Attention: Mr Nahid Mahmud
Application Number: SSD-30759158 - Minarah College
Proposed Location: 268 & 278 Catherine Field Road, Catherine Field NSW 2557

Objections to Development:

Further to my cover notice and stated objection, I would note while opposed to the proposed Minarah College development, this position holds true for any school of this magnitude or large scale commercial development proposed for the rural area as proposed.

Any such development would be totally out of character with the current rural, family friendly and safe village atmosphere enjoyed within the Catherine Field Community Village. Further and most importantly, in this specific instance (Proposed Minarah College), **the required critical infrastructure and services** to support such a development with the potential influx of persons (i.e. 1600 – 1800 teachers, assistants, maintenance staff and students) that would travelling into the Catherine Field Village daily to attend this college **simply do not exist therefore introducing an unacceptable risk to the communities lifestyle, residents health and wellbeing and it must be said the students!!**

The critical infrastructure services that I believe must be "put in place" prior to any major development in the area and the additional major concerns are:

1. **Critical Services Roads** i.e. their quality and capacity (width). Noting, any upgrades to the roads must cover the full length of these roads, not simply some 100 - 200m sections in front of the school entrance gates if all road users are to be kept safe.
    a. Current roads that are expected to be frequented by influx of vehicles / persons attending college twice daily (additional 800 – 1200 vehicles twice daily and weekends!); Catherine field Rd: Springfield Rd: Chisholm Rd & Deepfield Rd / Barry Ave.
        i. These roads have been long overdue for upgrades and have been turned into "pot holed goat tracks" creating unsafe driving conditions for all users as the road width is limited and people swerve to miss buses and trucks going the opposite way and / or the many deep potholes.
    b. Also to ensure emergency services (Police, Fire & Ambulances) free and clear access is not hindered within the area.
2. **Critical Services Traffic Management and Calming Measures** would be required for all school access roads and key intersections given the additional of some 800 – 1200 additional flowing through the area twice weekly.
    a. Catherine Field Rd & Springfield Rd
    b. Catherine Field Rd & Heatherfield Cl
    c. Catherine Field Rd & Chisholm Rd
    d. Catherine Field Rd & Centenary Pl
    e. Catherine Field Rd & Deepfield Rd / Barry Ave
    f. Chisholm Rd & Deepfield Rd
    g. Chisholm Rd & Yorkshire Cl

3. **Critical Services On Site Parking**: Sufficient secure off street "sealed" parking for buses and parents when picking children up.
    a. To avoid traffic chaos (through traffic log jams and / or accidents) in and around the college given some 800 – 1200 vehicles (cars, vans, SUV's and trucks) will be travelling to the site daily (twice).
        i. NOTE: 138 onsite parking spots for employees may just suffice HOWEVER **30 spots for drop off and / or pick up is grossly insufficient!** Given the number of students and vehicles I would expect no less that 100 spaces on the school site be available.
            - Further, "long lead in and lead out secondary lanes" will be required if Catherine Field Road is not to be turned into a "parking lot" as occurs at many poorly planned new schools with poor (width / single point) access roads.
            - If the road traffic stoppage is allowed to occur then local residents and those actually living nearby or immediately adjacent to the school will not be able to get into their own homes – I would expect this is unacceptable to anyone!
        ii. Of most importance the off street access and parking, as well as increased onsite parking will be crucial if we are to ensure <u>emergency services (Police, Fire & Ambulances) have free and clear access and not hindered within the area</u>.
4. **Critical Services concrete Footpath for Foot / Bike Access:** Sealed Footpath's must be put in place for all noted roads for the entire roads length NOT just some 50 or 100 meters at the school front.
    a. Currently there are no footpaths but rather grassed property frontage area. Not having purpose built / concrete footpaths not only creates health and safety risks if the development goes ahead as we would then have some 800 -1200 vehicles travelling up and down poorly maintained / pot holed roads and without sufficient parking (as suggested required), there is the real danger of those persons who cannot get to school (because of lack of access and / or parking spots) who will simply drive onto to grassed footpaths.
        i. This in itself creates further environmental damage (as can actually seen now in front of many properties) but likewise the danger of gouged and potholed footpaths that locals then have to try and walk through in early moving or late evening with risk of sprained or broken ankles, knees and hips!!
    b. There are many current local families who do walking for fitness and / or health reasons. I would expect the State & Local Council have a Duty of Care to these residents (and any others entering the area) to expect to safe when walking on or riding on the footpath.
    c. If any such development was to go ahead, I would expect the Duty of Care extends to health and safety of parents and children trying to get to school gates.
5. **Critical Services: Water Waste Water Management Systems**. That is given the size of the proposed school development, it is expected it must be able to connect to main services to avoid potential local environmental disasters, in this absence, as is the case the:
    a. Critical Services- Sewerage
        i. As it is understood there are no mains sewerage services in the area and there is no plan for the foreseeable future to have any mains sewerage connection OR local STP built by SWC in the foreseeable future.

