTION of a site sewerage management system an approval under section 68A will be required, where final design specifications for effluent treatment and reuse systems shall be submitted to council”.

How could this recommendation and conclusion by Martens possibly be considered when, as explained above, the proposal for any or all three of the above systems, that don't define the inflows or volumes the systems required, the type of treatment system and the means of how it will be treated be approved? Can be approved at this stage.

The final disposal by trucking off site and requires licenses. Or the installation of some kind or proposed treated sewage disposal system for more than 1500 people of on the flood affected site or within the overland flow of the creek tributaries at the rear boundary of the site. Also shows the proposal can't comply with any relevant standards or acceptable community acceptance.

Sect 8 – References page 29

Refers to one of the relevant standards this report relies upon being “the Dept of Local Government, NSW EPA Environment Health and Protection Guidelines, on-site sewage management for single households”. Is this proposal based on sewage management for single households as stated or is this a misprint??

This highlights the lack of appropriate detail required for a State Significant Development and the facts as outlined above of the commercial nature of the application as being Guidelines for “onsite sewerage management for single households” which can form no part of this application.

Members of the community who have looked at and discussed this approval have suggested no requirements of SEARs have been met in this report and that the consultants should be referred to the professional body for the amount of misleading and false information that has been placed for public examination for this D.A.

After it has been refused for lack of relevant information, false and misleading statements and refusal to provide documentary evidence from Sydney Water as to concurrence and consideration of the proposal

" Plans show; Nearly 1000m2 of commercial food preparation areas, science laboratories and chemical stores and preparation areas, including a commercial laundry and personal hygiene disposal areas. Purposely left out of sewerage management reports and their disposal requirements under the Act. "

I declare I haven't received or given any reportable donations

Thank you

Director, Social and Infrastructure Assessments

Planning and Assessment

Department of Planning and Environment Locked Bag 5022 Parramatta NSW 2140

Attention: Nahid Mahmud

21st July 2022

Application Number : SSD-30759158 - Minarah College

I request that my private information (name and address) not be disclosed.

I declare that I have not made any reportable political donations

I am **opposed** to the granting of planning approval for this project – Mariah College

Given that I and others have only had 4 weeks to review the thousands of pages provided by “expert Consultants” in support of this application, I have chosen to review four reports in detail and make some general comments and will leave it to others to review the remaining documents.

Based on my review of the reports Attached:

Appendix B Review of Overland Flow Assessment (I have also attached several videos in support of my review)

Appendix AA Review of Social Impact Assessment

Appendix R Review of Dam Dewatering Assessment

Appendix FF Review of Construction Noise & Vibration Report

Sections of each report contains cut and paste directly with rebuttals within the documents below each section.

As a general comment I say that I was deeply disappointed at the quality of the reports and the voracity of the data included. It is apparent that nearly all sections and comments appear to be cut and paste efforts with little facts among the wall of words. In fact it seems to be that the quantity of the words becomes important in wearing the readers down so there is actually little attention paid the important facts.

There is a high degree of repetition regarding the references to the rules and no real attempt to answer the questions pertaining to those rules.

There is also a lot of euphemisms rather than calling things as they are resulting in skirting around all of the non-compliances that clearly exist.

I can only assume that all of the other reports follow the same format. I have read parts of other reports and they all seem to be similar

On the basis of my reviews, I cannot support the granting of any DA related to this application

Construction Noise and Vibration review for SSD-30759158
Construction Noise And Vibration Report-- Day Design

1.1 Overview

I refer to Report 7280 – 1.3R Construction Noise & Vibration Dated 14th April 2022 Prepared by Day Design Pty Ltd:

Page 6 of the report Section 1.2 refers to the various stages being “aligned to the growth in population”. I contend this is false and misleading as all discussions with the proponents representatives (Midson’s) has clearly indicated on multiple occasions that the staged development reflects the growth of the school in terms of early enrolments in the lower grades then expanding the stages to the later school years as the kids move through the following years.

In the same section under site access, there is a direct reference to a bus zone which is not on the site and therefore requires significant civil works on public land. They will need council approval to do this and be assured that the ratepayers will oppose public land being given over to a private enterprise for the operation of a business.

Also within Section 1.2 is a reference to 138 parking spaces and depending on which report you read is insufficient under current school development rules (1 space for every FTE plus student parking requirements). The Social report states that there are 106 full time staff plus 12 casual so total parking spaces should be 158 **plus** visitor parking.

In Executive Summary on (p7) “proposed hours of construction are standard working hours” This is very loose and open to interpretation. The document further states on P17 section 5.4.1 that “normal construction hours as defined by the EPA are 7.00am to 6.00pm Monday to Friday and 8.00 to 1.00pm on Saturday”

On P8 in the “Executive Summary” there is a direct admission (that there is potential at least on some some occasions for noise emissions from construction works to exceed the noise management level at some residences during various stages of the works”

Page 12 section 4.2 Development Description Phase 1 Demolition will take 2 weeks. Phase 2 Earthworks is estimated to take 4 weeks and phase 3 states; the time frames for construction of the five stages of construction Expected timeframe:

<u>Stage 1</u>	<u>52 weeks</u>
<u>Stage 2</u>	<u>40 weeks</u>
<u>Stage 3</u>	<u>40 weeks</u>
<u>Stage 4</u>	<u>52 weeks and</u>
<u>Stage 5</u>	<u>40 weeks</u>

This totals to 224 weeks of construction and a further 6 weeks of demolition and earthworks all up 230 weeks or 4.42 years of work over a 20 plus years total time frame. This is totally unacceptable to all of the neighbours and surrounding properties and is a violation of our right to quiet enjoyment of our homes. At present we have farmland over our back fence which is currently zoned RU4 primary production – small holding and that is precisely why we bought here on the boundary of a small village with all of those rural surroundings to enjoy.

Section 5 Noise Criteria and specifically 5.1 talks about the sound data loggers used to establish the background noise levels in locations A and B

I note at the bottom of P13, 5.1 there is a reference to the data logger in position A being stolen and never recovered containing data between Wednesday 25th August and 2nd September.

Table 3 on p14 shows results for that same period. One of these statements must therefore be false and misleading. How can you show data that you supposedly don’t have?

I also note that there is data in Table 3 purporting to be between 15th September and 22nd September but there is no supporting data in Appendices B1, B2, B3, B4 for these dates also.

At the bottom of p14 referring to Table 3 a statement about meteorological conditions appears contradictory as it talks about “where applicable rain or wind affected data has been removed from the assessment period” Given that the data in Appendices B1-B4 has a mixture of rain affected days and clear days it is confusing at best. Dates not covered in Table 3 also have a mixture of wet and dry days causing one to wonder if the dates used have been cherry picked to achieve a specific set of numbers?

The writer has no specific training or qualifications in the area of noise and vibration so all comments here are a layman’s view of the information provided:

Table 4 on p18 (Noise Management Levels from Construction Activities) and intervening commentary seems to be worded in such a way as to minimise the importance of the information regarding the effects of noise on neighbours. The same can be said for Tables 5 and 6 which go to the EPA vibration Guidelines. Table 5 refers specifically preferred and **maximum** levels and Table 6 - Transient Vibration Guide Values for Cosmetic Damage actually refers to peak component particle velocity in frequency range of predominant pulse. This appears to be the maximum pulse speed in a particular range for cosmetic damage to result on near neighbours. The report then states that “in our opinion” the likely levels of intermittent vibration will not result in cosmetic damage to our homes. The writer as an affected neighbour, finds no comfort in such weasel words as “our opinion” and “likely levels” when the report also states that they have no idea of what if any rock will be encountered during the earthworks which will have a major effect on both noise and vibration. The writer therefore concludes that these statements are misleading and deceptive.

