Department of Planning and Environment

Our ref: Minarah College (SSD-30759158)

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

13 September 2022

Subject: Response to Submissions – Department's Key Issues

Dear Mr Halai

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

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

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

As advised in the Department's correspondence dated 3 August 2022 and 17 August 2022, you are required to provide a response to key issues raised by the Department in its preliminary assessment of the EIS.

The Department also procured the services of independent experts to undertake peer reviews of the Transport and Accessibility Impact Assessment and Wastewater Management Assessment provided with the EIS. The Department requests that the matters raised in the peer reviews (**Attachments 1** and **2**) be addressed as part of the Response to Submissions (RtS). The Department has identified other minor matters that must also be confirmed in the RtS (**Attachment 3**).

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

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

Yours sincerely,

A. Coomar

Aditi Coomar
Team Leader
School Infrastructure Assessments

as delegate for the Planning Secretary

ATTACHMENT 1

Preliminary Peer review – Transport and Accessibility Impact Assessment

A preliminary peer review of the Transport and Accessibility Impact Assessment (TAIA) has been undertaken by the Department's independent traffic consultant (JMT Consulting). Findings of the review are outlined below. It is requested that these matters be addressed in the Response to Submissions (RtS).

1. Trip generation (students)

The TAIA provides details of travel survey data from the nearby Green Valley Islamic College (GVIC) which is considered to provide a suitable site for determining trip generation for future students of the proposed school. The GVIC travel data indicates:

- 94% of students arrive in the AM peak hour and 95% depart in the PM peak hour.
- 89% of students arrive to the site by private vehicle.
- On average there are 1.61 students per vehicle.

Using the above data yields a trip generation rate of 1.04 vehicles / student during the morning and afternoon peak hours, recognising that car drop offs for schools generate two individual trips – one on arrival and one on departure.

The TAIA has adopted a trip rate of 0.496 vehicle trips per student for use in the analysis. Reviewing the SIDRA modelling outputs it appears that this rate has been used for both trips into the site as well as trips departing the site. However, this is not apparent in Table 13 of the TAIA, which does not consider the two-way nature of school trips.

The Department requires confirmation that the adopted trip rate of 0.496 vehicle trips per student considers both trips into and out of the site – equating to an overall rate of approximately 1 vehicle trip / student in both the AM and PM school peak hours. If this is the case, Table 13 of the TAIA should be updated to include total additional traffic movements.

2. Trip generation (staff)

Table 13 of the TAIA appears to consider student trip generation only and not factor in trips by school staff.

Confirmation is required as to whether staff trips have been considered in the traffic modelling. Table 13 of the TAIA should be updated to include all trips generated by school staff.

3. Queueing analysis

The queuing analysis undertaken has assumed a simplistic scenario whereby vehicles arriving to the site are distributed equally over a 60 minute period. In reality, as demonstrated through the GVIC travel surveys, the peak arrival period is more condensed – with over 50% of arrivals at the GVIC occurring within a 15 minute period.

Application of this peak 15 minute arrival period to the projected vehicle flows indicates there may be 415 vehicles arriving to the site during the busiest 15 minutes in the AM peak hour (at completion Stage 5). Based on an average dwell time of 1.25 minutes as assumed in the TAIA, the 95% queue may be 50 vehicles – 20 more than can be accommodated within the site boundary. This would result in spill-over of vehicles onto Catherine Fields Road from the on-site queueing area.

Further justification must be provided with respect to the queuing analysis undertaken and consideration of impacts given likely arrival profile of students during the peak hour.

4. Trip distributions assumptions

The trip distribution assumptions noted in Section 6.2.1 of the TAIA indicate that 70% of outbound trips travel south along Catherine Fields Road past Springfield Road, however only 50% of trips are distributed at the Catherine Fields Road / Camden Valley Way intersection (see **Figure 1** below).

There is a missing 20% of outbound trips that has potentially not been considered in the analysis. Further, the inbound trip distribution does not align with the outbound distribution. Updating the trip distribution assumptions along Catherine Fields Road may have further implications for operational capacity and safety.

Clarification as to the trip distribution assumptions should be provided and analysis (including traffic modelling) updated as required.

