

Minarah College, Catherine Field

State Significant Development Assessment Report (SSD 30759158)

November 2025





Acknowledgement of Country

The Department of Planning, Housing and Infrastructure acknowledges that it stands on Aboriginal land. We acknowledge the Traditional Custodians of the land and show our respect for Elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

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Minarah College, Catherine Field (SSD 30759158) Assessment Report

Cover image: A perspective architectural rendering of the new school, viewed from within the site facing east towards the main entrance. (Source: Applicant's updated Amendment Report, 2025)

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Preface

This assessment report provides a record of the Department of Planning, Housing and Infrastructure's (the Department) assessment and evaluation of the State significant development (SSD) application, as amended, lodged by Green Valley Islamic College Ltd for a new Kindergarten to Year 12 school (Minarah College) at 268-278 Catherine Fields Road, Catherine Field for 980 students/children, including a 30 place School for Special Purpose and a 60-place Early Learning Centre (ELC). The report includes:

- an explanation of why the project is considered SSD and who the consent authority is
- an assessment of the project against government policy and statutory requirements, including mandatory considerations
- a demonstration of how matters raised by the community and other stakeholders were considered
- an explanation of any changes made to the project during the assessment process
- an assessment of the likely environmental, social and economic impacts of the project
- an evaluation which weighs the likely impacts and benefits of the project, having regard to proposed mitigations, offsets, community views and expert advice; and provides a view on whether the impacts are, on balance, acceptable
- an opinion on whether the project is approvable or not, along with the reasons, to assist the Independent Planning Commission in making an informed decision about whether development consent for the project can be granted and any conditions that should be imposed.

Executive Summary

This report details the Department of Planning, Housing and Infrastructure's (the Department's) assessment of the State significant development (SSD) application SSD-30759158 (as amended) for Minarah College located at 268-278 Catherine Fields Road, Catherine Field in the Camden local government area (LGA).

Green Valley Islamic College Ltd (the Applicant) submitted an Amended Application on 10 September 2024, and it is this amended proposal (the proposal) that is the primary focus of this assessment. The Applicant proposes to construct and operate a new two storey Kindergarten to Year 12 school (Minarah College) for 980 students/children, including a 30 place School for Special Purpose and a 60-place Early Learning Centre (ELC). The project includes tree removal, demolition, bulk earthworks, on-site wastewater management including a sewage treatment plant, sports field, landscaping, public domain, and infrastructure works. The project is proposed to be developed in four stages.

The project has an Estimated Development Cost (EDC) of \$123,742,670 and is predicted to generate 434 construction jobs and 99 operational jobs.

The project is classified as SSD under section 4.36 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) because it satisfies the criteria under section 15(1)(a) of Schedule 1 of the State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP) being a new school with an EDC over \$20 million. The application is permissible with consent.

The Department exhibited the Environmental Impact Statement (EIS) for the original proposal from 28 June to 1 August 2022 (35 days) in relation to a staged K-Year 12 school development and ELC for up to 1580 students/children. The Department received advice from government agencies and a total of 290 submissions, including an objection from Council and 188 objections from the community. Issues raised included concerns regarding site servicing, land use conflict, built form, traffic, wastewater management and flooding.

The Independent Planning Commission (IPC) is the consent authority for the project under section 4.5(a) of the EP&A Act because it satisfies criteria under section 2.7 of the Planning Systems SEPP as Camden Council (Council) objected to the project and more than 50 submissions objecting to the proposal were made during public exhibition of the EIS.

Following the Applicant's Response to Submissions (RtS), an Amended Application was lodged reducing the scale of the development. The amended application was exhibited from 17 September to 28 October 2024 (42 days). During the exhibition period, the Department received:

- a total of 272 public submissions including 96 in objection and 176 in support

- an objection from Council
- one submission from a special interest group in support
- two submissions from utility providers
- advice from 10 government agencies.

The Applicant submitted a Response to Submissions for the amended proposal (ARtS), on 21 May 2025 and additional information on 14 August 2025 providing further justification for the development and addressing issues raised in submissions and agency advice.

The Department made the ARtS publicly available on the NSW Planning Portal and consulted Council and agencies. The Department received a submission from Council identifying issues and maintaining its objection, as well as advice from government agencies.

Key issues raised during exhibition of the original proposal and the amended proposal related to:

- Land use conflict and site servicing
- Built form and urban design
- Traffic, transport and access
- Flooding.

The Department has considered the merits of the amended proposal in accordance with relevant matters under section 4.15(1) of the EP&A Act, the issues raised in the submissions received during both exhibitions, the applicant's responses to submissions and additional information. The Department concludes that the amended proposal is acceptable as:

- it is consistent with the State Infrastructure Strategy 2022–2042 and Camden Local Strategic Planning Statement
- it would facilitate State government priorities by providing social infrastructure to support to meet the current and future needs of the growing population in this region. Benefits include the provision of additional school and childcare facilities in the non-government school sector, as well as the opportunity for the shared use of school facilities with the community
- the reduced scale of the development and measures to minimise land use conflicts during construction and operation, including a Biosecurity Management Plan, will ensure the development's compatibility with the RU4 zone objectives
- notwithstanding the site's current semi-rural nature, it also adjoins R1 Large Lot Residential zoned land, will be adequately serviced by utilities and infrastructure and subject to conditions, can support the development of an education facility of up to 980 students/children (including 60 children in the ELC), making it suitable for the proposed school

- the Applicant confirmed adequate electricity and telecommunications services for all development stages, with interim measures proposed to address uncertainties in water and wastewater servicing until public infrastructure is available when the Catherine Field Precinct (part) is released
- the development's height, bulk and scale, generous setbacks, topography-responsive design, articulated building façades would minimise the perceived bulk and amenity impacts, such as overshadowing and privacy loss
- subject to conditions for finalised façade plans and integrated design strategies, and the development's landscape design incorporating Connection with Country principles and strategic landscaping placement is contextually appropriate, minimises visual impacts and would enhance the area with open spaces shared with the community
- would not result in unreasonable overshadowing, view and privacy impacts on adjoining development
- despite gradual staged traffic increases over the twelve years forecast by the Applicant, as well as anticipated background growth, most intersections will maintain satisfactory performance, except Camden Valley Way/Catherine Fields Road, the impact of which the Applicant will mitigate with road upgrades, including road widening, bus bays and a right-turn bay. Conditions are recommended, requiring the school to promote active transport through a School Travel Plan (STP) and a Parking Management Plan
- provide approximately 434 construction jobs and up to 99 operational jobs
- the proposal is compatible with forecast flood behaviour, complies with local flood planning levels and poses no adverse impact on flood function, safety or the environment and incorporates appropriate risk management measures
- the Flood Emergency Response Plan developed with NSW SES and CPHR, will appropriately manage risks to vulnerable persons. Early closure of the development is the primary flood response. Refuge above the maximum flood level, with all new buildings (and accessways between classrooms) located above the Probable Maximum Flood level, provides a viable Shelter-in-Place option for large-scale flood events as a secondary response.

The Department has recommended conditions to appropriately address any residual issues.

Following its detailed assessment, the Department considers the project is not contrary to the public interest and concludes that the project is approvable, subject to conditions.

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1 Introduction

1.1 The proposal (as amended)

1. Green Valley Islamic College (the Applicant) proposes the staged construction and operation of a new Kindergarten to Year 12 school (Minarah College) in Catherine Field (SSD-30759158) for a maximum of 980 children including a 60-place Early Learning Centre (ELC).
2. The project description and mitigation measures, provided in **Section 3** and **Appendix D** of the Amendment Report (AR), refined by the Response to Submissions for the amended proposal (ARtS), are the subject of this report and will form part of the development consent if the project is approved. An overview of the proposed development as amended is provided in **Section 2**. A summary of the key amendments made to the project since it was initially lodged with the Department and exhibited is provided in **Appendix A**.

1.2 Site description

1.2.1 Project location

3. The subject site is located at 268-278 Catherine Fields Road, Catherine Field, within the Camden local government area (LGA). It is approximately 43 kilometres (km) southwest of the Sydney Central Business District (CBD), 17km southwest of Liverpool, 35km southwest of Parramatta CBD and 9km southwest of Leppington (see **Figure 1**).

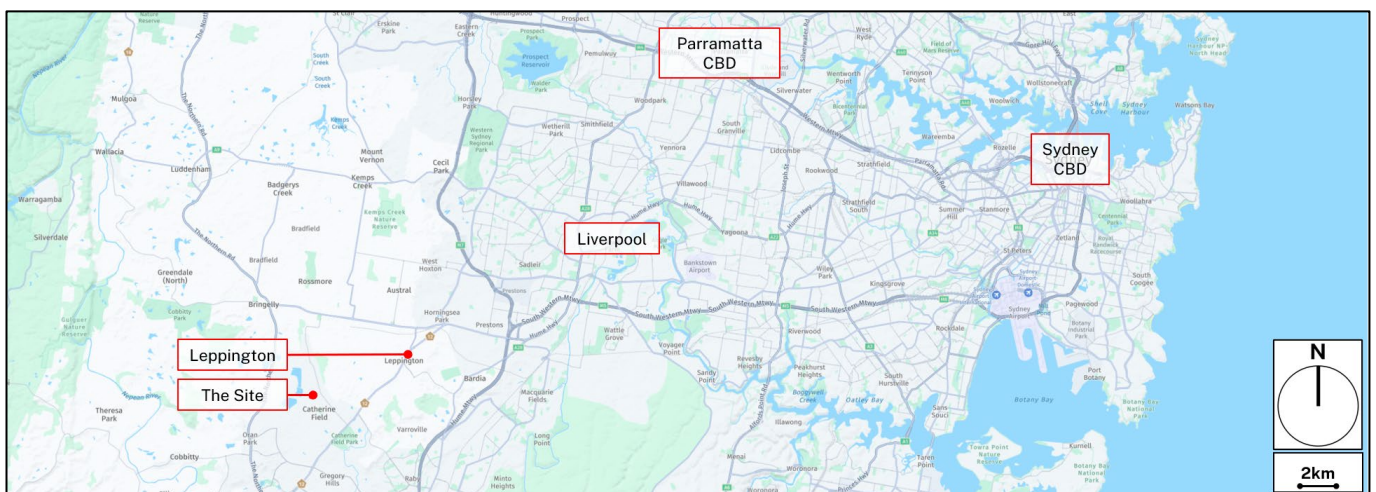


Figure 1 | Regional context map (Base source: Nearmap, 2024)

4. The site is legally described as Lot 11 DP 833983 and Lot 12 DP 833784 and comprises an area of approximately 4.5 hectares (ha). The site is zoned RU4 (Primary Production Small

Lots) under the CLEP 2010. The site is bordered by a single rural residential property to the north, bushland to the east, four large lot residential properties to the south and Catherine Fields Road to the west.

5. Immediately adjacent residential properties to the south are located on land zoned for large lot residential purposes. The site location is shown in **Figure 2**.



Figure 2 | Local context map (Base source: Nearmap, 2025)

6. Existing structures on the site include two single-storey dwellings, a detached secondary dwelling, sheds and derelict outbuildings, as well as ancillary farm structures, water tanks and an infilled farm dam. The existing buildings and site features are shown in **Figure 3** to **Figure 7**.



Figure 3 | Aerial view of the site (Base source: Nearmap, 2025)



Figure 4 | Dwellings at 278 (left) and 268 (right) Catherine Fields Road (Source: Department 2025)



Figure 5 | Shed (left) and derelict outbuilding (right) northern part of the site (Source: Department 2025)



Figure 6 | View from the central part of the site looking west to Catherine Fields Road (Source: Department 2025)



Figure 7 | View from the site looking east toward adjacent bushland areas (Source: Department 2025)

1.2.2 South West Growth Area

7. The site is located in the Catherine Field precinct of the South West Growth Area (SWGA), which is established under the State Environmental Planning Policy (Precincts – Western Parkland City) 2021 (Western Parkland City SEPP). The SWGA in its entirety is comprised of 14 precincts and sub-precincts in the Camden, Campbelltown and Liverpool LGAs as shown in **Figure 8** below.
8. Precincts in the SWGA are subject to strategic land use planning and coordinated infrastructure delivery, involving consultation between the Department, councils and the community. Nine precincts have so far been rezoned and released for urban development.
9. The Catherine Field (unreleased) precinct is in the early stages of the precinct planning process. While it is identified in the Western Parkland City SEPP, it has not undergone rezoning to be released for urban development. Therefore, the layout of future land use zones, transport corridors, open space provisions, the location of community facilities and social infrastructure (including any new schools), dwelling targets and development contributions are yet to be established for the precinct.

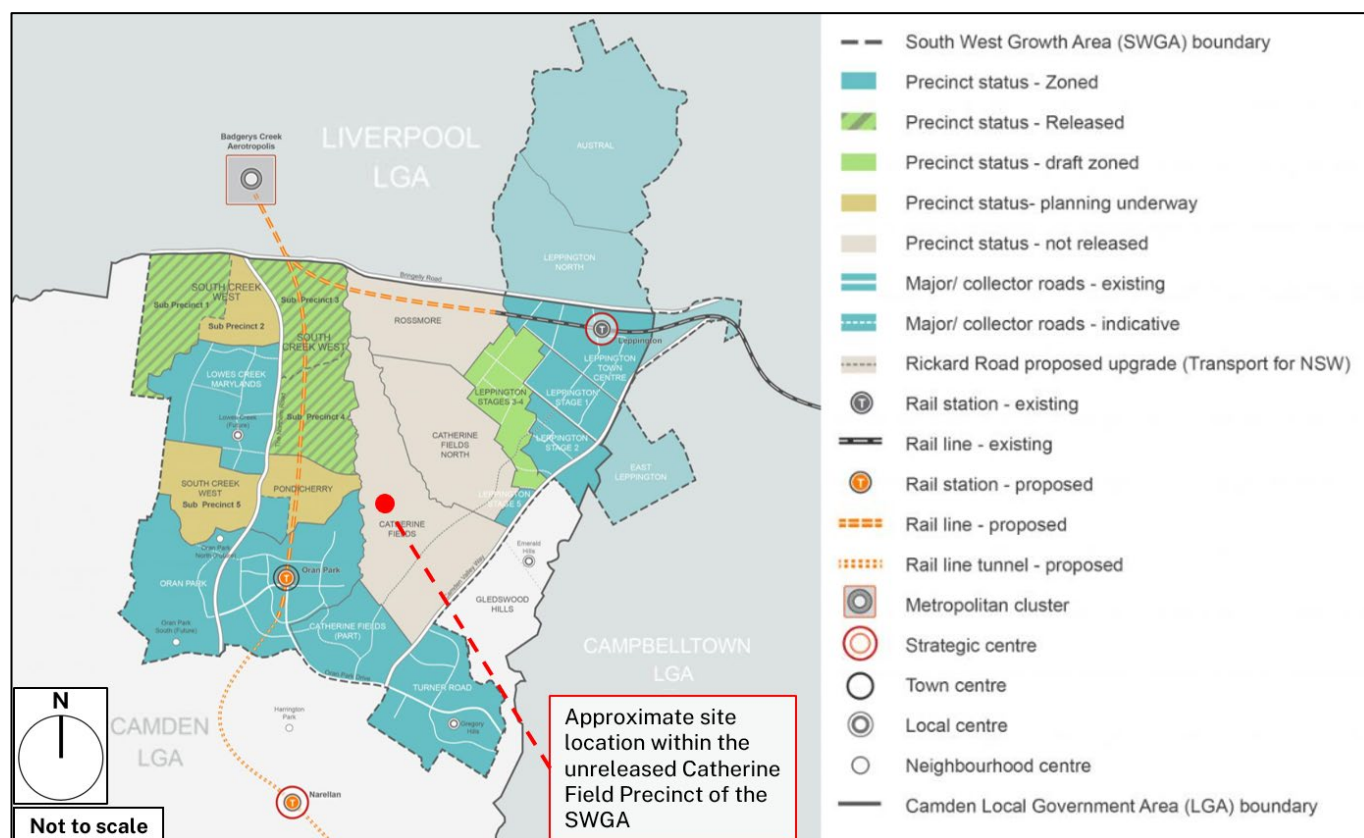


Figure 8 | Site within the SWGA precincts (Base source: SWGA Precinct Status Map, Camden Council (Council), December 2023)

1.2.3 Surrounding development

10. The surrounding locality is characterised by rural residential development, hobby farms, small scale agriculture and some primary production. Existing development immediately adjacent to the site's southern boundary comprises several residential single-storey dwellings located on large lots which reflect the R5 large lot residential zoning.
11. Wianamatta South Creek is located approximately 350m west of the site and is a tributary of the Hawkesbury-Nepean River. The waterway also forms the boundary between the suburbs of Catherine Field to the east and Oran Park to the west.
12. The Oran Park precinct within the SWGA is located southwest of the site across South Creen. Oran Park was one of the first SWGA precincts to be released for urban development in 2007. The Oran Park precinct now comprises in excess of 5,000 dwellings and is anticipated to grow to approximately 7,540 dwellings overall.
13. The Catherine Field (Part) precinct, approximately 3km south of the site, was rezoned in 2013 and is anticipated to deliver 3,200 new homes.

14. The surrounding land use zones, including the location of Oran Park, the section of Catherine Field Precinct (Part) that was rezoned and the alignment of Wianamatta South Creek in context to the site are detailed in **Figure 9**.
15. Land zoned for residential purposes (R5- Large Lot Residential) is adjacent to the south and R1- General Residential land is located approximately 500m to the west across Wianamatta South Creek.

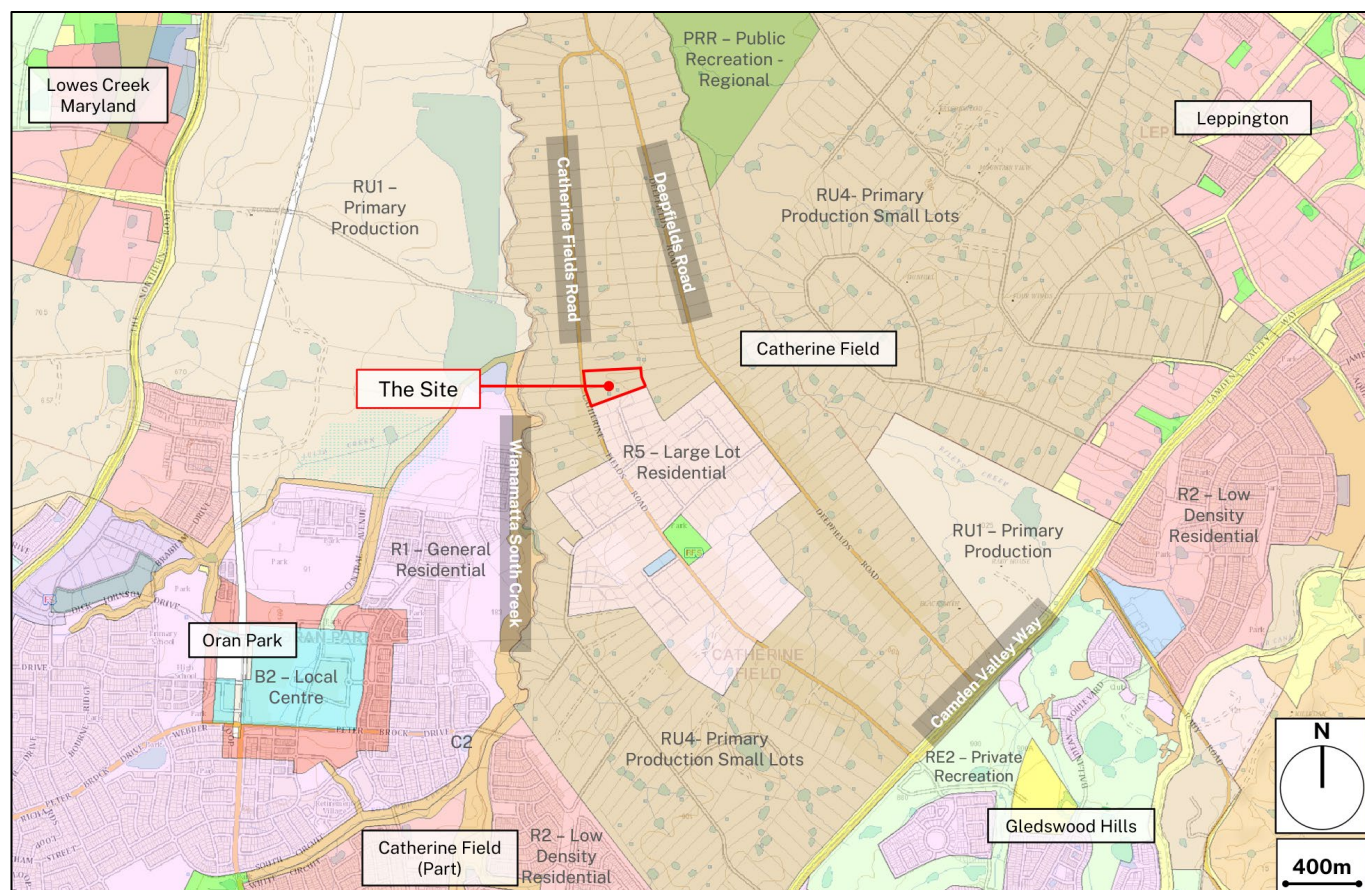


Figure 9 | Site and surrounding land use zones (Base source: NSW Planning Portal Spatial Viewer, June 2025)

1.2.4 Site access and public transport

16. Vehicular access to the site is provided directly from Catherine Fields Road. Catherine Fields Road provides broader connection to the classified road network, including the State road, Camden Valley Way, located approximately 2.5km southeast of the site and Bringelly Road (via Barry Avenue and Allenby Road), located approximately 5km north of the site.
17. Camden Valley Way provides further connections to The Northern Road, the Westlink M7 Motorway and the M5 South Western Motorway.
18. The site is not directly serviced by public transport.

19. The nearest bus stop is 850m south of the site along Catherine Fields Road, for Routes 850 (once per half an hour to Minto) and 857 (once every 3 hours to Liverpool). The nearest railway stations include Leppington railway station, approximately 5km northeast of the site, and Minto railway station, approximately 8km southeast of the site, shown in **Figure 10**.

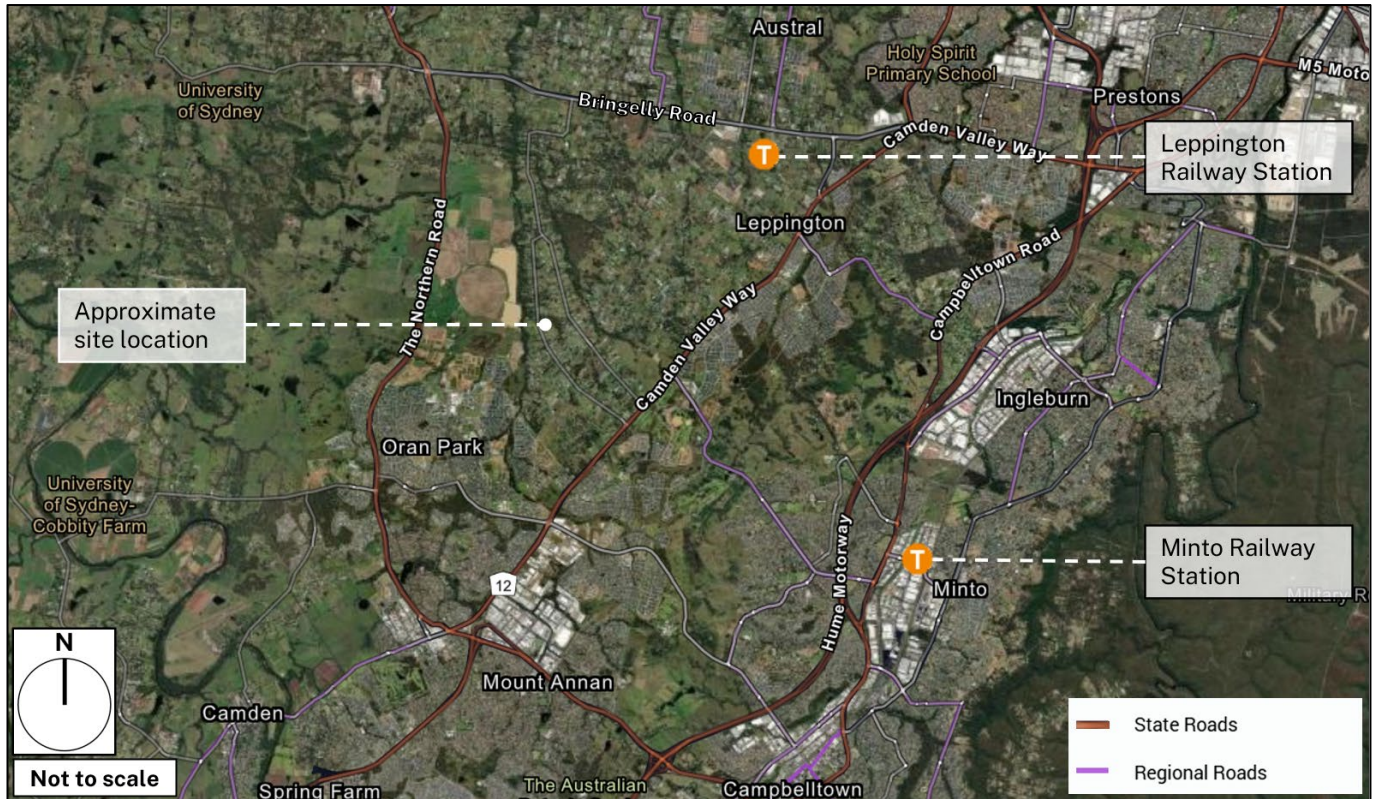


Figure 10 | Surrounding classified road network and the nearest railway stations to the site (Base source: NSW Road Network Classifications map, Transport for NSW (TfNSW) 2025)

1.2.5 Flooding hazard

20. The site slopes gently toward Catherine Fields Road with a drop of 10 metres (m) from the southeast to the northwest. Part of the site is subject to flooding, with flood waters primarily flowing across the site from east to west along the southern boundary towards the roadside swale fronting the site's west. As demonstrated in **Figure 11** and **Figure 12**, flood modelling identifies small pockets of isolated flooding within the site up to 0.5m deep in the 1% Annual Exceedance Probability (AEP) flood event. During Probable Maximum Flood (PMF) events flooding will occur along the southern and southwest boundary of the site with depths of 0.1m to 0.7m.



Figure 11 | Existing 1% AEP flood water level and depth (Source: Applicant's response to Further Request for Information (RFI), 2025)



Figure 12 | Existing PMF flood water level and depth (Source: Applicant's response to Further RFI, 2025)

1.3 Related projects and works

21. Historic aerial photography indicates that the site has been used for rural residential purposes from the mid-1960s with small scale agriculture activities carried out on the site until at least 1983. The site continues to be used for rural residential purposes.
22. Previous development applications (DAs) and complying development certificates (CDCs) that relate to the site are associated with minor works and are summarised in **Table 1**.

Table 1 | Previous DAs and CDCs relevant to the site

DA / CDC Number	Description	Consent authority	Determination date
CDC/2021/1840/1	Removal of swimming pool at 278 Catherine Fields Road	N/A	24 December 2021
DA/2010/650/1	Construction of gable pergola attached to dwelling at 268 Catherine Fields Road	Council	7 July 2010
DA/2006/620/1	Construction of shed at 268 Catherine Fields Road	Council	24 August 2006

1.4 Project background

23. Minarah College is an existing school established in 2002 and located at 264 Wilson Road, Green Valley. The Green Valley campus is currently at capacity, accommodating approximately 1,000 students from Year K to 12 and 90 staff members. The Applicant seeks to establish a new campus to support the existing College and provide diverse education facilities to meet the current and projected demand of the growing population for schools and early childcare facilities in the SWGA precincts. The Applicant explored alternative development options including Option 1 – ‘do nothing’; Option 2 – alternative design and location; and Option 3 – proposed design.
24. The Applicant advised that Option 3 was chosen as it will meet the identified need and result in positive social and economic benefits for the local community by creating jobs and reducing pressure on surrounding public schools.

2 Project

2.1 Project overview

25. The key aspects of the overall project (as amended) are provided in detail in the Revised Project Description chapter of the AR, as refined by the ARtS, and outlined in **Table 2**. Details of what is proposed to be developed in each of the stages is provided in **Section 2.4**.

Table 2 | Key aspects of the project

Aspect	Description
Project summary	Staged construction and operation over 4 stages of a new school (Minarah College) catering for a maximum of 980 students within Kindergarten to Year 12, Out of School Hours (OOSH) care and a 60-place ELC.
Site area	• 4.5ha
Tree removal, demolition and earthworks	• Demolition and removal of existing structures, including: – two single-storey dwellings – a detached secondary dwelling – detached sheds, rainwater tanks and ancillary farm structures • Dewatering an existing farm dam • Bulk earthworks (12,199 cubic metres (m³) of cut and 10,736m³ of fill).
Built form and uses (staged)	• Staged construction of a two-storey building with separate built form wings, incorporating the following uses: – western wing (Stage 1): school entrance, reception, ELC, primary school food and textile workshop, uniform store, staff and admin space and OOSH care – southern wing (Stage 2): primary school for SSP, kindergarten, primary school (PS) hall and library, wellbeing centre and PS GLAs – northern wing (Stages 3 and 4): high school for SSP, arts, science and technology spaces, canteen, high school (HS) hall and library, waste room, outdoor learning areas (OLAs) and HS general learning areas (GLAs).

Aspect	Description
Building height	• A maximum of 9.5m
Gross floor area (GFA)	• 13,109 square metres (m²).
On-site wastewater management (staged)	• Delivery of an on-site wastewater management system (OWMS) capable for indefinite operation (until the site can connect to reticulated sewerage infrastructure), including: – construction of an onsite sewage treatment plant – staged on-site effluent irrigation management areas – periodic off-site disposal of solid waste.
Open space and landscaping (staged)	• Removal of 230 trees • Hard and soft landscaping works including planting of 270 trees • Central landscape courtyard with steps, terraces, seating, raised planters, a covered outdoor learning area (COLA), outdoor play areas and a rectangular sports field providing: – 662m² of enclosed separated open space for the ELC – 15,564m² of open space for the school.
Student and staff population (staged)	• A maximum of 980 students/children, including: – 30 SSP students – 505 PS students (Years K-6) – 385 HS students (Years 7-12) – 60 ELC placements • 51 full-time equivalent (FTE) school and ELC staff.
Access	• Separate vehicular entry (northern crossover) and exit (southern crossover) points from and to Catherine Fields Road, forming a one-way southbound only movement • Gated pedestrian access point at the centre of the western frontage from Catherine Fields Road.
Drop-off/pick-up (DOPU) (staged)	• Two lanes of internal DOPU areas along the western frontage, providing up to 30 DOPU spaces over three stages

Aspect	Description
Parking (staged)	• 95 car parking spaces including: – 51 spaces allocated to staff – 23 spaces allocated to students – 15 spaces allocated to the ELC – 6 spaces for general use • Private school bus parking bays at the rear of the site • 30 bicycle parking spaces.
External roadworks (staged)	• External roadworks including: – a channelised right-turn bay from Catherine Fields Road into the site – seven indented bus bays on the eastern side of Catherine Fields Road • 1.8m wide pedestrian footpath and 4 waiting areas of 3m wide along the western site frontage.
Hours of operation	• ELC: 7am to 6pm (Monday to Friday) • OOSH: 7am to 6.30pm (Monday to Friday) • Core school hours: 8.20am to 3.20pm (Monday to Friday) • Primary school hall: 7am to 6.30pm (Monday to Friday) • Sports field: 8.20am to 9pm (Monday to Friday) and 9am to 9pm (Saturday and Sunday) • Multi-purpose hall (HS hall): 8.20am to 9pm (Monday to Friday) and 9am to 9.30pm (Saturday and Sunday) from Stage 4 onwards.
Hours of community use	• Sports field: 8.20am to 9pm (Monday to Friday) and 9am to 9pm (Saturday and Sunday) • Multi-purpose hall (HS hall): 8.20am to 9pm (Monday to Friday) and 9am to 9.30pm (Saturday and Sunday) from Stage 4 onwards.
Jobs	• Approximately 434 construction jobs and 99 operational jobs.
Estimated Development Cost (EDC)	• \$123,742,670.

