

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”.

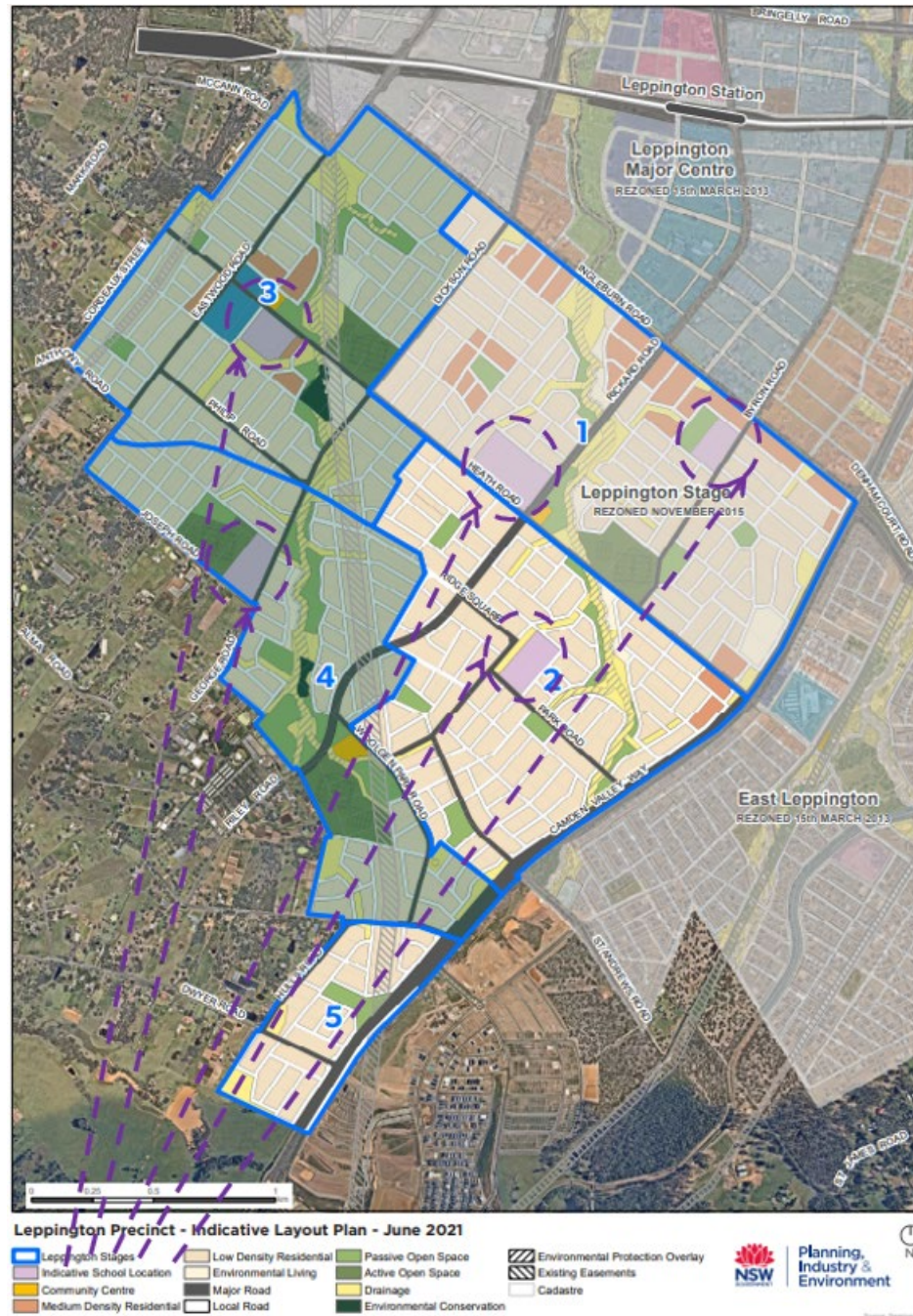


Figure 1: Leppington Precinct- Indicative layout plan⁶ showing 5 possible locations for schools

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.