Patricia Ellis
38-44 Mungerie Road
Beaumont Hills, NSW 2155

10 February 2025

ATTENTION: Dimitri Gotsis
NSW Government
Subject: Objection to the Malek Fahd Islamic School Expansion (SSD-56264716)

Dear Mr. Gotsis,

I am formally objecting to the proposed expansion of Malek Fahd Islamic School on Mungerie Road due to the severe and unacceptable impacts it will have on our daily lives, property, and overall well-being. The scale of this development will significantly disrupt our ability to access our home freely, create substantial traffic congestion, and diminish our quality of life. Below, I outline the key areas of concern that highlight why this proposal is unsuitable for our residence at 38-44 Mungerie Road and the surrounding community.

Overwhelming Traffic Congestion and Impact on Daily Life
The community is already experiencing high traffic volumes during school peak hours, due to nearby schools contribute to cumulative congestion. The expansion will result in a dramatic increase in traffic on Mungerie Road, which will severely limit our ability to move freely in and out of our property. The traffic volumes will almost double, increasing from 371 to 685 vehicles in the AM peak and from 298 to 550 vehicles in the PM peak ([Traffic and Parking Assessment, Appendix 9]). This means that leaving our home for work, school, or errands will become an ongoing battle with gridlocked traffic and constant on-going delays, also significant delay during construction.
During peak school hours, queues will extend past our driveways, making it difficult or even impossible to enter or exit without being blocked by waiting vehicles. Cars will be idling outside our homes, creating noise, air pollution, and a general deterioration of our living environment. The increased congestion will extend beyond just the immediate school area, impacting the broader road network and making even short local trips significantly more time-consuming and frustrating. The school lacks a right-hand turn into the site, forcing cars and buses heading east to make a detour via the Guardian Avenue and the Withers Road roundabout worsening congestion. This will also increase pedestrian safety risks at the existing Guardian Avenue crossing, as traffic delays will lead to heightened vehicular and pedestrian conflicts.

image - Traffic congestion **The Rise** heading east 15 June 2020 at 3.20pm – note this is due to existing student population, depicting heavy congestion.

Image: Traffic congestion Mungerie road heading North, 11 June 2020 at 3.15 PM – note this is due to existing student population note proposed

Traffic Generation and Impact on Private Property Use
The EIS and Traffic and Parking Assessment fail to provide realistic data and relies on outdated ABS data from 2016 to determine vehicle utilisation rates in the Hills District. This approach is flawed, as the Metro Hills line to Rouse Hill only opened in 2019, significantly altering transportation patterns. The assumptions in Part 7.2 of the Traffic Management Report fail to account for these shifts and do not reflect current real-world conditions.
Additionally, the school catchment area must be verified. Given the size of this Islamic school, it is likely that students will be commuting from various locations across Sydney, not just the Hills District. Applying standard "local school" traffic assumptions is misleading and does not accurately reflect the true impact on road congestion.

According to the 2021 ABS Census, only 939 people of Islamic faith reside in Rouse Hill and Beaumont Hills, comprising just 5% of the local population. This suggests that the vast majority of students will not live within walking or cycling distance and will require private vehicle or private school bus transport.
Despite claims in the Green Travel Plan claiming only 80 students will use buses also promoting walking and cycling, the demographic data indicates that these will not be viable primary transport options for most students. As a result, the proposed development will place an even greater burden on local roads and increase congestion, further limiting residents' ability to freely use their private property without obstruction.

Mode Share Targets – Unrealistic Assumptions **In reference to Cl 7.3.1 Mode Share Targets** for people coming to the site – They state that there will be 10% of the staff/students/ visitors will come by Train and 45% by Bus. Assume 1500 daily persons on site (that would be 150 people catching the train, and 675 persons via bus.

Assuming 150 people catching the train/ **Metro station over 2km away! this is not within walking distance**, meaning they must take a connecting bus, further increasing congestion.

- Possibly 675 persons arriving by bus, which dramatically increases bus movements and the demand for waiting bays and road capacity.

- The assumption that 10% of visitors will take the train is unrealistic without direct pedestrian access. The additional bus services required to accommodate train commuters are not accounted for in the traffic study.

Inadequacy of the Existing Bus Stop at 4 Mungerie Road
Proximity to the Intersection and Pedestrian Crossing:
There are two current locations at 4 Mungerie Road is approximately 30m from the pedestrian crossing, creating a hazardous mix of stopped buses in lane, crossing students, and turning vehicles at Guardian Avenue, also Concerns over unsafe driving behaviours, including illegal U-turns at Guardian Avenue.
The existing in-lane bus stop, located 30 meters from the intersection and 20 meters past the pedestrian crossing, is inadequate to accommodate the proposed increase in student numbers. A standard school bus typically carries between 50 to 60 students, meaning that at least 20 to 30 buses would be required to service the school effectively during peak periods. Given that this bus stop is not an indented bay but an in-lane stop, the queuing effect will significantly impact general traffic movement on Mungerie Road.