Section 5.5 on p20 Project Noise Trigger Levels states “**In our opinion** the most relevant noise and vibration management levels for this development are those outlined in Sections 5.4.1 and 5.4.2 and are summarised as follows...:” The report then goes to 5.5.1 Noise Management Levels being 46.dBA for residential receptors for 15 minute time periods. I should be noted that “residential Receptors” is a euphemism for families living in surrounding houses.

Section 6 NOISE EMISSION:

The second paragraph claims that readings presented will represent worst case scenario being, all equipment operating on the nearest boundaries unless otherwise stated.

Section 6.1 Refers to demolition works and specifically excludes worst case scenario stating that “concrete breaking is unlikely to take place at the same time as any other activity” but in all cases it will exceed the 46.dBA noise limit and I am confident that it will not stop after 15 minutes as all equipment used will most likely be on hourly hire contracts as this is standard building work practice. Table 7 in 6.1 purports to represent sound power levels for each machine likely to be used in the demolition. There are 7 different types of equipment listed and each single piece of equipment and each individual type far exceed the noise levels recommended (46.dBA). Demolition work by its nature requires multiple types of equipment operating during each part of the operation. Misleading and deceptive.

Section 6.2 Phase 2 refers to excavation and earth works and again specifically excludes worst case scenario stating “it is unlikely that this activity will take place at the same time as any other activity”

It should be noted that again recommended sound levels are well and truly exceeded at **all** adjoining residential receptors during this phase. Further to this as the underground rock formations are unknown, how can they state with any certainty as to what the likely readings will be as the worst affected residential neighbours (R3 to R7 on the southern boundary) are likely to have significant earthworks right on this boundary in the known overland flood zone. This boundary is also the closest boundary that the buildings will be adjacent to. It should be further noted that only one piece of equipment in the excavation works list operates at under 100.dBA This whole section is again therefore misleading and deceptive in all aspects.

Section 6.3 Phase 3 Construction

Table 11 of this section purports to represent sound power levels for typical construction equipment. The explanatory note below the table talks about the work being more dispersed across the site and therefore less concentrated but further claims that the resultant calculated noise levels are “worst case scenario”. This is confusing and could be misleading.

Section 6.4 Is a summary of preceding sections and shows exceedance on all adjoining properties except R3 which has been deemed by Day Design to be an industrial property and subject to a different set of noise/vibration levels.

The exceedance levels are above acceptable levels in all of the residential properties surrounding the site, many as high as 40 dBA above the acceptable levels. This is not acceptable to any of the neighbouring properties.

On P28 in the last paragraph notes that the rock breaking is not considered cumulatively as it is unknown at this stage if it will be required. This is double speak for it has been left out of the summary data in the report. On that basis then the whole summary is most likely misleading and deceptive.

Section 6.5 Vibration Emission

Para 1. The following statement is made: “It is difficult to accurately predict levels of ground borne vibration at remote location as there are many variables to consider including the surrounding terrain, strata, rock density, etc.” Given the earlier statement that the rock density etc is unknown then all previous statements on vibration are effectively null and void and all comments on this matter is clearly misleading and deceptive.

Section 7: NOISE CONTROL RECOMMENDATIONS

This section is an admission that the whole development does not meet the noise levels established in Section 5.5 and contains recommendations to control noise. Table 15 refers to possible control methods as being:

Distance: reducing noise by 6 dBL for each doubling of distance. – How do you reduce the noise by moving the work away from its planned position or relocation all of our houses until the construction is finished? This is in most cases impossible to do.

Enclosure: How do you enclose the earthworks or the building? Perhaps they can build sound walls around everyone’s houses? Again these suggestions are both impractical and in most cases impossible.

Silencing: It is possible to get plant that is silenced more than others but how do you quieten the actual operation. You can fit a silencer to a rock breaker but that won’t stop the noise of the rock breaker on the rock.

It is reasonable to assume that contractors and their equipment will be chosen firstly on cost and then productivity. To suggest that the first priority is silencing is both fanciful as well as misleading and deceptive.

The statement that they operate should only one machine at a time is just as silly and in practice will not happen so again it is misleading and deceptive.

Periods of respite: no one hires a machine on an hourly basis and then only operates it in 2 – 3 hour blocks, again it just won’t happen. The example quoted that if a rock breaker is operating in a specific location, then all other construction activities will cease in that area. Pull the other one – It plays Dixie

Work Practices: All of these recommendations are possible but again they just won’t happen as talking loudly and shouting is the only way to be heard over equipment noise on a building site.

Heavy Vehicles and Staff Vehicles:

All of these recommendations are great but not very practical. As a logistics operator with 40 years experience I can assure everyone that the truckies will do whatever they please and will intentionally park where they shouldn't so they get the "express service" to get them off site ASAP. All transport operators know that if you want to get in and out quickly then you need to be first in line so they will arrive early and park anywhere. If they are bringing product long distance then they will try to get as close as possible to the site or on it before hitting the bunk.

Community Relations

This is all good and well but, not much of it will work in accordance with all these recommendations.

Section 7.5 Is a disclaimer to any knowledge of building construction and as such, all the recommendations for noise attenuation should be viewed in the light of this disclaimer. Many of the recommendations contained within, attest to that lack of knowledge.

8.0 Conclusion

The conclusion states in part that "provided all of the recommendations in Section 7 are implemented then the noise and vibration will be minimised as far as reasonably practical" This is a motherhood statement that means nothing. The totality of this document shows that Day Design cannot accurately predict the vibrations likely to be experienced by all or any of the **"RESIDENTIAL RECEPTORS"**

The comprehensive sections on noise showed in summary that all **RESIDENTIAL RECEPTORS** will have statutory noise limits exceeded on a daily basis for at least 230 weeks and most likely more. There is no guarantee anywhere in this document that noise and vibration statutory levels will be complied with and as such it must be discarded in its entirety as it can only be treated as a totally misleading and deceptive document.

On the basis that this document contains factual errors and is misleading and deceptive I oppose the granting of permission to develop Mariah College application number SSD-30759158.

Review of Document for SSD-30759158

Dam Dewatering Assessment: 268 & 278 Catherine Fields Road, Catherine Fields, NSW P2108320JR03V01 – April 2022 Prepared by Martens Consulting Engineers

This review is based solely on the specified above document and appendices.

2.2 page 8 refers to “site observations of the lot at 268 Catherine Fields Road from the walkover conducted on 19 November 2019 were....” This claim is likely false & misleading as the date is highly contentious.

At the time of the alleged walkover there was another large dam on the site that was dewatered and filled in, shortly before the property was taken possession of by the development proponents. If Martens had completed the site walkover and observations on the date claimed, then they should have observed the third dam which was the biggest of the three. This aerial Imagery date is 22/03/2018 The third dam is circled but all 3 dams were dry at the time as it was taken in a drought period.

At the time of removal, the third dam was about 1/3 to half full.



It should also be noted that the aerial photo on **p18 of the Martens Report**, whilst not date stamped appears to be taken just after the dam was dewatered as the ground where the dam was located is mostly bare as is the area to the north of the dam that was levelled and used to fill in the dam. I am unaware of exactly when this shot was taken but recent alterations to my pool area are showing and they were completed late December 2019

. Further to this the following claims were made in the same section:

-A site dam was located in the central portion of the site. The dam appears to have been constructed by excavating an elongated basin. No embankments were observed.