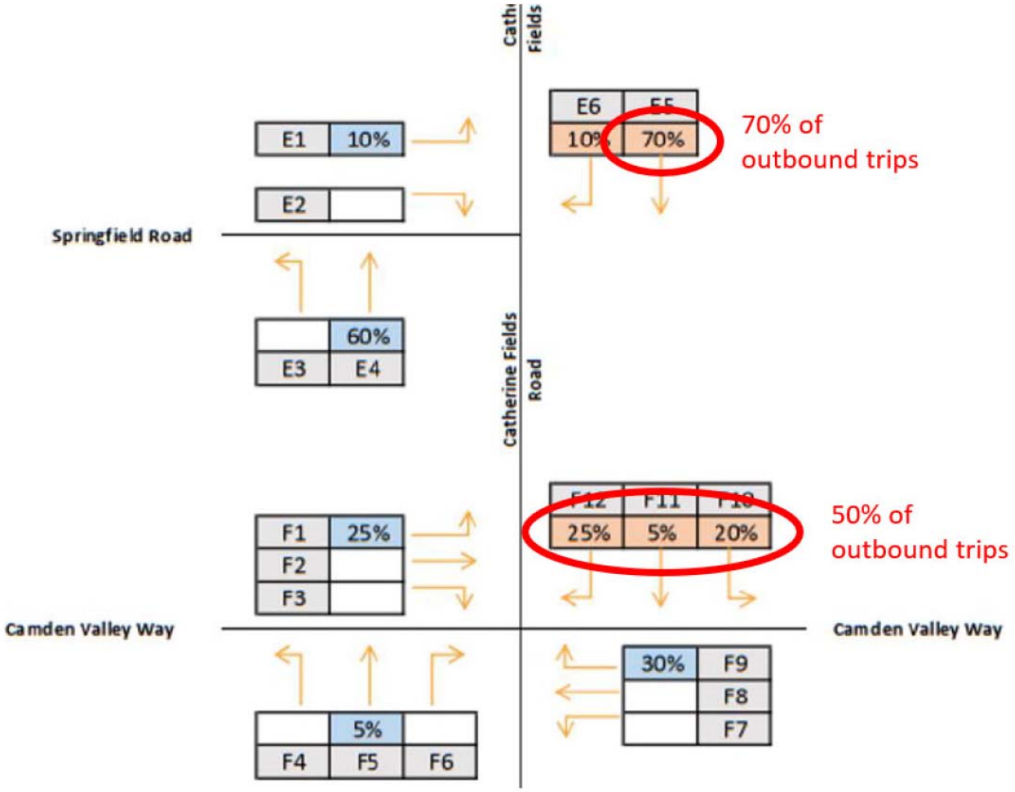

Figure 1: Trip distribution assumptions

5. Catherine Fields Road capacity

The TAIA focuses on the performance of intersections around the site however does not consider the operational capacity of Catherine Fields Road, which is currently a single-lane road in each direction with no shoulders or kerbs – consistent with the semi-rural nature of the area. Road conditions are poor at times with potholes and damaged road surface (see **Figure 2** below). Typically, a road of this nature would have capacity to accommodate approximately 900 vehicles per hour per lane.

The analysis indicates that in Stage 5 Catherine Fields Road may accommodate over 1,000 vehicles per hour in a single direction during both the AM and PM peak hours. Over 80% of traffic movements on Catherine Fields Road can directly be attributed to the proposed school. The SIDRA modelling outputs indicate that there are "*capacity constraints at oversaturated upstream lanes*" on Catherine Fields Road. No mitigation measures have been proposed to ameliorate any potential impacts on Catherine Fields Road.

Further analysis must be provided regarding the capacity of Catherine Fields Road to accommodate future traffic flows – up to and including Stage 5 of the proposed development including any mitigation measures required.

Figure 2: Catherine Fields Road (Source: JMT Consulting)

6. Proposed right-turn restriction

To mitigate traffic impacts following Stage 5 of the proposal it is proposed to direct all vehicles leaving the site to turn left onto Catherine Fields Road. This will require drivers wanting to travel back towards Bringelly Road to travel along Chisholm Road and Deepfields Road (see **Figure 3** below). No assessment of the performance of Chisholm Road, including its intersections with Catherine Fields Road and Deepfields Road, has been considered in the analysis.

Further detail is required (including traffic modelling) of the performance of Chisholm Road including its intersections with Catherine Fields Road and Deepfields Road at Stage 5 of the proposed development.