Furthermore, the bus dwell time—ranging from 30 to 60 seconds per bus—will result in multiple buses stopping simultaneously, leading to a backup of traffic along Mungerie Road. Without a designated pull-in area, each bus will occupy an active traffic lane, creating congestion that will affect not only school-related traffic but also the daily commute of residents and other road users. The reliance on this stop, without additional provisions, will disrupt traffic flow and contribute to unnecessary delays.

Traffic safety risk reliant on existing bus stop
The placement of the existing bus stop raises several traffic and safety concerns, particularly due to its proximity to a warranted pedestrian crossing. Austroads recommends that bus stops be placed to ensure clear sight lines for both vehicles and pedestrians, yet the current location risks obstructing the view of drivers approaching the crossing. When a bus is stopped, pedestrians crossing behind it may not be visible to oncoming traffic, significantly increasing the potential for accidents.
Additionally, the in-lane nature of the bus stop means that buses stopping for students will block one of the main traffic lanes. Given that Mungerie Road serves as a critical local thoroughfare, this will create unnecessary bottlenecks, potentially impacting emergency vehicle access and further exacerbating delays for residents. The increased frequency of buses stopping throughout peak school hours will amplify this issue, particularly as parents attempt to navigate around stationary buses, creating dangerous weaving and lane-changing movements

Alternate bus stop solution and Objection to the nominated Bus Bay on Architectural drawing – shadow diagram

Image: Bus stopping – 5th of November 2019 – Utilising 38-44 Mungerie Road driveway for safe student drop off.

The current bus stop arrangement is inadequate for the projected 1,300 students. Reliance on an in-lane stop on Mungerie Road is unworkable, possibly up to 26 full-sized buses would be required during peak times. The existing stop lacks the capacity to handle this volume without severe congestion, queuing, and safety risks. As illustrated in the previous image the school has in the past utilised our driveway as it is a safer set down area.

Compounding this issue, the school's is proposing a mini-bus drop-off zone, this is already failing to meet transport demands. Supplementing standard buses with approximately 50 mini-buses would further congest Mungerie Road, increasing queue times within and on approach and forcing more parents to park illegally or walk in to collect children, disrupting traffic flow and pedestrian safety.

The failure to provide adequate on-site transport facilities places an undue burden on Mungerie Road, which is not designed for high-frequency stopping and queuing. Without a dedicated off-road bus facility, reliance on mini-buses and private vehicles will cause significant delays, unsafe pedestrian interactions, and road blockages, impacting both school and general traffic. The current arrangements are inadequate.

Impact of the proposed bus stop at 38-44 Mungerie Road as illustrated in the architect's shadow diagrams.
The proposed 50m bus stop suggests a four-bus set-down area across our frontage, a plan previously rejected by council. The prior DA approval (Ref No. 602/2022/HC, Delegated Authority: 23 December 2021) explicitly required all bus movements and set-down areas to be contained within the school site to minimize congestion and noise spillover. The current proposal disregards this requirement, shifting the burden onto residents rather than the school itself.
The proposed 50m bus stop is grossly inadequate and fails to meet RMS and Austroads standards. A compliant four-bus bay requires a total length of 120m to 160m, incorporating:

- **Entry taper:** ~15m
- **Stopping area:** 30-40m per bus (for standard 12m buses)
- **Exit taper:** ~15m

This design would extend the bus stop across the entire frontage of 38-44 Mungerie Road, severely restricting future development potential and permanently limiting property use. Additionally, prolonged idling of large vehicles will degrade residential amenity, increase noise pollution, and contribute to property devaluation. The proposal is inconsistent with prior council decisions and imposes unreasonable impacts on surrounding properties.

Single Access Point and Internal Circulation Issues
The school expansion allows only one main entry and exit, does not meet Austroads Guide to Traffic Management Part 3, which requires multiple access points for provides a safe, efficient solution for both vehicle and pedestrian movement developments of this scale**.** The proposal relies on a single main access point, with the secondary road restricted to service vehicles. This design will lead to significant queuing issues, with vehicles entering the site backing up onto Mungerie Road, blocking driveways and limiting resident access. Departing vehicles will also face delays due to a single exit point, creating further congestion. Internal circulation will be severely impacted, particularly during peak hours when buses, parents, and staff navigate the constrained site simultaneously. At least 26 full-sized buses would be required during peak times, and the existing stop lacks the capacity to handle this volume without severe congestion, queuing, and safety risks.
The proposed on-site drop-off and pick-up zone provides stacking for approximately 50 vehicles, yet peak-hour demand is estimated at 95 vehicles. Queueing simulations predict that overflow queuing onto Mungerie Road will reach up to 180m, blocking multiple residential driveways. The introduction of turn restrictions and deployment of traffic wardens during peak hours is necessary to prevent cars from obstructing driveways and to mitigate bottlenecks caused by U-turns.