A second dam with an elongated shape had been filled with silt and was heavily vegetated

The reference to the second dam above is also currently not correct as the dam whilst partially silted currently has water in it.

“No embankments were observed.”

This statement is also false & misleading: There are embankments on the western end of both dams and there is a large embankment on the south side of dam 2.

-

3.1 Dam Water Volume Estimate: The numbers are not accurate as dam 2 currently has water in it and the depth in dam 1 exceeds the “*visual assessment depth of 0.75m* and a likely gradual deepening towards the dam centre.”. The reviewer measured the depth at 1.0m at approximately 1m from the dam edge so there is considerably more water in the dams than has been calculated in this report thus making the report false and misleading.

3.3 Sampling Methods – General states “*Sediment and water samples were placed in laboratory supplied jars, and placed into an esky with ice following collection and dispatched under chain of custody, to a NATA accredited laboratory the day of sampling*”. This excerpt from the document claims that all the samples (5 soil and 1 water) were placed in an esky with ice and despatched on the 22nd Nov. The chain of custody document listed in the appendices states that the samples of soil and water were placed in an esky with ice under chain of custody. There is no record of the water sample on the custody document. The chain of custody form also states the samples had no ice. – This is false & misleading and further to this the chain of custody form shows the delivery “by Courier”, was received by the laboratory of the 25th Nov. Where were the samples in the intervening period?

The chain of custody record makes no reference to a water sample being either despatched from site or received at the lab. No record of a water sample shows anywhere in the laboratory tests shown in the appendices. The claims associated with this operation are therefore false and misleading.

3.5.2 Dam Water

“Dam water sample contaminant levels were below their LOR and less than the ANZG 90% limit.

The laboratory certificate is provided in Attachment B”. There is no record of the dam water sample being on the chain of custody form or any laboratory testing records attached to the report so it must be concluded that the tests did not occur, so the report is again misleading and deceptive.

5.0 Discussion & Conclusion

I oppose application SSD-30759158 based on my conclusions noted in this report which cannot be relied upon as there are too many errors in the process, timing concerns, details wrong or missing and factually incorrect. This report should be discarded in its entirety and not form part of the approval process.

This report is a layman's review of a complicated document and contains local observations from a neighbouring property on the southern boundary.

The Southern Boundary of 268 Catherine Fields Rd. (Lot 11) is subject to overland flow (flooding) as AEP 1% which in the Definitions refer to as:

"AEP Annual exceedance probability: the probability of a flood event occurring within a year. A 1% AEP flood has a 1% chance of occurring in any given year".

I must take issue with this categorisation against what actually occurs in this overland flow watercourse. It is many times more frequent than that. Over my 12 years of living here, I cannot remember any one year passing without at least one event occurring, given that the last few years have been unusually wet, more than 3 events have occurred in each and every year during this period.

3.5 Discussion

Point 3: Claims the flood levels across the site as: The 1% AEP flood depth across the site varies from 100 to 500 mm. Local observations vary from this as depths have well exceeded 500mm in intense rainstorms I would estimate at least 750mm at times adjacent to the western boundary of my property.

This particular photo was taken on 10th Dec 2021.



4 Flood velocities along the southern boundary of the site and Catharine Fields Road are up to 1.5 m/s in the 1% AEP flood event

I consider this statement inaccurate and believe the flow rates well exceed this level.

“Hydraulic hazard is generally H1 across the site and increased to H2 along the Catharine Fields Road in the 1% AEP flood event. The highest hazard of H4 is observed at the inlet of the culvert crossing on Catharine Fields Road”.

I suspect that the H1 category is easily exceeded along the southern boundary of Lot 11, adjacent to my western boundary where there is a depression in the ground where the overland flood flows between the trees and would easily sweep a child or elderly person off their feet and away so H3 is much closer to reality. Even adjacent to my eastern boundary a H2 rating is more realistic.

The statement above is incorrect as the risk in Catherine Field Rd is stated to be H2 then also states it goes to H4 at the inlet of the culvert crossing on Catherine Field Rd. It is hard to take any report seriously where the details are so sloppy that they cannot even spell the location correctly.

3.3.2 Proposed Conditions

“The existing conditions model was modified as follows to simulate proposed conditions”:... As stated in previous sections, observations suggest that the existing conditions model does not accurately reflect correct current flows so, any modelling of future occurrences using this as a base cannot produce an accurate picture of how the water is likely to behave in the future.

Whilst I am unable to make specific comments on the claims in this section it is very apparent that the large increase to the pipe flow capacity under Catherine Field Rd. will create significant flooding issues for the neighbours on the western side of the road. A common sense view would suggest that the size of the buildings and huge roof areas will increase the runoff significantly in terms of volume and peak flooding and the velocity of the water will also increase dramatically due to the proposed drainage works as distinct from the current heavily grassed terrain shown below



NB: Mown section is maintained by the writer to help with land drying out, vermin control and reduction of fire hazard. To date the proponents have made little to no attempt at maintenance on either of the properties or reducing the fuel load for fire prevention.

I note that there is a proposal to include a bus zone on the eastern side of Catherine Field Rd. which must continue to flood as there is currently data suggesting over 1m of water in this area. It is proposed to increase the drainage size under the road but the increased volume and velocity of water coming in as a direct result of the development will likely counteract this measure. IT SHOULD ALSO BE NOTED THAT THE LOCAL RESIDENTS WILL OBJECT STRONGLY TO PUBLIC LAND BEING GIVEN OVER TO PRIVATE ENTERPRISE FOR THEIR OWN PRIVATE USE, SPECIFICALLY A BUS STOP.

3.4 Results

Flood mapping results (flood levels, depths, velocities, provisional hazard categories and water level afflux / impacts) for the critical duration 1% AEP flood event in existing and proposed conditions are provided in Attachment C, with map references summarised in Table 3

The claimed results cannot be relied upon as they are likely false and misleading as the baseline data is disputed (100mm to 500mm across the block) I contend from actual observations that it is more likely to be 200mm to 750mm. That said, the conclusions reached lead to significant concerns:

3. "The 1% AEP flood depth across the site varies from 100 to 500 mm and the maximum flood depth of 1.1m is observed at the inlet of the culvert crossing on Catharine Fields Road".

The depth claimed across the site is disputed. The current flood depth of 1.1m on Catherine Field Rd. is not disputed but, given the increased volume and velocity of water resulting from the development, even if the flooding level is reduced by the increased drainage capacity under the road, the velocity must increase further as there will not be all of the current grasses or earth to absorb and /or reduce the velocity and any bus stop that is proposed in this flood area poses significantly increased risk to life in that area. I contend that the risk will therefor remain at H3 to H4 and not reduce to H1 as suggested.

4. "Flood velocities along the southern boundary of the site and Catharine Fields Road are up to 1.5 m/s in the 1% AEP flood event".

The report suggests that the velocity will remain around 1.5 m/s. If you increase the volume via the development and also increase the velocity on site by replacement of heavily grassed virgin land with buildings, concrete play areas, lawn areas and a gravel access road right up the centre of the current floodway then the flooding will be much worse for a shorter duration.

5. "Hydraulic hazard is generally H1 across the site and increased to H2 along the Catharine Fields Road in the 1% AEP flood event. The highest hazard of H4 is observed at the inlet of the culvert crossing on Catharine Fields Road".

Whilst much of this claim is disputed, given that the report acknowledges a H4 risk already exists on part of Catherine Field Rd. near the Northern boundary of Lot 12. Even if the height of the flooding is reduced, the velocity of the water must also increase based on the increased outflow capacity under Catherine Field Rd.