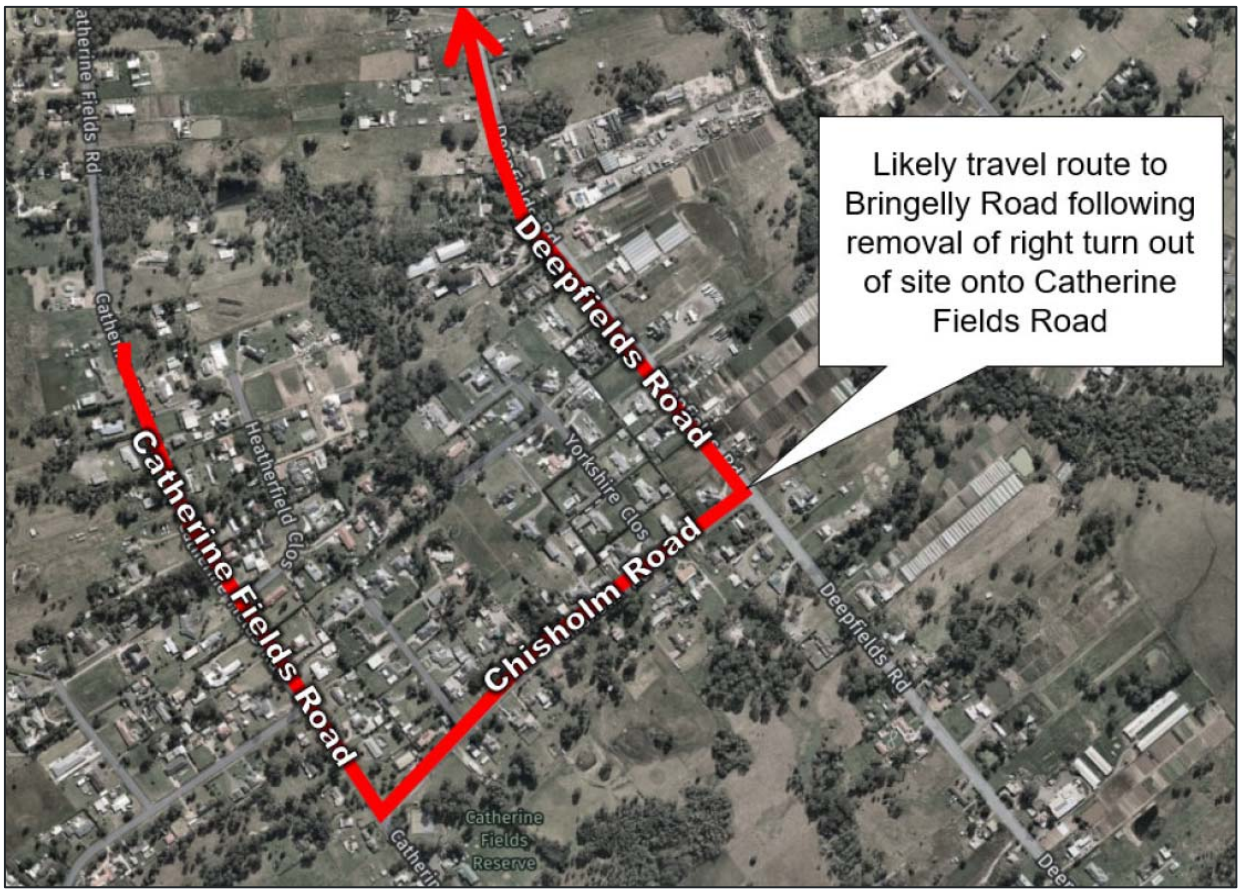

Figure 3: Likely travel route from the site to Bringelly Road

ATTACHMENT 2

Peer review – Wastewater Management Assessment

A peer review of the Wastewater Management Assessment (WMA) has been undertaken by the Department's independent environmental consultant. Findings of the review are outlined in the attached document prepared by Whitehead and Associates Environmental Consultants and dated 13 September 2022.

The key matters raised must be addressed in the RtS as part of a revised WMA. In particular, a response to the matters listed at Section 9 of the peer review is required.

ATTACHMENT 3

Other issues

1. Table 6 of the Environmental Impact Statement (EIS) indicates that the total gross floor area (GFA) for the proposal at Stage 5 completion is 13,109 sqm. However, Drawing No. A401 (Accommodation Schedule) indicates a total GFA of 12,160 sqm at Stage 5 completion. The RtS must confirm the correct GFA for the proposal.
2. Page 108 of the EIS confirms the proposal would generate 140 operational jobs. However, Table 10 of the EIS indicates that the proposed school would require 80 full-time equivalent (FTE) staff and 12 part-time equivalent staff. Further, the TAIA has relied on a projected FTE staff figure of 86 in undertaking the traffic assessment (refer Tables 12 and 13 of the TAIA). The RtS must confirm the total number of operational jobs that would be generated by the proposed development.