2.2 Physical layout and design

26. The proposal involves the staged construction of a new two-storey school building, featuring a northern wing for HS students and a southern wing for PS students. These wings will be connected by a shorter western wing facing Catherine Fields Road. The design of the building will follow the natural slope of the site, which descends from east to west towards the road.
27. The northern and southern wings will accommodate a range of functional and operational facilities for an educational establishment, including spaces for SSP, arts, science and technology spaces, a canteen, libraries, halls for both HS and PS, a waste room, kindergarten, a wellbeing centre, outdoor learning areas, and GLAs. The western wing will accommodate the school entrance, reception area, ELC, food and textile workshop, uniform store, administrative offices and OOSH facilities.
28. The Applicant also proposes extensive landscaping works, including planting native trees and shrubs. The articulated building wings are designed around an elongated central courtyard that features steps, terraces, tiered seating, raised planters and a COLA at the eastern end.
29. As shown in **Figure 13**, the site includes a gated vehicular entry point on the north side and a gated exit point on the south side along Catherine Fields Road. Two lanes of on-site DOPU bays will be located internally on site next to the proposed one-way southbound driveways, accommodating up to 30 cars. Secure fencing will be provided along Catherine Fields Road, with a 3m setback from the western boundary.
30. A single gated pedestrian access point, and crossing at the centre of the frontage, will lead to the school entrance. An internal driveway along the southern site boundary will provide access to the on-site sewage treatment plant and bus parking and circulation area at the rear. A total of 95 car parking spaces will be provided in two at-grade carparks to the north and south of the school buildings.
31. Sewerage services are not currently available in this area of Catherine Fields, although potable water is available with limited capacity. The proposal involves an OWMS capable of operation accommodating the ultimate anticipated school population without connection to reticulated sewage. The OWMS includes the installation of a sewage treatment plant and on-site effluent management areas (EMA) at the rear of the site. The OWMS necessitates intermittent disposal of effluent and waste to a suitable off-site facility, shown in **Figure 13**.
32. Acoustic walls with heights ranging from 1.5m to 2.4m are proposed at each stage of the development to mitigate noise impact. The types and locations of the acoustic walls are depicted in **Figure 14** to **Figure 17**.



Figure 13 | Site layout of the ultimate development from Stage 3 (Base source: Applicant's ARTS 2025)

2.3 Uses and activities

33. The proposed development will accommodate a maximum of 980 students (including 60 ELC placements and 30 SSP enrolments) from Kindergarten to Year 12 including:
 - 505 PS students from Kindergarten to Year 6
 - 385 HS students from Year 7 to Year 12, and
 - 51 FTE staff.
34. The proposal includes an OOSH care facility.
35. The proposed core operational hours of the school and the ELC are shown above in **Table 2**. The Applicant advised that students would have staggered lunch and recess times during school hours between 8.20am and 3.20pm.
36. The sports field (Stage 1) will facilitate training and competitions and be open for community use during hours between 8.20am and 9pm on weekdays and between 9am and 9pm on weekends. A multi-purpose hall (Stage 4 works) will also be open for community use during hours between 8.20am and 9pm on weekdays and between 9am and 9.30pm on weekends.
37. In addition to the proposed on-site transport infrastructure and external roadworks listed in **Table 2**, the school has committed to operation of a 12.5m private chartered bus for

exclusive school use. The bus would run every 30 minutes from the Leppington and Minto railway stations to the site during the morning and afternoon peak hours. A private bus bay is proposed at the rear of the site when the bus is not in service.

2.4 Timing and sequencing

38. The Applicant proposes the development be constructed and operated in four stages over 12 years. The staging has been designed to ensure adequate capacity and amenity for each operational stage, manage the potential conflict between construction and operation, and reduce impacts on the concurrent school operation and the road network. Details of the proposed staging are listed in **Table 3** and shown in **Figure 14** to **Figure 17**.

Table 3 | School population and works at each construction and operational stage

Stage	School population	Works
Stage 1	300 school students/children including 18 ELC children and 15 FTE staff	• Demolition of existing structures and dewatering dam • Remediation of the entire site • Excavation and bulk earthworks • Removal of 230 trees • Construction of: – PS western wing and ELC – separate open space play areas for PS and ELC students – COLA, canteen, waste shed and a sports field – a portion of the northern car park providing 24 spaces – access roads, bus parking and loading areas – the first lane of DOPU area providing 17 bays • Planting of 58 trees and associated landscaping • Fencing and acoustic walls, including 1.8m tall boundary acoustic walls along the northern and southern site boundaries • Onsite utilities: – on-site sewage treatment plant and EMAs (minimum 2301m²) – a 35 kilolitres (kL) potable water break tank, a new authority water meter and a potable cold water pump • Civil and public domain works, including upgrades to Catherine Fields Road comprising: – 1.8m wide pedestrian footpath and four 3m wide waiting areas near the school entrance – two indented bus bays

Stage	School population	Works
Stage 2	610 school students/children including 42 ELC placements and 33 FTE staff	• Excavation and bulk earthworks • Construction of the: – PS southern wing including the PS hall and open play area – southern car park providing 62 spaces (a total of 86 spaces) and access roads – second lane of DOPU providing 13 bays (a total of 30 bays) – EMAs (minimum 4749m²) • Extension of the outdoor play area • Relocation of the waste shed • Planting of 85 trees (a total of 143) and associated landscaping • Fencing and acoustic walls • Civil and public domain works.
Stage 3	980 students /children including 60 ELC placements and 51 FTE staff (increase of 328 students, 27 ELC placements and 18 FTE staff)	• Excavation and bulk earthworks • Construction of the: – HS northern wing, open play area, three playing courts, a COLA and the central courtyard – remainder of the northern car park providing 9 spaces (a total of 95 spaces), access roads and a loading area – EMAs (minimum 6619m²) • Civil and public domain works, including road widening and upgrades to Catherine Fields Road comprising: – a channelised right hand turning lane – 1.8m wide pedestrian footpath and four 3m wide waiting areas along the school's western street frontage – additional five indented bus bays (a total of seven bays) • Fencing and acoustic walls.
Stage 4	980 students /children including 60 ELC placements and 51 FTE staff (no increase)	• Excavation and bulk earthworks • Construction of: – HS hall – EMAs (minimum 6619m²) • Fencing and acoustic walls.

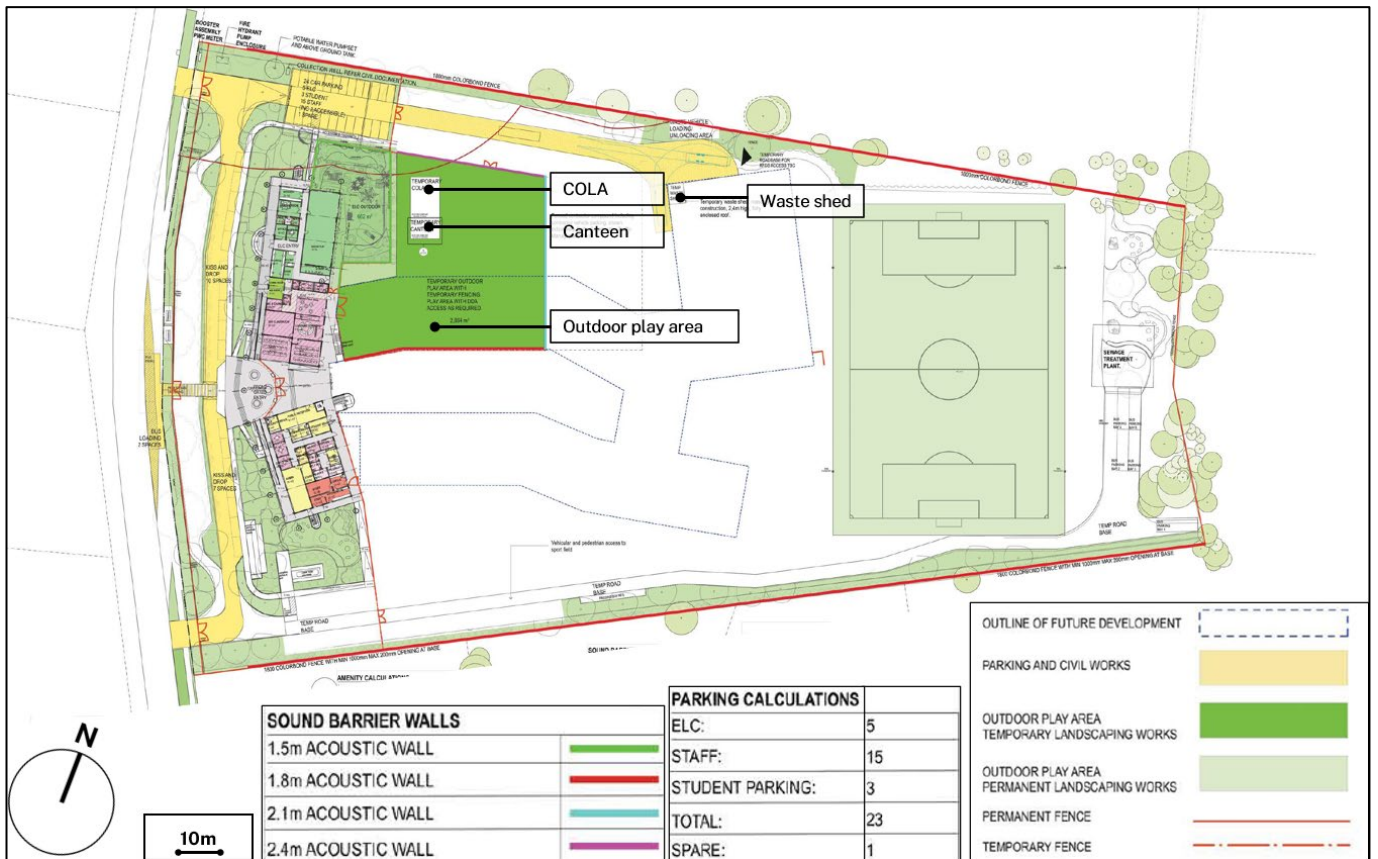


Figure 14 | Stage 1 Ground Floor Plan (Source: Applicant's ARtS, 2025)

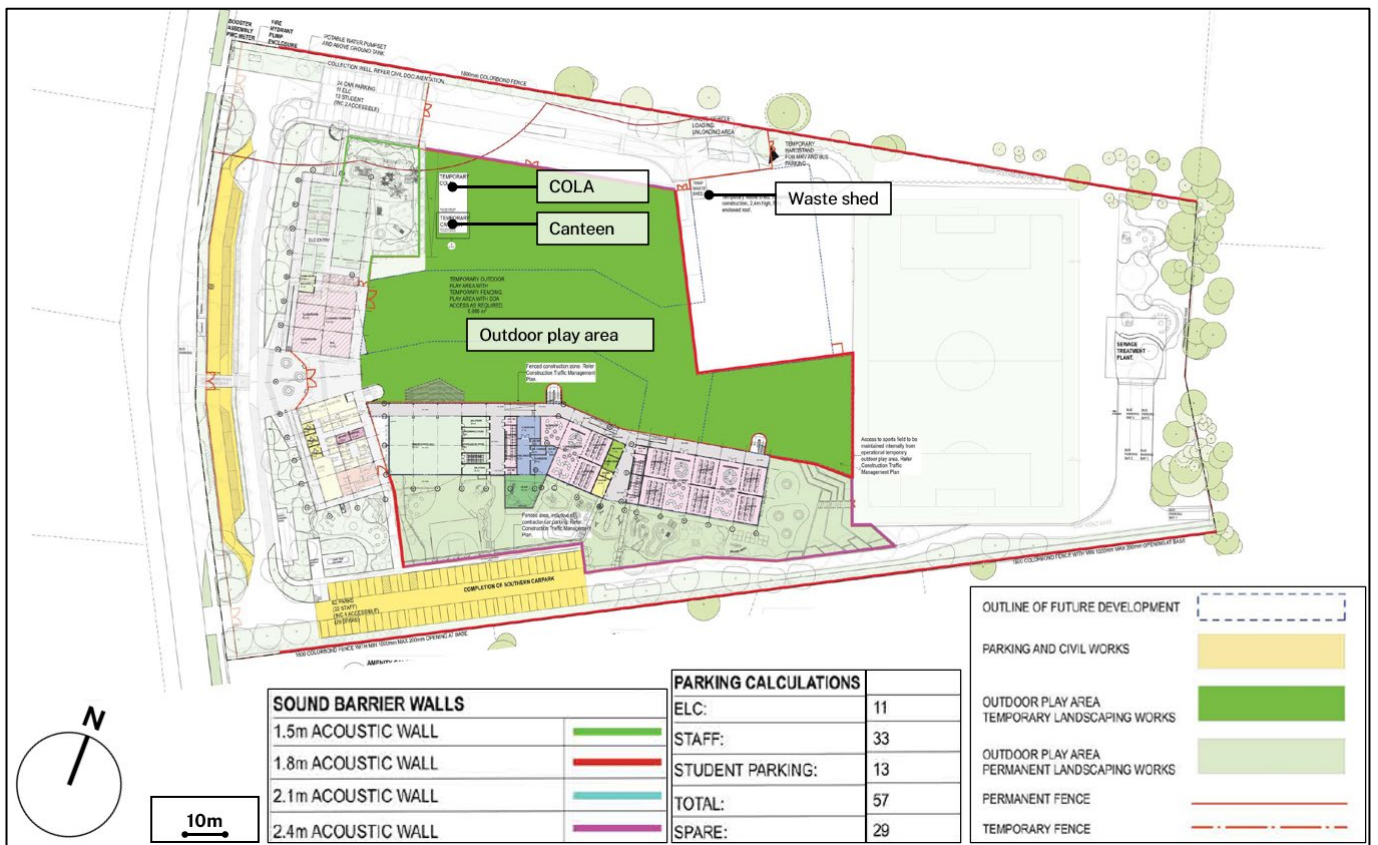


Figure 15 | Stage 2 Ground Floor Plan (Source: Applicant's AR, 2024)

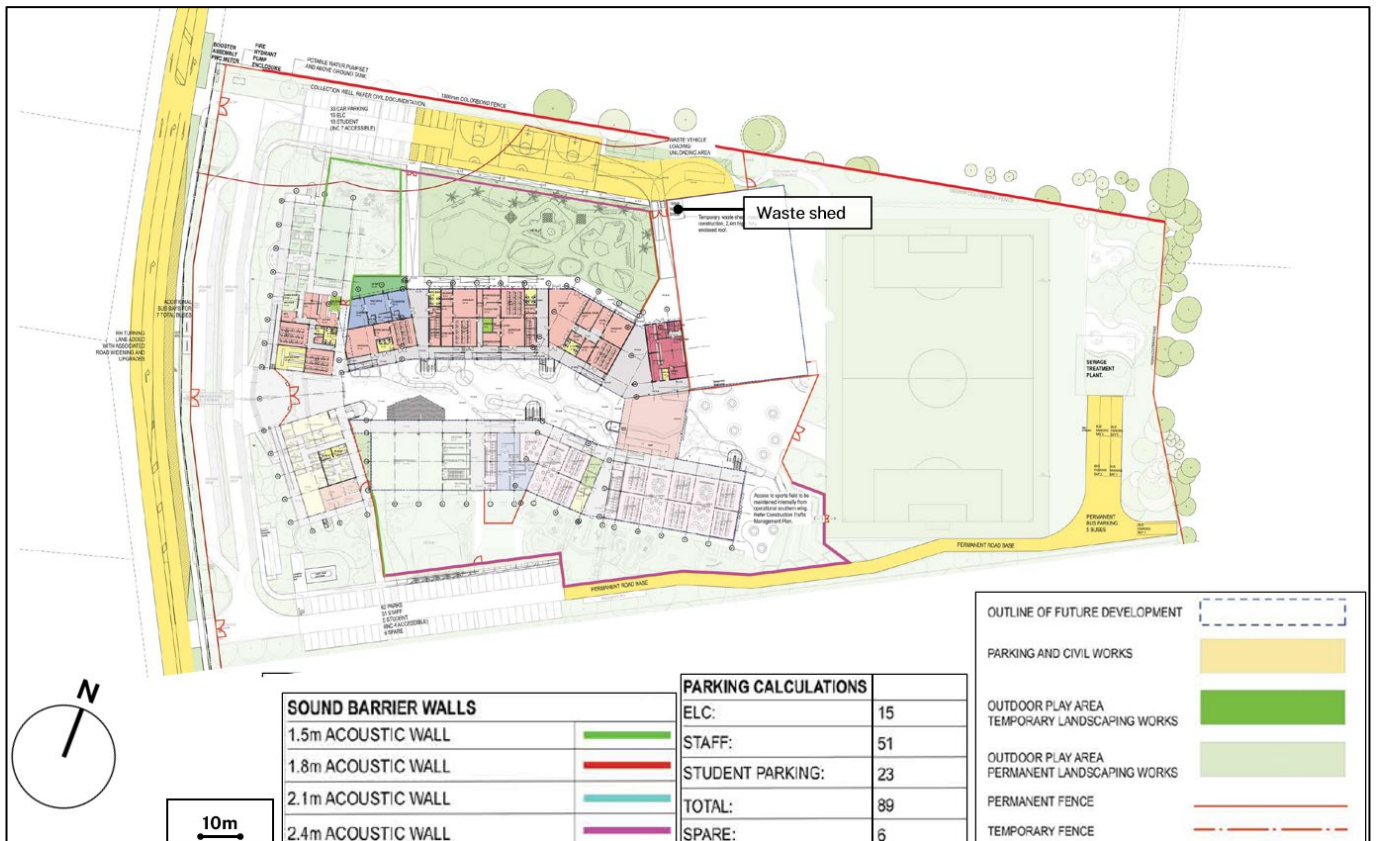


Figure 16 | Stage 3 Ground Floor Plan (Source: Applicant's AR, 2024)

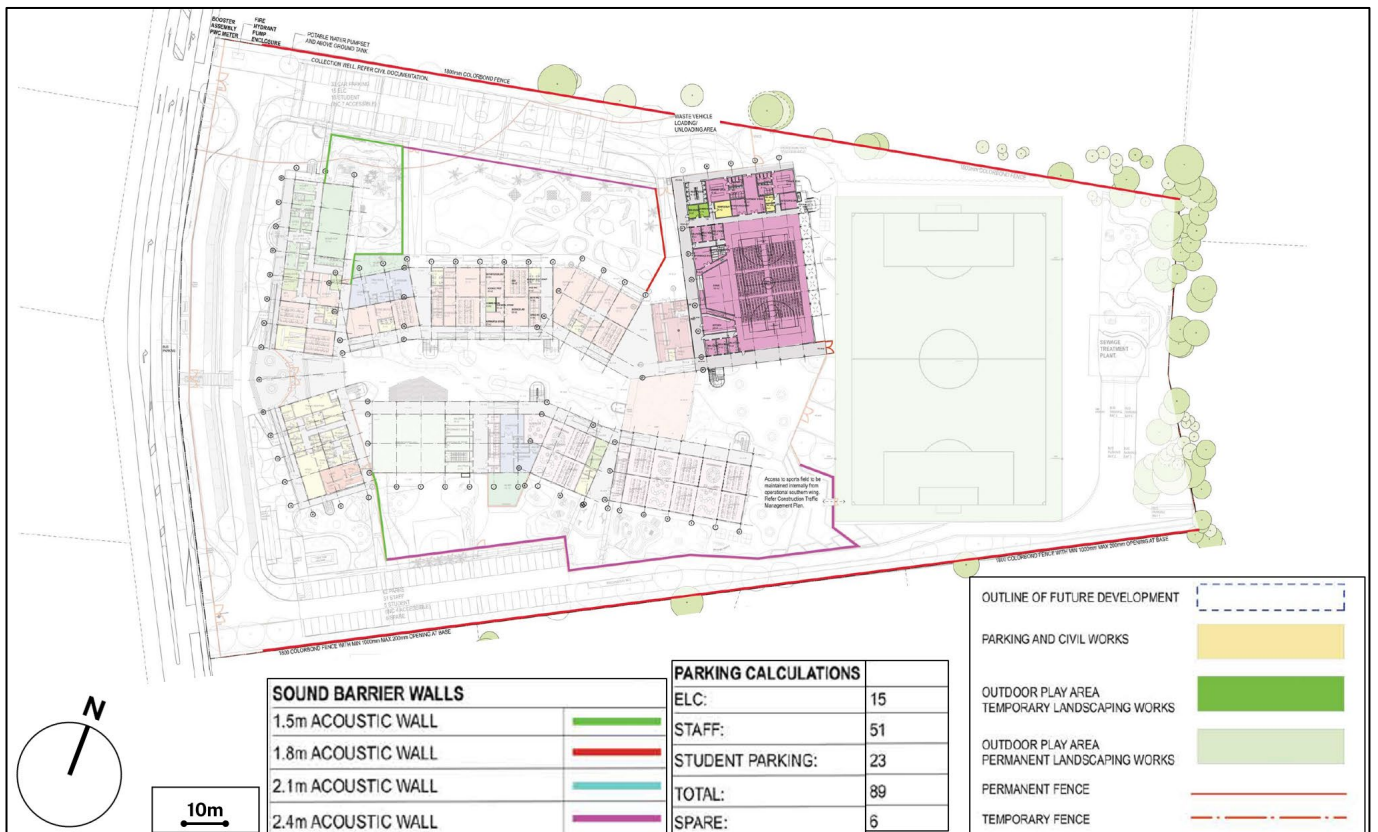


Figure 17 | Stage 4 Ground Floor Plan (Source: Applicant's AR, 2024)

3 Strategic context

3.1 Key strategic issues

39. The project is largely consistent with the strategies, plans and policies outlined in **Table 4**.

Table 4 | Summary of government strategies, plans and policies

Strategy, plan or policy	Consistency	Comments
Greater Sydney Region Plan (2018)	Consistent	The plan aims to transform land use and transport patterns to improve Greater Sydney's liveability, productivity and sustainability by spreading the benefits of growth. The project will be consistent with Objective 6 – Services and infrastructure to meet communities' changing needs.
Western City District Plan (2018)	Consistent	The plan aims to manage growth in the context of economic, social and environmental matters to achieve the 40-year vision for Greater Sydney. The project will be consistent with Planning Priority W3 – Providing services and social infrastructure to meet people's changing needs. This includes additional school placements and new child care facilities in the non-government school sector and opportunity for the shared use of school facilities with the community.
State Infrastructure Strategy 2022–2042	Consistent	The strategy aims to plan infrastructure needs for ongoing population growth and integrated infrastructure, land use and service planning. The project will align with the strategy as it will provide for additional school placements and new child care facilities in the non-government school sector and opportunity for the shared use of school facilities with the community.
Camden Local Strategic Planning Statement (LSPS)	Consistent	The Camden LSPS provides a 20-year planning vision with an emphasis on land use, transport and sustainability objectives for the Camden LGA.

Strategy, plan or policy	Consistency	Comments
		The project will be consistent with the LSPS as it will provide educational services and facilities in an area identified as a future urban precinct within the SWGA. In particular, the project is consistent with Local Priority L1 (Aligning infrastructure delivery with growth) and Local Priority L3 (Providing services and facilities to foster a healthy and socially connected community).

3.1.1 2022 NSW Flood Inquiry

40. The Department has had regard to the findings of the NSW Flood Inquiry, commissioned by the NSW Government in March 2022 to examine and report on the causes of, planning and preparedness for, response to and recovery from the 2022 catastrophic flood events. The Inquiry was handed down on 29 July 2022 and recognised that urgent action is required to enable immediate improvements in the way NSW prepares for, responds to and recovers from events of the magnitude of the 2022 floods.
41. While there is no specific mention of schools in the Inquiry recommendations, section 7.10 of the Inquiry, notes over 2000 pieces of essential and community infrastructure are located within the 1% AEP – including police stations, fire stations, hospitals, nursing homes, schools, airports, water filtration plants, sewerage works and power stations. As such, this recommendation more broadly relates to essential facilities, of which schools could be considered to form a part.
42. On 1 March 2024, the Department issued a Planning circular which includes:
 - actions taken in response to the Inquiry
 - updates on flood related policy initiatives
 - outlines existing flood-related planning legislation, development controls and policies and provides further information and advice on the application of:
 - Local Environment Plan (LEP) and Development Control Plan (DCP) flood-related development controls
 - clause 5.21 Flood Planning (Standard Instrument)
 - clause 5.22 Special Flood Considerations (Standard Instrument).

43. The Department has had regard to the Inquiry and Government's response in its assessment of the suitability of the site and matters of public interest, and has considered the merits, risks and impacts of the project with proposed measures in place to limit flood impacts to an acceptable level.
44. In line with the Department's circular, LEP and DCP flooding related requirements have been assessed in **Section 6** and **Appendix E**.

3.1.2 Shelter-In-Place (SIP) Guideline for Flash Flooding

45. The SIP Guideline for Flash Flooding (January 2025) provides clear and consistent guidance for the community, councils and consent authorities about when SIP can be considered an alternative to evacuation off-site/out of the floodplain where flash flooding is the only flood risk present at the site.
46. The guideline outlines that evacuation prior to major flood events is the preferred response to flooding emergencies but is not always possible especially during flash flooding.
47. The Department has had regard to the guideline in its assessment of the suitability of the site and matters of public interest with respect to flooding and managing risk to school occupants in **Section 6**.

3.1.3 A Guide to the South West Growth Area and the updated Structure Plan

48. In December 2022, the Department, in collaboration with local councils, state agencies and industry groups, developed a Guide to the SWGA. In conjunction with the updated SWGA Structure Plan, the Guide outlines key considerations that planning proposals must address to align with the strategic vision and informs the preparation, assessment and decision-making for future rezonings.
49. The updated SWGA Structure Plan provides high level guidance and strategic direction for the future development within the SWGA. It is purposefully broad in nature to establish principles for land use while allowing flexibility for urban design and development solutions. While the Plan is an important tool for proponents in preparing planning proposals and for councils and agencies to assess those proposals, it will be periodically updated as further planning and development occurs.
50. Following consultation with Council, the Department is aware planning for Catherine Field Precinct is at the very early stages, with no applicable Precinct Plan currently in place. Consequently, the Department has considered the matters outlined in section 3.21 of the Western Parkland City SEPP to ensure the proposed development is appropriately assessed. These considerations are detailed in **Appendix D**.

4 Statutory context

4.1 Permissibility and assessment pathway

51. Details of the legal pathway under which consent is sought and the permissibility of the project are provided in **Table 5**.

Table 5 | Permissibility and assessment pathway

Consideration	Description
Assessment pathway	State significant development • The project is declared State significant development (SSD) under section 4.36 of the <i>Environmental Planning and Assessment Act 1979</i> (EP&A Act) as it satisfies the criteria under section 2.6(1) of the State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP) • The proposed development on the land concerned is, by the operation of an environmental planning instrument, not permissible without development consent under Part 4 of the EP&A Act, and the proposed development is specified in section 15(1)(a) of Schedule 1 of the Planning Systems SEPP, being development for the purpose of a new school with an EDC of more than \$20 million.
Consent authority	Independent Planning Commission • The Commission is the consent authority under section 4.5(a) of the EP&A Act and section 2.7(1) of the Planning Systems SEPP.
Permissibility	Permissible with consent • The site is located in RU4 (Primary Production Small Lots) zone under the Camden Local Environmental Plan (CLEP) 2010. Educational establishments are permissible with development consent in the RU4 zone • The proposed ELC, defined as a centre-based child care facility in the LEP, is also permissible with development consent in the RU4 zone (see Section 6.1.2).

4.2 Other approvals and authorisations

52. The project will not require an environment protection licence issued by the NSW Environment Protection Authority (EPA) under section 42 of the *Protection of the Environment Operations Act 1997*.
53. Under section 4.41 of the EP&A Act, other authorisations required under other Acts are not required for SSD. This is because all relevant issues are considered during the assessment of the SSD application.
54. Under section 4.42 of the EP&A Act, certain approvals cannot be refused if they are necessary to carry out the SSD (e.g. approvals under the *Roads Act 1993*). These authorisations must be substantially consistent with any SSD development consent for the project.
55. The Department has consulted with and considered the advice of the relevant government agencies responsible for these other authorisations in its assessment of the project (see **Section 5** and **Section 6**). Suitable conditions have been included in the recommended conditions of consent (see **Appendix E**).

4.3 Planning Secretary's environmental assessment requirements

56. The Department's review determined that the Environmental Impact Statement (EIS) addresses each matter set out in the Planning Secretary's environmental assessment requirements issued on 29 October 2021 and is sufficient to enable an adequate consideration and assessment of the project for determination purposes.

4.4 Mandatory matters for consideration

4.4.1 Matters of consideration required by the EP&A Act

57. Section 4.15 of the EP&A Act sets out matters to be considered by a consent authority when determining a DA. The Department's consideration of these matters is shown in **Table 6**.

Table 6 | Matters for consideration

Matter for consideration	Department's assessment
Environmental planning instruments, proposed instruments, development control plans & planning agreements	See Appendix D and Appendix E .

Matter for consideration	Department's assessment
Environmental Planning and Assessment Regulation 2021	See Appendix D .
Likely impacts	See Section 6 – Assessment.
Suitability of the site	See Section 3 – Strategic Context and Section 6 – Assessment.
Public submissions	See Section 5 Engagement and Section 6 – Assessment.
Public interest	See Section 5 - Engagement, Section 6 Assessment and Section 7 – Evaluation.

4.4.2 Objects of the EP&A Act

58. In determining the application, the consent authority should consider whether the project is consistent with the relevant objects of the EP&A Act (s 1.3), including the principles of ecologically sustainable development (ESD). Consideration of those factors is described in **Appendix D**.
59. As a result of the analyses in **Appendix D**, the Department is satisfied that the development is consistent with the objectives of the EP&A Act and the principles of ESD.

4.4.3 Biodiversity development assessment report

60. The site is on land that is biodiversity certified under the *Threatened Species Conservation Act 1995* (TSC Act) (repealed). Land on which biodiversity certification was conferred within the Sydney Region Growth Centres under the former TSC Act is preserved under clause 43 of the Biodiversity Conservation (Savings and Transitional) Regulation 2017.
61. In accordance with section 8.4(2) *Biodiversity Conservation Act 2016* (BC Act), development (including SSD) under Part 4 of the EP&A Act does not require an assessment of the likely impact on biodiversity of development on biodiversity certified land.
62. Therefore, the application was not required to be accompanied by a biodiversity development assessment report.

5 Engagement

5.1 Exhibition of the EIS – Original Proposal

5.1.1 Public exhibition of the EIS (original proposal)

63. The Department:

- publicly exhibited the project from 28 June to 1 August 2022 on the NSW Planning Portal
- notified occupiers and landowners near the site about the exhibition
- notified and invited comment from relevant government agencies and Council.

5.1.2 Summary of government agency advice on EIS (original proposal)

64. The Department received advice from four government agencies, including TfNSW, Conservation Programs, Heritage and Regulation Group (CPHR) (formerly Environment and Heritage Group, Biodiversity and Conservation Division / Biodiversity, Conservation and Science) NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW), NSW Rural Fire Service (NSW RFS) and Heritage NSW on the EIS. A link to the full copy of the advice is provided in **Appendix C**.
65. TfNSW made recommendations for construction and operational traffic management, including the establishment of shuttle bus services and school zones, a Construction Traffic and Pedestrian Management Plan (CTPMP), a Preliminary School Transport Plan (STP) and annual travel surveys.
66. CPHR acknowledged the site's biodiversity certification under the TSC Act and recommended preparation of a Flood Emergency Response Plan (FERP).
67. NSW RFS recommended managing the site as an inner protection area (IPA) under Planning for Bush Fire Protection 2019 (PBFP), applying the relevant bushfire graded construction standards and preparing a Bush Fire Emergency Management and Evacuation Plan.
68. Heritage NSW supported the Aboriginal Cultural Heritage Assessment Report (ACHAR) recommendation to rebury two identified Aboriginal objects, which are to be managed under a Care Agreement issued by Heritage NSW before commencing works.

5.1.3 Summary of Council's submission on the EIS (original proposal)

69. Council objected to the project on the basis that it is not in the public interest due to the number of objections received and concerns raised by the community.
70. The key issues raised by Council primarily related to the development's inconsistency with the RU4 zone objectives, unsuitability for the rural site, potential disruption to planned infrastructure in the SWGA, reliance on an unsupported on-site sewage pump-out system, excessive operational noise levels from outdoor play and construction noise exceeding Council's Environmental Noise Policy, inadequate rural road infrastructure on Catherine Fields Road to accommodate increased traffic and flooding risks restricting evacuation due to frequent inundation and high hazard flooding on Catherine Fields Road. A link to Council's submission is provided in **Appendix C**.

5.1.4 Summary of public submissions on the EIS (original proposal)

71. The Department received 289 public submissions¹ during the public exhibition period of the EIS, including three submissions from special interest groups, two submissions from utility providers (Sydney Water and Endeavour Energy) and 284 submissions from individuals. Of the 289 public submissions received, 190 submissions objected to the project, 97 submissions supported the project and 2 provided comment. A link to all submissions is provided in **Appendix C**.
72. Public submissions raised concerns surrounding the following issues:
- traffic and access, citing increased traffic congestion and dangerous road conditions
 - inadequate infrastructure, including the rural state of Catherine Fields Road, lacking pedestrian or cycle facilities and poor stormwater management
 - incompatibility with the semi-rural character and zoning of the area
 - noise impacts from playgrounds, school bells, PA systems and increased road traffic
 - flooding risks due to limited stormwater infrastructure
 - excessive after-school operations until 10pm due to noise and traffic disturbances
 - the need for the proposal.
73. Sydney Water advised that the site, serviced by the Leppington Water Supply Zone which has limited capacity, may require a commercial agreement for water supply upgrades if

¹ Each petition or submission that contains the same or substantially the same text is counted as one submission in accordance with section 2.7(6) of the Planning System SEPP.

project timelines do not align with their investment program and wastewater services for the Catherine Field precinct are not planned within the next five years.