3.5.3 Offsite Flood Impacts

1. There are minor offsite impacts in the 1% AEP flood event as a result of the proposed development.

The writer cannot understand how the impacts of above can be categorised as minor. Given that there are already significant flooding issues associated with the site and Catherine Field Rd, even a minor increase is still an increase so is unacceptable. Any description using minor is therefor misleading and deceptive.

2. Flood impacts on Catharine Fields Road would be considered acceptable as the proposed road upgrade work has lowered the flood hazard category from H2 to H1, which has a beneficial effect on the existing trafficability of the road.

How can they suggest that any flood impacts are acceptable. Claiming that the development will lower the flood level from H2 to H1 is clearly incorrect as they admit in point 5 above that the report that a flood level of H4 currently exists on Catherine Field Rd associated with the runoff from 268/278 Catherine Field Rd. One of these statements is therefor untrue.

3. The proposed development and road upgrade works provide a net benefit to flood affectation of the residential properties downstream of Catharine Fields Road. The minor localised impacts of above 20 mm on these properties are considered acceptable and insignificant in the context of flooding in this locality .

This statement is both conflicting and confusing. How is a claimed 20mm plus increase in flooding, a net benefit to the downstream residential properties? Given that they are increasing the flow under the road by approximately 13 times the claimed 20mm+ increase in flooding is ridiculous Whilst the writer has no training and is unable to test the claim physically, The 20mm seems to be a massive understatement given the volume increase.

4. There is a small area of offsite impact above 20 mm near the south western corner of the site on the neighbouring property. This impact is likely to be associated with accuracy of the modelling result and is expected to be resolved by running a higher resolution model (ie. finer grid cell size) and incorporating with a more detailed grading design at CC stage

Again this statement is conflicting and confusing. I conclude that the "neighbouring property" is actually across the other side of the road and if the flooding here is above 20mm how will rerunning the modelling actually change anything? The term "above 20mm" appears in both points 3 and 4 but, there is no attempt to quantify exactly how far above 20mm will flooding actually occur. It is reasonable to conclude that this whole section is really designed using weasel words to try to minimise the concern around this serious flooding issue.

5. "The changes to the offsite flood conditions are of immaterial significance and are considered acceptable"

Again, more weasel words and to state the flood conditions are “of immaterial significance” would be laughable if it wasn’t so serious. To go on to say they “are considered acceptable” begs the question acceptable to whom? Certainly not to the residents who are already battling serious flooding issues. Any sensible person knows that adding buildings to rural land won’t reduce the flooding but will increase it. The more you improve the flow conditions on and around the site, the more you increase the downstream flooding issues for the adjacent neighbours.

5. Summary and Recommendations

1. The proposed upstream overland flow diversion system effectively renders the site development area flood free in the 1% AEP flood event.

Nowhere in this report do the authors state that they will not push the flooding onto the adjoining properties along the southern boundary which is a major concern of all these residents. This report merely states that they will remove the flooding risk from their property and is therefore unacceptable without a guarantee to those residents that they won’t bear the consequences.

2. The proposed development area of the site is flood free in the 1% AEP flood event.

Ok for the proponents but offers nothing to the adjoining residents.

3. The proposed development would have acceptable offsite flood impacts.

Clearly false and misleading.

4. Compliance with Council flood planning level requirements for building levels are achieved.

Good for the proponents but bad for the neighbours.

We recommend:

1. Structures below the site flood planning level are to be constructed using flood compatible materials in accordance with Council requirements.

I interpret these words to mean that although the site development areas are “flood free” all of the areas below the “development areas” may not be, hence being constructed in “flood compatible materials. All of the adjoining properties are below this level so are now at greater risk where no to little risk existed in the past.

2. An updated TUFLOW hydraulic model with detailed earthworks and should be simulated at detailed design stage.

Should this approval succeed then all of the neighbouring properties need a guarantee from both the proponents and the Consent Authorities that no development shall take place unless protections are enacted so that no one property is worse off than is their current situation.

Given that all of the neighbours are concerned about the modelling and this document provides no comfort in that regard I object most strongly to the application being given consent.

In appendices: **Preliminary Overland Flow mapset**

Maps 2 to 4 purport to show current overland flows but are not reflective of our lived experience. The flow is in part consistent in these maps which show different characteristics of the water flows being depth, velocity etc. As stated earlier in this response, we take issue with the characteristics on the maps being volume, depth and velocity rather than the path taken for this part of the flow in the overland water course.

Our lived experience is that a significant body of water emanating from around the dam near the top of the hill comes down the unmade roads on the northern end of Lot 19 and House number 16 Heatherfield Close and empties into Heatherfield Close. Some flooding is shown on the maps but not how it got there in the Cul De Sac but, the level shown is well below what we have seen on most occasions.

It should be noted that none of this flow shows on any of the maps and it appears not to go anywhere from there.

This water is actually collected in 2 pits which are connected, flowing into a stormwater drain which flows underground to about halfway down the old easement on the northern boundary of 10 Heatherfield Close where the pipe emerges beside the southern boundary of 260 Catherine Field Rd. The water then spreads and flows overland across this property to join the massive flooding occurring on Catherine Field Rd emanating in large part from the overland watercourse on 268 Catherine field Rd. None of this flow across 260 Catherine Field Rd appears on the maps either.

This body of water has not therefore been considered in the proposed flow maps either and is indicative of the multiple inaccuracies in the data and the report.

Again It is impossible to support this flooding report and its conclusions and therefor I object to the development proceeding on that basis.

See photo below for what was a small to moderate storm is like in Heatherfield Close but well below what we have witnessed on many occasions. This was taken on December 10 2021 the Camden Airport weather station recorded 30.4mm on that day



I oppose this application SSD-30759158 on the grounds this report contains too many mistakes, inaccuracies, False and misleading statements to be considered a reliable document on which to approve this application

Appendix AA Submission SSD-30759158
Review of Social Impact Assessment - April 2022
Prepared for: Minarah College

Executive Summary:

2.0 Proposed Development

Refers in part to the staged development *“growing in line with growth in the local population”* This statement is in conflict with statements made by Midson’s representatives that staged construction is to correspond with student progression through the school years and has nothing to do with population growth. If it were population driven, no school would be required here before 2040.

There is a series of bullet points talking about what the proposal is and contained within is the following:

- An on-site car park for 138 parking spaces. Given the requirements for 1 parking space for each FTE position and various student requirements, the detailed table of staffing on p42 indicates 96 FTE’s and 12 casuals. If 12 casuals constitute FTE’s then just for staff 108 spaces are required. Add student requirements Years K to 11 inclusive 15 and Year 12 – 22 spaces. This totals to 145 **plus visitor parking** so the parking is well short of statutory requirements or, the detailed table is not correct?

3.0 DEMOGRAPHIC PROFILE & CHARACTERISTICS

A separate, Catchment Analysis prepared by Lawrence Consulting...

The writer has not found this table in the supporting documents but data has been used in the Social Report to claim certain areas are within a catchment area of 10 klm². This is disputed in the following:

Camden – Ellis Lane. Most of Camden is not within the stated radius and parts of Ellis Lane are also outside the stated radius.
Hoxton Park Is outside the said 10klm catchment radius

The proposed school is an Islamic School and there are at least another 4 other Islamic Schools either in or adjacent to the claimed catchment area. Given that another large Islamic School is already approved for development on Byron and Ingleburn Rd Leppington in the Camden LGA why is this school even necessary? It should be noted that the 2016 Census Data relied upon for most of the demographic analysis and shown in Appendix A has no Islamic persons listed in Catherine Field or the Camden LGA. The writer is not suggesting that there are no Islamic persons in this area but, no data suggests that there is either an error in the compilation of the table or the numbers did not suit the narrative. The total Islamic persons in the identified catchment is claimed to be 10,617 (6.0% of the population) but the writers’ lived experience is that the majority of these persons reside in the North Leppington area and Liverpool LGA which are well served by current and planned Islamic schools. All of these schools are laying claim in part to the same Islamic persons in their catchments. It is unclear to the writer why this proposal even exists? It is certainly based on community need.

