

Site Suitability:

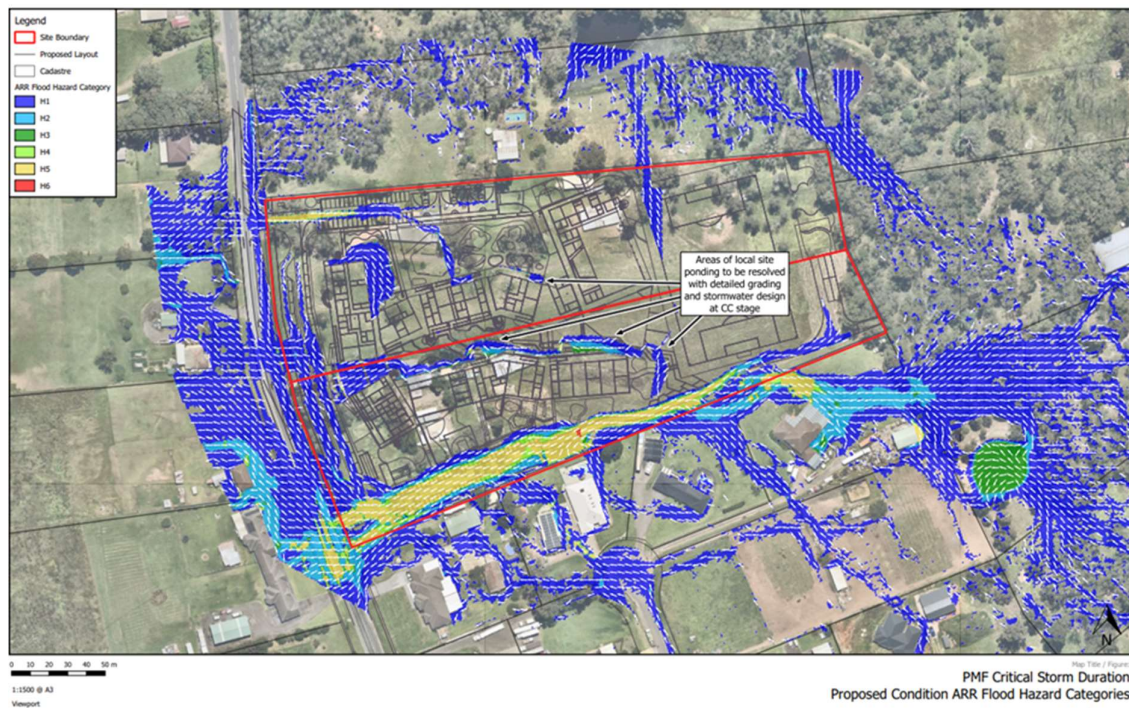
The site is not suitable for development at this point in time. The necessary infrastructure will not be in place to handle a development of this size and impact.

The Department has not identified Catherine Fields as being a priority within the South West Growth Area. Until a point of time that this occurs, no significant development should occur in the area. Council's previous comments summarise this issue succinctly:

"The Site is an unsewered rural property located on a rural road with no shoulder, formed kerb and gutter, footpath, lighting or piped underground stormwater"

Flooding: -this Hazards Map is crucial to raise.

Flood Level in PMF



Flooding:

The flood assessment within Appendix P - Overland Flow Assessment & FERP has excluded flood mapping for any depth of flood waters below 50mm despite the flood hazard curve identifying flows of 2m/s are H5 regardless of the depth. Further information is required to understand the full extent of the impact on the southern boundary where the majority of the overland flow impacts occur.

The flood mapping also shows ponding of water within the site in the 1% AEP and PMF flood events. This issue should not be deferred as the impact is currently not resolved and so the Department would not be able to make an informed assessment of the risk to students in a flood event.

In the PMF and 1% AEP events, the overland flood water will run onto Catherine Fields Road which is affected up to the hazard category H5. The proposed stormwater and swale will funnel all of the water and discharge directly onto the road.