74. Endeavour Energy noted that there are no easements on the site, requiring pad-mounted substations in to be provided in accessible locations and compliance to safety clearances for buildings and works near overhead powerlines.

5.2 Response to submissions (RtS) (Original Proposal)

75. Following the public exhibition period, the Department requested the Applicant respond to the issues raised in submissions and government agency advice, as well as key issues identified by the Department, including concerns about the site's suitability due to the proposal's scale, consistency with the zone objectives, clarification of traffic trip generation rates, water and wastewater infrastructure management, land use conflict, odour and drainage impacts on surrounding properties and watercourses and the staging details of the proposal.
76. On 22 March 2023, the Applicant submitted an RtS report to the Department, addressing the issues raised. The Department published the RtS report on the NSW Planning Portal and forwarded it to relevant government agencies and Council for comment.
77. In response to the RtS, Council maintained its objection, reiterating that the site is highly unsuitable for a school of the proposed scale due to the concerns raised during the EIS exhibition.

5.2.1 Summary of government agency advice and utility provider comment on RtS (Original Proposal)

78. The Department received advice from four government agencies, including TfNSW, CPHR, NSW RFS and NSW State Emergency Service (SES), and one comment from Sydney Water on the RtS. A link to the advice is provided in **Appendix C**.
79. TfNSW raised concerns about inadequate pedestrian infrastructure on Catherine Fields Road, recommending enhanced pedestrian paths and safe crossing points, while noting a recent speed limit reduction from 80km/h to 60km/h; CPHR recommended retaining on-site vegetation for ecological and amenity benefits, implementing tree protection measures, conducting pre-clearance fauna surveys, and ensuring the FERP aligns with the Camden Flood Emergency Sub-Plan through consultation with NSW SES; NSW RFS reiterated that the proposal should apply a Bushfire Attack Level (BAL) 12.5 construction standard to all new buildings; NSW SES noted flood risks to the car parking area, advised against SIP as a

flood management strategy due to potential isolation and safety risks, and recommended school closure before flooding and evacuation plans to avoid contact with floodwaters.

80. Sydney Water confirmed no current capacity for reticulated water supply connection to support the proposed development, with an ongoing options assessment for the Leppington Water Supply Zone and reiterated wastewater services in the area are not planned in the next five years.

5.3 Response to Request for Further Information – Amended Application

81. On 3 May 2023, the Department requested further information to demonstrate the site's suitability, citing inadequate water, wastewater, road and stormwater infrastructure for the proposed school. The Department recommended reducing the school population.
82. In response, the Applicant amended the application to scale down the development. A summary of key amendments to the project is provided in **Appendix A**.

5.4 Exhibition of the Amendment Report

5.4.1 Public exhibition of the Amendment Report (AR)

83. After receiving an amendment to the development application on 10 September 2024, the Department:
- publicly exhibited the AR from 17 September to 28 October 2024 on the NSW Planning Portal
 - re-notified landowners in the vicinity of the site about the AR
 - notified each person who made a submission in relation to the EIS (original proposal)
 - notified and invited comment from relevant government agencies and Council.

5.4.2 Summary of government agency advice on the AR

84. The Department received advice from eight government agencies on the AR.
85. A summary of the agency advice is provided in **Table 7**. A link to the full copy of the advice is provided in **Appendix C**.

Table 7 | Summary of agency advice on the AR

Agency	Advice summary
TfNSW	TfNSW recommended conditions for the installation of school zones on all roads with direct school access, requiring the Applicant to obtain written authorisation from TfNSW. TfNSW noted the absence of proposed pedestrian crossing infrastructure across Catherine Fields Road and suggested replacing the painted flush median for the new right turn lane with a concrete median island, incorporating a pedestrian refuge to improve pedestrian safety.
CPHR	The CPHR reiterated the RtS recommendations for retaining trees, conducting pre-clearance fauna surveys, protecting fauna during tree removal, maintaining trees and reusing removed trees and hollows. Regarding flooding, CPHR recommended considering measures to prevent cars from floating in the parking and DOPU areas in the southern and western site sections during rare flood events. Additionally, CPHR advised revising the Preliminary Overland Flow Assessment (POFA) colour palette for readability, confirming off-site flood signage details (design, installation and maintenance) in consultation with Council and updating and revising the POFA to align with current guidelines.
NSW RFS	NSW RFS recommended managing the site in perpetuity as an IPA in accordance with the requirements of PBFP, ensuring building design, utilities, roads, fire trails, fencing and landscaping comply with PBFP, Australian standards and NSW RFS guidelines. NSW RFS also recommended the preparation of a Bush Fire Emergency Management and Evacuation Plan and the application of BAL 19 to all new construction (at each stage) in accordance with the relevant standards and PBFP. NSW RFS supported the proposed access in accordance with PBFP performance criteria, noting the certifier must be satisfied that the building will comply with the development consent and the Building Code of Australia.
NSW SES	NSW SES noted the site's high flood island status, prone to isolation from roadway flooding and recommended: • considering climate change impacts • revising the FERP to reflect current NSW SES terminology

Agency	Advice summary
	• pursuing site design and stormwater management to reduce flooding risks • reducing the reliance on flood wardens, implementing early FERP triggers (e.g., monitoring severe weather warnings) • developing a FERP testing, monitoring and review schedule • consulting the NSW DCCEEW on any impact on flood behaviour and ensuring evacuation avoids floodwaters.
Fire and Rescue NSW	Fire and Rescue NSW provided no comments or specific requirements.
NSW DCCEEW Water Group	NSW DCCEEW Water Group recommended: • quantifying the maximum annual groundwater take from aquifer interference activities • securing sufficient water entitlements, unless an exemption applies • obtaining a water access licence for the maximum predicted groundwater take during construction and operation, unless an exemption applies • assessing impacts if the take exceeds 3 megalitres (ML) annually.
NSW Department of Primary Industries and Regional Development (DPIRD)	NSW DPIRD noted the site's location in an unreleased SWGA precinct and recommended assessing biosecurity risks during construction and operation and consulting the neighbouring residents or agricultural businesses in the Land Use Conflict Risk Assessment (LUCRA) to identify impacts from the nearby agricultural activities and propose mitigation measures.

5.4.3 Summary of Council's submission on the AR

86. Council provided a submission on the AR maintained their objection to the subsequent amendments to the project, citing public interest concerns due to the number of community objections and concerns raised by the community. A summary of Council's submission is provided in **Table 8**.

Table 8 | Summary of Council's submission on the AR

Issues raised	Summary
Planning matters	• the rural site is unsuitable for the proposed school

Issues raised	Summary
	- the proposal is inconsistent with RU4 zone objectives - the development's scale is excessive for a rural, unsewered property - the proposal will preclude future urban and employment land uses and hinder the orderly and coordinated infrastructure planning for the SWGA - the shared community use of school facilities is uncertain.
Wastewater management and EMA	- the on-site sewage management system proposed for the site is not appropriate due to risks of effluent exposure on the sports field, potential EMA damage from high traffic, the lack of 50% reserve area in accordance with Council's On-site Sewage Management Policy, disease risks, unsuitable Stage 4 EMA placement within hardstand areas and extended downtime after rain events, resulting in insufficient open play spaces for students. - the Wastewater Management Assessment Report omitted wastewater generation rates and trade waste from the canteen, staff kitchen and other school facilities.
Noise and vibration	- the proposed acoustic walls (from 1.5m to 2.4m in height) will negatively impact the rural landscape - operational noise will impact at least three adjoining residential properties by +1 Decibel (dB) to +6dB, despite the proposed mitigation measures - construction noise will exceed the relevant criteria over a 3.3-year period, despite the proposed mitigation measures.
Traffic and roadworks	- Catherine Fields Road cannot support the development's intensity - the proposed roadworks must be completed in Stage 1 to reduce traffic impacts on the community and future school users - additional queuing may occur due to parents arriving at the site early, requiring signage, line marking and supervision in the DOPU areas - traffic calming measures are required for parking aisles over 100m - Council also provided engineering comments on the proposed civil works and on-site detention system.
Public health	inconsistent and insufficient information was provided on food handling, waste storage and facility fit outs for the ELC, canteens, OOSH and other areas.

5.4.4 Summary of public submissions on the AR

87. The Department received 275 public submissions² during the public exhibition period of the AR (one submission from a special interest group, two submissions from two utility providers and 272 submissions from individuals). Of the 275 public submissions that were received, 96 submissions objected to the project, 177 submissions supported the project and 2 provided comments.
88. Further detail is summarised in **Table 9** below and a link to submissions is provided in **Appendix C**.

Table 9 | Submissions on the AR

Submitter	Number of submissions	Position
Special interest groups		
Minarah College	1	Support
Utility providers		
Sydney Water	1	Comment
Endeavour Energy	1	Comment
Submissions from community		
Individual	96	Object
	176	Support
	0	Comment
TOTAL	96	Object
	177	Support
	2	Comment
	275	Total

89. A summary of the utility providers' submissions on the AR is provided in **Table 10**.

² Each petition or submission that contains the same or substantially the same text is counted as one submission in accordance with section 2.7(6) of the Planning System SEPP.

Table 10 | Summary of utility providers' submissions on the AR

Utility Provider	Submission summary
Sydney Water	Sydney Water advised that full water servicing for the proposed development is feasible following 2030 Leppington trunk infrastructure upgrades. Until then, the proposed temporary break water tank can only be filled using Sydney Water supply between 9pm to 5am. Sydney Water did not object to the on-site wastewater arrangements but noted future wastewater network connection depends on infrastructure delivery within the Catherine Fields Gravity Carrier catchment in 2028/29. Sydney Water recommended early engagement due to capacity constraints and obtaining a Section 73 Compliance Certificate, Building Plan Approval and conditions for tree planting, trade wastewater and backflow protection.
Endeavour Energy	Endeavour Energy noted the inconsistent locations of the proposed pad-mounted substations across various documents and advised substations to be suitably located, accessible and protected in accordance with the relevant guidelines, with safety clearances and controls always maintained near overhead powerlines.

90. A summary of the key issues raised in the public submissions on the AR is provided in **Table 11** and a link to submissions is provided in **Appendix C**.

Table 11 | Key issues raised in submissions on the AR

Summary	% of Submissions
Infrastructure and servicing - the site lacks adequate infrastructure, including roads, water, wastewater, stormwater, community facilities, internet and electricity, to support the proposed development's size - the surrounding rural road network requires upgrades and repairs - there are no plans to improve Catherine Fields Road or provide pedestrian footpaths or cycle lanes - the existing road embankments along Catherine Fields Road cannot adequately manage stormwater run-off - the Applicant will not pay any contribution towards infrastructure upgrades.	82%

Summary	% of Submissions
Traffic and access • the proposal will increased congestion on the local road network • the surrounding road network is dangerous due to poor road conditions and high speed limits • there have been several traffic accidents near the site, including one fatality • the proposed on-site car parking and DOPU spaces are insufficient for school operations during school days, weekends and special events • the traffic assessment underestimated the traffic impact.	80%
Flooding • local roads flood during rain events due to limited stormwater infrastructure • the nearby community hall lacks capacity to accommodate the evacuated school students and teachers during flood events • the proposal will exacerbate the flooding on downstream properties.	63%
Impacts on local character • the site is an inappropriate location for a school • the proposal is inconsistent with the site's rural zoning, which is unlikely to be rezoned soon • the proposal is incompatible with the semi-rural character, impacting amenity and tranquillity • increased noise and traffic are inconsistent with the existing neighbourhood character.	52%
On-site wastewater management • the proposed EMA beneath the playfield poses public health risks and risks polluting nearby waterbodies • the proposed EMA is insufficient and inadequate for wastewater treatment, potentially exacerbating flooding in the area.	43%

Summary	% of Submissions
Noise - the use of the sports field and school halls will generate noise impacts for the surrounding residences - the use of the school bells and PA systems would increase noise - road traffic noise will be exacerbated by the proposal.	38%
Pedestrian and cyclist safety pedestrian and cyclist safety are at risk due to the absence of footpaths beyond the site's front boundary and limited street lighting.	30%
Hours of operation after-school hours of operation until 10pm are unusual for a school and inappropriate for a residential area due to increased noise and traffic.	24%
Documentation inconsistency and inaccuracy - the proposed student and staff numbers are inconsistent - the required car parking and DOPU provisions are inconsistent - the proposed community use is unclear.	17%
Impacts on trees and wildlife the proposal will adversely impact trees and wildlife.	16%
Need for the proposal the need for the proposed development is questionable.	14%
Visual impact the proposed built form will have a negative visual impact.	14%
Adverse construction impact construction will cause prolonged noise and traffic impacts over an extended period.	13%
Scale and bulk the proposed development's scale and bulk are excessive.	12%

91. Other issues raised included emergency vehicle access, air quality, overlooking, odour, loss of agricultural productivity, reduced property values and insufficient community consultation.

5.5 Response to submissions for the amended proposal (ARtS)

92. Following the AR public exhibition, the Department requested the Applicant address issues raised in submissions, government agency advice and the Department's key issues, including:
- a biosecurity risk assessment for construction and operation phases and a revised LUCRA
 - further justification to demonstrate consistency with the RU4 zone objectives
 - assessment of risks from the use of sports fields within the EMAs
 - further clarification and updates to the WMA report
 - a preliminary Operational Management Plan (OMP) for EMA management, monitoring and maintenance
 - a revised Bushfire Assessment Report (BAR) confirming compliance with the relevant bushfire legislations and guidelines and all safety measures for a 'Special Fire Protection Purpose' classification
 - odour impact assessment for the wastewater system
 - further clarification of details in the Staging Report
 - comparative noise exceedance levels after the application of noise controls and evaluation of control effectiveness
 - clarification of TAIA assumptions for the proposed private bus services
 - assessment of queuing and collision risks in shared pedestrian and vehicle areas
 - swept path analysis for waste vehicle loading areas
 - revised architectural drawings and design report confirming the proposed gross floor area (GFA), building heights, setbacks, elevations, collection well location, finished floor levels and the intended materials, colours and finishes
 - additional perspective rendering images

- a revised POFA and FERP addressing the relevant legislation and policies, flood hazard management in the parking and DOPU areas and correcting errors
 - clarification of stormwater discharge
 - revised landscape plans confirming canopy coverage, deep soil area, Water Sensitive Urban Design principles, bus waiting areas and the pad-mounted substation locations
 - confirmation of compliance with Australian standards for outdoor lighting
 - a revised Service Infrastructure Report (SIR) correcting errors and discrepancies
 - an updated mitigation measures table
 - confirmation of jobs created by the proposed development.
93. On 21 May 2025, the Applicant submitted an ARtS report to the Department, addressing the issues raised in the submissions and government agency advice. The ARtS included:
- a revised AR
 - a revised POFA and FERP
 - revised architectural and landscape plans and additional perspective renders
 - an updated LUCRA and a Biodiversity and Agricultural Land Use Conflict Risk Assessment (BA LUCRA)
 - an updated WMA report
 - a revised BAR
 - an updated Staging Report
 - a revised Construction Noise and Vibration Management Plan (CNVMP) and Environmental Noise Impact Assessment (ENIA)
 - a revised SIR
 - an updated mitigation measures table.
94. The Department published the ARtS report on the NSW Planning Portal and forwarded it to relevant government agencies and Council for comment.
95. Council reiterated its objection to the proposal in response to the ARtS, restating concerns raised during the AR exhibition (**Table 8**). Although Council maintained its objection to the proposal, it provided a draft set of recommended conditions for inclusion in the development consent.

5.5.1 Summary of government agency advice and utility provider comment on ARtS

96. The Department received advice from four government agencies and one comment from one utility provider on the RtS.
97. A summary of the agency advice and utility provider comment is provided in **Table 12**. A link to the full copy of the advice is provided in **Appendix C**.

Table 12 | Summary of agency advice and utility provider comment on the ARtS

Agency	Advice summary
Government agencies	
TfNSW	TfNSW recommended: • installing school zones on local roads adjacent to the site, ensuring all required School Zone signs and pavement markings comply with TfNSW guidelines, with detailed design plans submitted for TfNSW approval prior to the issuance of a completion certificate. • preparing a School Travel Plan (STP) in consultation with TfNSW to promote sustainable transport options, with the STP endorsed by TfNSW before the issuance of a completion certificate.
Conservation Programs, Heritage and Regulation Group (CPHR) of the NSW DCCEW	CPHR confirmed that the ARtS report adequately addressed CPHR's previous submission in relation to biodiversity, tree management and flooding risks, noting the Applicant's agreement to its recommended conditions.
NSW RFS	NSW RFS recommended managing the site as an IPA from the commencement of building works and in perpetuity, in accordance with the requirements of PBFP, ensuring building design, utilities, roads, fire trails, fencing and gates and landscaping comply with PBFP, Australian standards and NSW RFS guidelines. NSW RFS also recommended the preparation of a Bush Fire Emergency Management and Evacuation Plan and the application of a BAL 19 to all new construction in accordance with the relevant standards and PBFP. NSW RFS noted the 2025 Addendum updates to the National Construction Code for school buildings which replaced the previous stricter access requirements from the 2022 Addendum for primary and secondary schools on bushfire prone land.

Agency	Advice summary
NSW SES	NSW SES advised revising the FERP to: • reflect current NSW SES terminology and procedures, removing outdated references and aligning with the Australian Warning System categories (Advice, Watch and Act, Emergency Warning) and Council's evacuation centre determination process • remove specific methods of warning distribution, such as the 'SES emergency alert telephone warning system,' and reduce reliance on flood wardens and human behaviour for initiating emergency procedures, replacing visual monitoring triggers with early triggers like severe Weather Warnings and pre-emptive site closure ahead of school days due to flash flooding risks • include a testing, monitoring and review schedule to ensure regular exercises, updates based on new flood information or events and alignment with building fire evacuation drills.
DCCEE Water	DCCEE Water recommended a condition requiring obtaining a water access licence post determination to account for the maximum predicted water take for construction and operation activities, unless an exemption applies.
NSW DPIRD	NSW DPIRD recommended: • developing and maintaining Biosecurity Management Plan (BMP) for the construction and operational phases, with regular updates to address risks, particularly if farm animals or horticulture are introduced for student engagement • compliance with the LUCRA recommendations to mitigate potential land use conflicts through risk reduction controls for noise, odour, visual amenity, traffic, flooding, biosecurity and agricultural land use • implementing ongoing stakeholder engagement and performance monitoring, adjusting mitigation measures as needed based on consultation outcomes or identified risks.
Utility Provider	

Agency	Advice summary
Sydney Water	Sydney Water reaffirmed the constrained water servicing capacity in the Leppington Water Supply Zone, consistent with its prior responses, with adequate capacity not expected until approximately 2031. Sydney Water recommended early engagement due to capacity constraints and obtaining a Section 73 Compliance Certificate, Building Plan Approval and conditions for tree planting, trade wastewater and backflow protection. Sydney Water noted that any temporary water servicing solutions implemented before 2031 are likely to be at the proponent's cost.

5.6 Further request for further information

98. On 6 June 2025, the Department asked the Applicant to provide further information to address the agency advice, Council and utility provider comments made on the ARtS.
99. On 14 August 2025, the Applicant responded to the further RFI agreeing with most of the recommendations with minor adjustments proposed.

6 Assessment

100. Amended in response to concerns raised during the EIS exhibition in 2022, the proposed development consists of the staged construction and operation of a new school designed to accommodate up to 980 students, ranging from Kindergarten to Year 12, and 60 place ELC.
101. The amendments are detailed in **Section 3** of the AR and **Appendix A**, addressing key concerns from the Council, government agencies and public submissions. Issues raised included site suitability, infrastructure constraints, impacts on the rural character, traffic, flooding and noise. Each of these issues is discussed in **Sections 6.1** to **6.4**. Other issues identified during the assessment of the amended proposal are discussed in **Section 6.5**.

6.1 Land use conflict and site servicing

102. Council and public submissions raised significant concerns about land use conflict and site servicing. The site is zoned RU4 (Primary Production Small Lots) under the CLEP 2010 and located in the rural Catherine Field precinct of the SWGA. Public submissions during the exhibitions highlighted concerns regarding the excessive scale of the school, its potential conflicts with surrounding agricultural land uses and the insufficiency of existing infrastructure to accommodate 980 students. These concerns challenged the proposal's alignment with the rural zoning and the precinct's future planning.
103. Public submissions also identified specific impacts related to land use conflict and site servicing, including visual impacts from the development's size, which could detract from the rural character; adverse traffic and parking impacts stemming from school operations; flooding risks on-site and in adjacent areas; and negative environmental amenity impacts on nearby residents related to noise, loss of privacy, and other disturbances (see **Table 11**). Detailed assessments of these impacts are provided below.
104. The site is in a SWGA precinct that has not yet been rezoned or released for urban development. In addition to the previously mentioned concerns, Council and public submissions suggested more suitable locations for school development within already released and rezoned SWGA precincts. The Applicant stated that the proposed school will address the educational needs in Catherine Field, citing current demand and anticipated population growth in the area.
105. The Department acknowledges that, as an independent school, the Applicant faces limitations in site selection due to the availability and cost of land. The Applicant has provided sufficient information on alternative options, including the possibility of expanding their existing Green Valley campus, which is currently at capacity (see **Section 1.4**).

106. Site selection process is a matter for the Applicant to resolve prior to commencing design development and preparing and lodging an SSD application. Analysing the site selection process is outside the scope of this assessment, which focuses solely on the suitability of the chosen site for the proposed development.
107. The Department has assessed the site suitability in accordance with section 4.15 of the EP&A Act in the following sections, with further analysis against the applicable statutory instruments included in **Appendix D**.

6.1.1 Permissibility

108. The Department notes within the RU4 zone, both school (defined as educational establishments) and ELC (defined as centre-based child care) uses are permitted with consent, as they fall under the category of ‘any other development not specified in item 2 or 4’ in section 3 of the CLEP 2010 Zone RU4 Land Use Table. Additionally, the proposed shared community facilities, which includes the multi-purpose hall and sports field, are ancillary to the school and permissible with consent.
109. Further, RU4 is identified as a prescribed zone under Chapter 3, Part 3.4 of the State Environmental Planning Policy (Transport and Infrastructure) 2021, where development for the purpose of a school is permitted with consent. Development for the purpose of a centre-based child care facility is also permitted consent within an existing or approved school.
110. The Department is satisfied that there are no legislative requirements or land use restrictions prohibiting the development or use of the site as a school.

6.1.2 Land use conflicts

111. Agricultural zoned land borders the RU4 zoned site to the west, north and east (see **Figure 9**). Under CLEP 2010, the objectives of the RU4 zone are to:
- enable sustainable agriculture and other compatible uses
 - promote diversity and employment in primary industry, particularly on smaller lots
 - minimise land use conflicts.
112. The surrounding area includes small-scale vegetable farms, while the broader region comprises poultry sheds and crop production. Council and public submissions raised that the scale of the school does not align with these objectives, as it may alienate nearby agricultural activities and disrupt local farming. The Applicant’s BA LUCRA engaged with landowners and found no current or planned commercial-scale agricultural operations on

adjacent properties and existing farms are unlikely to expand due to limited lots sizes, aging ownership and low economic viability.

113. The BA LUCRA concluded there are low biosecurity risks of off-farm impacts from rural activities such as dust from soil cultivation, noise from equipment, odours from fertilisers, limited spray drift from chemical applications and biosecurity risk impacts from people and machinery movement. The site will not involve agricultural activities or be near any active farms. Additionally, it will manage soil, plant material, dust, sediment and runoff appropriately during both construction and operation phases, as outlined in the LUCRA. The BA LUCRA recommended a BMP be developed and regularly reviewed and updated to address any new on-site activities, potential biosecurity hazards and necessary safeguards.
114. DPIRD reviewed the BA LUCRA and LUCRA and raised no objections, subject to conditions requiring compliance with the recommendations of the BA LUCRA and LUCRA and performance monitoring and ongoing stakeholder engagement to adapt mitigation measures if new risks emerge.

Department's consideration

115. The Department considered the above findings, noting that school users will primarily be indoors, with limited outdoor exposure during breaks or sports. Site occupancy will occur mainly during daytime hours and will be significantly reduced during holidays, resulting in reduced conflicts. The proposed landscaping along site boundaries will further minimise potential impacts, such as odour, noise or dust.
116. While acknowledging the proposed school will alter the area's existing character, the Department considers that adequate measures have been taken to minimise the land use conflicts during the construction and operation of the school. Subject to conditions requiring the development, implementation, regular reviews and updates of a BMP, along with ongoing stakeholder engagement and monitoring of long-term regional agricultural trends, the Department does not consider the proposal would alienate nearby agricultural activities or disrupt local farming and is satisfied that the proposed development will have an acceptable impact and in this regard is compatible with the RU4 zone objectives.

6.1.3 Infrastructure and servicing

117. The site is in the SWGA Catherine Field precinct, which currently does not have confirmed timing for the rezoning, or a Precinct Plan for strategic land use decisions and coordinated infrastructure delivery. The site is an unsewered property along a rural road with no shoulder, kerb and gutter, footpaths, lighting or piped stormwater drainage.

118. Council and public submissions raised concerns regarding inadequate infrastructure to support the proposed development's scale. The Department also expressed concerns about the original proposal's reliance on third-party infrastructure delivery and recommended reducing the proposal's size and scale to align with the site's current infrastructure capacity (Section 5.3).
119. In response, the Applicant amended the proposal, reducing the proposed built form and the school population from 1580 to 980 students and from 106 to 51 FTE staff, consolidating the project from five to four development stages and including an on-site wastewater management system (see **Appendix A**).
120. The following details the infrastructure needs for water, wastewater, stormwater, roads, and other utilities, based on the project's amended / reduced scope and considerations of the relevant advice from government agencies and Council, utility providers.

Reticulated water supply

121. Sydney Water provided updated advice that there is limited water supply capacity to support growth until the completion of water infrastructure upgrades in 2031. As a temporary measure until these upgrades are finalised, the Applicant proposed installing a 35 kL break tank, a new authority water meter and a potable cold water pump to help manage water demand during peak periods. Sydney Water raised no objection to these temporary measures, provided tank filling is restricted to off-peak hours between 9pm and 5am to protect the upstream network. Additionally, the Applicant proposed to incorporate a 40kL rainwater harvesting tank to collect and recycle rainwater for landscape irrigation, reducing reliance on the potable water supply.
122. The Department is satisfied that these proposed temporary measures are sufficient until an accessible reticulated water connection with adequate capacity becomes available, subject to conditions that require engagement with and post-determination approval from the relevant utility provider.

Wastewater management

123. Sydney Water confirmed that wastewater infrastructure that could support future sewer connection at Catherine Field is planned for delivery in 2028/29, contingent upon approved delivery funding.
124. In the absence of public wastewater infrastructure, the Applicant proposed an OWMS to permanently service the ultimate school population of 980 students, 51 FTE staff and up to 90 weekly visitors until reticulated services are provided. The OWMS will store wastewater

in a collection well, filter and treat it in a secondary plant and irrigate it through a subsurface EMA (see **Figure 13**). Sydney Water raised no objections to the proposed OWMS. Council and public submissions raised concerns about health risks associated with irrigating wastewater beneath the student play area (the sports field) and the adequacy of the OWMS performance.

125. The proposed OWMS mitigates health and operational risks by relocating the EMA to turf areas, installing grease traps for canteen and food facilities waste (if required) and implementing wet weather storage and downtime policies following rainfall and irrigation events to prevent damage and ensure safety. The OWMS design is anticipated to have a 20-year lifespan without a 50% reserve area if properly maintained, only requiring occasional off-site effluent disposal through pump out when the storage tank reaches 80% capacity.
126. The Department notes that the proposed OWMS will be subject to further approvals under section 68A of the Local Government Act 1993 when design specifications for the effluent treatment and reuse systems are required to be finalised prior to school occupation. The section 68A application will need to be prepared having regard to the Department's Onsite Wastewater Management Guidelines (April 2025). An assessment against potential odour impact from the OWMS is discussed in **Section 6.5**.
127. The Department considers there are several critical elements regarding the operation of the OWMS across the 4 stages of the development. The operational demands on the OWMS over Stages 1 and 2 are low in terms of staff and student/child numbers. Community recreational use of the EMA is proposed during Stages 1 and 2. From Stage 2 to Stage 3 the OWMS will service an increased staff and student/child population of 33 to 51 FTE staff and 652 to 980 student/children. Additionally, the proposed use of the EMA (sports field) by the community and potentially other schools during school hours and also on weekends, will continue placing further pressure on the turf EMA sports field during wet periods and during slow growing periods. From Stage 3 – 4 the potential to provide 50% reserve EMA will be replaced by a school hall. Additionally adequate alternate open space area, for use by students during the necessary down time and withholding periods for the EME, will be reduced at Stage 4. The Department has recommended conditions of consent that adequate monitoring and performance reporting is provided before progressing to Stage 3 and 4.
128. The Department is satisfied that a sewer treatment plant can be installed to service wastewater with a school population from Stage 1 to Stage 4 subject to a detailed application being submitted and further approvals being obtained under section 68A of the Local Government Act 1993. However, the Department considers that evidence of the successful management of the OWMS at Stages 1 and 2, including the Applicant's

management of school and non-school use of the EMA during the early stages is necessary to demonstrate that the OWMS can support the operation of the school and the proposed community uses moving through to Stage 3 and 4.

129. The Department recommends conditions requiring a strong monitoring regime throughout the life of the OWMS, including of the EMA functioning and pump out activities. The Department also recommends that prior to Stages 3 operation commencing, that a review of the OWMS be undertaken by an appropriately qualified independent professional verifying the OWMS and the management of the EMA continues to be acceptable to support school operations moving to Stage 3, including ongoing community use of the EMA. Further verification would again be required prior to a Construction certificate being issued for Stage 4 work.
130. The Department consider that in concept the OWMS will be capable of operation to support the ultimate school development, subject to consent conditions that require:
- compliance with the relevant Australian Standard, recommendations outlined in the updated WMA and consideration with the Department's Onsite Wastewater Management Guidelines (April 2025)
 - further approvals under section 68A of the Local Government Act 1993 before each Stage of occupation, when updated design specifications for the effluent treatment and reuse systems are required
 - a separate approval trade waste pre-treatment provisions and appropriate trade waste agreement for canteens, kitchens, lab facilities and art rooms (where relevant)
 - installation of flow meters with regular monitoring and collection of hydraulic flow data to validate the accuracy of WMA estimates early on, along with measures to enhance system performance if required
 - submission of a wastewater OMP detailing maintenance, a strong monitoring regime, withholding periods after rainfall and irrigation events and emergency response protocols to Council for approval prior to school operation at each development stage
 - in Stages 3 and 4, installation of pressure-compensating subsurface irrigation lines and a zoned EMA to optimise system performance in the absence of a 50% reserve area.
 - reviews of the OWMS and broader school operations and community uses occurring prior to Stage 3 operation and before issue of the Stage 4 construction certificate.

Natural Gas Infrastructure

131. The Applicant's SIR confirmed that no natural gas infrastructure is currently available at the site. To meet the potential requirements of specific school facilities, such as science laboratories, food technology, café and mechanical plants operations, which may necessitate a liquid petroleum gas supply, the Applicant proposed the installation of on-site liquid petroleum gas storage tanks in accordance with the relevant Australian standards and the Educational Facilities Standards and Guidelines (EFSG). The Department has recommended a condition that requires a report be submitted to demonstrate compliance with the most recent Australian standards for the storage and handling of liquid petroleum gas prior to the commencement of any related gas storage and handling works.

The Department's consideration

132. The Applicant has provided evidence of consultation with Endeavour Energy and Sydney Water regarding the provision of utilities to the site. Adequate electricity and telecommunications service are expected to be available at the commencement of each development stage. While there are uncertainties regarding wastewater servicing capacity, the Department is satisfied that the Applicant has proposed appropriate interim measures to ensure operational continuity until public infrastructure in the surrounding area is developed.
133. Based on the above, the Department is satisfied that the proposed development will have access to all essential utilities at each stage, subject to the implementation of the proposed interim measures and infrastructure upgrades. These measures will allow the development to operate independently, without incurring additional cost for the public, without adversely impacting the environment or development potential of adjacent sites.
134. The Department concludes that subject to recommended conditions, including a strong monitoring regime regarding the OWMS, the site will be adequately serviced by essential utilities and infrastructure to support the operation of the development, and that it is capable of accommodating up to 980 students in line with the proposed staged development and gradual increases in school population. As such, the Department considers the site suitable for the proposed development in this regard.

6.2 Traffic, transport and access

135. The ARtS significantly reduced the school and ELC population from 1580 to 980 students/children to address both servicing and traffic issues raised during the exhibition of the EIS. The updated TAIA submitted in response to the further RFI addresses key issues

raised by the Department, Council, government agencies and public submissions pertaining to road safety and capacity, pedestrian infrastructure, construction traffic impact, active transport, car parking, DOPU operations, congestion and road upgrade works.