The only internal bus set-down area currently available is a mini-bus zone, which is already struggling to meet transport demands. The proposed expansion, which adds approximately 55 mini-buses to supplement standard buses, would further congest Mungerie Road. This would lead to

increased queue times, forcing more parents to park illegally or walk to collect their children, disrupting traffic flow and compromising pedestrian safety

Pedestrian and Cyclist Safety Risks
The school expansion fails to incorporate additional pedestrian crossings or safety upgrades despite the projected increase in foot traffic along Mungerie Road, Withers road, The Rise and Brampton Drive in particular. The placement of buses near the pedestrian crossing obstructs driver visibility, heightening accident risks. Furthermore, the existing footpaths are not designed to accommodate the increased number of students, creating additional safety hazards that have not been addressed in the proposal.

Inadequate On-Site Parking and Spillover into Residential Areas
The proposal provides only 187 on-site parking spaces, resulting in a parking ratio of 0.14 spaces per student—significantly below the RMS recommended 0.2 spaces per student. Additionally, the NSW Department of Planning's Parking Policy suggests one space per full-time staff member, yet only 110 staff spaces have been allocated, leaving minimal capacity for additional parking spillover. Without additional on-site parking, we have concerns parents will be forced to park illegally in surrounding streets, further restricting resident access and exacerbating local congestion.

Combined Impact of Construction Truck Traffic, Extra Buses, and Increased Cars
The proposal will introduce a substantial increase in vehicle movements, including construction trucks, additional school buses, and private cars. During peak school hours, traffic volumes on Mungerie Road will nearly double, rising from 371 to 685 vehicles in the AM peak and from 298 to 550 vehicles in the PM peak as previously noted.

The construction phase alone will generate 30-70 truck movements per day for 6-8 months in removal of the site material close to 80,000 m3, severely disrupting traffic flow and accessibility for residents.

The impact of these factors will lead to:

- Deterioration of already substandard local roads from increase heavy vehicles traffic.
- Severe delays at intersections, particularly Withers Road, The Rise, and Brampton Drive.
- Heightened risk of accidents involving vehicles and pedestrians due to congestion and reduced visibility.
- Deteriorating air quality from construction dust, idling buses, and increased vehicle emissions.
- Increased noise pollution from heavy vehicles, idling buses, and intensified traffic activity, exceeding acceptable residential levels.
- Heavy machinery will operate between 7AM and 6PM on weekdays and 8AM to 1PM on Saturdays, this also create tremendous disruption with weekend sport with multiple regional sporting complexes close by.
- Pile driving, excavation, and concrete work will create continuous noise pollution.
- Structural Damage to Nearby Homes from Vibration:
    - Deep excavations (up to 4.5m below ground) near Mungerie Road for underground car parks may cause ground instability and vibrations.
    - Vibrations from pile driving and excavation may crack nearby house foundations.
    - Long-Term Noise Impact from School Expansion:

Heavy machinery, pile driving, and excavation works will create continuous noise pollution far exceeding acceptable residential levels. The cumulative impact of dust, vibrations, and traffic obstruction has been completely ignored in the EIS.

This level of long-term disruption in a residential zone is completely unacceptable and demonstrates a failure to consider the well-being of the community. Negative impact on residential properties severely impacting any future development potential for 38-44 Mungerie Rd.

Stormwater Management Failures – Flood Risk to Surrounding Properties
The stormwater management plan

- No detailed flood risk assessment has been conducted for adjacent properties.
- The removal of 222 mature trees will significantly increase stormwater runoff, heightening flood risks for nearby homes.
- The proposed excavation and underground parking may alter local groundwater flows, leading to long-term instability and erosion risks,

This is a clear failure, exposing local properties to unmitigated environmental damage.

Overdevelopment & Incompatibility with Residential Zoning
This expansion is grossly incompatible with the surrounding R2 Low-Density Residential zoning:

- The three-storey buildings will overshadow adjacent homes, violating privacy.
- PA announcements, school events, and playground noise will be constant sources of disruption.
- The library and prayer hall are positioned close to residential boundaries, amplifying noise and visual impact.
- Especially since 222 mature trees will be removed and the school is only proposing a 1:1 replacement ration, this significantly inadequate to provide a visual buffer also supplement canopy loss.

The scale and density of this proposal is entirely inappropriate for the area.

I urge the NSW Government to take these concerns into account and require the necessary changes before considering approval of the project. Until these concerns are adequately addressed, I strongly oppose the approval of this planning proposal.

Sincerely,
Patricia Ellis