

Our ref: Minarah College (SSD-30759158)

Mr Faizal Aliaz Ajmat
Treasurer
Green Valley Islamic College Ltd
264 Wilson Road
Green Valley, NSW 2168

18 November 2024

Subject: Response to Submissions

Dear Mr Ajmat

The exhibition of the amended development application and Amendment Report for the Minarah College (SSD-30759158) ended on 28 Oct 2024.

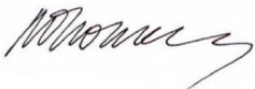
We have placed all submissions on the NSW Planning Portal at <https://www.planningportal.nsw.gov.au/major-projects/projects/minarah-college>.

The Department 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 4 November 2024, you are required to respond to key issues raised by the Department in its preliminary assessment of the Amendment Report. The Department's key issues are provided at **Attachment A**.

Please lodge your submissions report by Friday, 17 January 2025 via the NSW Planning Portal <https://majorprojects.planningportal.nsw.gov.au/>. If you have any questions, please contact Ingrid Zhu, on 02 9585 6995 or via email at ingrid.zhu@dpi.nsw.gov.au.

Yours sincerely,



Madeline Thomas
Team Leader
Social Infrastructure Assessments
as delegate for the Planning Secretary

Attachment A

Key Issues

1. Land Use Conflict Risk Assessment (LUCRA)

- The Department of Primary Industries and Regional Development (DPIRD) has raised concerns regarding the LUCRA. In response to DPIRD's comments, provide the following:
 - a biosecurity risk assessment for both the construction and operation phases, outlining the likely risks and any proposed mitigation measures.
 - a revised LUCRA that:
 - accurately identifies the surrounding land use and addresses potential land use conflicts, including the likelihood of their occurrence.
 - includes details of consultation with neighbouring residents and agricultural businesses to understand any plans for future permitted land uses.
 - identifies the potential impacts from lawful agricultural land uses and activities in the vicinity, and any proposed mitigation measures to manage the impacts.

2. Land use zone objectives

- The Department notes the site is located in a South West Growth Area (SWGA) precinct that is yet to be rezoned or released for urban development.
- The development site is currently zoned RU4 Primary Production Small Lots under the Camden Local Environmental Plan (CLEP) 2010. Insufficient information has been provided to demonstrate the project is consistent with the objectives of the zone. The Department requires further justification to demonstrate the project's consistency with the RU4 zone objectives under CLEP 2010.

3. Wastewater management

- The proposed on-site wastewater management system utilises open space areas (sports fields) for effluent irrigation. Provide the following details regarding the use of sports fields in conjunction with effluent irrigation:
 - identify and address any conflict or risk arises from the use of sports fields within the effluent management areas and any proposed mitigation measures.
 - include a preliminary Operational Management Plan that addresses the sizing and operational monitoring of the collection, emergency storage, and flow balancing systems. Additionally, specify the protocol for implementing 'downtime' to restrict use of the sports fields after rainfall events.

- confirm the location of a dedicated vehicle bay to accommodate the required periodic offsite disposal and the frequency of wastewater collection required at each stage.
- Demonstrate that suitable and adequate effluent management areas are provided on site and address the specific concerns listed in Council's comments.
- The Department awaits a further independent wastewater management advice in relation to the amended project. Further information may be requested once this is received.

4. Bushfire

- Clarification must be provided that this report relates to the amended application. Information relating to the original design and/or staging must be amended to ensure documentation is consistent.
- The Bushfire Assessment Report must be updated to be consistent throughout and confirm building compliance with the most recent versions of the *National Construction Code* and *Planning for Bushfire Protection*. Multiple sections inconsistently refer to requisite BAL – i.e. BAL of 19. References to BAL 12.5 notwithstanding contextual references, must be amended.
- Detailed justification and evidence must be provided to demonstrate engineered building compliance with all safety measures in accordance with the classification of the establishment as a 'Special Fire Protection Purpose'.

5. Odour

- The air quality assessment focuses on the proposed collection well and secondary sewage treatment plant but has not assessed the impact of the effluent management area or other elements of the wastewater system (periodic offsite disposal, etc.).
- Provide a revised report to assess the odour impact from proposed wastewater system holistically and recommend any mitigation measures to ensure the project would not produce unacceptable odour.

6. Staging Report

- Clearly identify the parties responsible for implementing the proposed mitigation measures.
- Clarify the access path to the oval for community and student use in the figures for each operational stage.