6.2.1 Existing conditions

136. As discussed in **Section 1.2.4**, the site is approximately 5km from the closest railway station (Leppington railway station) and not serviced by public transport within a reasonable walking distance. The closest bus stop is located 850m south of the site along Catherine Fields Road, beyond the Springfield Road intersection, providing infrequent and very limited connectivity to Liverpool and Minto.
137. Given the rural context and the absence of any pedestrian footpaths, and/or crossing network within walking distance, pedestrian movements around the site are expected to be minimal. Additionally, there is no designated cycling infrastructure. Council's Pedestrian Access and Mobility Plan does not anticipate future footpath developments in the Catherine Field area.
138. However, the TAIA notes that future provisions related to anticipated housing development in the Catherine Field precinct will facilitate the growth and expansion of the footpath network, improving connectivity in the area in the longer term.
139. The site has a single street frontage to Catherine Fields Road to the west, providing direct vehicular and pedestrian access. Catherine Fields Road links to Camden Valley Way to the south and Bringelly Road to the north. The existing road hierarchy in proximity to the site is shown in **Figure 18**.

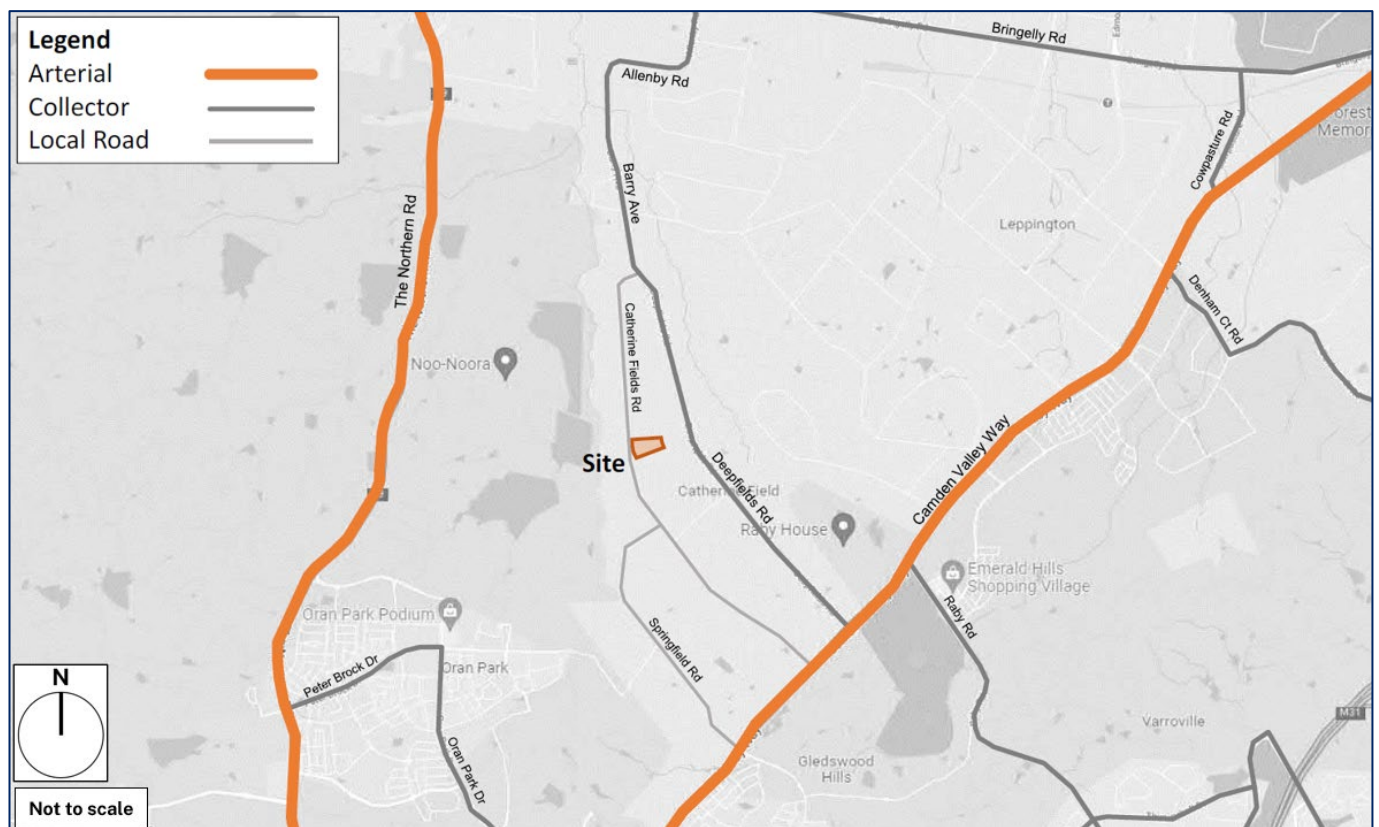


Figure 18 | Existing road hierarchy in proximity to the site (Source: Applicant's ARTS, 2025)

140. During the assessment of this application, TfNSW advised that the speed limit on Catherine Fields Road, between Camden Valley Way and the site, has been reduced from 80km to 60km per hour since the lodgement of the original application.

6.2.2 Construction traffic and parking

141. The updated TAIA includes a preliminary Construction Traffic Management Plan (CTMP), which outlined the details of construction vehicle movements, travel routes, contractor parking, access arrangements and provisions for managing pedestrians and cyclists. It also describes the measures to mitigate the impact of construction traffic at each development stage. The preliminary CTMP concludes that the proposed development will result in a moderate increase in traffic on the surrounding road network. Therefore, it proposes management measures to minimise the impact of construction activities, including:
- installing and maintaining suitable fencing and hoarding along site boundaries and work area boundaries to ensure safe pedestrian access
 - implementing traffic control to manage vehicle movements, prioritising pedestrians during peak hours and maintaining public transport access
 - scheduling intensive deliveries outside peak hours to minimise disruption

- establishing an on-site contractor compound with dedicated parking for contractors
 - implementing supervised traffic control to manage trucks turning movements, restricting truck movements from peak vehicle and pedestrian activities.
142. From Stage 2 onward, the development will implement additional measures to reduce conflicts with the school operations, including:
- prohibiting all heavy construction vehicle movements during school DOPU hours
 - enforcing a code of conduct for construction staff, prioritising school-related movements at all times
 - separating operational and construction areas using appropriate fencing and hoarding, while maintaining adequate sightlines from work areas to pedestrian crossings
 - maintaining a pedestrian route between the school entrance and frontage road footpath via the internal pedestrian crossing with supervision.
143. The amount of on-site parking available for construction workers will vary at different stages based on the required truck loading and turning areas. The Department has recommended conditions requiring the implementation of measures to manage contractor parking demand, ensuring no loss of on-street parking.
144. The Applicant also proposed to prepare a detailed Vehicle Management Plan as part of the detailed CTPMP to prevent queueing or obstruction on public roads at all times. Neither Council nor TfNSW raised any concerns regarding the preliminary CTMP.
145. The Department accepts the Applicant's assessment of construction traffic and considers that encouraging construction workers to carpool will help reduce impacts on the local road network by reducing vehicle movements and on-street parking. The Department has recommended conditions of consent requiring preparation and implementation of:
- a final CTPMP in line with the recommendations of the preliminary CTMP prior to the issue of a construction certificate
 - a Construction Worker Transportation Strategy, detailing adequate parking facilities or other travel arrangements construction workers to minimise demand for parking in nearby public and residential streets.

6.2.3 Mode share and active transport plan

146. Since there is no existing school or staff cohort at the site, the Applicant conducted a travel mode survey at Minarah's Green Valley campus to understand the travel characteristics, including travel modes and times for arrival and departure trips, vehicle occupancy, OOSH

care usage, carpooling and interest in green travel strategies. The survey received responses from 386 students (35% response rate) and 31 teachers (34% response rate), which is considered an acceptable representation of the cohort and an accurate reflection of the travel patterns at the existing campus.

147. The Department considers the survey a reasonable proxy for the proposed school development, given the similarities in school catchments and family structure characteristics of the student population. **Figure 19** shows the breakdown of student travel modes surveyed. Almost all surveyed staff drive to and from the school, except one respondent who walks.

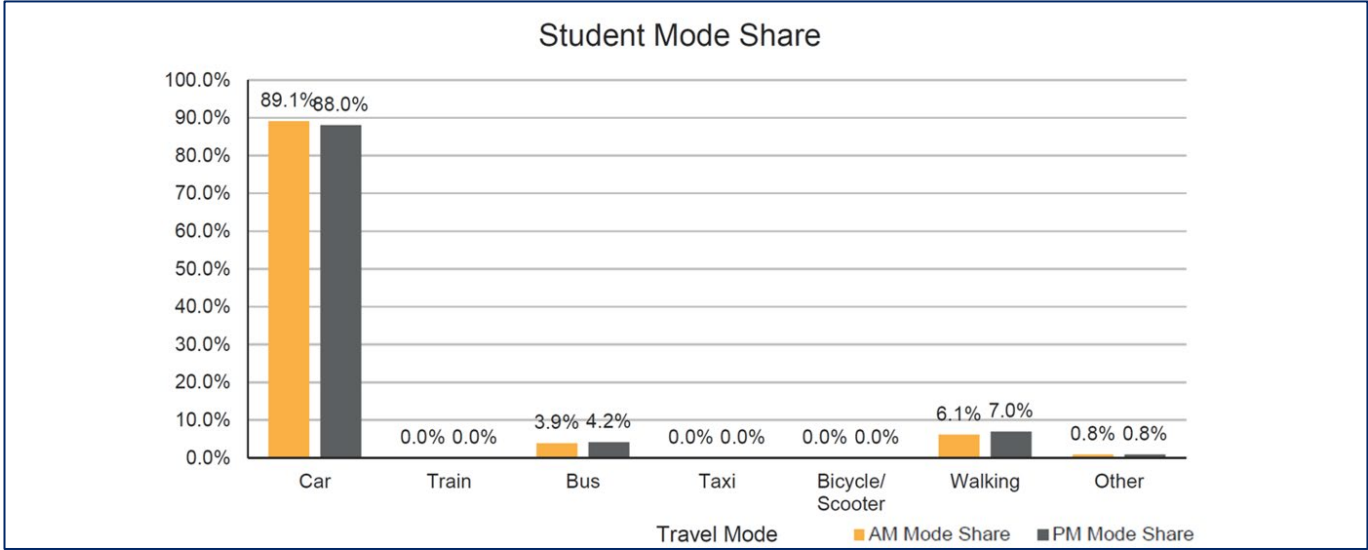


Figure 19 | Surveyed student travel mode share at the Green Valley campus (Source: Applicant’s ARtS, 2025)

148. The updated TAIA submitted in response to the further RFI includes a preliminary STP designed to encourage and improve sustainable travel modes and promote active transport. The preliminary STP outlines site-specific initiatives and programs to maximise walking, cycling, public transport and carpooling as preferred travel modes to and from the new school. It identifies the existing transport options and sets realistic yet ambitious targets for effective implementation.
149. Consultations with TfNSW and Council confirmed that no cycleway connections to or from the school currently exist, nor are any planned. The Council recommended providing some on-site bicycle parking in Stage 1, with conditions for additional provisions by the final development stage or upon the planning and establishment of surrounding cycling connections. In response, the Applicant proposed 30 secured and weather-protected bicycle parking spaces in Stage 1, accessible via Catherine Fields Road (see **Figure 21**). The final STP will include details of required End of Trip facilities.

150. The Applicant acknowledged the limited pedestrian and/or cycling infrastructure and the lack of public transport options surrounding the site. However, the Applicant confirmed that sections of Catherine Fields Road are adequately sized to support bus services. As a result, the Applicant has proposed the following:
- a private chartered bus service exclusively for school use starting from Stage 3. This service will operate every 30 minutes during peak hours, transporting students to and from Leppington and Minto railway stations. The new school may operate up to five private shuttle buses, depending on future demand
 - seven indented bus bays (two in Stage 1 and five more in Stage 3) and four covered bus waiting areas with a minimum width of 3m to accommodate waiting students. These bus bays will also serve as unrestricted on-street parking outside school peak hours
 - a 1.8m wide footpath (a portion near school entrance in Stage 1 and along the entire length of the Catherine Fields Road frontage in Stage 3), designed in accordance with the Austroads Guide to Road Design.
151. TfNSW supports the proposed shuttle bus services as a viable short-term option to promote sustainable travel modes. TfNSW recommended implementing a Parking Management Plan that prioritises spaces for car-poolers and includes electric vehicle charging stations. Council also supports the proposed shuttle bus service and encourages the development of adequate pedestrian facilities and footpath connectivity to promote active transport and alleviate potential queuing by allowing parents to park outside the site and walk to the school gates.
152. The Department reviewed the preliminary STP and considers the proposed student mode share target (see **Table 13**) attainable, accounting for a small percentage of students and staff who may reside nearby. The future STPs will conduct travel mode surveys similar to those conducted at the Green Valley campus to understand the future school's travel patterns better. **Table 13** and
153. **Table 14** outline the proposed student and staff travel mode share targets for Stage 4 (maximum student numbers). The base case represents the current travel mode share, while the moderate and reach cases represent increasingly ambitious targets for mode share distribution.

Table 13 | Stage 4 student travel mode share targets in 2037 (Source: Applicant's ARTS, 2025)

Mode	Base (Number / %)	Moderate (Number / %)	Reach (Number / %)
Bicycle	- / -	- / -	20 of 980 / 2%

Mode	Base (Number / %)	Moderate (Number / %)	Reach (Number / %)
Walk	- / -	- / -	20 of 980 / 2%
Public bus	- / -	20 of 980 / 2%	49 of 980 / 5%
School bus	49 of 980 / 5%	98 of 980 / 10%	196 of 980 / 20%
Car - DOPU	862 of 980 / 88%	804 of 980 / 82%	627 of 980 / 64%
Car - Single Occupancy Vehicle (SOV)	49 of 980 / 5%	29 of 980 / 3%	20 of 980 / 2%
Car - Carpool	20 of 980 / 2%	29 of 980 / 3%	49 of 980 / 5%

Table 14 | Stage 4 staff travel mode share targets in 2037 (Source: Applicant's ARtS, 2025)

Mode	Base (Number / %)	Moderate (Number / %)	Reach (Number / %)
Bicycle	- / -	- / -	1 of 51 / 2%
Walk	- / -	- / -	2 of 51 / 2%
Public bus	- / -	1 of 51 / 2%	2 of 51 / 4%
Car - SOV	46 of 51 / 90%	43 of 51 / 85%	39 of 51 / 76%
Car - Carpool	5 of 51 / 10%	7 of 51 / 13%	7 of 51 / 14%

154. The Department agrees with Council that the 1.8m wide footpath along the site frontage should be delivered in entirety in Stage 1 to be readily available for site users and any future connection to encourage safe active transport and assist with parents and students accessing the site by foot. As such, the Department has recommended conditions requiring the footpath to be completed prior to Stage 1 operation.
155. To reduce reliance on private car use and the proportion of single-occupancy car journeys to and from the site, the Department has recommended conditions requiring the Applicant to prepare, in consultation with Council and TfNSW, implement and regularly review and update a final STP and a Parking Management Plan. This process will include an initial audit six months after the school becomes operational to establish baseline mode share as early

as possible. The final STP will feature an auditing and review mechanism to ensure that mode share targets are consistently met and additional measures are introduced to address any shortfalls identified. The review will also consider overall bus ridership demand and the need for electric vehicle charging stations, addressing any shortfalls as necessary.

156. The Department acknowledges the uncertainty about the timing and delivery of the surrounding pedestrian and cycling infrastructure related to the anticipated growth in the local area, which is unlikely to be in place before the school opens. However, the Department considers that the Applicant should seek solutions to connect to any planned pathways and cycling routes through future precinct planning related to the Catherine Fields residential development potential.
157. As such, the Department has recommended a condition of consent requiring the regular review and update of the final STP and Parking Management Plan to prioritise integration with surrounding pathways and cycling routes as they become available. The Department has also recommended a condition for a Road Safety Audit (RSA) be conducted to identify and address potential safety issues near pedestrian and vehicle access points to the school following construction and implement any recommendations from the RSA prior to operation of the school.

6.2.4 Operational traffic impacts and intersection performance

158. The Applicant conducted traffic surveys in October 2022 at the intersections of Catherine Fields Road/Deepfields Road and Catherine Fields Road/Chisholm Road (marked as 2 and 7 in **Figure 20**, respectively). The traffic count data identified that peak traffic periods coincide with typical school bell times, specifically from 7.30am to 8.30am in the morning and from 3pm to 4pm in the afternoon.
159. In assessing traffic generation, the TAIA used data from the travel mode survey conducted at the Green Valley campus to estimate the number of trips generated during peak hours. The Applicant deemed this approach appropriate, as the proposed school's operations will reflect those of the existing campus. This includes a large student catchment area, specific family structure characteristics, a high reliance on private vehicles (nearly 90% for students and 97% for staff) and minimal dependence on public transport. The results are consistent with the averages reported in the TfNSW (formerly Roads and Maritime Services) Trip Generation Surveys Schools Analysis Report.
160. Considering the availability of OOSH facilities at the proposed school that are not present at the Green Valley campus, the TAIA adopted a peak-hour trip rate of 0.496 trips per student per lane (equivalent to 0.992 two-way vehicle trips per student) and an average car occupancy of 1.61 students per vehicle. Key considerations in the TAIA include:

- a high dependency on private vehicles, with the assumption that all staff drive to and from the school
- a moderate level of student carpooling
- one-third of staff travel with children attending the school (averaging 0.67 students per staff member), generating no additional trips
- adoption of similar occupancy rates, family structures and attendance patterns, with staff typically attending an average of 4.7 days per week (based on staff response)
- some staff peak arrival and departure times are offset from student peak times, with only 70% of staff arriving during the morning student peak and 27% departing during the afternoon peak. This pattern is typical in schools due to administrative tasks after students leave.

161. The Department considers this approach to be acceptable, noting the similarities in catchment sizes, family characteristics, travel behaviours and patterns between the Green Valley campus and the proposed school. Based on the surveyed data, it is also recognised that school bell hours represent worst-case scenarios for the day. Without assuming that the school will reach the mode share targets outlined in the preliminary STP, the TAIA predicted an increase in car traffic generation during peak hours at each development stage, as outlined in **Table 15**.

Table 15 | Staged student and staff trip generation during peak hours (Source: Applicant's ARtS, 2025)

Stage, Year	Student Number	Staff Number	AM Peak Student Trips*	AM Peak Staff Trips	Total AM Peak Trips**	PM Peak Student Trips *	PM Peak Staff Trips	Total PM Peak Trips**
Stage 1, 2026	318	15	157	11	<u>325</u>	157	4	<u>318</u>
Stage 2, 2031	652	33	320	24	<u>664</u>	320	9	<u>649</u>
Stage 3, 2035	980	51	482	36	<u>1000</u>	482	14	<u>978</u>
Stage 4, 2037	980	51	482	36	<u>1000</u>	482	14	<u>978</u>

Stage, Year	Student Number	Staff Number	AM Peak Student Trips*	AM Peak Staff Trips	<u>Total</u> AM Peak Trips**	PM Peak Student Trips *	PM Peak Staff Trips	<u>Total</u> PM Peak Trips**
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Note:

* Student vehicle trips are shown as one-way per lane.

** Total peak vehicle trips = two-way student vehicles + staff vehicles.

162. As advised by TfNSW, the modelling conducted in the TAIA for the surrounding intersections applied an annual background traffic growth rate of 2.5% through to 2040. This rate reflects population growth and upcoming developments in an area that has not yet been fully rezoned. The intersections analysed using SIDRA modelling are illustrated in **Figure 20** and include:

1. Bringelly Road/Allenby Road
2. Barry Avenue/Deepfields Road/Catherine Fields Road
3. Catherine Fields Road/School Entry
4. Catherine Fields Road/School Exit
5. Catherine Fields Road/Springfield Road
6. Camden Valley Way/Catherine Fields Road (signalised intersection)
7. Catherine Fields Road/Chisholm Road
8. Chisholm Road/Deepfields Road.

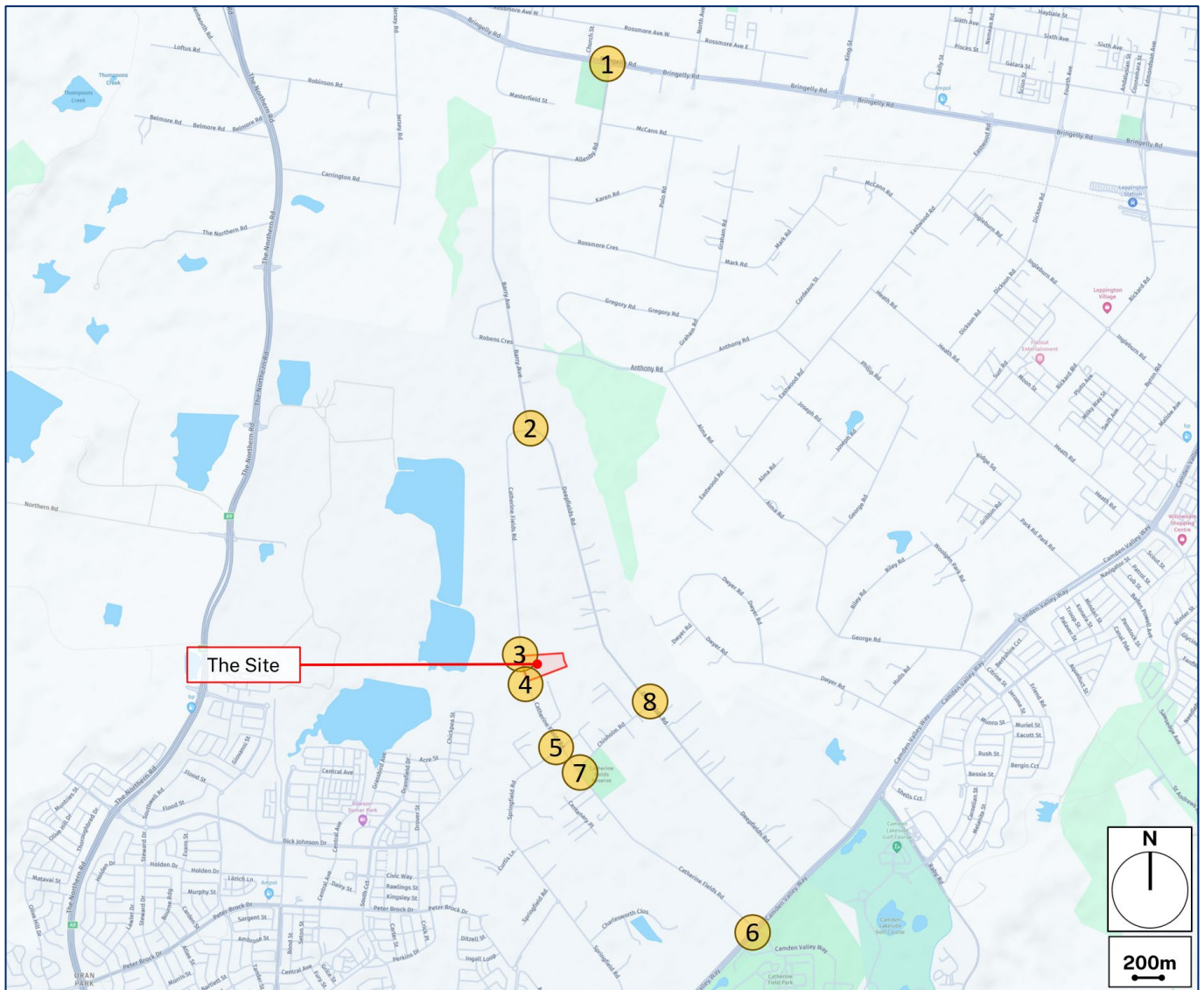


Figure 20 | Modelled intersections (Base source: Nearmap, 2025)

163. The modelled scenarios include the following:

- base results for 2021 and 2022
- baseline results for 2026, 2031 and 2035 (based on 2021/2022 results with an annual growth rate of 2.5%)
- baseline for 2026 plus Stage 1 development (320 students)
- baseline for 2031 plus Stage 2 development (650 students)
- baseline for 2035 plus Stage 3 development (980 students, noting that there is no student increase in Stage 4).

164. The Level of Service (LoS) measures the average delay experienced by vehicles at road intersections. Each approach and movement are categorically assigned a qualitative grade from A to F. In typical urban environments, intersections can usually operate at LoS grades

D or E and still maintain acceptable performance levels. The baseline and predicted LoS experienced at nearby intersections at each stage are outlined in **Table 16** to

165. **Table 18** and discussed below.

Table 16 | Baseline and proposed road network intersection performance in terms of LoS in 2026 (Stage 1) (Source: Applicant’s ARtS, 2025)

Intersection	Baseline AM Peak	Baseline PM Peak	Baseline + Stage 1 AM Peak	Baseline + Stage 1 PM Peak
Bringelly Road/Allenby Road	A	A	A	A
Barry Avenue/Deepfields Road/Catherine Fields Road	A	A	A	A
Catherine Fields Road/School Entry	A	A	A	A
Catherine Fields Road/School Exit	A	A	A	A
Catherine Fields Road/Springfield Road	A	A	A	A
Camden Valley Way/Catherine Fields Road (signalised intersection)	C	C	D	C
Catherine Fields Road/Chisholm Road	A	A	A	A
Chisholm Road/Deepfields Road	A	A	A	A

Table 17 | Baseline and proposed road network intersection performance in terms of LoS in 2031 (Stage 2) (Source: Applicant’s ARtS, 2025)

Intersection	Baseline AM Peak	Baseline PM Peak	Baseline + Stage 1 AM Peak	Baseline + Stage 1 PM Peak
Bringelly Road/Allenby Road	A	A	A	A
Barry Avenue/Deepfields Road/Catherine Fields Road	A	A	A	A
Catherine Fields Road/School Entry	A	A	A	A
Catherine Fields Road/School Exit	A	A	A	A

Intersection	Baseline AM Peak	Baseline PM Peak	Baseline + Stage 1 AM Peak	Baseline + Stage 1 PM Peak
Catherine Fields Road/Springfield Road	A	A	A	A
Camden Valley Way/Catherine Fields Road (signalised intersection)	F	F	F	F
Catherine Fields Road/Chisholm Road	A	A	A	A
Chisholm Road/Deepfields Road	A	A	A	A

Table 18 | Baseline and proposed road network intersection performance in terms of LoS in 2035 (Stage 3) (Source: Applicant's ARTS, 2025)

Intersection	Baseline AM Peak	Baseline PM Peak	Baseline + Stage 1 AM Peak	Baseline + Stage 1 PM Peak
Bringelly Road/Allenby Road	A	A	A	A
Barry Avenue/Deepfields Road/Catherine Fields Road	A	A	B	B
Catherine Fields Road/School Entry	A	A	A	A
Catherine Fields Road/School Exit	A	A	A	B
Catherine Fields Road/Springfield Road	A	A	B	B
Camden Valley Way/Catherine Fields Road (signalised intersection)	F	F	F	F
Catherine Fields Road/Chisholm Road	A	A	A	A
Chisholm Road/Deepfields Road	A	A	A	A

166. The modelling indicated that, at each development stage, most intersections operate at LoS A with or without the development, with some operating at LoS B due to the Stage 3

development. The exception is the signalised Camden Valley Way/Catherine Fields Road intersection, which will operate at LoS D or better until 2031 (Stage 2), then LoS F with or without the development. **Table 19** provides detailed comparisons of the Camden Valley Way/Catherine Fields Road intersection performance with and without the development.

Table 19 | Performance modelling results at the signalised intersection of Camden Valley Way and Catherine Fields Road (Source: Applicant's ARTS, 2025)

Stage, year	Scenario	Period	Average Delay (sec)	Degree of Saturation	Level of Service (LoS)	Change in Average Delay (sec)	Change in Degree of Saturation
Stage 2, 2031	Baseline	AM Peak	91.1	1.108	F	-	-
	Baseline + Stage 2		108.0	1.541	F	+16.9	+0.433
	Baseline	PM Peak	83.8	1.037	F	-	-
	Baseline + Stage 2		103.5	1.575	F	+19.7	+0.538
Stage 3, 2035	Baseline	AM Peak	130.4	1.196	F	-	-
	Baseline + Stage 3		164.3	2.048	F	+33.9	+0.852
	Baseline	PM Peak	139.1	1.112	F	-	-
	Baseline + Stage 3		175.3	2.059	F	+36.2	+0.947

167. All scenarios exhibit a degree of saturation greater than 1.0, resulting in a LoS rating of F. This indicates oversaturated conditions characterised by significant queuing and delays. The changes demonstrate the intersection's sensitivity to the additional traffic generated by the increased school population during Stages 2 and 3. Delays are projected to increase by 16.9 to 36.2 seconds, and saturation levels will rise by 0.433 to 0.947, exacerbating the intersection's instability.
168. The Applicant argues that the SIDRA modelling is conservative due to the adopted flat annual background growth rate of 2.5%, which typically decreases over time, and the potential for higher public transport usage with the long-term bus network planning in the area. The TAIA stated that:

- in the 2031 (Stage 2) and 2035 (Stage 3) scenarios, the Camden Valley Way/Catherine Fields Road intersection operates at a LoS F, regardless of whether the proposed development goes ahead
- the reported performance of the intersection is sensitive to minimal changes, as the degree of saturation already exceeds 1.0 in the baseline scenario. Consequently, the resultant increases in delay are modest
- with only left-out movements from the school exit, all other intersections will have capacity to accommodate the school traffic without causing adverse impacts.

169. Further, the ARtS clarified that:

- the use of the proposed sports field outside of core school hours will mainly involve students already on-site, thereby reducing traffic during peak hours. Students using the field will leave later, instead of all at once at dismissal.
- any external use of the sports field will be occasional and secondary to school activities, primarily involving small-scale training rather than competitive matches, or occasionally for weekend events. These will occur outside peak hours (the worst-case scenario) and the proposed traffic and parking provisions will meet demand. An Operational Traffic Management Plan (OTMP) will be prepared to provide additional operational management measures to mitigate residual impacts further.

170. The ARtS included significantly reducing the school and ELC population from 1580 to 980 students/children to address both servicing and traffic issues raised during the exhibition of the EIS.

6.2.5 Road upgrades, DOPU and access

Road capacity

171. The school development is expected to generate 450 to 550 vehicles per hour in each direction during the busiest periods of the day. The Department considers this traffic volume is below the physical capacity of the roadway and generally aligns with the environmental capacity for a collector road.
172. The Applicant noted that the projected baseline traffic volume on Catherine Fields Road, without the proposed development, is anticipated to exceed the 500 vehicles per hour threshold established for collector roads in 2035 (Stage 3).

173. To address potential traffic congestion and road safety concerns, the Applicant proposed road widening and upgrades to Catherine Fields Road along the site's frontage as part of Stage 1 and Stage 3 works.
174. The Department is satisfied that the traffic generation from the amended proposal will not exceed the physical carrying capacity or the environmental capacity of Catherine Fields Road, subject to suitable conditions of consent requiring the implementation of necessary roadworks by Stage 2 and other traffic mitigation measures.
175. However, the Department agrees with Council that the proposed road widening and upgrades to Catherine Fields Road along the site's frontage should be delivered in entirety in Stage 1 to better manage road efficiency, and the safety for road users and school attendees during operation of the school as well as the parallel activities of construction and operation in the subsequent stages of the development. such, the Department has recommended conditions requiring the upgrades be completed prior to Stage 1 operation.

DOPU and access

176. The proposed operational access arrangement includes a single vehicular entry at the northern end and an exit point at the southern end along Catherine Fields Road. As discussed in **Sections 6.1.3** and **6.2.3**, the Applicant has proposed upgrades to Catherine Fields Road along the site's frontage and on-site transportation infrastructure to mitigate potential traffic congestion and enhance road safety. The specifics and timing of the proposed on-site and off-site transportation infrastructure are outlined in **Table 3** and shown in **Figure 21**.
177. The proposal includes the construction of two lanes of DOPU spaces within the site in front of the school building, facing Catherine Fields Road, to minimise potential queuing impacts. The eastern lane, to be completed in Stage 1, will accommodate up to 17 cars, while the western lane, to be completed in Stage 2, will provide an additional 13 spaces, resulting in 30 on-site DOPU spaces. These spaces will be accessible via the northern crossover for school entry and exit via the southern crossover, as shown in **Figure 21**.