Appendix P fails to discuss the conditions on the site during a PMF event although this is the flood event that has the potential to cause the greatest impact. The images below show the flood risk with the proposed development which shows H5-H6 along the southern boundary.

SES's latest submission states:

"However, the flood risk at the site consists of overland flow at the site and the potential of isolation in relatively frequent events, even after the proposed drainage works, as areas to the east and west are subject to flooding from South Creek and Rileys Creek."

I would encourage you to include wording such as the above in a submission to raise the concern with flooding.

Built Form

The reduction in student numbers is not reflected in the scale and density of the development. Although the student numbers have reduced by nearly 600 students. The amended proposal includes 11,746m² of total GFA which is only a net deduction of 1,363m² of GFA from the original EIS.

It is inconceivable that the development would still need the floorspace or capacity within the school despite a net reduction of 600 students and teachers. Further information is required to ensure the school is not simply retaining a large portion of the existing built form to simply modify the application at a later stage under a section 4.55(1A) or 4.55 (2) modification which cannot be assessed by the Independent Planning Commission.

Land use zoning:

The proposed school does not align with the current objectives of the RU4 Primary Production Small Lots. The objectives of the RU4 Primary Production include:

- To enable sustainable primary industry and other compatible uses.
- To encourage and promote diversity and employment opportunities in relation to primary industry enterprises, particularly those that require smaller lots or that are more intensive in nature.
- To minimise conflict between land uses within this zone and land uses within adjoining zones.

The proposed development is incompatible with primary industry, does not foster employment opportunities related to primary industry enterprises, and fails to reduce conflicts between land uses in this zone.

Water Servicing and Wastewater

The proposed development is located within the Leppington Water Supply Zone (WSZ) which has limited capacity for development growth.

The proposed development is located within the Lowes Creek catchment. There is currently NO capacity in the existing wastewater network to service this development.

Sydney Water identified the following on 1 September 2023

“Our preliminary hydraulic modelling assessment shows that the drinking water system has some capacity to service the proposed school with 980 students at this time.”

This letter was issued over a year ago. Is this still relevant or has the capacity changed since then?

Sewer treatment plant shown on staging plan is TBC and is only for Stage 1 and 2. The Onsite wastewater management system and sewerage system staging is unclear.

Stormwater

The OSD and connection to the Catherine Fields Road is insufficient and does not provide a safe exit from the proposed school site. The majority of the road upgrade works to Catherine Fields include just a kerb and are not being upgraded with a channel or gutter and so the potential water flow onto the road is unacceptable.

Summary:

Until the local Council or State Government complete holistic strategic planning and infrastructure delivery for the region, development of this scale and impact should not be accepted or endorsed. The flow on effects for the local community will be significant and therefore the project is not in the public interest.

Some further notes:

Flooding – attached is a series of flood maps from Council's intra mapping that shows the site is affected by flooding as is the road frontage. In a flood event students would be trapped on site as the road floods and would prevent access to the area. This is combined with the fact that parts of the school are sited within the flood prone area which be dangerous for students, staff and greater school community.

Traffic & Parking – The development has been reduced in capacity however the traffic impacts don't appear to have been addressed beyond the original proposal. They are only proposing road works to the frontage of the property and no other road upgrades. The upgrades are also not proposed until stage 3 of the development. Whilst I note that there is a "kiss and drop" zone in stage 1 and an expansion to this in stage 2 not all children or parents like this arrangement and with limited parking within the school, parents will likely park on the street. There is also a pedestrian crossing through the kiss & drop zone which would impact the functionality of the zone.

Wastewater – The extent of wastewater area that they are showing on the plans doesn't appear to be adequate for a development with a school population of 980. Also the location of the EMA where the fields are would prevent use of the fields due to waterlogging. The report mentions that the field would be closed during periods when there has been rain but with the amount of effluent that would be dispersed to this area its likely to be water logged without rainfall. The wastewater report also mentions a effluent treatment plant but the plans and other documents don't specify where this would be located.