ii. This in mind, the DA proposes an on-site treat plant which given the site development size (currently 10 acres) it is very difficult to envisage how it is proposed that this system will work to service the teachers, support staff and students of such a sized school (1600 – 1800 persons PLUS visitors during various events (would this mean potentially 2000 – 2500 persons on site??). Will the Developer specifically qualify and guarantee expected maximum numbers expected on site under and conditions?

iii. Taking general numbers as the "norm" and Councils own (& EPA) regulation for the necessary free space for the pump out / dispersal of any treated effluent as being approx. 500SqM for general house hold of 4 persons then the following typical Sqm areas / total persons as staged in attendance would be required:

- 400 workers / student (400/4=100*500Sqm = 50,000SqM OR 12.5 Acres!!)
- 800 workers / students (800 / 4 * 500Sqm = 100,000Sqm OR 25 Acres!!)
- 1200 workers / students (1200 / 4 * 500SqM = 150,000Sqm OR 37.5 Acres!!)
- 1600 workers / students (1600 / 4 * 500Sqm = 200,000Sqm OR 50 Acres!!)
- 2000 workers / students and visitors (200 / 4 * 500Sqm = 250,000Sqm OR 62.5 Acres!!)
- In summary, **the current development site does not have sufficient land as would be required to be to set aside for the safe dispersal of the expected volumes of treated effluent**!!
- I would further note, that the **reality will be that in fact the volume of effluent waste being over a condensed and continuous period (school hours / every week day (and potentially week ends) and therefore the saturation rate** will be higher than that for a normal family scenario hence **therefore it is not unreasonable to assume the required Sqm area to be set aside should in fact increase as attendance numbers increase!!**
- Even if argued in some unforeseeable way that the treated sewerage outflow can be managed on a smaller Sqm area, how long before the grounds reach saturation and you have the situation where all excess is simply "flowing across the grounds" to contaminate neighbouring properties and all those down-stream given high position of proposed development site? And the environmental impact i.e. are we saying it's ok to potential contaminate the down-stream creek, those with vegetable gardens, chickens, horses, dogs and general wild life with human virus / bacterial waste?
  - Given current and future predicted weather events, the current reality is that all surrounding grounds of the proposed (and greater area) are well and truly saturated and at best will take 1 month to sufficiently dry out before being able to absorb any more water. So with current conditions, and those reasonably expected in coming years to be repeated, how and where is the treated sewerage going to go?
  - There is suggestion that any flow will be "controlled". If there is any "holding capacity" how many days of actual calculated sewerage will the system store?
  - When full, and having no more capacity will they simply overflow to create an environmental disaster and health risk?

- When full, and school clearly needs to continue, yet grounds are still saturated, is it proposed that the treated sewerage will simply be pump out to flow where it will?
- When full, and school clearly needs to continue, and we assume the grounds are actually dry, typically any storage and pump out system will run to a low level in the tank, that said given the stored volume and that as created (schools still operating), then what you can reasonably expect is that the grounds will quickly saturate and you have the same impending environmental and health risks!
- In a final scenario, treated sewerage has been pumping out over numerous months successfully and the grounds have been able to reasonably cope. We move to summer and now we have evaporation of ground water and moisture – given ongoing saturation (albeit potentially mild) of grounds, is the Developer / State and Councils to guarantee there will be no air borne bacteria and / or infectious virus released in the suburb given poor method of dispersal and restricted dispersal area!!

iv. A reasonable solution to this (and noted by the developer) is that this sewerage system will be connected to the SWC mains systems at some time in the future.

- **Can State planning, SWC and / or Council please advise in writing that budgets have been allocated and approved for the extension of sewerage pipeline to allow the local residents and this school to connect to mains sewerage services OR that for the building of a new STP in the local area to likewise allow residents of the area and the school to connect services, together with the proposed timeline to deliver AND connect such infrastructure??**

b. Critical Services- Storm Water

i. Given there is no piped infrastructure to manage the flow of storm water in the suburb, it raises concerns as to how the developer proposes to mange storm water flow from the school roof and grounds. To point the main road affected will be Catherine Field Road, and it has been inundated by flood waters numerous times from the run-off from properties facing that road, their roofs and of course cumulative effects of rain as fallen on the road in the immediate location and any run off from upstream catchment.

- The roofs typically are some 400Sqm and with regular storm weather events have eroded the roads sides, created damaging pot holes and flooded the immediate road and turning the local causeway / creek into a deep, fast flowing, dangerous creek. Further, this road has been closed down many times over the past 12 months due to high, dangerous fast flowing waters.
- These conditions have also caused flooding to the properties on the lower side of the road.

ii. The school as it appears, will have a roof space of some 4000Sqm – 6000Sqm (and possible greater over time). How is the "torrent and volume" of water going to be managed without adding to OR created significant land, road and property damage and flooding?

iii. There is / was a report included in the DA, however on close review:

- 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 re-divert the upstream overland flows to Catherine Fields road".