7. Noise

- The Construction Noise and Vibration Management Plan (CNVMP) concludes that predicted demolition, excavation and construction noise would exceed established noise levels provided in section 5.5. Recommended noise control mitigation measures provided in section 7.1 are

detailed with provided dB noise reduction values of 3 control types. However, no comparative data between 'before noise controls and 'after noise control' is provided.

- Provide details of noise exceedance levels after the application of noise controls and evaluate the effectiveness of the proposed noise control measures.

8. Traffic and parking

- Please clarify how the intended staggering of the proposed private chartered bus service as part of Stage 3 development will occur outside of peak drop-off pick-up (DOPU) times, despite being proposed to operate during the school's morning and afternoon peak hours.
- In addition, noting the chartered bus will occupy 12.5m of the eastern half of the DOPU area, provide further evidence to demonstrate the shared DOPU area can adequately accommodate the expected traffic during these peak hours.
- Considering the new school population and the change in DOPU areas at each operational stage, existing and new students, staff and parents are unlikely to be more familiar or proficient with the DOPU operation. Provide further justification for the reduction in service time during Stages 2, 3 and 4.
- Address the potential additional queuing and congestion within the DOPU circulation areas and around the site exit due to cars accessing the staff parking area located at the southern part of the site.
- Outline the proposed management measures to minimise the collision risks within the three sports courts, which also serve as access routes for waste vehicles, located east of the northern car parking area.
- Provide a swept path analysis to demonstrate that the waste vehicle loading area has sufficient space for safe on-site manoeuvring for vehicles to enter and egress the site in a forward direction.

9. Built form

- Provide amended architectural drawings and/or design report (where relevant) to:
 - confirm the height of the proposed buildings and indicate the height on all section and elevation drawings.
 - indicate the building setbacks to each site boundary.
 - confirm the elevations' orientation on Drawing No. A201.

- revise the elevations to include the entire length of the northern and southern site boundary to include the playfield and the oval floodlights at the rear. Indicate the height of these structures on the drawings.
- clearly indicate the proposed collection well as part of the wastewater management system on site.
- indicate the finished floor levels of each floor (including split levels) on the section drawings.
- reference the intended materials, colours and finishes listed in the Materials Schedule on the architectural drawings.
- Provide additional perspective rendering images of the proposed development. All views are to be clear, taken from an eye-level perspective from the footpath opposite the site's street frontage, and accurately represent existing and proposed buildings and vegetation. Indicate locations of the views on a site plan.

10. Flooding

- The Overland Flow Assessment (OFA) and Flood Emergency Response Plan (FERP) must reference and address the relevant provisions of the Flood Risk Management Manual gazetted in June 2023 and Camden's Flood Risk Management Policy adopted in February 2023.
- In consultation with BCS and Council, provide specific measures to manage the flood hazard within the parking and DOPU area during PMF flood events.
- Rectify the duplicate of Figure 5 on Page 29 of the OFA.

11. Stormwater drainage

- The Applicant is to clarify whether any part of the development will result in stormwater discharge to the Cathrine Fields Road reserve, given there is no established piped underground drainage system within the road reserve.

12. Tree management and landscaping

- Confirm the existing and proposed canopy coverage and deep soil area.
- Provide evidence the proposal incorporates Water Sensitive Urban Design principles.
- Provide revised landscape plans to:
 - clearly indicate the waiting areas provided along the western frontage of a minimum of 3m wide on the site plan.
 - rectify the location of the proposed pad mount substation to be consistent with the architectural plans.

13. Outdoor lighting

- Confirm the proposed oval floodlights comply with the relevant Australian Standards.

14. Service Infrastructure Report

- Update the wastewater generation table on page 6 to reflect the most recent figures in the Wastewater Management Assessment report.
- Rectify the location of the LPG on-site storage tank to be consistent with the architectural and civil drawings.

15. Mitigation Measures

- Any new or updated mitigation measures relied upon for managing construction or operation impacts must be incorporated and detailed into an updated mitigations table attached to the Response to Submissions Report in accordance with the State Significant Development Guidelines.

16. Documentation

- Amendment Report
 - Table 4 Project Details refers to an on-site effluent management and temporary sewerage plant will serve Stage 1 and 2. Please rectify this to reflect the proposed permanent on-site wastewater management system.
 - Confirm the number of operational and construction jobs the proposed development would generate.
- Architectural Plans
 - The Gross Floor Area (GFA) calculation in the architectural drawings indicates a GFA of 11,746sqm and 11,992sqm at Stage 4. Confirm the correct GFA for the proposal.