

17 October 2024

Director, Social Infrastructure Assessments
Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

RE: Exhibition of Amended State Significant Development Application – Proposed Minarah College, Catherine Field (SSD 30759158)

**PROPERTY: 268-278 Catherine Fields Road, Catherine Field
Lots 11 & 12 in DP 833983**

I refer to the exhibition of the above-mentioned amended State Significant Development Application (amended SSDA) being assessed by your department and thank you for the opportunity to comment.

Council officers have undertaken a review of the amended SSDA and supporting information and this letter provides feedback on the revised proposal for your consideration.

Of note, as the exhibition / submission deadline concludes on Monday 28 October 2024, this submission has not been reported to the elected Council for formal consideration and endorsement. A further submission, or amendments to this submission, may be lodged from the elected Council following their consideration of this Council officer submission at the Ordinary Council Meeting on 12 November 2024.

Council staff have reviewed the amended SSDA and maintain the primary objections/concerns outlined in Council's previous submissions dated 25 July 2022 (original SSDA) and 6 April 2023 (Response to Submissions).

For convenience, the previously outlined objections to the proposed development, which remain current, include:

- The site is not suitable for the proposed development.
- The proposal remains inconsistent with the public interest based on the number of objections received and the substantiated concerns raised by the community.
- The proposed development is of an excessive scale and is an inappropriate use for a rural / unsewered property.
- The onsite sewage management system proposed for the site is not appropriate and there are risks to children being exposed to effluent.

- The proposed development will result in unacceptable impacts on the amenity of the area and fails to meet the objectives of the RU4 Primary Production Small Lots zone.
- A school of this size / intensity should not be considered / approved prior to any precinct planning / re-zoning for this portion of the South West Growth Area (SWGA). The inappropriateness of the proposal is evidenced by the inconsistency with the zone objectives; the lack of services (especially suitable roads and sewerage infrastructure); and the inconsistency with the matters for consideration in Section 3.21 of the State Environmental Planning Policy (Precincts-Western Parkland City) 2021.
- The proponent is seeking to develop relatively cheap rural land prior to precinct planning / re-zoning. This provides a private benefit for the proponent at the expense of the wider community.
- There are already released and/or rezoned precincts within the SWGA which would be more appropriate locations for the proposed school.
- A school of this size / intensity is not a planned or desirable use on land zoned RU4 Primary Production Small Lots.
- Catherine Fields Road is a rural road that is not designed to cater for a development of this size and intensity.

These key concerns are outlined in further detail below.

1. Site Suitability

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 system.

The site is not unsuitable for a new school accommodating up to 980 students.

The location of the school on a rural road with no footpaths / bike paths places immense pressure on the road system to support cars and buses traveling to the school to pick up and drop off students as there are no feasible alternatives to commute to the school (e.g. walking, cycling etc.).

The Department is aware of the servicing issues facing south-west Sydney, with released and rezoned areas currently not serviced by reticulated sewer (e.g. Lowes Creek Maryland). It is not considered appropriate to approve a high demand use, such as a school for up to 980 students, in an area where there is no commitment from Sydney Water to service the area. Approval of a high demand use in this location will only place further strain on the sequencing issues (i.e. multiple development fronts requiring servicing) already faced by Sydney Water.

There are already released and/or rezoned areas (or precincts currently being rezoned) within the SWGA which would be more appropriate locations for the proposed school.

2. Zone Objectives

The objectives of the RU4 Primary Production Small Lots zone are:

- *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 not compatible with primary industry; does not encourage or promote employment opportunities in relation to primary industry enterprise; and does not minimise conflict between land uses within this zone.

Establishing a school of this size at this location effectively alienates any potential primary industry on adjoining or nearby sites due to conflicts in terms of amenity for school children.

3. Matters for consideration in Growth Centres

Sections 3.21 and 3.26 of the State Environmental Planning Policy (Precincts - Western Parkland City) contain a number of matters for consideration until finalisation of precinct planning for land. As Catherine Field is still in the early stages of precinct planning these matters must be taken into consideration.

Council maintains that the proposed development will preclude future urban and employment development land uses from this site and that the development will hinder the orderly and coordinated provision of infrastructure that is planned for the Growth Centre.

The extent of the school investment on the site and the operational and economic life of the proposed school means that the school (if approved) would dictate future planning outcomes surrounding the school and would need to be planned around, rather than forming part of an integrated planning process.

The proposed school does not consider the precinct planning process, which may ultimately reveal that this location is not the most appropriate or desirable location for a school and / or is a highly desirable location for a different land use.