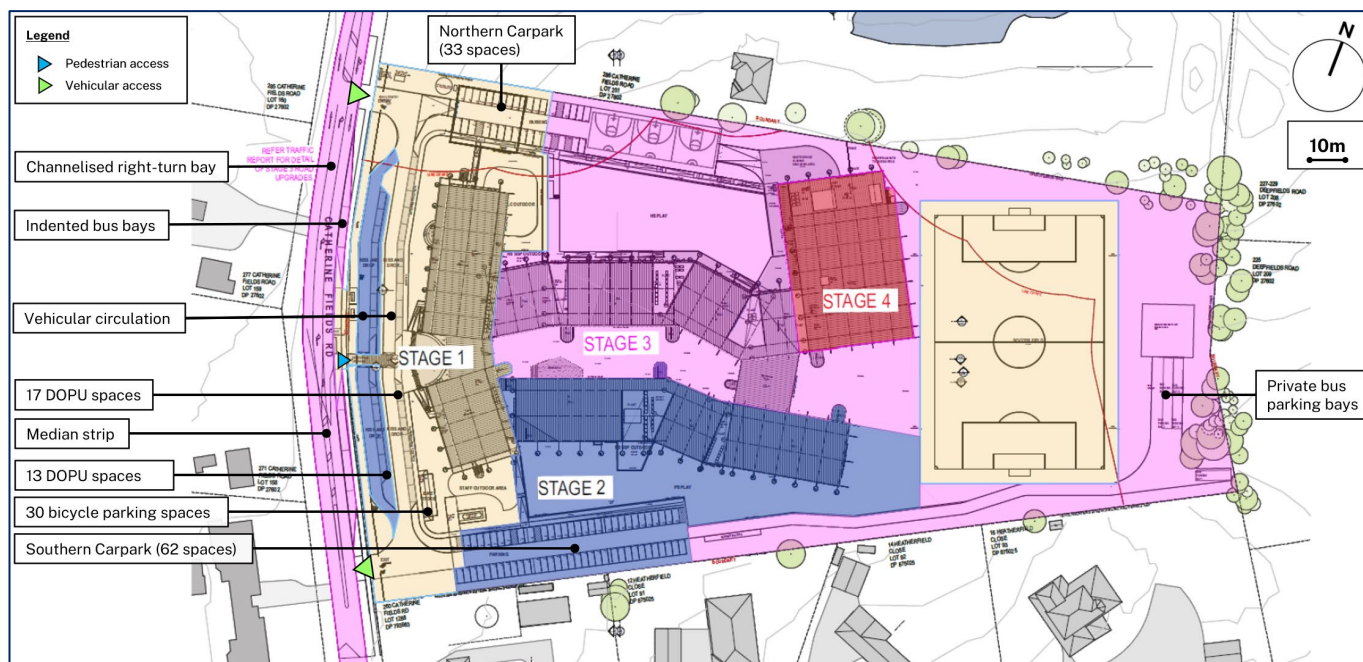


Figure 21 | Proposed on-site and off-site transportation infrastructure at final development stage (Source: Applicant's ARTS, 2025)

178. To evaluate the effectiveness of the DOPU operation in managing vehicle queues, the updated TAIA identified key operational components and conducted a staged queuing analysis during peak hours. This analysis is based on the trip generation data outlined in **Table 15** and considers factors influencing queuing, including:
- managed bays - number of supervised DOPU spaces, where staff assist with student entry and exit to optimise vehicle flow
 - service time - average vehicle stopover time required for the DOPU process (e.g., student boarding or alighting)
 - 95th percentile queue length in number of vehicles, excluding managed bays – the maximum number of cars forming behind the managed bays 95% of the time during the analysis period.
179. **Figure 22** outlines the results of the stage-by-stage queuing analysis in the updated TAIA. The number of managed bays increases from eight in Stage 1 to 14 in Stage 3. The TAIA assumes staff will become more familiar with supervising DOPU operations over time. The TAIA suggested that the proposed DOPU area (17 bays from Stage 1 and 30 from Stage 3) will have the capacity to accommodate queue lengths during peak hours.

Queuing Factor	Stage 1	Stage 2	Stage 3	Stage 4
Managed Bays (vehicle bays)	8	12	14	14
Service Time (min/veh)	2	1.5	1.5	1.5
Vehicle Trips (veh/hr)	157	320	482	482
95 th %ile Queue (excluding managed bays)	3 vehicles	2 vehicles	15 vehicles	15 vehicles
Total Vehicles in System	11 vehicles	14 vehicles	29 vehicles	29 vehicles

Figure 22 | Queuing analysis at each stage (Source: Applicant's ARtS, 2025)

180. The Applicant stated that the queuing modelling is conservative, based on the following specific considerations, that the:
- analysis assumes all student-related vehicle trips occur within a 60-minute window for arrivals and departures, representing a worst-case scenario and not accounting for natural dispersion over time or the operation of the OOSH. In practice, arrival and departure profiles often extend longer, as evidenced by the Green Valley campus survey results
 - queuing estimates are based on baseline mode share splits without assuming that the school will successfully meet the preliminary STP targets. This accounts for scenarios in which the uptake of sustainable travel modes is lower than anticipated.
181. The Applicant states that queuing will further decrease when considering staggered school start and finish times between PS and HS students. The existing Green Valley campus releases PS students to the student waiting area at 3.05pm and HS students at 3.20pm. The Applicant advises that the new school would likely continue this operational practice to staggered school times, which will distribute arrival and departure times more evenly throughout the peak period, shortening queues.
182. The TAIA recommended the implementation of the private chartered bus service from Stage 3, with a capacity of 60 passengers, which will reduce the estimated trip generation and is estimated to decrease the total queuing demand in the DOPU system from 29 vehicles to 20 vehicles in Stages 3 and 4.
183. The Department considered that the proposed DOPU provisions are appropriate and supported the TAIA's assumption, noting the amended proposal reduces the student number while maintaining 30 DOPU bays.

184. As part of the ARtS, the Applicant clarified that:
- the private chartered bus will operate during peak hours, with boarding and alighting occurring exclusively at the external bus bay to avoid disruption to DOPU operations
 - existing staff and students will guide newcomers at each stage, to ensure improved DOPU management efficiencies over time
 - a significant portion of staff arrive or depart outside peak periods, implying negligible impact on the DOPU operations
 - an OTMP will be developed post-approval to further reduce any residual impacts
 - waste collection and deliveries will be scheduled outside peak periods to limit operational conflicts
 - fencing will separate sports courts from the school area to manage pedestrian and vehicle interactions
 - the final STP will include additional management measures to minimise collision risks.
185. Additionally, the Applicant has proposed road widening, additional bus bays and a channelised right-turn bay with a 55m storage capacity, as part of the Stage 3 works. The Applicant has stated that this aims to address potential queuing of vehicles approaching the site from the south. The design will also facilitate left turns only for cars exiting the school, thereby restricting right turns to reduce delays caused by vehicles turning right onto Catherine Fields Road and ensuring smooth traffic flow at the school exit.
186. Council reviewed the ARtS and continued to raise concerns about insufficient queuing capacity, noting parents may occupy the DOPU spaces early before dismissal, potentially causing overflow onto the public road. Council recommended completing the proposed roadworks before Stage 1 operations to avoid traffic disruption in later stages.
187. The channelised right-turn bay and median island are implemented to ensure efficient and smooth operations within the DOPU areas by improving traffic flow and reducing delays caused by exiting car turning right onto Catherine Fields Road.
188. The Department agrees with Council that the proposed road widening and upgrades to Catherine Fields Road along the site's frontage should be delivered in entirety in Stage 1 to better manage vehicle movements for all road users and the school community, as well as later operational and construction traffic congestion occur during subsequent construction Stages. As such, the Department has recommended conditions requiring the upgrades be completed prior to Stage 1 operation. These upgrades are in addition to the Department's, recommendation of a condition requiring the footpath along the site's frontage also be completed in Stage 1 (see **Section 6.2.3**).

189. Overall, the Department is satisfied that the proposed on-site DOPU provisions, subject to footpath and roads works brought forward to Stage 1 as recommended, will adequately meet the school's transport needs and will not result in traffic overflow onto public roads, subject to conditions that require the implementation of a final STP and OTMP, staggered school arrival and departure times and the proposed private chartered bus service to ensure future DOPU demand is accommodated, should DOPU management efficiencies fall short.

6.2.6 Operational car parking

190. As part of the AR, the Applicant reduced the number of proposed on-site car parking spaces in response to a decrease in the school population proposed. The TAIA includes a stage-by-stage assessment of the on-site parking provision, aligned with the requirements specified in the Camden DCP 2019, which sets minimum parking rates for educational establishments. The DCP specifies the following minimum car parking rates:

- one space per FTE staff member
- one space per 100 students
- one space per five Year 12 students, where applicable
- one space per four children for ELCs, with at least one accessible space
- adequate provision for delivery vehicles, DOPU areas and buses.

191. The Applicant has demonstrated compliance with the DCP requirements for on-site parking at each stage of development, as detailed in **Table 20**.

Table 20 | Off-street car parking requirements and provisions across all stages (Source: Applicant's ARTS, 2025)

Stage, Year	School population	Required spaces	Proposed spaces
Stage 1, 2026	15 FTE staff, 18 ELC and 300 students (K – 12), with no HS students	23	23
Stage 2, 2031	33 FTE staff, 42 ELC and 610 students (K – 12), including 25 HS students	55	86
Stages 3 and 4, from 2035	51 FTE staff, 60 ELC and 920 students (K – 12), including 50 HS students	86	95

192. Council did not raise specific concerns regarding the proposed parking provision but requested the implementation of traffic calming measures along parking aisles extending beyond 100m.

193. The updated TAIA confirmed that all parking and DOPU spaces will comply with the relevant Australian standards, including the required traffic calming measures. Additionally, servicing vehicles will have sufficient manoeuvring space to perform a three-point turn within the designated loading and unloading area to enter and exit in a forward direction. Further details regarding the DOPU operation can be found in **Section 6.2.4**.
194. Based on the above, the Department considers the proposed provisions for car parking and servicing vehicles on-site to be adequate to meet the parking demand at each development stage. The Department has recommended a condition requiring the parking provisions be completed before the commencement of school operations at the relevant stage.
195. The Department has also recommended that the Applicant prioritise ride share parking for staff and students as part of its final STP.

6.2.7 Department's consideration – operational traffic

196. While acknowledging that the Camden Valley Way/Catherine Fields Road intersection will reach a LoS F in Stages 2 and 3 regardless of the proposed development, the Stages 2 and 3 developments will exacerbate the pre-existing issue by increasing delays and the degree of saturation. To mitigate this, the Applicant has proposed on-site and off-site transport infrastructure works, including road capacity upgrades on Catherine Fields Road to address the already strained baseline performance, including road widening works, seven indented bus bays and a channelised right-turn bay connecting to the school entry (see **Figure 21**).
197. On balance, the Department considers the impacts of the operation traffic impacts of the development including worsening of the intersection performance is not unreasonable, because:
- the development will change the character of the local road network; however, this change will occur gradually over 12 years. Drivers may adjust their travel behaviours in response to traffic increases, such as shifting travel modes or using alternative routes
 - all intersections, except for the Camden Valley Way/Catherine Fields Road intersection, will operate at a satisfactory level (LoS A to B), with spare capacity to accommodate extra traffic choosing alternative routes
 - the traffic generation from the amended proposal will not exceed the physical carrying capacity or the environmental capacity of Catherine Fields Road, subject to conditions
 - the proposal includes more DOPU spaces than needed to accommodate potential overflow and any residual impacts

- the proposal includes trip reduction measures, as part of the final STP, by promoting active transport, providing shuttle services and incentivising carpooling. The final STP will encourage shifts in travel modes, with mode share targets influencing travel behaviour to and from the site and reducing detrimental traffic impacts
- the projected traffic generation is conservatively estimated, assuming that the school maintains current travel mode share in the Green Valley campus despite the implementation of the final STP
- subject to conditions, the proposal will be required to upgrade pedestrian infrastructure along the site's street frontage in Stage 1 to facilitate potential green travel mode uptake and future connectivity in line with the future SWGA planning
- subject to conditions, the proposal would deliver road widening and upgrades to Catherine Fields Road along the site's frontage in entirety in Stage 1 to better manage vehicle movements for all road users and school users, as well as later operational and construction traffic congestion
- adequate provisions for car parking and servicing vehicles on-site are provided at each development stage to prevent parking overflow onto public roads.

198. Overall, the Department is satisfied that the proposal has minimised its incremental traffic impact, with adequate measures in place to address cumulative effects, subject to conditions requiring proposed widening and roadworks being brought forward to Stage 1 ; an OTMP; and a detailed STP, prepared in consultation with Council and TfNSW to be strictly implemented and regularly reviewed to identify any need for earlier intervention(s) should background growth exceed TAIA predictions or if sustainable mode uptake is lower than expected.

6.3 Built form and urban design

199. The AR included an amended design report outlining the proposed development's rationale in response to the site context. It established the guiding principles for site layout and building design, addressing key elements such as the Connecting with Country framework, building bulk, scale, articulation, setbacks, access, circulation, building performance, façade presentation, materials, and landscaping.
200. The amended design has been refined through consultations with the NSW Government Architect (GANSW) through the State Design Review Panel (SDRP) process, ensuring alignment with best practice design standards. The design report detailed design considerations and amendments made during the SDRP process.

6.3.1 Height, bulk and scale

201. The site is in a rural-residential area characterised by single- and double-storey dwellings on large lots, typically enclosed by low-profile post-and-wire fencing. The open rural landscape provides shared views from Catherine Fields Road towards the Wianamatta South Creek green corridor.
202. The site is subject to a maximum building height control of 9.5m under the CLEP 2010. The Applicant confirmed that all proposed buildings will reach a maximum of two storeys and comply with the 9.5m height limit (see **Figure 23**). There is no floor space ratio control applicable to the site.



Figure 23 | Sections of the proposed school building indicating the 9.5m height limit (Source: Applicant's ARTS, 2025)

203. Public submissions raised concerns about the proposal's bulk and scale and its potential impact on the rural local character, affecting the amenity and tranquillity of nearby residents. Council raised that the proposed acoustic walls would negatively impact the visual amenity of the surrounding rural landscape. These walls would consist of Colourbond fencing, ranging from 1.5m to 2.4m in height, including the 1.8m acoustic walls along the entire length of the site's northern and southern boundaries.
204. GANSW did not raise any concerns regarding the proposed development's height, bulk and scale. The Applicant stated that the proposed built form and urban design outcomes are acceptable and consistent with the expected development for the site. **Figure 24** to **Figure 26** provide analysis of the view impacted by the existing and proposed development, including gates and fencing, from Catherine Fields Road.



Figure 24 | Development viewed from Catherine Fields Road, facing southeast (Source: Applicant's AR, 2025)



Figure 25 | Development viewed from Catherine Fields Road, facing east (Source: Applicant's AR, 2025)



Figure 26 | Development viewed from Catherine Fields Road, facing northeast (Source: Applicant's AR, 2025)

205. The proposed building wings feature zig-zagging building footprints, providing minimum setbacks of approximately 26m from the western (street) frontage, 20m from the southern boundary and 8m from the northern boundary (to the HS hall). The proposal sets back the

metal paling fencing and gates facing the street frontage, screened by a continuous landscape strip 3m wide to reduce visual bulk.

206. The Department acknowledges that the intended planning outcomes for the wider precinct, including future land uses, road hierarchy and infrastructure provisions, are yet to be finalised. As one of the first non-rural developments of its scale in the area, the proposed development will alter its surroundings rural character.

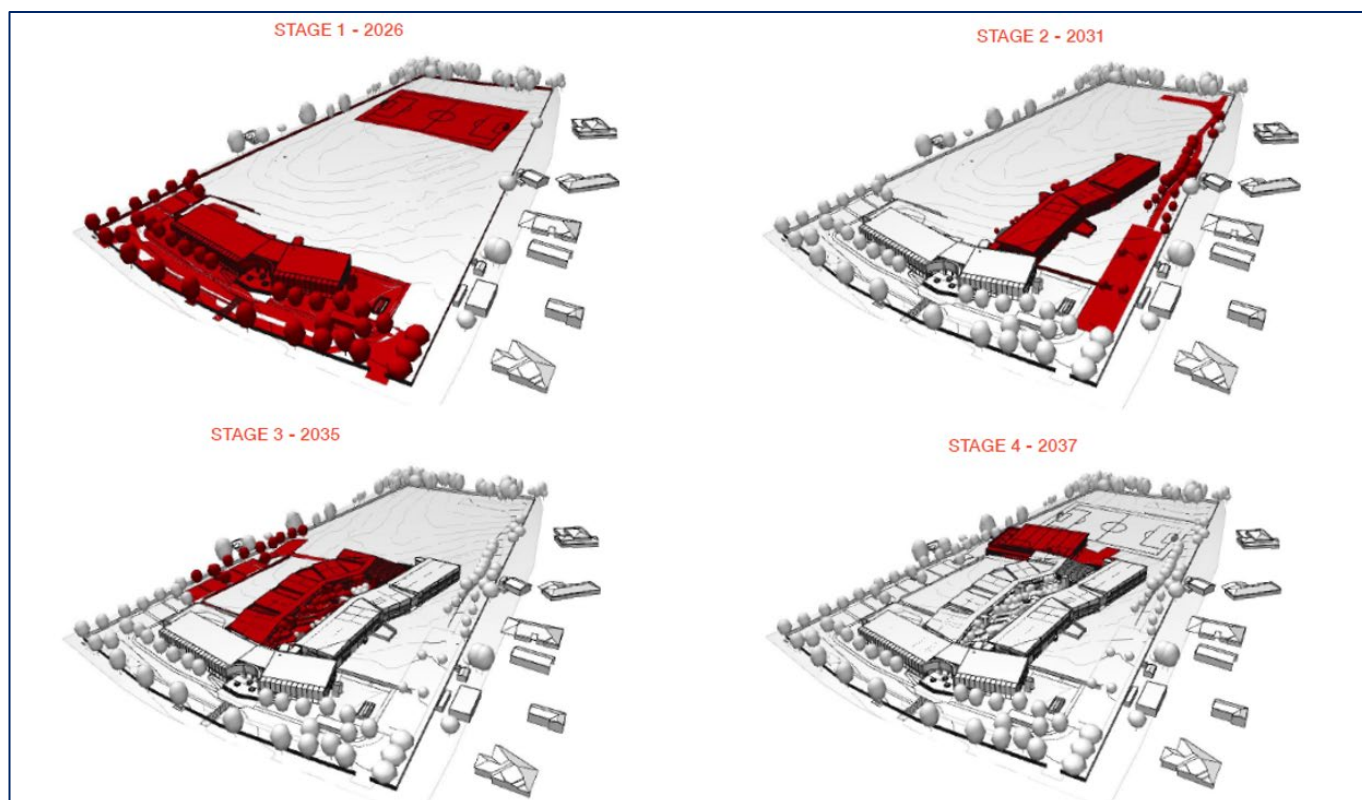


Figure 27 | Proposed built form at each development stage (Source: Applicant's AR, 2024)

207. The Department recognises that the proposed development will be delivered in stages, with its visual impact on the existing local character unfolding progressively over a 12-year period, culminating in approximately 2037 (see **Figure 27**). This phased approach enables a gradual integration of impacts on the local character.
208. The Department has recommended conditions that require advanced replacement tree stocks, along with suitable tree species and planting locations, to ensure healthy tree growth to provide effective visual screening throughout each development stage.



Figure 28 | A perspective architectural rendering of the new school, viewed from within the site facing east towards the main entrance (Source: Applicant's ARtS, 2025)

209. The Department has considered the SDRP comments and concerns raised by Council and public submissions. The Department is satisfied that, on balance, the height, bulk and scale of the proposed development, along with its visual impact on the streetscape, are acceptable as:

- the proposal includes substantial setbacks between the proposed school building and the nearest site boundaries and residential properties
- new planting and landscaping at the northwestern and southwestern corners, along with a landscape strip along the street frontage, will provide a sense of enclosure for the school. This will create sufficient visual buffers, obscure public views of the development and soften the perceived bulk of the school building
- the building design responds to the site's topography by following its natural east-to-west slope. This minimises site disturbance from cut and fill and presents a two-storey form that is significantly set back from Catherine Fields Road
- although the proposed buildings are elongated and continuous from west to east, the northern and southern elevations are highly articulated and modulated to reduce the perceived bulk and scale of the buildings

- the height and scale are consistent with those typically found on school campuses. Reducing the building length or creating separate buildings would compromise functionality or lead to taller structures with larger development footprints closer to nearby residential properties
- the development will not result in any significant amenity impacts arising from overshadowing, view loss or loss of privacy for the adjoining properties, as discussed in **Section 6.5**.

210. The Department also considers the proposed fencing along the northern and southern boundaries will assist in mitigating noise impact (see **Section 6.5**). To lessen the fencing's visual dominance on the streetscape and neighbouring properties, the Department has recommended conditions requiring a sympathetic choice of neutral, recessive colours and designs that blend with the natural environment to ensure compatibility, in line with the Camden DCP 2019.
211. Overall, the Department is satisfied that, subject to the recommended conditions, the proposed development's height, bulk and scale have been well thought out to minimise visual impacts on the surrounding rural landscape while providing an appropriate transition through extensive boundary planting.

6.3.2 Landscaping and tree management

212. As shown in **Figure 13**, the proposal includes extensive tree planting and landscaping throughout the site, including new trees along the western, northern and southern site boundaries, as well as within the outdoor play spaces surrounding the school building. The proposal will retain existing trees along the eastern boundary to preserve the fringe of nearby bushland.
213. The Applicant's design report stated that the site master planning adopts a holistic approach, incorporating a communal spine (the central courtyard) with perimeter landscape buffers surrounding the building masses, while maximising play and integrated landscaped areas. Fencing will be set back from the front boundary and screened by a landscape strip along the site's frontage and footpath, softening the boundary interface with the streetscape. The proposed landscape strategy is depicted in **Figure 29**.

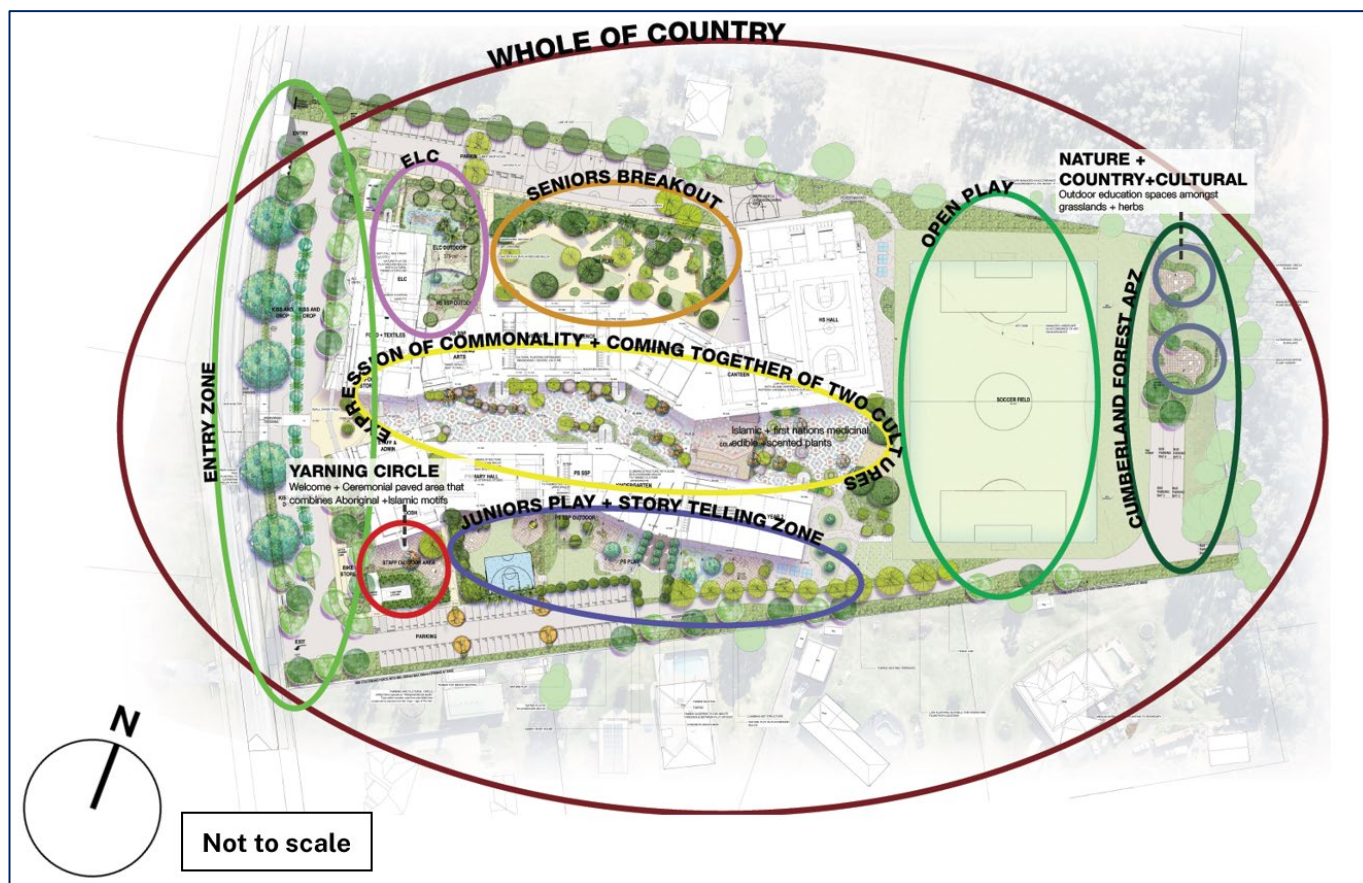


Figure 29 | Proposed landscape strategy (Source: Applicant's AR, 2024)

214. The proposal involves replacement planting of a mix of native and exotic species, including 253 replacement trees, shrub underplanting and groundcovers, increasing tree canopy coverage from the existing 11.6% to 16.2% (by Stage 3), providing sufficient canopy area and shade, while screening views to and from the site along its boundaries. However, the proposal will decrease the deep soil area to 19,882m² (44.3% of the site area, including turf, planting and permeable paving) due to the school footprint and new hardscape areas.
215. In response to the Department's request, the Applicant confirmed the landscaping plan for each development stage, ensuring that sufficient open play space and landscaped buffers at each phase, in line with the amenity and functional requirements of the staged school population. In addition, the Applicant confirmed that the sports field will be available for community use starting from Stage 1.
216. The Applicant submitted an Arboricultural Impact Assessment (AIA) report that assessed the health and condition of existing trees adjoining and within the site. The AIA recommended management and protection measures for tree removal and preservation, including engaging a suitably qualified arborist for appropriate maintenance of new trees. Along with the CPHR advice, the Department has recommended conditions that require compliance with the AIA recommendations, implementation of tree protection measures

prior to construction, pre-clearance fauna surveys, relocation of native fauna and the salvage and relocation and reuse of tree hollows.

Carpark landscaping

217. The Department acknowledges the landscaping design requirements for at-grade car parks outlined in the Camden DCP 2019. However, while these controls do not apply to SSDs under section 2.10 of the Planning System SEPP, the Department considers that the:
- proposed parking areas incorporate extensive landscaping, including canopy trees and shrubs, to mitigate the visual impact of large, paved surfaces and parked cars, provide shade, and assist with surface runoff
 - car parks are set back from the street frontage, placed behind new trees to filter public sightlines and, with proposed boundary fencing and planting, will not be readily visible to the adjacent residential properties to the north.
218. The Department considers strict compliance with the DCP landscaping requirements is unnecessary. The Department has recommended conditions to avoid trees with intrusive roots, use advanced replacement tree stocks compliant with the relevant Australian standards and require additional canopy tree planting along the southern boundary of the southern carpark to further mitigate visual impacts on residential properties, particularly 260 Catherine Fields Road and 12 Heatherfield Close.
219. The Department has reviewed the proposed landscape design as refined by the AR and ARtS. The Department is satisfied that the scheme is appropriate for the site context, incorporates the Connection with Country principles, responds to the needs of students and staff by providing a safe and engaging outdoor environment, includes diverse spaces for play, gathering and outdoor learning, offers suitable shading and screening and effectively mitigates visual impacts from the proposed built forms. Overall, the Department is satisfied that, subject to the recommended conditions, the proposed landscaping design is of high quality and will positively contribute to the area's character, noting that the:
- proposed tree removal is unavoidable to facilitate the school development; however, the overall proposal will result in greater canopy coverage than currently exists
 - reduction in deep soil area is reasonable given the new building footprint and the incorporation of permeable surfaces will minimise impact
 - landscape design will include open spaces shared with the local community.

6.4 Flooding

220. A POFA was submitted with the EIS and updated as part of the AR and ARtS.
221. The POFA included flood modelling and assessed localised overland flooding risks to the site and the impacts of the proposed development on flood behaviour, incorporating climate change impacts, addressing a range of flood events, including the PMF. The assessment of the POFA was informed by the following flood investigations:
- *Upper South Creek Flood Study*, prepared by WMAwater in 2013, commissioned by Council.
 - *Review of Upper South Creek Flood Study in the Context of Ongoing Development*, prepared by WMAwater in 2021, commissioned by Council.
 - the 2022 flood study: an updated version of the 2021 flood study (adopted by Council in 2022), including 2022 hydrologic and hydraulic models provided by Council.

6.4.1 Flood behaviour

222. The site is not affected by mainstream flooding but experiences overland flows from a 5.5 hectares upstream catchment southeast of the site. These flows travel east to west along a shallow drainage depression on the southern site boundary where water travels along a roadside swale fronting the site and discharges into downstream properties through an existing culvert crossing under Catherine Fields Road (see **Figure 11** and **Figure 12**). The site and other adjacent lands are a high flood island, becoming isolated by roadway flooding as frequently as 5% AEP events. Flood impacts and risks increase up to the PMF event, where water depths may exceed 1m in depth and surround the site and inundate parts of the site primarily along the southeastern boundary (see **Figure 34**).

Flood hazard categories

223. Section 3 of the Flood Risk Management Guideline FB03 (Department's publication, 2023) outlines general flood hazard vulnerability curves, as shown in **Figure 30**. These curves assess the relative vulnerability of the community and built assets using flood depth to velocity thresholds. The hazard categories (H1 to H6) reflect increasing levels of risk, with H1 indicating low hazard (generally safe for pedestrians, vehicles and buildings) and H6 indicating extreme hazard (unsafe for all access and building types). These categories inform the flood risks assessment and the mitigation design.

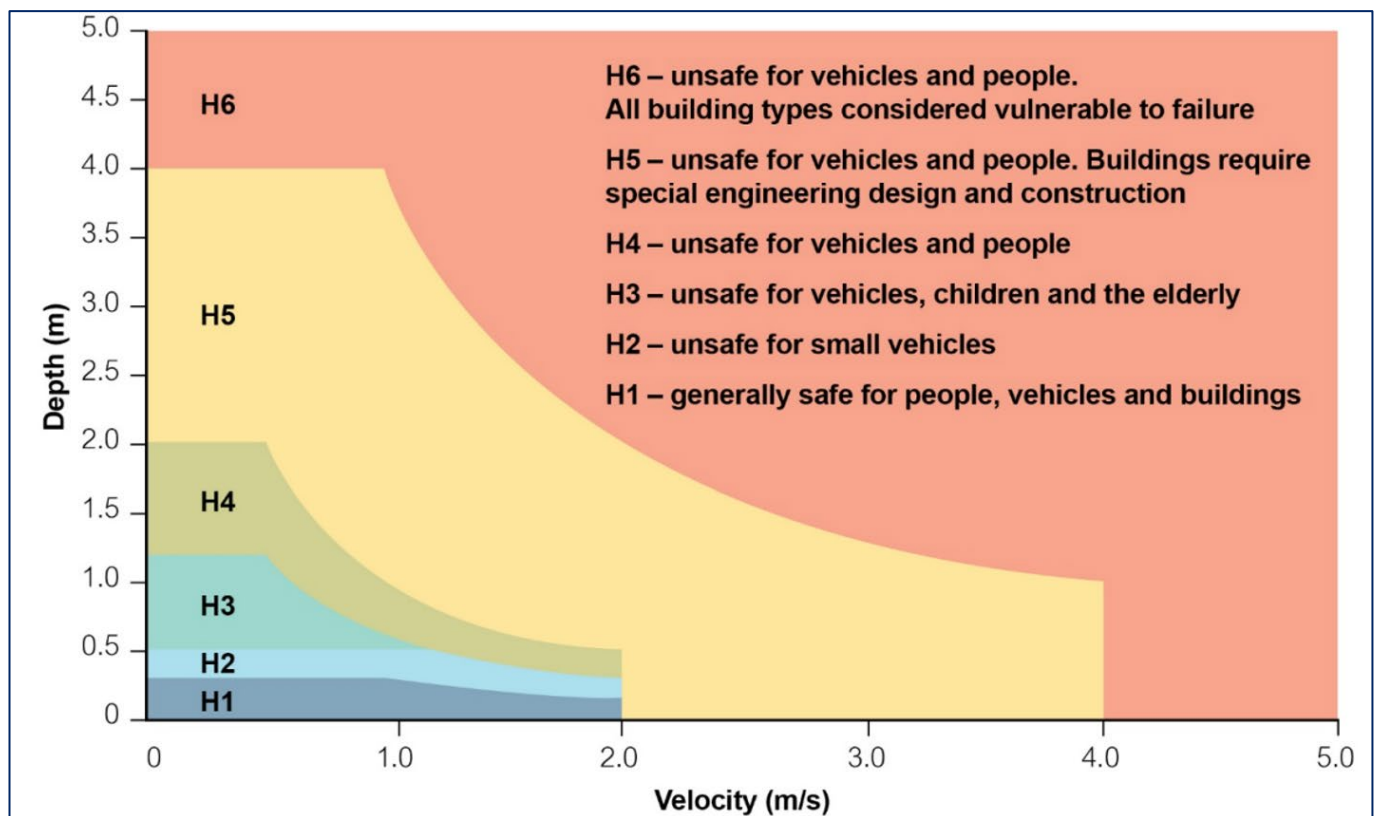


Figure 30 | General flood hazard vulnerability curves (Source: Australian Institute for Disaster Resilience, 2017)

Existing flood conditions

224. Currently, the roadside swale and culvert crossing do not have sufficient capacity to convey the upstream flows to the downstream areas. During the 1% AEP and 0.2% AEP flood events, flood waters overtop the carriageway near the northwestern of the site (a low point). During the PMF, overtopping occurs at both the northwestern and southwestern corners of the site.