4.0 Community Consultation

The report states that: 945 flyers were delivered to residential dwellings and 8 commercial premises surrounding the subject site. There has been significant lack of awareness of the development, therefore I question the distribution of these flyers, as many residents have stated they have not received any communication, flyers or otherwise including adjoining properties. I became aware of the project via the local newspaper and joined up to the website from the email address in the article. The report goes on to say that “35 people registered to participate with an online session with 28 joining the session.” The original link to the session did not work and I am told that there was another link sent out 1 minute prior to the commencement of the online session. I cannot verify this as I had already linked into the session and was waiting online. I waited online for 15 minutes and when it became apparent that this link was not included in the session, I was forced to install Zoom on my computer and sign in consequently I was only able to listen to the last 15 minutes of the session. I contacted Midson’s via email expressing my displeasure and received a follow up phone call from Toby at Midson apologizing for the issue and saying that they wanted to try to establish contact with the near neighbors.

The report states “Detailed letters delivered with the flyer to 17 adjacent neighbours inviting them to a dedicated online information session for immediate neighbours only.” I will state categorically that I did not receive this letter either. In consultation with all other adjacent neighbours, I can confirm that 1 flyer was received without any detailed letter. This property adjoins the development properties on the southern boundary. In conversations with adjacent property owners I have been unable to establish that any other invitations were received. The report states that there were no attendees to the session. This was due to the fact that no one was aware of the meeting being scheduled. I was able to organize another meeting involving my family and several other stakeholders either side of my property but that did not resolve any of our concerns.

The report states “Stakeholder correspondence by email to individuals and organisations and groups including provision of an information sheet and community Q&A document;

however it provides little detail relating to the discussion or outcomes.

There were several contacts between Midson representatives and me by email and phone. I have records of all the emails should proof be required.

The document goes on to provide some detail around the issues raised during several conversations including:

- Timing and details around the planning process, construction program and staged opening of the school;
 - Concern re vibrations from heavy vehicles during construction;
 - Traffic and parking concerns including increased traffic, delays around the school, safety issues (pedestrians), and parking provision on the site;
 - Operational characteristics of the proposed school including hours of operation including OOSH care; use of facilities by the wider community for sports etc; noise and light spill; number of staff; student characteristics; curriculum and uniform;
 - Building design including proposed fencing to maintain **privacy** for neighbours;
 - Environment and the potential cumulative impacts on the environment and animal habitats;
 - Strategic context and infrastructure and whether the proposed school would impact on plans for rezoning of surrounding land for residential uses; and whether the school would align with community need in a semi-rural area,
- Building design including proposed fencing to maintain privacy for neighbours.

It should be noted that there has been little to no meaningful responses on all/any of these issues other than to attempt to minimize them and in most cases suggest that they are not really problems at all. via the “expert consultants” reports

Flooding was raised on numerous occasions but has been ignored completely in this report

5.0 SOCIAL IMPACT ASSESSMENT

The subject application has been assessed against the following criteria:

- • Way of Life
- • Community
- • Accessibility
- • Culture
- • Health and wellbeing
- • Surroundings
- • Decision-making systems
- • Issues raised during consultation
- • Public interest benefits

Considered by whom and where?

By way of more detail:

Way of Life.

- Will privacy, peace and quiet enjoyment significantly change for the neighbours and the local area, particularly changes to people’s daily lives and activities during both construction and operation.

This was not addressed with the community and I fail to see how a change from Primary Production – Small Holding ie: farmland over my back fence to the construction of a 1580 student school would not be a dramatic change to my privacy and quiet enjoyment and a change my and my family’s as well as all neighbours lifestyle dramatically.

- How will people be affected if traffic/parking demands or noise levels change.

The report acknowledges that there will be additional noise through traffic and parking demands but states this is in line with planned future development. There has been no future development plan released for this area of Catherine Field. The plan does not explain how people would be affected so this has not been addressed. It should be noted that the “tolerable” noise level of 46db quoted in the Noise and Vibration Report will be exceeded by up to 40db during construction which is scheduled to take 224 weeks, plus 2 weeks demolition and 4 weeks of earthworks (all going to plan) over the 5 stages of the development. So the noise levels would be appalling if this project gains consent. Traffic and parking demands have not been addressed and would lead to considerable dislocation for all adjacent properties.

Community: o Will the school result in marked changes to community composition or character? Yes

o How will demand for support services (e.g. child care, social infrastructure) change? Unknown at this time

o Will there be an impact on community cohesion, identity or sense of place? **Yes absolutely**
None of these matters have been addressed with the community

• Surroundings: o Will there be impacts to public open space, public facilities or streets? **Yes**

o Will there be changes to environmental values, visual landscape, or aesthetic values? **Yes**

o How will nearby residents experiences changes in their surroundings during construction? **The impacts will be enormous**

o Will construction or operations affect public safety for pedestrians, children, drivers or cyclists? **Yes** There is no drainage, kerb and guttering or footpaths or bicycle lanes or paths in the vicinity of the school or anywhere in the suburb not to mention flooding and dramatically increased traffic as a result of the development consequently there is a significantly increased risk for all of these groups.

Issues raised during consultation

It would be fair to categorise this as being ineffective at best and negligent at worst as none of the issues raised during consultation, (if that is what you call it) have been addressed directly but they have been used to give the consultants a guide as to what to talk down in their various reports.

Public interest benefits

The writer sees no public interest benefits in this application Given that this is a private business posing as a school with numerous commercial interests operating after school hours including weekends well outside of what would be regarded as a normal school operation.

How many fee free places are the proponents offering at the school that could qualify it as a public interest benefit.

6.0 ENHANCEMENT, MITIGATION & MONITORING

The proposed school is unlikely to generate any long term or significantly negative social impacts that require mitigation. While it is acknowledged that the proposed development represents a significant change of use and intensification of use of the site, that intensification of use is not unexpected given planned future character of the area for higher density residential development, and the need for infrastructure such as schools to support the future population.

This statement is misleading and deceptive. There are currently no plans for higher density residential development in this area and there is currently no sewer connection to this area and no plans to connect it in the near to medium term so to suggest that it will happen anyway is a nonsense, misleading and deceptive.

Any impacts generated by the intensification of use of the sites are likely to be associated with noise and traffic, which have been separately addressed in reports accompanying the application (including Acoustics and Traffic and Parking).

Another misleading statement. The reports have gone to great lengths to minimise what will be the real impacts of this development proposal. To suggest that the writing of numerous reports will fix it is quite frankly misleading and deceptive. The acoustics will exceed what the reports have determined as tolerable 46db by up to and additional 40db, making 86db a likely common occurrence during 230 weeks of demolition and construction. Traffic will be an absolute disaster and the parking does not meet the statutory requirements.

Negative short-term impacts that may be generated are likely to arise with the construction and fit out of the school buildings over the staged construction of the College, should the application be approved.

To describe 2.4 years of actual construction over a proposed 20 odd year 5 stage plan is anything but short term

Any potentially negative impacts associated with construction can be mitigated through conditions of development consent.