As mentioned above, there are already released and/or rezoned areas (or precincts currently being rezoned) within the SWGA which would be more appropriate locations for the proposed school.

4. Public Benefit

The amended SSDA provides little detail and no firm commitments on the community benefits that the new school will offer the wider community.

5. Wastewater Management

The Wastewater Management Assessment Report submitted as part of the amended SSDA acknowledges that there is *“no clear commitment from Sydney Water to provide wastewater infrastructure to the site”* and accordingly a *“permanent onsite wastewater management system may be required indefinitely”*.

The Wastewater Management Assessment Report outlines recommendations for a wastewater treatment and effluent disposal system for the school. The proposed sports oval / field is identified as an area to be used for effluent irrigation.

Council's Onsite Sewage Management Officer advises that the proposed effluent management areas (EMAs) are not suitable given:

- There are risks to children being exposed to effluent by using the EMA as a sports field;
- There is risk of damage to the EMA due to high traffic and sporting use;
- Should the EMA be damaged or fail, there is no reserve area available for effluent disposal; and
- There is the potential risk of disease outbreaks should school children come in contact with effluent.

Overall, given the health and environment risks associated with the proposed EMA and non-compliance with Council's Onsite Sewage Management (OSSM) Policy, the development is not supported.

Some more specific concerns include:

- Council's OSSM Policy requires a 50% reserve area to cater for future extensions / failures. There is no space available for a reserve area from Stage 3 onwards.
- Upon completion of Stage 4, the available EMA (as per Map 05 of the Wastewater Management Assessment Report) is in the space between the Year 2 building, the High School Hall and the COLA. Concern is raised that the EMA will not be protected from damage and is near the classrooms. In addition, the plans indicate that this area will include hardstand areas, trees and seating making it unsuitable for use as an EMA.
- Furthermore, as per the Wastewater Management Assessment Report, the use of sports fields as EMAs generally increases soil moisture levels and therefore delays the time required for "return to play". The report recommends that the school implement a policy including downtime following rain events to prevent damage to sports field. It may not be suitable for a school to have the field excluded for use for an extended period, especially given that it is the only open field play space allocated for the school.
- The Wastewater Management Assessment Report recommends a design figure of 20L/person/day based on water usage invoices and studies obtained for similar facilities. The Report has failed to include wastewater generation rates from the canteen, staff kitchen, food and textile room, OOSH Kitchen and laundry. Given that the canteen will serve a total of 980 students (plus staff), it is expected to generate trade waste.

6. Noise Impacts

Noise associated with school operation

The Environmental Noise Impact Assessment Report submitted as part of the Amended SSDA demonstrates that acoustic compliance is only achieved during Stage 1 of the development. To reduce the acoustic impact on the neighbouring residential receivers, acoustic walls ranging from 1.5m to 2.4m are required within the proposed school and along the boundary. The proposed acoustic walls, which includes a 1.8m to 2m high colorbond fence extending along the entire length of the side and rear property boundaries, will have a negative impact on the visual amenity of the surrounding rural landscape. Furthermore, despite the proposed acoustic walls and façade treatments, the acoustic amenity of at least three residential receivers will be impacted by children during outdoor play by +1dB to +6dB.

Construction noise

The Construction Noise & Vibration Management Plan submitted as part of the Amended SSDA outlines the noise emissions from works to be undertaken over the various stages of the proposed development. The main source of noise will be from heavy machinery such as excavators, dump trucks, cranes, cement mixers and rock breakers. Noise exceedances (without controls) for residential receivers range from +3dB up to +40dB. Section 7.2 of the Report outlines noise management controls aimed at managing the impacts on neighbours and include:

- Periods of respite – noisy construction activities only operate for 2 to 3 hours at a time.
- Work practices – workers and contractors be trained in work practices to minimise noise emissions.
- Heavy vehicles and staff vehicles – keep truck drivers informed of designated vehicle routes, parking location, acceptable delivery hours etc.
- Community relations – a Community Liaison Officer be appointed to ensure communication is maintained with neighbours prior to and throughout the construction process.
- Managing a noise complaint – the Community Liaison Officer should receive and manage all noise complaints.

Despite the proposed controls, acoustic exceedances will still be encountered by several adjoining residential receivers. Based on the proposed timeframes for the construction of the four stages of the development, it is unreasonable for the acoustic amenity of residents to be impacted for a period of approximately 3.3 years. Furthermore, given the proposed 'periods of respite' (to limit noise generating construction works to 2 to 3 hours a day), it is likely that development works will take longer than the timeframe(s) outlined in Section 4.2 of the report.