6.4.2 Impacts from the proposed development

225. To address the shallow overland flow path through the southern portion of the site, as identified in the flood modelling, the Applicant designed the southern accessway, the southern carpark, diversion pipes and swale along the southern boundary of the site to capture and redirect upstream overland flows to Catherine Fields Road. Additional POFA flood modelling was provided in the AR, which incorporated the proposed site grading, the critical duration for 1% AEP, 0.2% AEP and PMF events and included the proposed on-site and off-site stormwater drainage upgrades.

Proposed flood conditions

226. The POFA modelling found that the proposed diversion system effectively collects and redirects the upstream overland flows away from the proposed main building areas and discharges the flows into the proposed upgraded drainage system on Catherine Fields Road (see **Section 6.1.3**).
227. The POFA compared existing and proposed flood conditions and identifies the proposed development will reduce flood hazard on-site and off-site, as shown in **Figure 31** to **Figure 33** and outlined below:
- 1% AEP - peak flood hazard on Catherine Fields Road adjacent the site will reduce from H5 to H1, ensuring safe pedestrian and vehicle access
 - 0.2% AEP - flood hazard on Catherine Fields Road adjacent the site mostly reduced to H1, with isolated H2 patches
 - PMF - hazards greater than H1 are confined to the roadside swale and carpark areas (along the southern boundary and at the northwest corner of the site). All proposed buildings are outside PMF flood extents, unaffected by flood waters and hazards.
228. Additionally, the POFA identified several isolated areas of shallow, low hazard water occurring in 1% AEP, 0.2% AEP, and PMF events due to preliminary site grading and the absence of an internal stormwater conveyance system in the model. The POFA considered these areas shallow ponding, not flooding, which will be addressed during final grading and stormwater design at the detailed design stage.

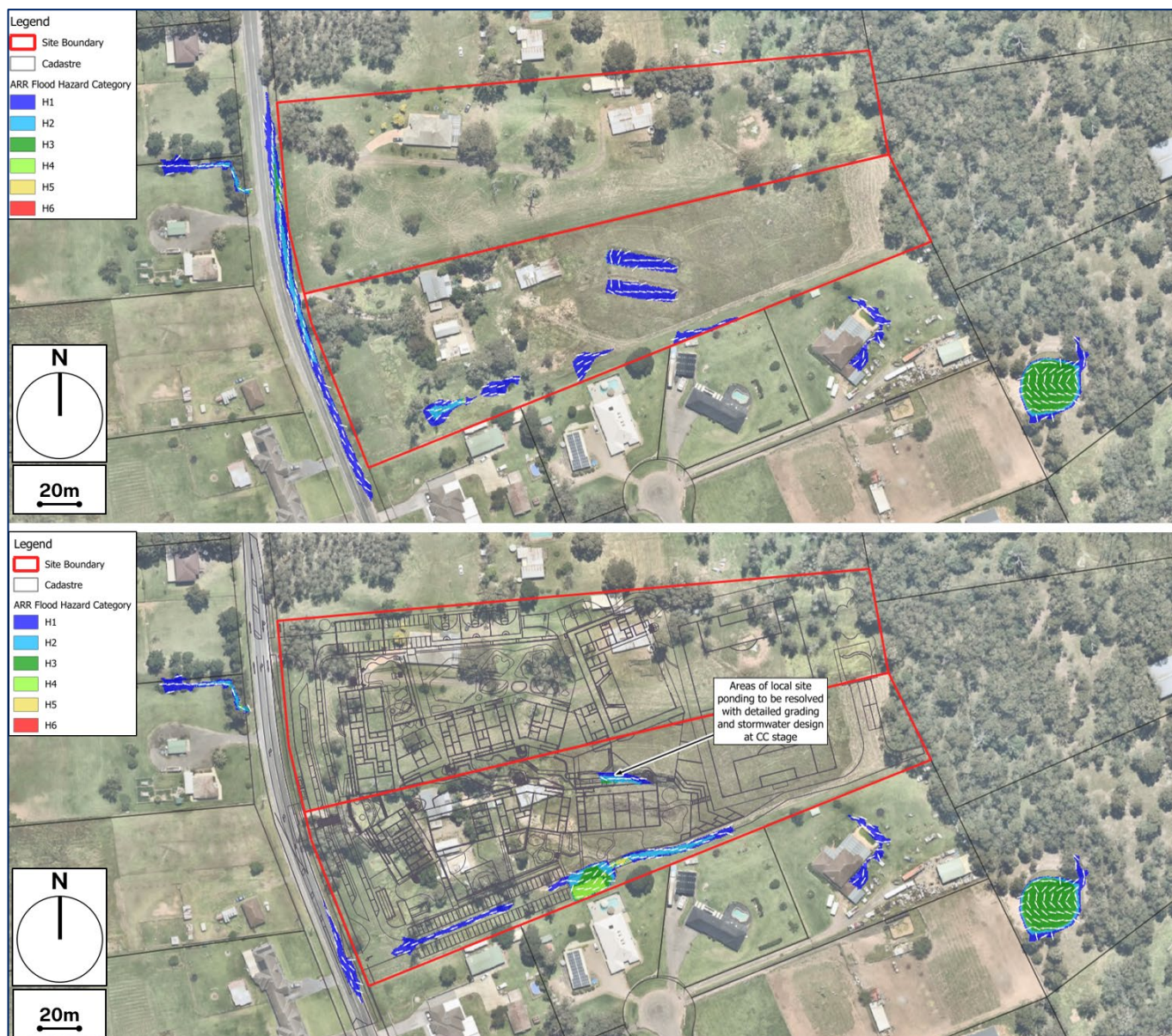


Figure 31 | Existing (above) and proposed (bottom) flood hazards, during 1% AEP events within and near the site (Source: Applicant's ARTS, 2025)

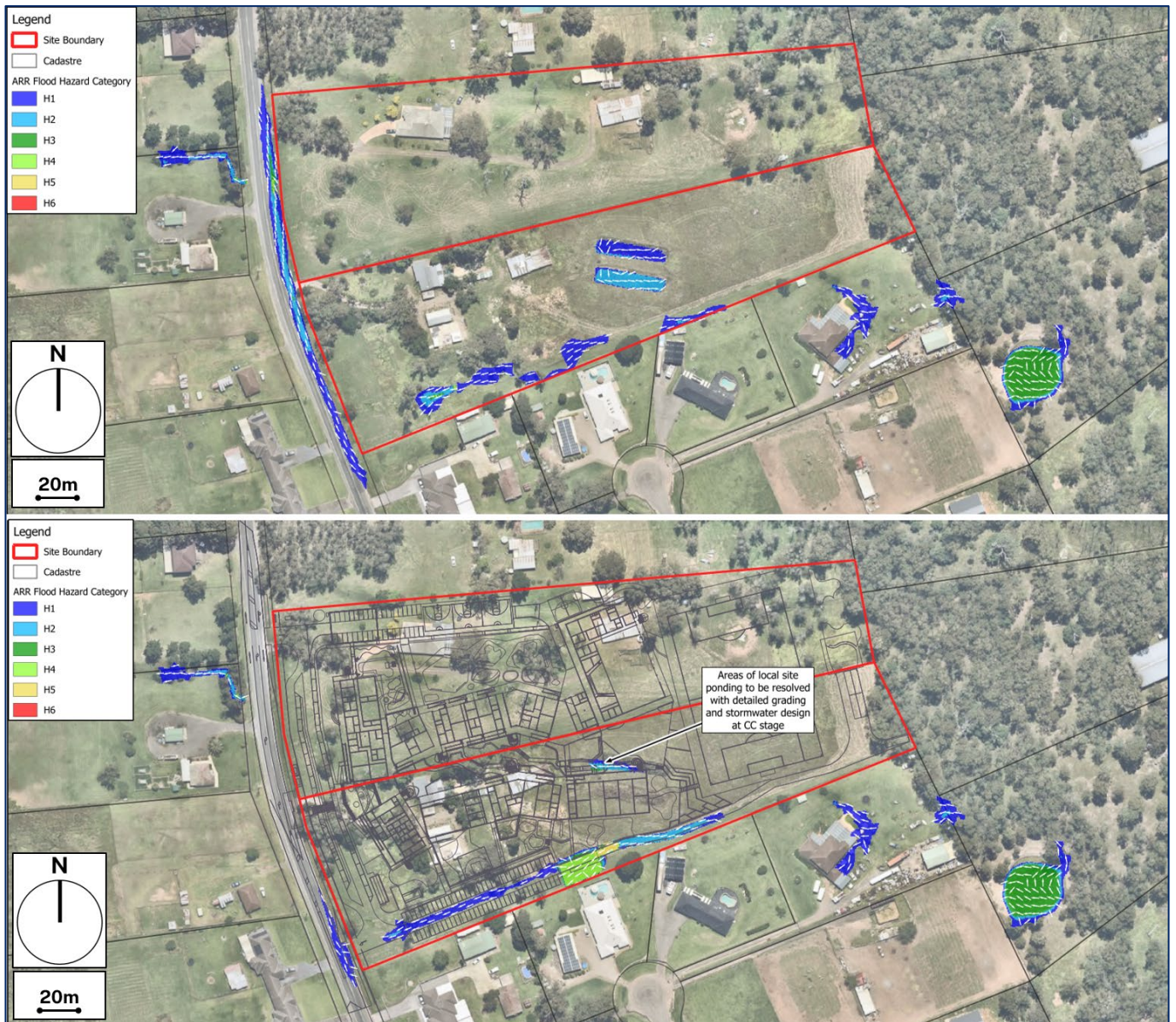


Figure 32 | Existing (above) and proposed (bottom) flood hazards, during 0.2% AEP events within and near the site (Source: Applicant's ARtS, 2025)

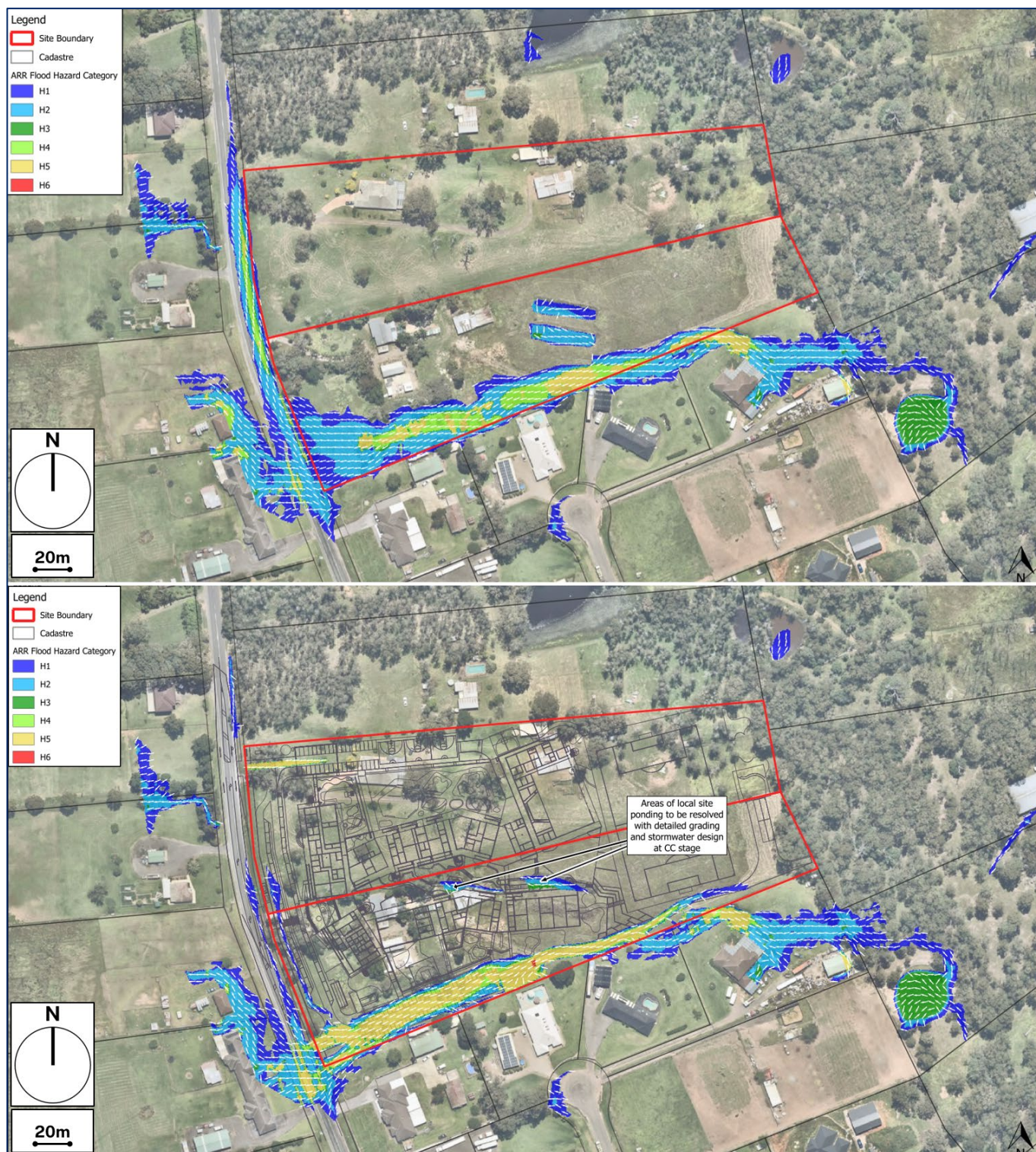


Figure 33 | Existing (above) and proposed (bottom) flood hazards, during PMF events within and near the site (Source: Applicant's ARTS, 2025)

Flood level compliance

229. Council's Flood Risk Management Policy requires a Flooding Planning Level no lower than the PMF flood level with no freeboard for habitable floor levels. The Applicant confirmed

that all proposed buildings' finished floor levels exceed the PMF levels, ensuring all buildings are flood free in 1% AEP, 0.2% AEP and PMF events, compliant with Council's policy and supporting the implementation of a SIP strategy as a contingency in the FERP.

230. In addition, the Applicant confirmed that the northern carpark will not experience inundation during 1% AEP events and the southern carpark will be 120mm below the 1% AEP flood level, which complies with Council's policy.

Off-site flood impacts

231. The POFA concluded that the off-site impacts from the proposed development are minor, acceptable and appropriate, with benefits to road safety as well as downstream flood affectation, noting the:
- minor off-site impacts occurring, with a localised impact increasing flood level for 20mm on one downstream residential property to the west of Catherine Fields Road, (during the 1% AEP flood event are considered acceptable given the proposal generally improves flood conditions for the site and surrounds due to infrastructure upgrades
 - proposed road upgrades will significantly reduce flood hazard along the Catherine Fields Road, improving the access road's trafficability.
232. Additionally, the Applicant clarified that the elevated soil moisture levels within the EMA area have been considered within the POFA's hydraulic modelling and the engineering design of the on-site stormwater drainage and diversion system.

6.4.3 Flood risk and emergency management

233. Schools and childcare centres are identified as flood sensitive uses due to the vulnerability of occupants. During the EIS exhibition, CPHR and Council identified potential high hazard flooding on the access road to the site during extreme flood events and recommended the preparation and implementation of a FERP. The Applicant subsequently prepared a FERP in accordance with the NSW SES Camden Flood Plan, Council's 2023 Flood Risk Management Policy and the Department's SIP Guideline for Flash Flooding. The FERP establish evacuation capacities and emergency flood response strategies for the school during large scale flood events.
234. Upon reviews of the FERP, the CPHR recommended considering measures to prevent cars from floating in the parking and DOPU areas during rare flood events.
235. In response, the Applicant provided an updated FERP as part of the ARtS. The updated FERP detailed the flood warning mechanism, flood engineering control features, roles and responsibilities of flood wardens and site occupants, flood response phases and triggers,

flood awareness training, communication protocols and on-site and off-site flood signage. The FERP recommended three emergency flood response strategies, including pre-emptive school closure, evacuation and SIP:

- The pre-emptive closure trigger is activated when the Bureau of Meteorology (BOM) forecasts average daily rainfall exceeding 100 mm, identified as the smallest daily storm event that could cut off site access due to flooding on the evacuation route. This trigger enables school management to switch to online learning, with closure planning commencing at least 24 hours in advance, minimising the likelihood of occupants being on-site during heavy rainfall. Based on the local rainfall Intensity Frequency Duration from BOM and historical data, a school closure is expected every three to five years based on forecast rain events, which is considered infrequent enough to avoid excessive false alarms
- As a secondary strategy, evacuation on foot to the Catherine Field Community Hall (1 km southeast via the Catherine Fields Road) is available if occupants are on-site during a flood event (see **Figure 34**). The community hall is an identified evacuation centre in the NSW State Emergency Service (SES) Camden Flood Emergency Sub Plan (2016)., The FERP noted that an evacuation event of all students and staff is unlikely due to the pre-emptive closure response, implying a low number of potential on-site occupants. An evacuation route along Catherine Fields Road limited to H2 flood hazard is available during the PMF event, being trafficable by pedestrians (14 minutes walking time) but not vehicles. Council and NSW SES will be contacted to confirm the status of the evacuation centres before proceeding
- As a backup strategy, SIP will only be required if pre-emptive closure and evacuation are not feasible. All site occupants will have adequate space for refuge on the ground floor of each building, which is flood free up to and including the PMF event. The proposed buildings will be designed to resist additional flood forces, including water, debris and buoyancy up to the PMF level. The estimated SIP duration is around 5 to 6 hours based on the 2022 flood study PMF results, which is considered acceptable for a school with students, ELC children and staff occupying the site.

236. The overland flow depths within parking areas will exceed 0.15m during 0.2% AEP and greater events, which may mobilise parked cars. The updated FERP included vehicle mobilisation mitigation measures to prevent cars floating off-site, including bollards and chains (if considered necessary) and automatic gates that will close off the carparking area when triggered by flood warning devices.

237. To address the comments raised by the Department and agencies, the Applicant confirmed:

- the FERP has been developed to enable safe SIP in the instance of a rare, large flood event
- to reduce reliance on human behaviour, visual observation of flood depths using flood indicators is only proposed as a contingency measure, implemented along with several other warning mechanisms such as SES emergency alerts and media warnings
- the FERP will be reviewed and updated regularly and following flood events
- all structures below the PMF level will be constructed using flood compatible materials
- an updated hydraulic model will be simulated at detailed design stage
- the primary response of pre-emptively school closure will prevent the need for vehicles and pedestrians, including emergency transport, accessing Catherine Fields Road, reducing the likelihood of site occupants being isolated or exposed to high hazard.

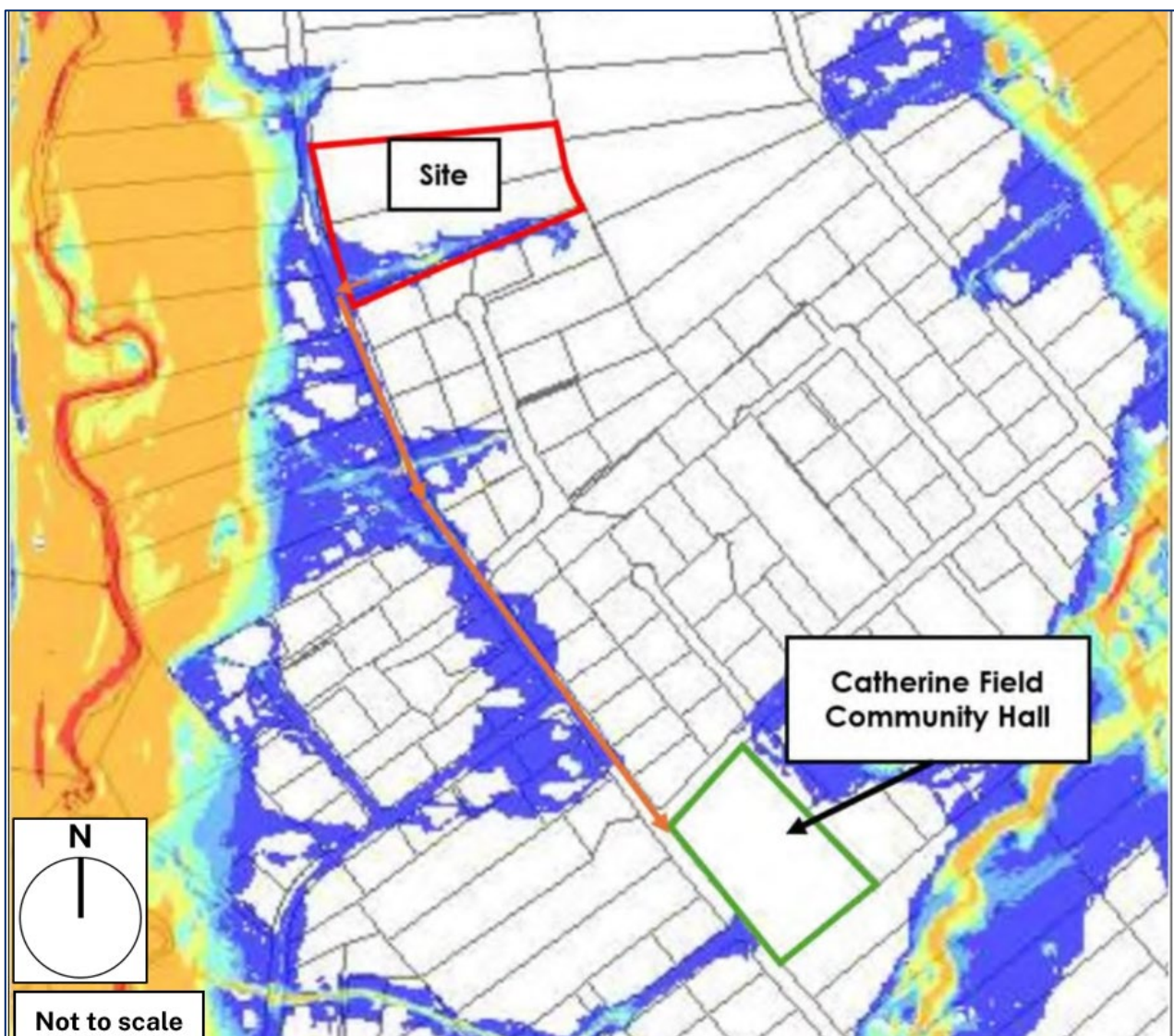


Figure 34 | Flood hazard categories (PMF event) near the site and proposed evacuation route (Source: Applicant's ARTS, 2025)

6.4.4 Department consideration

238. The Department has assessed the proposal against the requirements of clause 5.21 (Flood planning) of the CLEP 2010, which requires the consent authority must be satisfied the development is compatible with the flood function and behaviour of the land, will not adversely affect flood behaviour or the safe occupation and efficient evacuation of people, incorporates appropriate measures to manage risk to life and will not adversely affect the environment.
239. The Department has considered the information provided by CPHR, NSW SES and Council. The Department considers the proposal has been appropriately designed having regard to flooding risks and is not likely to create significant adverse flood impacts on or off the site.
240. The Department notes the concentrated inundation in excess of 1m depth to the east of the southern carpark during 1% AEP events, as a result of the proposed fencing and diversion strategies to reduce the flood extent along the southern boundary. Overall, the increase in flood depth and risks within this smaller area during large and rare flood events is considered acceptable, subject to the recommendations of the FERP.
241. A feasible emergency response plan has been developed in relation to the development, the primary response being the pre-emptive closure of the school (and ELC). In the unlikely event school and ELC occupants are present on site during large scale flood events, a viable SIP option is also available as all new buildings and walkways between buildings will be above the PMF level and the SIP duration is expected to be acceptable.
242. However, the Department has concerns regarding the FERP recommendation the excavation on foot of vulnerable persons (students and children) from the school to the Catherine Field Community Centre along the Catherine Field Road reservation for the following reasons:
- Other than the footpath proposed to be constructed along the school frontage, the remainder of the road corridor linking the school to the Community Centre, along which evacuation is proposed by foot, has no footpath.
 - Whilst Catherine Field Road will likely be upgraded as part of the release of this precinct, in its current state Catherine Field Road road shoulder is inundated for the majority of the proposed excavation path during the PMF event.
 - The decision by the School's Chief flood warden to evacuate the site, commence evacuation of up to 980 vulnerable persons (students and children), and complete the evacuation from the school site is time critical. Any delays in the evacuation being underway, will mean increased risk that students and children (some of which will need

to be carried) will encounter PMF flood waters, likely during a rain event, before their arrival at the Community Centre.

- Whilst it is suggested in the POFA that the Catherine Field Road is inundated PMF up to H2, is safe for children to walk through, it is noted H5 PMF waters are located immediately outside the school.

243. The Department recommends a condition that requires, that prior to the FERP being finalised as recommended by SES, that the length of the evacuation path be modelled in relation to 1%, 0.5% and PMF to provide better certainty regarding flood hazard ratings along the length of the evacuation path under each flood scenario and to inform the School's Chief flood warden's critical timing window. Further, that following this additional assessment consideration be given to the suitability of the evacuation triggers in the FERP and the suitability of excavation by walking for vulnerable persons (students and children).
244. The Department is satisfied that the localised overland flood risks can be appropriately managed for the development in relation to vulnerable persons (students and ELC children), both on the site, and movements to and from the school subject to conditions. This will be achieved through the management provisions detailed in the FERP prepared in consultation with, and taking on board, advice from both NSW SES and CPHR. To mitigate residual risks, the Department has recommended consent conditions requiring:
- a final operational FERP be prepared and implemented in accordance with the recommendations of the draft FERP and in consultation with NSW SES and Council
 - the finalisation of the FERP be informed by a detailed assessment of overland flow for the length of the evacuation path to the Catherine Fields Community Centre
 - the operational FERP must apply equally to out of hours activities and events, including school, the ELC, OOSH service and community uses
 - sufficient supplies (drinking water and appropriate food) and essential services (sewerage, water and electricity) for all potential; occupants are to be maintained at all times at the school within a flood free and accessible area
 - the operational FERP must include arrangements to prevent students from leaving the school site until flood waters recede, to ensure students are not walking through flood waters
 - a FERP testing, monitoring and review schedule will be developed as part of the operational FERP to ensure regular exercises, updates based on new flood information and alignment with building fire evacuation drills

- a major review of the operational FERP occurring in consult with SES ahead of each stage of operation commencing
- an alternate source of electricity generation being provided on site sufficient to support the worst-case SIP period.
- prior to the commencement of construction, detailed design drawings are confirmed by a suitably qualified structural engineer and provided to the Certifier, ensuring that all new buildings and structures can withstand the additional forces that may arise from moving water flow, buoyance and debris, up to the PMF flood level

6.5 Other issues

245. The Department's consideration of other issues is summarised in **Table 21**.

Table 21 | Assessment of other issues

Issue	Findings and conclusions	Recommended conditions
Contamination	The AR included Preliminary and Detailed Site Investigations (DSI) and a Remedial Action Plan (RAP) that assessed the contamination status of the site. The testing of on-site soil samples found there to be no risk to human health or the environment from a contamination perspective, except for one sample location (P1) that had an elevated concentration of zinc in the central part of the site, near a former (backfilled) farm dam. The DSI recommended additional soil sampling be undertaken at this location, followed by remediation and validation following removal of the affected soil. The DSI further recommended: • a hazardous materials survey be carried out prior to demolition of existing structures, to determine the presence of asbestos and lead paints • further assessment be carried out of soils within the footprints of buildings and	The Department is satisfied the site is suitable for its intended use as an educational establishment, in accordance with State Environmental Planning Policy (Resilience and Hazards) 2021, subject to conditions requiring compliance with the recommendations set out in the DSI and RAP. The Department has recommended a condition requiring the entire site be remediated as part of Stage 1. The Department has also recommended the following conditions to address potential site contamination issues: • the Applicant must ensure the development does not

Issue	Findings and conclusions	Recommended conditions
	structures that are proposed to be demolished • additional sampling P1 to determine the extent of zinc contamination, followed by remediation and validation of the site • the assessment of dam water be carried out, prior to de-watering to determine the contamination status and de-watering method • upon the completion of de-watering, an assessment of the dam sediment, dam walls and associated drainage lines be carried out. The RAP outlined the methodology to address the identified zinc contamination and concluded that the site shall be suitable for the proposed development following successful remediation and validation of the site.	result in a change of risk in relation to any pre-existing contamination that will result in significant contamination • an unexpected finds protocol must form part of the Construction Environmental Management Plan (CEMP). • a Site Audit Statement to be prepared by an EPA accredited Site Auditor confirming the suitability of the site for its intended land use.
Biodiversity	The Biocertification Letter prepared by Narla Environmental submitted as part of the AR concluded that the proposed development is designed to minimise impacts on threatened ecological communities (TECs). Impacts are primarily contained in areas dominated by exotic species and isolated paddock trees. On-site EMAs are limited to the ultimate development footprint, which helps minimise further vegetation removal. Additionally, several species proposed for replacement planting are representative of the TECs identified within the site, aiding in the regeneration of local TECs. To mitigate further impacts, the Biocertification Letter recommended engaging a qualified ecologist to conduct a pre-clearing survey to delineate habitat-bearing trees and shrubs. The ecologist would supervise and relocate any fauna residing within the waterbodies slated for removal, manage the clearance of habitat trees	The Department has recommended conditions for retaining trees, conducting pre-clearance fauna surveys, protecting fauna during tree removal, maintaining trees and reusing removed trees. The Department recommended conditions requiring compliance with the recommendations within the submitted Biocertification Letter prepared by Narla Environmental.