How do you mitigate the noise from a rock breaker? Perhaps put a silencer on the engine but that does nothing for the percussive noise from the actual operation. All of the mitigation strategies in the noise and vibration report just won't happen in a practical situation. This whole section is misleading and deceptive rubbish.

The potential positive social impacts generated by the proposed school will only be realised if consent for the application is granted.

Which positive social impacts are being referred to? Conversely all of the negative impacts will not happen if the application is refused.

7.0 CONCLUSION

With the implementation of the recommendations, impacts associated with noise and disturbance, and traffic and parking can be minimised such that there are not material social impacts generated by the proposed development. There are no reasons from a Social Impact perspective, to refuse the application

How do you trivialise 4.4 years of actual construction, over 800 car trips to and from the school - twice a day, weekend events such as sports up until 09:00pm on weekends including light disturbance by suggesting that there are no material social impacts associated with this development application? False and misleading by any measure. (End of Executive Summary)

1.0 INTRODUCTION

The first 4 pages (Introduction) refer to the rules and guidelines required but contains little by way of content in outcomes. Near the end of Introduction the following appears

In addition to the above, issues raised during the community consultation process and public interest benefits are also considered.

This was covered in the executive summary but it is not clear where this actually happened or the public interest benefits are actually declared. I consider that there is no clear public benefit given it is a private commercial operation.

The Catherine Field area is an area earmarked for future growth as part of the South West Growth Area Precinct and estimates prepared by Profile id estimate the number of dwellings in Catherine Field Precinct will increase by an average of 123 dwellings per annum to 3,101 in 2041 and the number of dwellings in Catherine Field North Precinct will increase by an average of 189 dwellings per annum to 5,723 in 2041

What appears lost in this report is the timing of this growth. Predictions are for **2041**

2.0 SITE AND PROPOSED DEVELOPMENT

The site has an area of 4.5 hectares and is irregular in shape. The sites currently contain residential dwellings and associated outbuildings

It should be noted that these properties are zoned RU4 Primary production small holdings They do have residential dwellings but they are/were working farms prior to purchase by the proponents.

Development surrounding the site is predominantly residential, with large, semi-rural allotments to the immediate north, west, and east, and smaller residential allotments to the south.

Incorrect descriptions as all the properties to the north, east and west are RU4 and the properties to the south are R5 – large lot residential

There are currently no schools located in the suburb of Catherine Field.

The closest primary schools are:

- Barramurra Public School (K-6) at 65 O'Keefe Drive, Oran Park, approximately 3.2km (straight line) and 5.2km driving distance from the subject site
- Gledswood Hills Public School (K-6) at 78 The Hermitage Way, Gledswood Hills, approximately 3.2km (straight line measure) and 4.2km (driving distance) from the subject site
- St Justin's Catholic Parish Primary School (K-6), 3 Hollows Drive, Oran Park, approximately 3.5km (straight line measure) and 5.7km (driving distance) from the subject site.

Missing from above list in the claimed school catchment are 11 Primary Schools: St Clares Catholic Primary Narellan Vale, Narellan Vale Public, Mawarra primary school, Narellan Public School, Currans Hill Public School, Denham Court Public School, Leppington Public School, Austral Public School, Rossmore Public School, Harrington Park Public School, St Gregory's Primary School Gregory Hills. Thus makes the claims above misleading at best.

There are no public high schools in the area, and there is only one independent High School – St Benedict's Catholic College (7-12), 1 Hollows Drive, Oran Park, approximately 3.5km (straight line measure) and 5.7km (driving distance) from the subject site.

What is defined as "the area"?

I have used the same criteria as is used in the school catchment referred to in **3.0 DEMOGRAPHIC PROFILE & CHARACTERISTICS** on P1 of the Executive Summary. The statement above is also wrong with 14 Schools missing: **public high schools** not accounted for within the claimed Minarah College catchment - Elderslie High, Mt Annan High School, Elizabeth Macarthur High School Narellan Vale, John Edmondson High School Horningsea Park: **Independent Schools:** Mount Carmel Catholic College Varroville, Magdalene Catholic College Smeaton Grange, St Anthony of Padua Catholic College Austral, Unity Grammar Austral, Arrahman College Austral, Al Faisal College Austral, Macarthur Anglican College Austral, St Gregory's high School Gregory Hills, Approved new Amity College Leppington and Hope Christian School Heath Rd. Leppington. This report nominates a total of 4 schools in "the area" where the writer has counted a total of 25 schools roughly 6 times as many. This report is false and misleading.

2.2 Proposed development

Minarah College Catherine Field will be a co-educational K-12 school accommodating 1,580 students, 840 in primary school and 660 in high school. There will also be an Early Learning Centre (ELC) for 60 students and a School for Specific Purpose (SSP) for 20 students. The new school will be constructed in stages, growing in line with growth in the local population

Parts of the description have been left out in terms of Canteen, Library, Halls, and Sporting Fields. Given that the halls and sporting fields are available for hire out of school hours and on weekends and the canteen may be available also, it is clear that this application does not fit the definition of a school and is clearly a commercial enterprise.

3.0 SOCIAL LOCALITY

A separate Catchment Analysis Report prepared by Lawrence Consulting on behalf of Minarah College Green Valley identifies that the proposed school is likely to have a catchment area within a 10km radius of the subject site. This identified catchment area takes into account existing Islamic schools in the area...

This "Catchment Analysis Report" has been mentioned several times but I am unable to find any such report amongst the documents provided that support this application. If the study took into account the 4 Islamic schools in or adjacent to the stated catchment of 10km radius, how can a 5th Islamic school be justified on religious grounds? Those schools catchment areas should be excluded from this catchment.

There is nothing about the proposed school, that is likely to result in any impacts on levels of relative disadvantage.

Correct statement: This is a private Islamic educational facility and will be fee paying. They could however offer fee free places and have an impact on relative disadvantage.

Principle 1 – Surveillance

The attractiveness of crime targets can be reduced by providing opportunities for effective surveillance, both natural and technical.

Given That this area is in the lowest category for crime currently this is unnecessary and perhaps the application for this educational Facility will actually increase the risk for adjacent neighbours

The proposed school buildings and school grounds will include the installation of electronic surveillance of all building entrances and exits, and entrances and exits to car parking areas in the form of 24 hour CCTV monitoring.

Casual surveillance to surrounding properties and Catherine Fields Road will be improved due to the increased activity on the site, and from upper levels

This means that our privacy will be compromised especially from the CCTV and the 2nd level

4.0 Community Consultation

This has been well covered in the executive summary and requires no further comment.

1. The current road condition and poor infrastructure would not support additional traffic
2. The danger of having an 80k zone used by large trucks and peak hour traffic with no allowance for turning lanes.
3. Current dangerous conditions of traffic travelling along Catherine Fields Road at speed, has eventuated in serious accidents and fatalities.

5.1 Way of Life

The proposed education establishment is unlikely to generate any significant impacts in terms of privacy as the two school buildings have been located centrally within the site, and oriented towards a central forecourt to minimise overlooking to adjoining properties. In addition to the location and orientation of the school buildings away from adjoining residential dwellings and site landscaping, privacy screening is proposed for south facing windows, where required, to mitigate direct overlooking.

This statement is clearly false and misleading for the following reasons: Residents on the southern boundary will be greatly overlooked ensuring no privacy. The claim of centrally located buildings is patently inaccurate, on the southern boundary the building is well away from the boundary at the front but bends and orients on an angle towards the boundary. At the eastern end, the building encroaches on the overland floodway and comes with 8m of the boundary with a building height approaching 9.5 m. Privacy screening is shown only on the bottom sections of the windows and a person standing would see directly over them. They are also not solid in construction and would still allow vision

However it goes on to say on the next page.