- **Is the suggestion by the property developer and the consultant who wrote this report that having a situation whereby diverting all the water flow from the property and the roof catchment area to "flood" the road, down-stream properties and homes, creeks is OK?**
- Has anyone taken the time to calculate the volume of water expected to flow from the roof area? If standard roof houses are already cause for regular road & property flooding, I can only extrapolate that this development with a roof area of some 4000Sqm – 6000Sqm, aided by poor weather, will destroy the roads and turn the properties across the road into a Lake!!

6. **Critical Services – Main Water security**: Potential Water pressure issues with new proposed school
    a. With the many developments in the surrounding suburbs, I can only assume SWC has booster the water pressure to service the new suburbs / properties. That said, what we have seen is many more main water failure over the past 2 – 3 years.
        i. Whether caused by pressure line increases, flood saturated grounds is unclear HOWEVER it would be useful to have clarified AND how the school will be serviced from these main pipe lines. To point:
        ii. Are existing pipes sufficiently sized to cope with added required capacity?
        iii. Are they of an age where with added water mains pressure we will see regular mains water failures?
7. Noise. Currently the semi rule community village is a very tranquil and quite area.
    a. It is not hard to imagine the noise and disruptive effects of having 800 – 1200 vehicles travelling twice daily in the area will have NOR the disturbance to the current peaceful atmosphere that will be created by some 1600 plus screaming and yelling students on site together with bells, musics etc playing.
    b. Other, the DA proposes that the school may remain open and / operate Monday to Fridays up to 900PM!! As stated many times this is a quite, safe rural area and this type operation will be totally out of character for the area, not to mention the further increased risk of have significant increased traffic flowing to late hours.
        i. Further, the school may also operate over weekends – are the local residents not to get any respite from the continuous student and / or vehicle noises as these arrangements would create?
    c. I would further note that the report in this regards appears incomplete and / or flawed given the following:
        i. Day Design Pty Ltd's **timing of the measurements** and the fact **by it's own admission it has missing data i.e.**
            - **"Measured Ambient Noise Level' firstly being conducted during Covid lockdown period, and,**
            - **Due to <u>their admission of a missing noise logger at 'Location A' for 18 days out of the 25 days.</u>**
        ii. It would be most useful to see the modelling as developed to reflect student noise volume together with daytime and after hour (500pm – 900pm) student & vehicle noise volumes.
        iii. Further how has this modelling being further developed and tested to allow for nominated longer than usual opening hours i.e. Monday to Friday to 900pm and weekends!!

8. **Critical Risk Management – Health and Safety Concerns**
    a. It is noted that one of the properties has asbestos throughout the dwelling and fittings. While the developer notes "managed removal", my own experiences at such sites is that these are very poorly managed with very little 3rd party oversight provided but rather the reliance that the developers and builder will / are "doing the right thing"
        i. If the DA is to be approved, given the rural nature of the area, open spaces, frequent wind gust and populated by elderly and families alike, nothing less than full independent management and oversight of the safe property demolition and material removal would be acceptable.
    b. It is noted that development includes commercial large storage GAS tanks as there is no piped gas lines in the area!
        i. I would have expected that such storage would not be allowed in a rural living area given the risk of gas leakage and or worst case explosion.
    c. Both noted items are of major concern given potential impact to health and / or life. In this regards I would like to understand the details of all Insurances as offered, registered and will be held valid for the life of the school should the development proceed:
        i. Liability, Professional and Personal (developer, builder and all 3rd parties associated with the project).

Further to above objection summary points, I would address the my comments regarding DA submission report appearing incomplete, rely on, or reference outdated and / or flawed data, together with ignoring or overlooking those prior independent reports which have already flagged a rafted of infrastructure requirements to support any future development or increase in traffic throughout the Catherine Field rural community area, these being:

1. 3.4.1 of The Transport & Accessibility Impact Assessment – Overlooked, ignored and requirements not addressed.
2. Ason Group "Catherine Fields road is a rural road" recommendations report – Overlooked, ignored and requirements not addressed.
3. Martens overflow assessment – Inaccurate & flawed leading to ill advised recommendations which will severely compound and / or create new potential catastrophic flooding events (roads, property and homes!!)
4. SIDRA traffic modelling – inaccurate given limits of study and timing (pandemic event period)

On a final note, I would circle back to my very first point, what would this type development potentially bring to the area, local community and families? With all facts and details reviewed, I cannot not find a single benefit, but rather can only think of the following very real concerns:

1. Increased deterioration of the rural atmosphere, community and individuals health and well being, and,
2. The very real potential for increased risk to: life, properties, home and the environment.

Some may state that the development for children school is a good one, however the sad reality is it is not when it comes at such a high risk to the community and residents and caters more to those families and children well outside the immediate proposed area (this detail as published and reflected in the last consensus).