Issue	Findings and conclusions	Recommended conditions
	and shrubs to capture, treat and relocate any displaced fauna and oversee the removal of any additional fauna habitat within the site. To further reduce potential impacts on TECs within and adjoining the site, the Biocertification Letter recommended: • installing sediment fencing around the effluent management area before utilisation, to limit nutrient runoff into adjacent vegetation • regular monitoring of the adjacent TECs for signs of dieback, weed invasion, increased soil moisture, increased nutrition, rubbish accumulation and sedimentation • no additional trees are to be removed beyond those identified in the AIA. The Biocertification Letter confirmed that the site is on Biodiversity Certified land and no further impact assessment under the BC Act for threatened species, populations or ecological communities is necessary for the proposed development (see Section 4.4.3). Subject to conditions that require compliance with the recommendations of the Biocertification Letter and relevant government agencies, the Department is satisfied that efforts have been made to preserve on-site vegetation for amenity, urban cooling and local biodiversity within the regional context.	
Operational noise and vibration impacts	The AR included an Environmental Noise Impact Assessment (ENIA), which quantitatively assessed the operational noise and vibration impacts associated with the development on nearby residential receivers, in accordance with the Noise Policy for Industry (NPfI). The ENIA	The Department considered the findings of the revised ENIA/Noise and Vibration Report (NVIA), and concludes operational noise levels can be appropriately managed and would not unreasonably

Issue	Findings and conclusions	Recommended conditions
	was updated during ARtS and refined in response to the further RFI. In preparing the ENIA, the Applicant undertook long-term unattended noise surveys to establish the background noise levels and project noise trigger levels (PNTLs) in accordance with the NPfI and identified the places of worst possible annoyance as the nearby residential dwellings. The ENIA considered various operational noise sources, including indoor and outdoor student activities, rooftop mechanical plant and equipment, sports field usage, peak hour traffic, parking and DOPU areas, ELC staff arrivals before 7am, public address systems, school bells, OOSH care facilities and the use of the PS hall and the HS multi-purpose hall outside of school hours and community use of the site. The worst-case assessment of student outdoor play noise, assuming simultaneous active participation by one third of students and all ELC children, predicted exceedances of PNTLs up to 7 dB at residential receivers from Stage 2 onward. Mitigations via staggered play times, sound barrier walls around the site and play areas from Stage 1 will reduce exceedances to up to 6 dB to the north and south of the site. The Department considers the exceedances acceptable, as they are minor, limited to short daytime periods on school days, non-offensive in nature (per <i>Meriden v Pedavoli [2009] NSWLEC 183</i>), expected as usual ambient noise of a school, comparable to conversation levels and confined to few receivers. The ENIA confirmed that noise from sports field usage (including small-scale training), school hall usage, cumulative indoor activities (e.g., simultaneous GLA use with teachers and students talking and open windows), rooftop	impact on the amenity of surrounding residents, subject to conditions requiring: • HS hall uses restricted to 8.20am to 9.30pm (weekdays) and 9am to 9.30pm (weekends), with noisy activities prohibited before 9am • PS hall uses restricted to 7am to 6.30pm (weekdays) and limited to OOSH care before 9am • submission of a final Noise Management Plan before operations at each stage • installation of controlled gate closers to reduce early morning noise • compliance with ENIA-recommended mitigation measures • staggered outdoor play times for PS and HS students • school halls constructed to meet ENIA-specified sound reduction indices • detailed acoustic assessment before construction to select low-noise mechanical equipment and ensure PNTL compliance, including assessment of the

Issue	Findings and conclusions	Recommended conditions
	mechanical plant at full capacity (with sound barrier walls and further mitigation upon final specifications), ELC staff arrivals before 7am, on-site parking, DOPU operations, school bus movements and external road traffic noise impacting ELC indoor and outdoor areas all comply with the PNTLs at sensitive receivers across all stages, with on-road traffic noise on Catherine Fields Road increasing by less than 1 dB during peak hours, which is considered a minor, barely perceptible impact. The ENIA also concluded that road traffic noise intrusion to the ELC indoor and outdoor areas will comply with the Guideline for Child Care Centres Acoustic Assessment limit. ENIA concluded that vibration emissions are unlikely to cause discomfort or damage due to the distance to sensitive receivers and typical school operations. The ENIA did not consider noise generated from the proposed sewer treatment plant and activities associated with infrequent pump out with other mechanical plant proposed (such as air conditioning units). A condition of consent has been recommended that these be addressed prior to the issue of a construction certificate and appropriate measures implemented to mitigate any acoustic impact on users of the development or adjoining properties.	sewerage treatment plant functions, including EMA irrigation and associated pump out activities • public address systems and school bells installed per ENIA-specified sound levels and distances • sound barrier walls constructed as per ENIA recommendations • short-term noise monitoring post-operation to verify compliance with the PNTLs, with additional mitigation implemented if exceedances occur.
Construction noise and vibration impacts	The AR included a Construction Noise and Vibration Management Plan (CNVMP), which quantitatively assessed the construction noise and vibration impacts associated with the development on the nearby residential receivers. The CNVMP was updated during ARtS and refined in response to the further RFI.	The Department recognises that, despite the outlined mitigation measures in place, noise levels are unlikely to be reduced below the NMLs in all cases. The Department acknowledges that some

Issue	Findings and conclusions	Recommended conditions
	The updated CNVMP established construction noise management levels (NMLs) for the site as perceived at the closest noise sensitive receivers in accordance with the Interim Construction Noise Guideline (Department of Environment and Climate Change NSW, 2009) (ICNG). The proposed construction hours, including materials delivery to and from the site, align with the standard hours outlined in the ICNG. The CNVMP structured the development process into three phases: demolition (Stage 1 only); excavation and earthworks at each stage; and construction at each stage. The CNVMP indicated that construction NMLs will be exceeded at all nearby sensitive receivers during all phases of the development, with exceedances reaching up to 40 dBA at residential receivers to the north and south, 17 dBA at residential receiver to the east and 34 dBA at residential receivers to the west during demolition and bulk earthworks. For several residential receivers, noise impacts are expected to exceed the highly affected NML of 75 dBA during building construction phases, with specific exceedances at the south during Stage 1, at the south during Stage 2, and at the north and south of the site during Stage 3. The CNVMP argued that the predicted noise levels represent a worst-case scenario. In practice, construction activities are not expected to operate simultaneously or continuously. To address these exceedances, the CNVMP recommended best practise noise management measures, including scheduling respite periods for noisy activities, staggering construction	noise disruption is unavoidable and will require that all feasible and reasonable mitigation measures be implemented during construction activities, subject to conditions. The Department has recommended conditions of consent requiring: • compliance with the standard construction hours as per ICNG • a detailed CNVMP developed in consultation with the closest sensitive receivers, ensure that the acoustic impacts of construction works are managed in accordance with CNVMP recommendations and the ICNG • where feasible , the boundary fence be constructed prior to major noise generating construction activity.

Issue	Findings and conclusions	Recommended conditions
	tasks, using low-noise equipment, constructing acoustic enclosures, providing best work practice training, managing vehicle movements to avoid early morning disturbances, and appointing a community liaison officer to manage notifications and complaints and maintain community consultation. To address the uncertain ground-borne vibration levels during construction, due to variable site conditions, the CNVMP established vibration management levels. The CNVMP recommended compliance monitoring at critical receptors during rock hammering or concrete breaking. If complaints arise, vibration monitors with alarms will prevent cosmetic damage to nearby buildings, require immediate cessation of works and consider alternative methods if thresholds are exceeded. Dilapidation reports will be required for potentially affected premises prior to commencing works.	
Odour	The Department requested an Odour Impact Assessment (OIA) be prepared to assess the impact of odour emissions from the on-site sewage treatment plant and staged EMAs and sought additional clarification as part of the revised OIA submitted with the ARtS. The revised OIA included the results of air dispersion modelling to predict odour impacts from the collection, storage and treatment of wastewater. The OIA concluded that the school is capable of operating without exceeding the relevant air quality criterion both on-site and at the nearest surrounding receiver locations. Measures to mitigate any potential odour sources include:	The Department is satisfied that the collection, storage and treatment of wastewater on the site will not result in unacceptable odour impacts on the proposed school or surrounding residences, subject to the recommended conditions requiring the Applicant to comply with the mitigation and management measures recommended in the OIA.

Issue	Findings and conclusions	Recommended conditions
	• provisions of ventilation stacks and odour scrubbers for the collection well and sewage treatment plant to mitigate odorous emissions • enclosure of the treatment plant to control odour emissions • dense landscaping around the sewage treatment plant to assist with odour dispersion • provision of tall vegetation for dispersion and dilution of odour emissions, as well as floral and fragrant trees to mask odour • orientating vegetation to encourage air flow in a particular direction. The Applicant further clarified that the amended project no longer involves regular off-site disposal of treated effluent, as was initially proposed in early development stages. Off-site disposal will occur only occasionally when required, minimising the risk of potential odour impacts, with the OIA assessing the worst-case scenario.	
Stormwater management and water sensitive urban design	Public submission raised concerns about unmanaged stormwater runoff into the road reserve, risking increased flooding and contamination along Wianamatta South Creek. Council noted the absence of piped stormwater infrastructure on Catherine Fields Road and potential downstream impacts. In response, the Applicant proposed an on-site stormwater system with a pit and pipe network, directing runoff via swales, bunds, or underground pipes to treatment devices before discharge into the Catherine Fields Road reserve. The system includes a 700m³ on-site detention tank in Stage 1 to effectively manage	The Department is satisfied that the proposed conceptual stormwater management system will adequately manage stormwater runoff and water quality without increasing downstream flooding risks, subject to conditions requiring: • submission of the finalised design • the establishment of a positive covenant, ensuring access for necessary

Issue	Findings and conclusions	Recommended conditions
	stormwater runoff throughout all development stages, ensuring that post-development flows do not exceed pre-development levels. It incorporates gross pollutant traps and a cartridge filter tertiary treatment system, designed using MUSIC modelling to meet Council's water quality targets. Additionally, the Applicant will upgrade the Catherine Fields Road culvert, replacing the existing twin 450mm pipes with 450 to 600mm pipes along the site's frontage, capped in anticipation of future public drainage connection.	inspections and maintenance • compliance with relevant Australian standards and the stormwater design outlined in the AR • implementation of a stormwater OMP to ensure that the proper operation of the stormwater management devices.
Operational waste management	Council raised concerns regarding inadequate information regarding the proposed canteens (including the canteen in Stage 1), kitchens and waste storage area at each stage and requested compliance with the relevant Australian standards and appropriate construction of waste storage facilities. The AR is accompanied by a Waste Management Plan detailing construction and operational waste management across all stages. The Applicant confirmed that the waste storage area at each stage will be a masonry enclosure and provided a swept path analysis, demonstrating sufficient space for safe on-site manoeuvring of waste vehicles for ingress and egress in a forward direction. Subject to conditions, the Department is satisfied that the proposal will provide safe and reliable access for waste collection vehicles to all collection points throughout the development stages, with adequate waste storage ensured at each phase. The Department requires liquid/hazardous waste generated from visual art studios and science	The Department has recommended conditions regarding trade waste pre-treatment provisions for the OWMS and trade waste agreement for canteens, kitchens and lab facilities at relevant stages. Liquid/hazardous waste generated from visual art studios and science labs should be managed in dedicated bunded hazardous waste storage cabinets, science prep/chemical storerooms for the safe storage of any paints, solvents or liquid chemicals associated with class/science lab activities. These wastes should then be collected by a specialist contractor directly for appropriate disposal i.e. Chemsal.

Issue	Findings and conclusions	Recommended conditions
	labs should be managed in dedicated bunded hazardous waste storage cabinets, science prep/chemical storerooms for the safe storage of any paints, solvents or liquid chemicals.	In addition, the Department recommended conditions requiring the design and construction of food handling and storage facilities to comply with the relevant Australian standards and compliance with the recommendations of the submitted Waste Management Plan.
Bushfire	To accord with PBFP, a minimum 42m Asset Protection Zone (APZ) will be required to the north, north-east and east of the proposed school building. The BAR recommended those areas not built upon within the site be maintained as an Inner Protection Area (IPA) and for a BAL 19 construction standard to be applied to all buildings in accordance with the addendum to PBFP and specification 43 of the National Construction Code. The NSW RFS reviewed the ARTS and recommended: • BAL 19 construction requirements be applied to all new buildings • new fencing and gates, IPA, internal roads and fire trail, servicing comply with PBFP requirements • a Bush Fire Emergency Management and Evacuation Plan be prepared in accordance with the relevant guidelines.	The Department is satisfied the bush fire risk can be managed through the recommended conditions including: • all buildings must be constructed to meet the requirements of BAL 19 • the site must be managed as an IPA in accordance with the APZ requirements in PBFP • preparation of a Bush Fire Emergency Management and Evacuation Plan for the school, prior to the commencement of operation, to be implemented for the duration of the development.
Aboriginal heritage	The ACHAR provided as part of the AR included the results of test excavations, which confirmed the presence of two Aboriginal objects that will be impacted by the project.	A condition is recommended requiring the Applicant to comply with the recommendations in the

Issue	Findings and conclusions	Recommended conditions
	The ACHAR described the two Aboriginal objects as ‘silcrete artefacts consisting of small fragments with limited diagnostic features’. The ACHAR recommended the two Aboriginal objects be moved to an agreed reburial site in agreement with the registered Aboriginal parties. Alternatively, the objects may be managed under a care and control agreement issued by Heritage NSW. Heritage NSW advised that it agrees with the ACHAR’s recommendations and that there are no other concerns in respect to Aboriginal cultural heritage.	ACHAR. This includes either reburial of the two Aboriginal objects on the site, or alternatively, for them to be managed under a care and control agreement prior to the commencement of works. A condition is also recommended requiring works on the site to be carried out in accordance with an unexpected finds protocol for Aboriginal heritage. The Department is satisfied any impacts to Aboriginal heritage can managed and mitigated, subject to compliance with the recommended conditions.
ELC space	The proposed ELC is considered a centre-based child care facility. The AR is accompanied by an assessment of the proposed ELC against the Department of Education’s National Quality Framework, which contains a range of controls which regulates children’s education and safety, staffing, partnerships with families and the community, as well as the physical environment and use of the child care facility as stipulated by the Education and Care Services National Regulation. The AR confirmed that the proposal will provide for adequate fencing, on-site hygiene facilities, natural ventilation and light, administrative space, nappy change facilities, natural environment and shade within the outdoor space and designs to facilitate supervision of children (see Table 25).	No additional conditions are recommended.

Issue	Findings and conclusions	Recommended conditions
	The construction of the ELC facilities will be completed in Stage 1, including an unencumbered indoor space of 197m² and a designated unencumbered outdoor space of 662m². The provisions satisfy the numeric indoor (3.25m² per child) and outdoor (7m² per child) unencumbered space requirements for 60 child placements in accordance with regulations 107 and 108 of the Education and Care Services National Regulations. However, the Applicant proposes to stage the operation of the ELC starting at 30 child placements as part of Stage 1, with the 60 child placements not coming online until Stage 3.	
Play space	The Department notes that Department of Education's EFSG stipulates a requirement of approximately 10m² of open space per student for schools located on greenfield sites. The EFSG states that, where this is unachievable, an agreement for joint use facilities with a local council or landowner is required. In response to the Department's request, the Applicant provided a detailed Staging Plan as part of the ARtS and confirmed the provisions of staged outdoor play areas and the availability of at least 10m² per students in Stages 1 and 2, meeting the amenity and functional requirements of the staged school population. From Stage 3 onward, without the rear sports field of 6,992m², the outdoor play area will provide only 5.69m² per PS student and 5.82m² per HS student, which is below the required 10m² per student. If the shared sports field is included in this calculation, the average increases to 13.39m² per student.	The Department has recommended conditions requiring the proposed school, including the proposed open space areas, be developed generally in accordance with the Staging Plan as part of the ARtS.

Issue	Findings and conclusions	Recommended conditions
	Additionally, the Applicant stated that several public parks and ovals near the site can be hired for school activities as needed. The Department recognises that the EFSG serves as a guide only. The Department is satisfied that the provision between 5.69m² and 5.82m² of open space per student from Stage 3 onward, excluding the sports field and 13.39m² per student including the sports field, is acceptable for the total 980 students. However, the Department has concerns regarding the estimated downtime (after rain and irrigation events) of the sports field for OWMS purposes and the absence of a reserve irrigation area, raising concerns that the play area from Stage 3 onwards is no longer suitable for both a play area and an irrigation area, particularly following rain events (see Section 6.1.3).	
Ground and water conditions	The AR included a Geotechnical Assessment, which concluded: • groundwater inflow was only observed in the southern portion of the site near an existing shed, likely from the former (backfilled) farm dam • ephemeral perched groundwater may occur within the soil profile or at the soil-rock interface due to surface water infiltration during heavy rainfall • excavation near the southern lot may encounter groundwater seepage, particularly near the dam and drainage channel. This seepage is expected to be low and can be managed with sump and pump methods • appropriate surface and subsurface drainage should be provided to divert	The Department has recommended conditions requiring the Applicant to: • implement the recommendations of the Geotechnical Assessment • obtain a water access licence should groundwater be intercepted, unless an exemption applies under the Water Management (General) Regulation 2018.

Issue	Findings and conclusions	Recommended conditions
	overland flows and potential perched groundwater away from excavations and foundations to prevent water ponding. The DCCEE Water Group reviewed the AR and requested the Applicant quantify the maximum annual water take during aquifer interference activities and to demonstrate the capability to obtain sufficient water entitlement unless an exemption applies (where predicted inflow is less than 3ML/year). In the ARtS, the Applicant clarified that: • earthworks excavation will be limited to cuts and fills of approximately 1m to 2m, generally following existing site contours • no groundwater wells were installed for groundwater assessment due to the limited scope of excavation • groundwater was found in one borehole associated with a previous dam; no groundwater was detected in others • subsurface conditions of silty clay over shale suggest low permeability, indicating minor groundwater inflow if encountered • any groundwater inflow will likely be well under 3ML/year; thus, a water access licence is likely unnecessary. DCCEE Water Group had no further issues with the ARtS and recommended a condition related to groundwater take and licensing.	
Dam dewatering	The AR included a Dam Dewatering Assessment, which outlines the volume and the recommended sequence and method for dewatering the two remaining dams in the site's southern part.	The Department has recommended conditions requiring the Applicant to implement the recommendations of the Dam Dewatering Assessment and the submission of a

Issue	Findings and conclusions	Recommended conditions
		dewatering plan prepared by a suitably qualified person to the certifier's satisfaction.
Social impacts	The AR included an updated Social Impact Assessment (SIA), which outlined potential positive impacts of the development including provision of modern education facilities for the existing and future population, employment opportunities during construction and operation, increased casual surveillance of surrounding streets, improvements to the site presentation with extensive landscaping, and opportunities for community use of facilities including the HS multi-purpose hall and sports fields. The SIA also found potential negative impacts of the proposal, including: • temporary construction-related noise, vibration, dust and traffic disruptions • operational noise from school bells, PA systems and outdoor play areas • increased traffic and parking demands, particularly during peak school times, affecting local streets and pedestrian safety • changes to the visual character and amenity of the semi-rural area due to intensification of site use The SIA recommended the: • implementation of a CEMP, including a CTMP and CNVMP • application of Crime Prevention Through Environmental Design principles in detailed design, including lighting, fencing and surveillance • provision of school contact details on the College website for community feedback	The Department has recommended conditions requiring the preparation of a CEMP (incorporating a CTPMP and CNVMP) and adherence to Crime Prevention Through Environmental Design principles. To ensure a tangible commitment to sharing of school facilities with the community, the Department recommended a condition requiring the Applicant to develop a community sharing strategy prior to school operations.

Issue	Findings and conclusions	Recommended conditions
	ongoing liaison with the community regarding operations. The updated SIA was prepared in accordance with the Department's SIA Guideline 2023. The Department is satisfied the proposal would not result in any significant adverse social impact, subject to conditions.	
Staging	In response to the Department's request, the Applicant provided an updated Staging Plan as part of the ARtS, addressing cumulative impacts and mitigation measures across four construction and operational stages. The plan included school layouts and available facilities, such as learning areas, classrooms, common rooms, staff amenities, open play spaces, and parking and DOPU arrangements for staff, visitors and construction workers, with evidence of adequate capacity and amenity, including noise attenuation, odour and waste management, natural ventilation and daylight access at each stage. It also included conceptual civil plans, operational and construction stage details and strategies to manage conflicts between the school operations and construction, ensuring student and staff safety. The plan also provided specific mitigation measures, including timing for fencing and acoustic barriers, responsible parties, short-term access controls and territorial reinforcement, EMA installation, ingress and egress traffic management, supervision in shared access areas during peak hours, community sports field access, construction-operation conflict strategies, tree removal and replacement schedules and waste management provisions.	The Department has recommended conditions requiring the preparation and implementation of a detailed Staging Plan to ensure the school be developed generally in accordance with the Staging Plan within the ARtS.

Issue	Findings and conclusions	Recommended conditions
	The Department reviewed the updated Staging Plan and considered it provided sufficient construction management details and tailored mitigation measures to address concurrent school operations at each stage. The Department is satisfied that the staging of the proposed school will ensure an acceptable level of amenity, sufficient open space, suitable acoustic treatment, landscaping, tree planting, traffic provisions and waste management at each stage, effectively managing cumulative impacts.	
Solar access	The AR is accompanied by shadow diagrams illustrating the solar access impact between 9am and 3pm during winter and summer solstices. The diagrams demonstrated that the proposed development will not cause any overshadowing of the surrounding residential properties except for a minor increase in shadow from 3pm during midwinter on the backyard of one residential property located to the south of the site. However, this shadow is confined to an area behind an existing shed. Additionally, the proposed 1.8m tall fencing along the southern boundary will cast extra shadows along the boundaries of the neighbouring residential properties to the south. The Department is satisfied that the proposed development will not significantly overshadow nearby properties, even during midwinter. The proposal will not affect the existing solar access to the living areas and private outdoor spaces of adjacent homes. The school building is strategically designed to be centrally located on the site to minimise overshadowing of neighbouring properties, ensuring sunlight access for the private outdoor living areas of	No additional conditions are recommended.

Issue	Findings and conclusions	Recommended conditions
	nearby dwellings, in accordance with the solar access requirements in Camden DCP 2019.	
Visual impact and privacy	The Applicant considered the visual impacts of the development and provided a view analysis as part of the updated DR, which highlighted the site's predominantly rural residential context, featuring dwelling houses, farm structures, dams, and a bushland pocket to the east. The Department has considered broader visual impacts and considered the view analysis, including photomontages from eight public domain viewpoints and is satisfied that visual changes will be limited to close views from Catherine Fields Road and adjacent properties. Potential impacts such as visibility of new fencing, the substation and school building, are effectively mitigated through substantial setbacks, replacement tree planting along boundaries, articulated facades and privacy screens on upper windows to prevent overlooking. The Department considers the development would have a significant impact on the current streetscape, amenity or privacy. The Department notes that this impact is mitigated as follows: • the proposal is unlikely to generate significant privacy impacts, as the school building is centrally located and oriented toward a forecourt to minimise overlooking of adjacent properties • site landscaping and 1.6m privacy screens on south-facing and north-facing windows will ensure adequate privacy • the northern and southern carparks and vehicular access areas provide physical separation between active school uses,	The Department has recommended conditions requiring advanced and appropriate replacement tree stocks, early boundary tree planting to ensure visual and privacy impacts are mitigated across all stages and additional canopy tree planting along the southern landscape strip of the southern carpark.

Issue	Findings and conclusions	Recommended conditions
	including the outdoor play areas, and residential dwellings • overall landscaping will provide a positive contribution to the overall visual catchment.	
Light spill	The proposal includes the installation of four new floodlights: two on the western edge and two on the eastern edge of the sports field. These floodlights will be directed towards the sports field and reach a maximum height of RL 98.246, approximately 16.5 m above ground. A public submission raised concerns that the proposal will lead to excessive lighting operating until 10pm, potentially impacting residents' sleep and privacy. The Applicant confirmed that the sports field operating hours will conclude by 9pm. The proposed sports field schedule indicates that regular use of the sports field will be limited to activities ending between 4.30pm and 6.30pm, with any events past 6.30pm occurring only occasionally. The Department notes that the flood lights will be angled away from adjoining residential properties and directed towards the sports field. Internal lighting during school operational hours is expected to have minimal impacts. Additionally, the proposed tree planting and substantial building setbacks will mitigate any general lighting. The Department is satisfied that the proposal can be managed to mitigate unacceptable light spill impacts to surrounding residents and to the night sky subject to conditions.	The Department has recommended conditions requiring all lighting to comply with relevant Australian standards, including control of obtrusive effects from outdoor lighting. The Department has recommended that a lighting assessment be submitted for the Secretary's approval prior to installation of sports field lighting, demonstrating that light spill is appropriately managed.
Community use	As discussed in Section 2.3 , the sports field and the HS multi-purpose hall will be available for	The Department has recommended conditions

Issue	Findings and conclusions	Recommended conditions
	community use outside of school hours. Additional school facilities may also be accessible for community workshops and classes. Council and public submissions raised that the commitment to sharing school facilities with the community is unclear. The Applicant's ARTS provided indicative details about regular community use and has considered the potential impacts on traffic, wastewater and acoustic that may arise from community users. The Department supports the shared use of school facilities, provided that these impacts can be effectively managed. Due to the absence of detail regarding specific proposed activities, the Department considers it appropriate that community use of the school halls, library, classrooms and sports fields outside school hours be managed by an out of hours event management plan whenever more than 100 attendees are expected. Additionally, such events should not take place before 8am or extend beyond 9.30pm. With these restrictions in place, the Department is satisfied that community use will not result in significant impacts beyond those considered in other sections of this report, including operational traffic, parking, wastewater management and operational noise.	requiring the preparation and implementation of an out of hours event management plan. The operational FERP and Bushfire Emergency Management and Evacuation Plan apply to all out of hours usage and events.
Development contributions	At the time of lodging the SSD application, the Camden Council Section 7.12 Development Contributions Plan 2011 was applicable to the site; however, it did not require contribution payments for the proposed development of educational establishments. During the exhibition of the 2022 EIS, Council and public submissions raised concerns about	The Department has recommended a condition requiring the staged payment of contributions, in accordance with the s7.12 CP 2023, set at 1% of the EDC of each stage.

Issue	Findings and conclusions	Recommended conditions
	the absence of a requirement for the school to contribute to future infrastructure works. On 20 October 2023, Council adopted the Camden Council Section 7.12 Development Contributions Plan 2023 (s7.12 CP 2023), which applies to any residential and non-residential development with a proposed cost exceeding \$100,000 that is not otherwise subject to a Section 7.11 contribution. The s7.12 CP 2023 specifies the types of infrastructure funded by the Section 7.12 levies, including current and future roads, water, waste management, open spaces, and community facilities. It requires that any development application submitted prior to the adoption of the s7.12 CP 2023 but not yet determined must be assessed according to the provisions of the s7.12 CP 2023 as applicable at the time of the application's determination. The Council requested the inclusion of a condition requiring the payment of contributions in accordance with the s7.12 CP 2023. In response, the Applicant has agreed to pay the section 7.12 contributions but proposed staging these payments to align with the EDC incurred at each development stage. The Council did not oppose the proposed staging of the section 7.12 contributions.	

7 Evaluation

246. The Department has reviewed the EIS, RtS, AR, ARtS and responses from the Applicant and assessed the merits of the amended proposal, taking into consideration advice from government agencies, Council and public submissions.
247. The Department considers that the amended proposal is approvable as it will benefit the community by providing additional school placements and child care facilities in the non-government school sector, addressing social infrastructure needs arising from population growth in a designated future urban precinct within the SWGA, and promote shared use of educational facilities. The proposal will provide direct investment of approximately \$123.7 million, generating approximately 434 construction jobs and 99 operational jobs.
248. The proposed development is consistent with the objectives of the *Environmental Planning and Assessment Act 1979* and with the State's strategic planning objectives set out in the Greater Sydney Region Plan, Western City District Plan, State Infrastructure Strategy 2022–2042 and Camden Local Strategic Planning Statement.
249. The Department has identified and considered the project's key issues for assessment to be land use conflict and site servicing, built form and urban design, as well as traffic, transport and access and flooding. The Department is satisfied that:
- the development site, subject to conditions, can be adequately serviced and can support the proposed development to operate independently at no cost to the public until such time as the precinct is released and broader infrastructure is delivered throughout the locality. Potential land use conflicts can be satisfactorily mitigated
 - the height, bulk and scale of the proposed development are appropriate, subject to conditions mitigating visual impacts through early boundary planting, strategic landscaping, substantial setbacks and articulated building façade, and integrated design strategies, minimising amenity impacts
 - construction and operational traffic impacts of the proposal on the local traffic network and surrounding key intersections can be managed and mitigated, subject to conditions, and DOPU and parking demand can be accommodated without overflows onto public roads
 - the proposal is compatible with flood behaviour, subject to conditions, and poses no adverse impact on flood functions, safety, or the environment and incorporates site-specific and appropriate risk management measures.

250. The Department has recommended a range of conditions to manage residual environmental impacts and manage residual flood risks.
251. Overall, the Department concludes that impacts of the development are acceptable and can be appropriately managed or mitigated through the implementation of recommended conditions of consent. Consequently, the Department has formed the opinion that the:
- proposed development is in public interest; and
 - project is approvable, subject to conditions.

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Glossary

Abbreviation	Definition
AIA	Arboricultural Impact Assessment
ACHAR	Aboriginal Cultural Heritage Assessment Report
AEP	Annual exceedance probability
AR	Amendment Report
ARtS	Response to Submissions for the amended proposal
BA LUCRA	Biodiversity and Agricultural Land Use Conflict Risk Assessment
BAL	Bushfire Attack Level
BAR	Bushfire Assessment Report
BC Act	<i>Biodiversity Conservation Act 2016</i>
CBD	Central Business District
CDC	Complying development certificate
CLEP	Camden Local Environmental Plan
CNVMP	Construction Noise and Vibration Management Plan
COLA	Covered outdoor learning area
Commission	Independent Planning Commission
Council	Camden Council
CPHR	Conservation Programs, Heritage and Regulation Group
CTMP	Construction Traffic Management Plan
CTPMP	Construction Traffic and Pedestrian Management Plan
DA	Development application
dB	Decibel

Abbreviation	Definition
NSW DCCEEW	NSW Department of Climate Change, Energy, the Environment and Water
DCP	Development Control Plan
Department	Department of Planning, Housing and Infrastructure
DOPU	Drop-off/pick-up
DPIRD	Department of Primary Industries and Regional Development
DSI	Preliminary and Detailed Site Investigations
EDC	Estimated Development Cost
EFSG	Educational Facilities Standards and Guidelines
ELC	Early Learning Centre
EMA	Effluent management area
ENIA	Environmental Noise Impact Assessment
EIS	Environmental impact statement
EPA	NSW Environment Protection Authority
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPI	Environmental planning instrument
ESD	Ecologically sustainable development
FERP	Flood Emergency Response Plan
FTE	Full-time equivalent
GLA	General learning area
HS	High School
ICNG	Interim Construction Noise Guideline
IPA	Inner protection area
LEP	Local environmental plan

Abbreviation	Definition
LGA	Local government area
LoS	Level of Service
LSPS	Local Strategic Planning Statement
LUCRA	Land Use Conflict Risk Assessment
M²	Square metre
M³	Cubic metre
ML	Megalitre
NML	Noise management level
NPfI	NSW Noise Policy for Industry
OIA	Odour Impact Assessment
OOSH	Out of school hours
OMP	Operational Management Plan
OTMP	Operational Traffic Management Plan
OWMS	On-site wastewater management system
PBFP	Planning for Bush Fire Protection 2019
Planning Systems SEPP	State Environmental Planning Policy (Planning Systems) 2021
PMF	Probable Maximum Flood
PNTL	Project noise trigger level
POFA	Preliminary Overland Flow Assessment
PS	Primary School
RAP	Remedial Action Plan
Resilience and Hazards SEPP	State Environmental Planning Policy (Resilience and Hazards) 2021
RFI	Request for information

Abbreviation	Definition
RFS	NSW Rural Fire Service
RtS	Response to Submissions
RSA	Road Safety Audit
SDRP	NSW State Design Review Panel
Secretary	Secretary of the Department of Planning, Housing and Infrastructure
SEPP	State environmental planning policy
SES	State Emergency Service
SIP	Shelter-In-Place
SIR	Service Infrastructure Report
SSD	State significant development
SSP	School for specific purposes
STP	School Travel Plan
Sustainable Buildings SEPP	State Environmental Planning Policy (Sustainable Buildings) 2022
SWGA	South West Growth Area
TAIA	Transport and Accessibility Impact Assessment
TEC	Threatened ecological community
TfNSW	Transport for NSW
Transport and Infrastructure SEPP	State Environmental Planning Policy (Transport and Infrastructure) 2021
TSC Act	<i>Threatened Species Conservation Act 1995</i>
Western Parkland City SEPP	State Environmental Planning Policy (Precincts – Western Parkland City) 2021

Appendices

Appendix A – Summary of key amendments to the project

Since lodgement, some key aspects of the project have been amended by the Applicant in response to the public submissions, agency advice and at the request of the Department. The amendments to the project are detailed in the Amendment Report (AR) and refined by the Response to Submissions for the amended proposal (ARtS).

A summary of the key amendments is provided in **Table 22**.

Table 22 | Key amendments

Aspect	Original project	Amended project
School population	- Up to 1580 students/children inc. 60 Early Learning Centre (ELC) placements - Up to 106 staff.	- Up to 980 students/children inc. 60 ELC placements - Up to 51 Full-time equivalent (FTE) staff.
Project staging	Five construction and operation stages: - Stage 1 by 2025 for 318 students/children incl 18 ELC places and 20 staff - Stage 2 by 2031 for 652 students/children inc. 42 ELC places and 41 staff - Stage 3 by 2035 for 980 students/children incl. 60 ELC places and 65 staff - Stage 4 by 2038 for 1280 students/children incl. 60 ELC places and 82 staff - Stage 5 by 2040 for 1580 students/children incl. 60 ELC places and 106 staff.	Four construction and operation stages: - Stage 1 by 2026 for 318 students/children incl. 18 ELC places and 15 FTE staff - Stage 2 by 2031 for 652 students/children incl. 42 ELC places and 33 FTE staff - Stage 3 by 2035 for 980 students/children incl. 60 ELC places and 51 FTE staff - Stage 4 by 2037 for 980 students /children incl. 60 ELC places and 51 FTE staff.

Aspect	Original project	Amended project
Built form	GFA: 13,109 square metres (m²)	- GFA: 11,992m² - Removed a northern annexure of the high school wing - Reduced the size of the eastern end of the primary school wing - Relocated and reduced the size of the covered outdoor learning area.
Open play space	500m² of open space for the ELC 20,140m² of open space for the school exclusive of the EMA sports field	662m² of open space for the ELC 15,564m² of open space for the school exclusive of the EMA sports field
Car parking provision	138 car parking spaces	95 car parking spaces by Stage 3
Road upgrades	- Catherine Fields Road upgrades, including: - channelised right turn to school entry as part of Stage 4 works - two indented bus bays at Stage 1 and five at Stage 4 1.8m wide pedestrian footpath along the school's western street frontage at Stage 1.	- Catherine Fields Road upgrades, including: - channelised right turn to school entry as part of Stage 3 works - two indented bus bays at Stage 1 and five at Stage 3 1.8m wide pedestrian footpath and four 3m wide waiting areas along the school's western street frontage at Stage 1.
Wastewater management	- On-site wastewater management system that serves Stages 1 and 2 - Connection to Sydney Water's reticulated sewer system for Stages 3, 4 and 5.	On-site wastewater management system capable for indefinite operation.