Page 23. States:

"It is likely that noise will be generated through the stated construction of the proposed college and in the operation of the school, particularly when children are playing in outdoor areas and from school bells and the PA system."

It then goes on to state that these are only temporary impacts, however given staged construction will be present over the duration of the staged development. The noise that they have called out is not associated with development but the daily running of the school.

It then goes onto say that:

"It is reasonable to assume that there will be some noise emissions from the Early Learning Centre and the proposed school, largely limited to hours of operation when there will be children on site. Noise will be generated through school bells and children playing on the outdoor play areas. These emissions represent potential social impacts for residents and tenants of the properties immediately surrounding the subject site."

Noise and disturbance from the site to surrounding properties was raised as an issue during the consultation process. A Construction Noise & Vibration Management Plan prepared by Day Designs Pty Ltd accompanies the application. That Report considers potential noise and vibration emissions associated with demolition, excavation and construction of the proposed College associated with heavy machinery such as excavators, dump trucks, cranes, cement mixers rock breakers etc. The Report includes a number of recommendations to minimise noise emissions and disturbance to nearby commercial and residential premises, including periods of respite, work practices; management of heavy vehicles and staff vehicles; dedicated community relations officer; noise complaint procedures; noise and vibration monitoring

The reliance on the Noise & Vibration Report from Day Designs suggests that the person preparing this report did not read it. Noise levels are up to 40db's above the considered "tolerable levels" of 46db. If the writer is happy with up to 86db can I respectfully suggest she buy my house and see how that goes. The N&V report is hotly disputed and contains multiple inaccuracies and false and misleading statements.

Provided the recommendations in Section 6 of this report are implemented, the level of noise and vibration from the construction works at Minarah College, 26/-278 Catherine Fields Road, Catherine Field, NSW will be minimised as far as reasonably practical in accordance with Australian Standard AS2436:2010 "Guide to noise and vibration control on construction, demolition and maintenance sites" and the EPA's Interim Construction Noise Guideline 2009 and Assessing Vibration: a technical guideline 2006, as detailed in Section 4 of this report

The recommendations contained are not practical and will most certainly be ignored if approval is gained. It should be noted that generally the machines are not the main contributor to the noise but the cutting and hammering resulting from the operation of that equipment is generally worse. Add both together and what do you get - 86db etc.

Page 25

The report states: that noise can be controlled through considered positioning of speakers throughout the site, oriented away from residential dwellings and through controlled hours of use of outdoor play area being confined to school hours only.

However, page 41 states the hours of operation for the Multi purpose Hall to be 5pm to 9pm M-F and 9am to 10pm Saturday and Sunday and the playing fields 9am to 9pm – 7 days.

Also on the same page reference is made to noise reducing strategies and dot point 6 states:

- sound barrier walls made of 6mm FC sheeting

This proposed wall on the southern side of the building is in the centre of the overland flood zone and will likely be washed away in the first downpour after construction

Parking is provided on the site for:

- 86 staff (22 spaces, including one accessible space in the northern carpark and 64 spaces, including 2 accessible spaces, in the southern car park);
- 15 spaces for the Early Learning Centre;
- 37 student parking spaces
- 5 bus parking spaces
-

Given this information, why is there a table on P42 titled **Staff Numbers** that nominates 106 staff and there is requirement of 1 car space per FTE in the regulations. Is the table false and misleading or are the car parking spaces incorrect?

Under the same heading "Way of Life" The report then moves into the traffic issues related to the school. I am not prepared to go through this in detail as I am aware that others are dealing with it in depth however, with 1580 students and potentially 80% -90% travelling using private vehicles. If we take the mean average -85%, that would mean 1343 students would be dropped off during a one hour window morning and afternoon, with a known peak period of 15 minutes within that hour of drop offs. If we assume 1.5 Kids per car then there is likely 1733 car trips on every school day. Catherine Field Rd cannot cope with this.

In summary, the Proposal is supportable on traffic planning grounds and is not anticipated to result in any adverse impacts on the surrounding road network

Given the current diabolical condition of Catherine Field Rd I believe that above summary statement is false and misleading.

5.2 Community

The reports states that "The proposed school will generate a temporary increase in population of the suburb and the immediate vicinity during school hours". The report stated earlier that we need schools to service our area owing to the limited number of schools. This was shown to be patently false. On CENSUS NIGHT the great majority will be reported in other suburbs and LGA's so should not be even referred to as temporary increases in population.

The proposed College will alter the character and identity of the local area as it represents a departure from the established use of the sites as residential allotments.

It will clearly alter the character and identity of the local area as the ratepayers will need to pick up the tab for the increased local traffic coming from other LGA's. These are not residential allotments. Again false & misleading

There is nothing about this change that is unexpected, given the planned continued growth in the area, and planned change from large allotment/semi-rural residential to an area with increased density, and population While the proposed development represents an intensification of use of the site compared to existing uses, there is nothing about it that is likely to generate any impact in terms of social cohesion and integration within the community.

This statement is very misleading as there is no planned rezoning or growth in the near term in this area . The growth will come around 2040. In the intervening period we are all happy to keep it RU4.

On balance, the proposed development represents a positive social impact in terms of the provision of education and community facilities for the community.

There is no balance here and it does not represent a positive social impact as we like it just the way it is. There are existing community facilities here in Catherine Field and this commercial enterprise adds nothing to our community. How many free places are they offering to the community?

5.3 Accessibility

Refer notes from page #27, relating to concentration of traffic within 2 x 15min windows each week day, with 80-90% of students travelling by private car, one student per car with low levels of car pooling.

With only 30 spaces available for kiss and drop it is logical to assume queues travelling to and from the school, there has been no mention of how to manage the traffic with only 1 entrance and 1 exit on Catherine Fields Road, or alternate routes should there be an accident or road closures during heavy rain. The majority of this section contains no information of significance other than the references to the questionnaire given to the Green Valley campus of Mariah College. It should be noted that the student numbers there are less than half of what is proposed here.

Page 36

Heath & Wellbeing

The guidelines pose the questions of potential impacts to health and wellbeing.

- Will community health be improved by public access to school facilities, eg sport facilities?
- Will there be benefits from better active transport and the ability of local children to live near the school.

Neither of these questions have been properly addressed.

The points made include:

- Recreation areas for students – the question in this section relates to the community not the students of the school
- Multi purpose hall and sport fields will be available for hire by the broader community. There are already existing sports fields, and a hall which services the community. I believe that these facilities will not be available to the community and this is only a ruse to get approval. In any case they could easily make the hire rates unacceptable to discourage community use.
- The report calls out temporary health impacts generated associated with noise disturbance, demolition and construction, however does not cover off the impacts of having a school in a rural area and the impacts to health and wellbeing for the residents, once the school has been built.
- The report states "that the proposed development does not generate any negative impacts in terms of health and wellbeing", however no detail is provided to justify or support this statement. I expect that my and my family's health will suffer as a direct result if this development gains approval.

5.4 Culture

Moreover, the facade needed to create a distinct entry point to the school, as this would be the predominant pedestrian entry. Through the design process emerged two distinct architectural motifs for the front facade. These were perforated brickwork and perforated aluminium screening. The patterned textural quality of each medium could be utilised to express some of the

culturally significant themes that are significant to Minarah College. The patterned brickwork is a nod towards the intricate geometries prevalent in Islamic architecture.