Overall, the proposed development is considered to have an unreasonable impact on the amenity of the surrounding area, both during construction and ongoing operation.

7. Traffic

Council submits that should the development be approved the following traffic matters must be addressed:

- The road works, i.e. channelised right turn and median island, must be installed as part of Stage 1.
- It is observed that at most schools many parents arrive prior to the school dismissal time, and it is envisaged that the 30 space kiss and drop spaces may be occupied early and queuing may extend beyond the site boundary.
- The kiss and drop area must be signposted and line marked accordingly. It is also to be managed to ensure vehicles flow through and use it for its intended purpose to reduce the chance of queuing along Catherine Fields Road.
- Traffic calming measures are required along parking aisles that extend beyond 100m.

8. Engineering Comments

The following engineering comments are provided:

- The Catherine Field Road upgrade should be completed as part of Stage 1 to avoid any traffic nuisance at later stages;
- The Bus accessway 1 long section has instantaneous grade change of 6.2% at a sag. This would be considered a large grade change for a B99 vehicle and a ground clearance check is recommended.
- The OSD has only catered for 60% impervious area. Any additional impervious area will require an updated and/or additional OSD system.
- The Catherine Fields Road long section shows road grades of as little as 0.3%. This is non-compliant and it is recommended that road grades are a minimum of 1%.
- Kerb return grades are noted as having a minimum of 0.3%. An absolute minimum of 0.7% is required under the Camden Council Engineering Design Specification.
- Catherine Fields Road north bound should have pits every 70m and a minimum of four additional pits are required. Pits are also required at the sag point in the road.
- Details of the retaining wall within road reserve are required.
- North bound lane – given the full width of the road is being constructed, Council requires kerb and gutter to be provided on both sides of the road.

9. Public Health

There are inconsistencies within the plan series provided, the uses of space and the staging of the development which affect the food handling activities of the development. Furthermore, insufficient information has been provided to adequately assess the food handling requirements, adequacy of space and fit-out for the food activities of this development.

Specifically:

- **The Early Learning Centre** – Insufficient information is provided to adequately assess the required kitchen and bottle preparation facilities for this activity.
- **The Temporary Canteen** - The Post Construction Plan Series DRW A111 and 113 Rev D dated 19/03/2024 show a Temporary Canteen located externally of the building. No details of the Temporary Canteen are provided. The temporary canteen does not appear in other plans. Clarification of the location and fit-out of the canteen facilities to service Stages 1 and 2 of the development ahead of the construction of the final shared canteen facility in Stage 3 is required to assess the adequacy and compliance of the proposed facility.
- **OOSH** – Insufficient information has been provided to adequately assess the food handling requirements, adequacy of space and fit-out for this activity.
- **High School Canteen** - Insufficient information has been provided to adequately assess the food handling requirements, adequacy of space and fit-out for this activity. The High School Canteen will require assessment for trade wastewater requirements.
- **High School Hall Kitchen** – Insufficient information has been provided to adequately assess the food handling requirements, adequacy of space and fit-out for this activity.

- **Waste Storage** – Access to the waste store is over the newly added “hard paved outdoor play for high school” (formerly car parking). Access to the waste storage room for collection vehicles will need to be addressed to prevent dangerous conflict of use of the recreational facilities.
- **Temporary waste storage facilities** - Are indicated in two locations on the northern boundary of the property. Given the nature of the rural environment, the proximity of neighbours and the likely high proportion of putrescible waste in the waste stream of the school, these facilities will need to be of solid construction with attention to pest exclusion and odour control to prevent nuisance from these facilities.

10. Conclusion

For the above reasons Camden Council maintains its objection to the proposed new school on this site.

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 system. The proposal remains inconsistent with the public interest given the number of objections received and the substantiated concerns raised by the community.

The site is an unsuitable location for a new school accommodating up to 980 students. There are already released / rezoned areas and/or precincts currently being rezoned within the SWGA which would be more appropriate locations for the proposed school.

Should you have any enquiries in relation to this matter, please do not hesitate to contact Council's Manager Statutory Planning, Mr Jamie Erken on (02) 4645 5631.

Yours sincerely,

A handwritten signature in black ink, appearing to read "n magurren".

Nicole Magurren
DIRECTOR PLANNING & ENVIRONMENT



Chinese (Simplified) | 简体中文

Chinese (Traditional) | 繁體中文

العربية | Arabic

Spanish | Español

Vietnamese | Tiếng Việt

Punjabi | ਪੰਜਾਬੀ

Italian | Italiano

Assyrian | ܐܫܘܪܝܐ

Nepali | नेपाली

Serbian | Српски

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