There is currently no Islamic architecture in the Camden LGA much less the Hamlet of Catherine Field. This design is ugly and brings no association to the existing architecture or culture in the area.

There are no existing or proposed bicycle pathways in the area and no ability for safe cycling to and from the school, however council has requested parking for 48 bicycles.

It is safe to assume that over time if approval is granted there will be some upgrades to assist safe cycling but this is a longer term issue. If approval is not granted then this is irrelevant.

It is anticipated that school facilities, specifically the multi-purpose hall and sports fields will be made available for hire by the broader community on weekends

I note the term anticipated, not guaranteed so I won't hold my breath waiting.

The proposed development does not generate any negative impacts in terms of the health and wellbeing of the community

Stated as an absolute: Privacy, quiet enjoyment are negatives we cannot avoid. This a false and misleading statement.

5.6 Surroundings

Due to the lack of existing or proposed bicycle pathways in the area, there is no apparent ability for safe cycling to and from the proposed school. However, as requested by Council, bicycle parking is included in the masterplan for 48 bicycles in the form of 24 double racks

The first part of this statement is a negative in terms of safety but its Camden Council's fault? No mention of: no footpaths, kerb a gutter or drainage?

The Guidelines suggest consideration of the potential impacts of a school development on its surroundings, in particular:

- Will there be impacts to public open space, public facilities, or streets? Yes
- Will there be changes to environmental values, visual landscape, or aesthetic values? Yes
- How will nearby residents experience changes in their surroundings during construction? Noise. Disruption
dislocation and parking
- Will construction or operations affect public safety for pedestrians, children, drivers, or cyclists? Yes

Nearby residents and tenants may experience disturbance associated with the proposed fit out and additions to the existing buildings. As detailed in Chapter 5.1, these impacts are temporary, and are able to be controlled through conditions of development consent.

Change the "may" to "will". What are the proposed changes to existing buildings? Earlier in the report it stated that they would be demolished. I am glad that 4.4 years of actual demolition and construction are "temporary". If you also believe that Development Consent will control all of that disturbance, then I have a bridge I can sell you.

The proposed works will be contained wholly within the existing buildings and within the sites, it is not envisaged that the construction process will result in any impacts in respect of public safety for drivers, or cyclists

This statement is false and misleading as there is a considerable amount of civil works to be completed on and around Catherine Field Rd and all of this will cause inconvenience as traffic control will be required and public safety will be at risk for cyclists, motorists and pedestrians. It must be remembered that there are no footpaths, cycleways, or made road edges around here and all the road verges flood during moderate rain.

5.7 Decision making systems

Guidelines highlight the importance of the local community to be informed about decisions.

Can affected people make informed decisions and feel they have power to influence project decisions, including elements of project design

This point will be sorely tested by this process. We have the ability to make informed decisions but whether that opportunity is afforded to us in terms of power and influence cannot be answered at this time.

.1 Issues raised during consultation

As detailed in Chapter 4.0, the following issues were raised during the consultation process:

- Timing and details around the planning process, construction program and staged opening of the school;
- Concern re vibrations from heavy vehicles during construction;

- • Traffic and parking concerns including increased traffic, delays around the school, safety issues (pedestrians), and parking provision on the site;
- • Operational characteristics of the proposed school including hours of operation including OOSH care; use of facilities by the wider community for sports etc; noise and light spill; number of staff; student characteristics; curriculum and uniform;
- • Building design including proposed fencing, and window screening to maintain privacy for neighbours;
- • Environment and the potential cumulative impacts on the environment and animal habitats;
- • Strategic context and infrastructure and whether the proposed school would impact on plans for rezoning of surrounding land for residential uses; and whether the school would align with community need in a semi-rural area,

Not all issues have been included in this report that have been raised. Issues around the lack of engagement with the community, poor communication, making misleading statements around the amount of engagement, Road conditions and safety concerns, potentially an increase to traffic accidents and potential loss of life owing to increase in traffic, with speeding vehicles in a 80km speed zone, drainage, storm water management and waste management and more. Flooding also seems to have been missed here.

Operational Characteristics:

Hours of operation:

	Hours of Operation	Days	
The different parts of the College will likely have the following hours of operation: Use			
ELC	7am - 6pm	Mon - Fri	
OOSH	7am - 6:30am	Mon - Fri	
School Hours	8:20am - 3:20pm	Mon - Fri	Staggered lunch and recess
Multi purpose Hall	School hours and 5pm - 9pm	Mon - Fri	
Multi purpose Hall (weekend)	9am - 10pm	Sat and Sun	Training and competition and community use
Primary Hall	8:20am - 3:20pm	Mon - Fri	
Sports field (during the week)	School hours and 5pm - 9pm	Mon - Fri	
Sports field (weekend)	9am - 9pm	Sat and Sun	Training and competition

These hours are not the normal hours of a school and reflect the commercial nature of this enterprise

Light Spill:

It is not anticipated that a significant volume of activities will be held on the site at night such that lighting will be required outside of the core hours of the college

False and misleading. The playing fields will be used 9.00 to 21.00 Sat & Sun which will cause significant light spill for the neighbours. The security section also referenced lights burning all night.

Staff Numbers

This table conflicts with earlier representations in the document and whilst it seems to be a comprehensive list it also conflicts with all the other reports so which is correct?

5.9 Public interest benefits

- The proposed school provides a number of public interest benefits, including provision of a modern education facility for the existing and future school population;

Public interest benefits don't exist unless the College is offering public school places ie: fee free places. If they are - how many and which documents show this information?

- In the census data attached there are no Islamic persons listed in the suburb of Catherine Field or the Camden LGA and the 10,000 claimed in the catchment area are also covered by four other Islamic colleges

The Report refers to a modern education facility, however it states in the report that most of the children will be travelling from outside the local Catherine Field area, considering low density in the area and an ageing population. How is there a public benefit in this

It also adds that there will be an increased casual surveillance of surrounding streets, but no explanation of what that means or how they plan to provide the surveillance.

Improvements to the existing site are justified and a matter of opinion. Those improvements are not in line with the surrounding community, or a rural residential lifestyle.

6.0 Enhancement, Mitigation and Monitoring

The proposed school campus is unlikely to generate any long term or significantly negative social impacts that require mitigation as it involves the staged construction of a Early Learning Centre and College providing education across all stages. While it is acknowledged that the proposed development represents an intensification of use of the site, that intensification of use is not out of character with the planned and anticipated future character of the area and schools are essential services for an area earmarked for future residential growth.

This area is slated for residential development in approximately 20 years and there are currently no sewerage services in the area and I understand that Sydney Water has no plans to do anything for the foreseeable future. This statement has no relevance here.

7.0 Conclusion

The proposed Minarah College Catherine Field development at 368-378 Catherine Fields Road, Catherine Field has been assessed in social impact terms in this report.

False and misleading. The address is incorrect

The proposed development is unlikely to generate any long term negative social impacts.

This was disputed when stated earlier in the report.

Temporary negative impacts are likely to be associated with internal construction and fit out of the school. Temporary impacts associated with construction and fit out can be controlled through conditions of development consent.

This statement shows no consideration of the issues associated with operating a building site and how useless rules in the DC really are. Trying to operate only one machine at a time will double the construction time and the cost.

The Traffic and Parking and Acoustic reports accompanying the application outline design and operational recommendations to ensure the proposed campus can operate with minimal disturbance to surrounding residential properties

The traffic I have left to others. The parking does not comply with the regulations. The acoustic data is rubbish and report only support how bad it will actually get. 86db is not acceptable in anyone's language.

On the basis of this report I oppose any granting of approval for this or any other learning establishment development on this site.