Appendix B – List of referenced documents

The following supporting documents and information to this assessment report can be found on the Department's website as follows:

1. Environmental Impact Statement (EIS)

<https://www.planningportal.nsw.gov.au/major-projects/projects/minarah-college>

2. Response to Submissions (RtS)

<https://www.planningportal.nsw.gov.au/major-projects/projects/minarah-college>

3. Response to Request for Information (RFI)

<https://www.planningportal.nsw.gov.au/major-projects/projects/minarah-college>

4. Amendment Report (AR)

<https://www.planningportal.nsw.gov.au/major-projects/projects/minarah-college>

5. Response to Submissions for the Amended Proposal (ARtS)

<https://www.planningportal.nsw.gov.au/major-projects/projects/minarah-college>

Appendix C – Submissions and government agency advice

All submissions and government agency advice can be found here:

<https://www.planningportal.nsw.gov.au/major-projects/projects/minarah-college>

Appendix D – Statutory considerations

Objects of the EP&A Act

A summary of the Department's consideration of the relevant objects (found in section 1.3 of the EP&A Act) are provided in **Table 23**.

Table 23 | Objects of the EP&A Act and how they have been considered

Object	Consideration
(a) to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,	The proposal will provide direct investment in services and social infrastructure to meet the community's changing needs, providing additional school placements and new child care facilities in the non-government school's sector and provide opportunity for the shared use of school facilities with the community. The proposal will create temporary construction jobs and increase operational jobs. The development will not negatively impact on the economic welfare of the community, or the State's natural resources. The proposal has been designed to minimise impacts to the State's natural and built resources, where possible.
(b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,	The proposal includes measures to deliver ecologically sustainable development (ESD), as detailed following this table.
(c) to promote the orderly and economic use and development of land,	The proposal promotes the orderly and economic use of the land. Educational establishments and child care facilities are permitted with consent in the RU4 Zone under the CLEP 2010. The merits of the proposal are considered in Section 6.
(d) to promote the delivery and maintenance of affordable housing,	Not applicable.

Object	Consideration
(e) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,	The site in its entirety comprises land that is biodiversity certified under the former <i>Threatened Species Conservation Act 1995</i> (TSC Act). Land on which biodiversity certification was conferred within the Sydney Region Growth Centres under the former TSC Act is preserved under clause 43 of the Biodiversity Conservation (Savings and Transitional) Regulation 2017. An assessment of the likely impacts on biodiversity, including threatened species and ecological communities is, therefore, not required. The biodiversity certification of the site is discussed in Section 4.4.3.
(f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),	The site is not located in proximity to any listed heritage items or heritage conservation areas. The Aboriginal Cultural Heritage Assessment Report submitted with the EIS confirmed that two Aboriginal objects were identified on the site during the test excavation sampling. The recommended conditions ensure these objects are either moved to an agreed reburial site or are managed on-site under a care and control agreement. The Department is satisfied any impacts to Aboriginal heritage can be managed and mitigated, subject to compliance with the recommended conditions. Aboriginal heritage is considered in Section 6.5.
(g) to promote good design and amenity of the built environment,	The proposal has been developed through the NSW State Design Review Panel process. The Department considers the overall built form of the development to be complementary to the existing development within the surrounding locality. Consideration of the proposal against the Design Quality Principles set out in Schedule 8 of State Environmental Planning Policy (Transport and Infrastructure) 2021 is provided below.
(h) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,	The proposal promotes the proper construction and maintenance of buildings, subject to compliance with the recommended conditions of consent.

Object	Consideration
(i) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,	The Department publicly exhibited the proposal which included consultation with Council, other State government agencies and relevant authorities and considered the responses received (see Section 5).
(j) to provide increased opportunity for community participation in environmental planning and assessment.	The Department publicly exhibited the proposal and then the amended proposal. This included notifying previous submitters and occupiers and landowners in the vicinity of the site about the public exhibition and displaying the project on the NSW planning portal during the exhibition periods (see Section 5).

Ecologically sustainable development

The EP&A Act adopts the definition of ecologically sustainable development (ESD) found in the *Protection of the Environment Administration Act 1991*. Section 6(2) of that Act states that ESD requires the effective integration of economic and environmental considerations in decision-making processes and that ESD can be achieved through the implementation of:

- the precautionary principle
- inter-generational equity
- conservation of biological diversity and ecological integrity
- improved valuation, pricing and incentive mechanisms.

The Department required the Applicant to demonstrate how the principles of ESD were incorporated into the project, including how it addresses:

- national best practice sustainable building principles to improve environmental performance and reduce ecological impact
- projected climate change impacts.

The Applicant has demonstrated a commitment to ESD and sustainability measures, targeting a minimum 4-Star Green Star rating or equivalent, achieved by:

- incorporation of strategic external shading to minimise glare and reduce solar heat gain, enhancing energy efficiency
- maximised natural ventilation in circulation and learning spaces, reducing reliance on mechanical systems

- electric design and installation of photovoltaic panels to generate electricity from solar energy, contributing to on-site renewable energy production
- implementation of a rainwater harvesting system for rainwater collection, storage and reuse in toilet flushing and on-site irrigation, reducing potable water demand
- high efficiency heating, ventilation and air-conditioning systems to optimise thermal comfort
- high efficiency LED lighting with sensor-based controls to reduce overall lighting demand
- installation of an energy metering and monitoring system to monitor energy usage
- minimising embodied carbon and purchasing carbon offsets for avoidable emissions.

The proposed development is designed to be carbon-neutral ready, incorporating an all-electric design and prioritising energy efficiency in the proposed building. The Department has considered the project in relation to ESD principles. The precautionary and inter-generational equity principles have been applied in the decision-making process via a thorough and rigorous assessment of the environmental impacts of the project. On balance, the project is consistent with the principles of ESD and the Department is satisfied the proposed sustainability initiatives will encourage ESD, in accordance with the objects of the EP&A Act.

Environmental Planning and Assessment Regulation 2021

The Environmental Planning and Assessment Regulation 2021 requires the Applicant to have regard to the State Significant Development Guidelines when preparing their application. In addition, the Planning Secretary's environmental assessment requirements (SEARs) require the Applicant to have regard to the following the:

- *Social Impact Assessment Guideline for State Significant Projects*
- *Undertaking Engagement Guidelines for State Significant Projects*
- *Cumulative Impact Assessment Guidelines for State Significant Projects.*

The Department is satisfied that the Applicant has demonstrated the application has been prepared having regard to the guidelines above.

Environmental Planning Instruments (EPIs)

To satisfy the requirements of section 4.15(a)(i) of the EP&A Act, this report refers to the provisions of EPIs that govern the carrying out of the project and were considered in the Department's assessment. EPIs considered as part of the proposal's assessment are:

- State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP)

- State Environmental Planning Policy (Transport and Infrastructure) 2021 (Transport and Infrastructure SEPP)
- State Environmental Planning Policy (Precincts–Western Parkland City) 2021 (Western Parkland City SEPP)
- State Environmental Planning Policy (Resilience and Hazards) 2021 (Resilience and Hazards SEPP)
- State Environmental Planning Policy (Biodiversity and Conservation) 2021 (Biodiversity and Conservation SEPP)
- State Environmental Planning Policy (Sustainable Buildings) 2022 (Sustainable Buildings SEPP)
- Camden Local Environmental Plan (CLEP) 2010.

State Environmental Planning Policy (Planning Systems) 2021

Chapter 2 of the Planning Systems SEPP identifies development that is State significant development (SSD), State significant infrastructure, critical State significant infrastructure and regionally significant development. An assessment of the proposal against the relevant provisions of the Planning Systems SEPP is provided in **Table 24**.

Table 24 | Planning Systems SEPP compliance table

Relevant Sections	Consideration and Comments	Complies
2.1 Aims of Policy The aims of this Chapter are as follows - (a) to identify development that is State significant development	The proposed development is identified as SSD.	Yes
2.6 Declaration of State significant development: section 4.36 (1) Development is declared to be State significant development for the purposes of the Act if - (a) the development on the land concerned is, by the operation of an environmental planning instrument, not permissible without development consent under Part 4 of the Act, and (b) the development is specified in Schedule 1 or 2.	The project is permissible with development consent and is development specified in Schedule 1 of the Planning Systems SEPP.	Yes

Relevant Sections	Consideration and Comments	Complies
Schedule 1 State significant development – general 15 Educational establishments (1) Development that has a capital investment value of more than \$20 million that - (a) is for the purpose of a new school	The project is for development that has a capital investment value of more than \$20 million that is for the purpose of a new school.	Yes

State Environmental Planning Policy (Transport and Infrastructure) 2021

Chapter 3 of the Transport and Infrastructure SEPP simplifies and standardises the planning approval pathways for educational establishments and child care facilities, while minimising impacts on surrounding areas and improving the quality of the facilities. The SEPP specifies where these developments can be built and sets out the development and construction standards that apply. The application has been assessed against the relevant provisions of Chapter 3 of the SEPP.

Section 3.58 of the SEPP requires traffic generating development that involves 50 or more additional students and involves an extension of existing premises or a new premises that has direct vehicle or pedestrian access to any road to be referred to Transport for NSW (TfNSW). The application was referred to TfNSW and the Department has considered advice received in its assessment.

Section 3.22 states that concurrence of the Regulatory Authority is required for a 'centre-based child care facility', if the floor area of the building or place or the outdoor play space do not comply with regulations 107 and 108 of the Education and Care Services National Regulations. The proposed ELC is considered a centre-based child care facility and satisfies the numeric indoor and outdoor unencumbered space requirements for 60 placements (see **Section 6.5**). Therefore, separate concurrence of the Regulatory Authority is not required.

Section 3.23 of the SEPP requires the consent authority to consider the relevant provision of the Department's Child Care Planning Guideline before determining a development application for a centre-based child care centre. An assessment of the development against the relevant planning provisions of the Guideline is provided in **Table 25**.

Table 25 | Consideration of the relevant provisions of the Child Care Planning Guideline

Matter	Consideration
Design quality principles	

Matter	Consideration
Context	The ELC will be appropriately integrated within the northern portion of the western school wing, featuring a dedicated entrance, direct access from the northern carpark and a designated outdoor play area with landscaping for screening. The proposed ELC is considered a compatible use for co-location with the new school, aligning with the character and identity of its surrounding development, streetscapes and neighbourhood, subject to compliance with recommended conditions.
Built form	The ELC will be integrated within the new school building, with scale, bulk and height consistent with the desired future character of the area (see Section 6.2). The ELC will occupy a limited footprint in the overall school development, representing a small contribution to the overall bulk and scale of the proposal.
Adaptive learning spaces	The ELC floor plan provides a spacious, unobstructed indoor area oriented towards the rear of the site, with connectivity to the dedicated outdoor play spaces to its north and east. The ELC design facilitates ample natural light and ventilation, supporting adaptive learning through a functional layout that ensures high-quality, purpose-built learning environments with a high level of amenity for children and staff.
Sustainability	The ELC will incorporate sustainable design features, including natural cross ventilation, passive solar design and durable, low-maintenance materials to minimise reliance on mechanical heating, cooling and ventilation systems. ESD initiatives measures will be integrated throughout the proposed development, as discussed above.
Landscape	The landscaping of the ELC will be integrated with the overall landscape setting of the school. It incorporates elements from both Islamic and Australian Indigenous cultures, creating a safe and engaging environment. Planting native trees and shrubs will provide effective screening and shade and support diverse play areas and gardens for learning. The proposal includes planting 253 replacement trees to increase the on-site tree canopy coverage. Additionally, the ELC's northeast orientation ensures that both indoor and outdoor spaces receive adequate solar access.
Amenity	The ELC design includes multiple operable windows to optimise natural daylight and cross ventilation while controlling glare. Positioned in the northern portion of the site, behind the northern carpark and drop-off/pick-up

Matter	Consideration
	(DOPU) areas, the ELC will benefit from substantial boundary setbacks and landscaping screens, mitigating visual and acoustic privacy impacts. The design provides comfortable, diverse and functional learning, play and social interaction spaces.
Safety	The ELC will incorporate secure fencing and where required, acoustic walls of solid construction around the dedicated outdoor play area. Controlled entry gates incorporate the Crime Prevention Through Environmental Design principles, including adequate lighting for entrances, paths and carparks, minimised areas of hiding, passive and active surveillance (via CCTV) and access control measures. Direct access from the northern carpark and DOPU areas via an accessible footpath will reduce traffic-related conflicts and risks. A construction management plan will address potential risks during construction of Stage 2 and beyond in relation to the concurrent operation of the school and ELC.

Matters for consideration

Site selection and location	The ELC forms an integral part of the broader school campus and is considered a compatible use. The ELC is strategically separated from residential dwellings to the north and south by internal landscaping, vehicular access and parking areas, school building and boundary fencing, ensuring no adverse acoustic, visual or amenity impacts (see Section 6.5). Bushfire and flood risks (see Section 6.5 and 6.4) are addressed through mitigation measures. While public transport and pedestrian connectivity are limited, the proposal includes green travel initiatives, such as bus service and footpath upgrades, with plans to connect to future public pedestrian and cycling networks. A construction management plan will mitigate conflicts between pedestrians and traffic during DOPU times. No significant site contamination risks were identified, and it was concluded that the site is suitable for the proposed child care centre subject to conditions (see Section 6.5).
Local character, streetscape and the public domain interface	The ELC will be integrated in the school building, with scale, bulk and height aligned with the desired future character of the area (Section 6.2). Located on the ground level of the western wing, the ELC has a minimal footprint and does not significantly contribute to the overall bulk and scale. Substantial boundary setbacks, façade design, landscaping and dedicated outdoor spaces ensure clear delineation between the ELC, public domain and other

Matter	Consideration
	school buildings, with the outdoor play area positioned at the rear to ensure visual and acoustic privacy.
Building orientation, envelope, building design and accessibility	The ELC will be set back significantly from the front and northern boundaries, ensuring adequate separation from the public domain. Its orientation will optimise natural light and ventilation, with articulated facades and high-quality materials enhancing visual interest without adverse streetscape impacts. The ELC's scale is compatible with the school and aligns with the setbacks of adjacent residential developments to the south. Accessible pathways are provided for ELC users, school staff and visitors in compliance with the relevant Australian standards.
Landscaping	The landscaping of the ELC will be integrated with the overall landscape setting of the school, incorporating elements from Islamic and Australian Indigenous cultures. Planting of native trees and shrubs will provide effective screening and shade and support diverse play areas and gardens for multicultural and Indigenous learning.
Visual and acoustic privacy	The ELC will be located away from the public domain, oriented towards the internal dedicated outdoor play area. Strategic siting, physical barriers and landscaping will prevent overlooking and minimise noise emissions to neighbouring properties, ensuring visual and acoustic privacy.
Noise and air pollution	The ELC is not located near major roads, rail lines or any significant noise sources. The Environmental Noise Impact Assessment confirms compliance of the predicted road traffic noise intrusion with the Guideline for Child Care Centres Acoustic Assessment. Regarding operational noise emissions, a moderate noise increase due to children's outdoor play at one northern residential dwelling is considered acceptable, as outdoor play noise is limited to short daytime periods and not considered offensive (see Section 6.5). The Odour Impact Assessment confirms that the on-site wastewater management system is capable of operating without exceeding the relevant air quality criterion on-site (see Section 6.5).
Hours of operation	The ELC will operate between 7am to 6pm, Mondays to Friday, consistent with the core hours outlined in the Child Care Planning Guideline. The Department is satisfied that the proposed operating hours will not result in adverse amenity impacts on neighbouring residential properties.

Matter	Consideration
Traffic, parking and pedestrian circulation	Dedicated parking spaces within the northern carpark will be allocated for ELC staff. The Applicant's traffic impact assessment confirmed the staff parking provision will meet demand in line with Camden Council Development Control Plan. Operational traffic impacts will be minimised to prevent overflow onto public roads (see Section 6.2). Design and management measures will be in place to ensure safe on-site circulation for children, visitors and ELC users.
Regulatory requirements and the National Quality Framework	
Indoor space requirements	The ELC will have an ultimate capacity of 60 placements, requiring 195m ² of unencumbered indoor play space. The proposal satisfies the requirement, providing 197m ² unencumbered indoor play space from Stage 1 throughout all stages
Laundry and hygiene facilities	Laundry facilities are proposed on site. Sufficient space is available for these facilities, although limited fixtures and fitting details are provided on the proposed plans. Accordingly, the Department recommended a condition requiring detailed drawings to be submitted to the certifier to ensure compliance prior to construction.
Toilet and hygiene facilities	The Applicant confirmed that toilet and hygiene facilities adequate and age-appropriate to the ELC will be provided on-site. Sufficient space is available to provide these facilities, although limited fixtures and fitting details are provided on the proposed plans. Accordingly, the Department recommended a condition requiring detailed drawings to be submitted to the certifier to ensure compliance prior to construction.
Ventilation and natural light	The Applicant has submitted details demonstrating that children's outdoor and indoor play spaces will receive adequate natural daylight and ventilation.
Administrative space	The internal layout of the proposed ELC includes adequate areas for the administrative functions, including a meeting area for consulting with parents and conducting private conversations.
Nappy change facilities	Sufficient space is available for these facilities, although limited fixtures and fitting details are provided on the proposed plans. Accordingly, the Department recommended a condition requiring detailed drawings to be

Matter	Consideration
	submitted to the certifier to ensure compliance (if required) prior to construction.
Premises designed to facilitate supervision	The proposed ELC layout, including staff rooms, hallways, hygiene facilities and indoor and outdoor spaces, facilitates the supervision of children.
Emergency and evacuation procedures	The Department has recommended a condition requiring details of emergency and evacuation procedures, prepared by a suitably qualified access consultant, to be provided to the certifier to confirm compliance prior to construction.
Outdoor space requirements	The ELC will have an ultimate capacity of 60 placements, requiring 420m ² of unencumbered indoor play space. The proposal satisfies the requirement, providing 662m ² unencumbered indoor play space from Stage 1 onwards.
Natural environment	The integrated landscaping design of the ELC incorporates opportunities for outdoor play that engage with the natural environment and encourage interaction and exploration, while ensuring adequate supervision of children.
Shade	A covered area has been provided within the outdoor play space, and sufficient canopy trees are proposed to provide adequate natural shade to protect children from overexposure to ultraviolet radiation.
Fencing	The ELC outdoor play space will be enclosed by impervious acoustic fencing free of visible air gaps, which will prevent children from climbing over, under or through fences or people outside the facility from gaining access.
Soil assessment	The Applicant has provided a soil assessment for the site, which satisfactorily demonstrated that the site does not pose an unacceptable contamination risk to site occupants and that it is suitable for its intended use as an educational establishment, subject to conditions.

Section 3.36(6) of the SEPP requires that the design quality of the school development should be evaluated in accordance with the design quality principles set out in Schedule 8 of the SEPP and the consent authority to consider whether the development enables the use of school facilities to be shared with the community.

The proposed school development will enable the shared use of school facilities, including a multi-purpose hall and a sports field with the community. An assessment of the development against the design principles is provided in **Table 26**.

Table 26 | Consideration of Schedule 8 Transport and Infrastructure SEPP – Design quality principles in schools

Design principle	Consideration
Responsive to context	The configuration and siting of the proposed school have been developed to address site constraints, including topography, existing vegetation and adjacent low-density residential and agricultural areas. The proposed two-storey building complies with the height limit under the Camden Local Environmental Plan (CLEP) 2010. The development is consistent with the desired future character, with articulated massing and zig-zagging footprints providing substantial setbacks to mitigate visual impacts. Extensive landscaping, including 253 replacement trees, will be integrated into the overall school design to improve amenity and to help mitigate negative impacts on the streetscape and neighbouring sites. The proposal integrates Islamic and Indigenous design elements, such as mosaic star paving and yarning circles, aligning with a Country-centred approach. The proposal will not have unreasonable impacts on adjoining residential properties, responding to the rural residential character and minimising environmental impacts and land use conflicts (see Section 6.1, 6.2 and 6.5).
Sustainable, efficient and resilient	ESD initiatives measures will be integrated throughout the proposed development, including natural cross ventilation, passive solar design and durable, low-maintenance materials to minimise reliance on mechanical heating, cooling and ventilation systems, improving energy efficiency and reducing operational costs. Extensive landscaping, including 253 replacement trees, is provided to support biodiversity, shading and cooling. The proposal also involves rainwater harvesting and reuse to reduce potable water demand. The proposed road upgrades and Green Travel Plan will promote school users' sustainable travel modes.
Accessible and inclusive	The school is designed to be accessible and inclusive through the provision of lifts and accessible ramps in semi-external corridors ensuring equitable access across the rising grade of indoor and outdoor spaces, connecting the school grounds, carparks and DOPU areas. The Disability Access Report and the Building Code of Australia 2022 Capability Statement confirmed the proposal can comply with the relevant access regulations and Australian standards, with details to be finalised prior to construction. The

Design principle	Consideration
	Department recommended conditions requiring the detailed design be submitted to the certifier to ensure compliance with the accessibility regulations. The proposed school building and grounds provide for children of different ages and needs and seek to reflect the cultural diversity of students. The proposal will enable sharing of school facilities, including a multi-purpose hall and a sports field with the community and to cater for activities outside of school hours.
Healthy and safe	The proposed school will provide a safe and secure environment through the incorporation of Crime Prevention Through Environmental Design principles, including passive and active surveillance (24-hour CCTV monitoring), well-lit access ways, secure perimeter fencing and access controlled gates. The school design will maximise natural light and ventilation via operable windows and semi-open corridors with landscaping providing natural shading and cooling properties in play areas. Mitigation measures have been proposed to ensure that the on-site subsurface irrigation of wastewater will not adversely impact student and neighbourhood health. Bushfire and flood risks will adequately be addressed through design, construction and mitigation measures, with adequate flood emergency response plan in place. While public transport and pedestrian connectivity are currently very limited, the proposal includes green travel initiatives with plans to connect to future green travel networks. A construction management plan will mitigate conflicts between pedestrians and traffic during DOPU times. No significant site contamination risks were identified and it was concluded that the site is suitable for the proposed child care centre subject to conditions.
Functional and comfortable	The proposed school will provide a variety of comfortable and engaging spaces that are accessible for a wide range of formal and informal educational and community activities via shared school facilities. The proposal will not have unreasonable impacts on adjoining residential properties, responding to the rural residential character and minimising visual impacts and land use conflicts (see Section 6). Appropriate indoor and outdoor learning and play spaces, access to services and adequate storage are considered and provided on site.
Flexible and adaptable	The proposal is considered consistent with the long term State strategic planning objectives in delivering essential school enrolments and child care placements in the non-government sector to support future growth.

Design principle	Consideration
	The school is proposed to be developed in four stages, providing flexibility of development timing based on future needs. The school design will provide adaptable learning spaces and multi-purpose facilities to meet future learning requirements.
Visually appealing	The proposed school building within its landscape setting is of a high quality design, with articulated built form with durable materials and a neutral colour palette, following the site's topography. The Department is satisfied that the staged school development over twelve years will gradually integrate visual impacts on the local character, subject to conditions. Subject to conditions, the Department considers that the development is contextually appropriate, minimises visual impacts and enhances the area with open spaces shared with the community.

State Environmental Planning Policy (Precincts–Western Parkland City) 2021

Chapter 3 of the Western Parkland City SEPP relates to the Sydney Region Growth Centres which aims to co-ordinate the release of land for residential, employment and other urban development in the North West Growth Centre, the South West Growth Centre, the Wilton Growth Area and the Greater Macarthur Growth Area.

The site is in the South West Growth Centre (now referred to as the South West Growth Area (SWGA)). Therefore, Chapter 3 of the Western Parkland City SEPP applies. Section 3.21 of the SEPP sets out matters to be considered by a consent authority for development applications in growth centres where a Precinct Plan does not apply to the land. The project is in the Catherine Field precinct which does not currently have a Precinct Plan in place. Consideration of Section 3.21 is provided in **Table 27**.

Table 27 | Consideration of section 3.21 of the Western Parkland City SEPP

Relevant section	Consideration
Development applications in growth centres–matters for consideration until finalisation of precinct planning for land	
(1) Until provisions have been specified in a Precinct Plan or in section 3.11 with respect to the development of the land, consent is not to be granted to the carrying out of development on land within a growth centre unless the consent authority has taken into consideration the following:	
(a) whether the proposed development will preclude the future urban and	The site has not been identified as near or within future urban or employment development land uses in the SWGA structure plan

Relevant section	Consideration
employment development land uses identified in the relevant growth centre structure plan,	(December 2022). Precinct planning for the site within the Catherine Field precinct has yet to commence. The Applicant stated that establishing social infrastructure before the release of residential development in a growth area will benefit the public. Precinct planning is considered standard practice that occurs around existing school infrastructure. The proposed development in four stages will also enable the school to grow based on the area's population growth. The Department considers that the site, subject to conditions, will be adequately serviced by utilities and infrastructure, with appropriate interim measures proposed to address uncertainties in water and wastewater servicing, can support the proposed development to operate independently without additional cost to the public or harming the development potential of neighbouring sites. The Department is satisfied that the proposed development will not preclude the future urban and employment development land uses identified in the SWGA structure plan.
(b) whether the extent of the investment in, and the operational and economic life of, the proposed development will result in the effective alienation of the land from those future land uses,	Council and public submissions raised that the proposal does not meet the RU4 zone objectives because of the proposed school size, which will alienate potential primary industry on adjoining or nearby sites and will not be compatible with agricultural activities in the area. In Section 6.1, the Department assessed the site's suitability for the proposed development based the risk of potential land use conflicts and the availability of infrastructure needs to support the school and concluded the proposal is compatible with the RU4 zone objectives. Subject to conditions, the Department does not consider the proposed would alienate nearby agricultural activities and disrupt local farming, noting: • there are no existing or potential future commercial-scale agricultural activities in the neighbouring sites • the site will be adequately serviced by public infrastructure, with suitable interim solutions addressing water and wastewater servicing needs, at no additional cost to the public • any residual biosecurity risk will be managed and mitigated by a Biosecurity Management Plan.

Relevant section	Consideration
(c) whether the proposed development will result in further fragmentation of land holdings,	The project involves the consolidation of two adjoining land parcels and would not result in the fragmentation of land holdings.
(d) whether the proposed development is incompatible with desired land uses in any draft environmental planning instrument that proposes to specify provisions in a Precinct Plan or in section 3.11,	Not applicable. The project is in the Catherine Field precinct which does not have a Precinct Plan in place. The site is not subject to any draft environmental planning instrument that proposes to specify provisions in a Precinct Plan or in section 3.11 of the SEPP.
(e) whether the proposed development is consistent with the precinct planning strategies and principles set out in any publicly exhibited document that is relevant to the development,	The proposal will have positive economic and social impacts, providing direct investment of approximately \$123.7 million, generating approximately 434 construction jobs and 99 operational jobs. The proposal is consistent with the planning principles set out in the SWGA structure plan, because it: • has demonstrated a Country-centred approach through site-specific design initiatives • will contribute to delivering new walkable neighbourhoods through green travel initiatives and road upgrades and future green network connections • will provide valuable open space and sports field to be shared with the community • will provide extensive landscaping, including new tree canopy cover • will provide additional school placements and child care facilities in the non-government school sector.
(f) whether the proposed development will hinder the orderly and co-ordinated provision of infrastructure that is planned for the growth centre,	The site is located within an unrealised precinct in the SWGA. The Applicant stated that the proposal will not hinder the orderly and co-ordinated provision of infrastructure as there is currently no specific plan in the area. The Department assessed the proposed development's infrastructure and servicing needs in Section 6.1.3, and concluded that the site, subject to conditions, will be adequately serviced by

Relevant section	Consideration
	utilities and infrastructure. Appropriate interim measures are proposed to address uncertainties in water and wastewater servicing, can support the proposed development to operate independently without additional cost to the public or harming the development potential of neighbouring sites. In consultation with the relevant utility providers, the Department does not consider the proposed development will hinder the orderly and co-ordinated provision of infrastructure that is planned for the growth centre, subject to conditions.
(g) in the case of transitional land– whether (in addition) the proposed development will protect areas of aboriginal heritage, ecological diversity or biological diversity as well as protecting the scenic amenity of the land.	Not applicable.

State Environmental Planning Policy (Resilience and Hazards) 2021

Chapter 4 of the Resilience and Hazards SEPP relates to the remediation of contaminated land. Section 4.6 of the SEPP requires a consent authority to consider contamination and remediation in determining a development application.

The AR included a Preliminary and Detailed Site Investigation (DSI) that identified areas of potential contamination on the site from past and present activities and assessed whether the site is likely to present a risk of harm to human health and the environment.

The DSI confirmed there to be an elevated concentration of zinc at one sampling location near the former (backfilled) dam located in the central portion of the site. It was recommended that additional soil sampling to be undertaken at this location, followed by remediation and validation of the site after removal of the affected soil.

A Remedial Action Plan (RAP) provided as part of AR defined the extent of areas requiring remediation, set out the relevant remediation criteria and outlined the preferred remediation and validation methodology. The RAP concluded that the site can be made suitable for the proposed development, following the successful remediation and validation.

The Department has recommended conditions requiring the Applicant to adhere to the recommendations in the DSI and RAP and for the preparation of an unexpected finds protocol to ensure measures are in place should any contamination be uncovered during site works. The

Department is satisfied that, subject to recommend conditions, the site would be suitable for its ongoing use as an educational establishment, in accordance with the Resilience and Hazards SEPP.

State Environmental Planning Policy (Biodiversity and Conservation) 2021

Chapter 9 of the Biodiversity and Conservation SEPP relates to the Hawkesbury-Nepean River and aims to protect the environment of the Hawkesbury-Nepean River system by ensuring that the impacts of future land uses are considered in a regional context.

The site is in the South Creek Catchment Area of the Hawkesbury-Nepean River. Therefore, Chapter 9 of the Biodiversity and Conservation SEPP applies.

Chapter 9 of the Biodiversity and Conservation SEPP was repealed on 21 November 2022 by the State Environmental Planning Policy Amendment (Water Catchments) 2022. Notwithstanding, in accordance with the savings and transitional provisions set out in section 6.65 of the Biodiversity and Conservation SEPP, the former provisions of the SEPP continue to apply to the application as it was lodged, but not finally determined, before the commencement of the State Environmental Planning Policy Amendment (Water Catchments) 2022.

Accordingly, in accordance with Chapter 9 of the Biodiversity and Conservation SEPP, a consent authority must consider the general planning considerations set out in section 9.4 and the specific planning policies and related recommended strategies set out in section 9.5.

The Department finds that the proposal is generally consistent with the relevant provisions of the Biodiversity and Conservation SEPP. Consideration of Chapter 9 of the SEPP is provided in **Table 28** below.

Table 28 | Consideration of Chapter 9 of the Biodiversity and Conservation SEPP (prior to 21 November 2022)

Relevant section	Consideration
9.4 General planning consideration The general planning considerations relevant for this Part are — (a) the aim of this Chapter (b) the strategies listed in the Action Plan of the Hawkesbury-Nepean Environmental Planning Strategy (c) whether there are any feasible alternatives to the development or other proposal concerned (d) the relationship between the different impacts of the development	The aim of this Chapter is to protect the environment of the Hawkesbury-Nepean River system by considering the impacts of future land uses within a regional context. The Biocertification Letter submitted as part of the AR concluded that the proposal minimises impacts on threatened ecological communities (TECs). As the site is on Biodiversity Certified land, no further impact assessment under the <i>Biodiversity and Conservation Act</i> is required. The Department is satisfied that efforts have been made to preserve on-site vegetation for amenity, urban cooling and local biodiversity, subject to conditions. Further details are provided in Section 6.5.

Relevant section	Consideration
or other proposal and the environment, and how those impacts will be addressed and monitored	
9.5 Specific planning policies and recommended strategies	
(1) Total catchment management	The Department has conducted a merit assessment and considers that the proposal would not result in a significant adverse impact on the adjacent or downstream area (see Section 6.4).
(2) Environmentally sensitive areas	Not applicable.
(3) Water quality	The proposal will ensure Camden Council's water quality targets are met and that post-development stormwater runoff will not exceed the pre-development flow. The proposal will require limited excavation, making any groundwater encounter likely to be under the threshold that would require a water access licence. The Department is satisfied that the proposal will not have an adverse impact to water quality or quantity in the area, subject to conditions. Further details are provided in Section 6.5.
(4) Water quantity	
(5) Cultural heritage	The site is not near any heritage items or a heritage conservation area. Two Aboriginal objects were identified on site during the test excavation sampling. The Department is satisfied any impacts to Aboriginal heritage can be managed and mitigated, subject to conditions (see Section 6.5).
(6) Flora and fauna	Subject to conditions, the Department is satisfied that efforts have been made to minimise adverse environmental impacts, protect existing habitat and restore habitat values (see Section 6.5).
(7) Riverine scenic quality	Not applicable.
(8) Agriculture/aquaculture and fishing	The proposal does not involve any agriculture activities but is within agriculture zoned land. The Department considers that adequate measures have been taken to minimise the land use conflicts during the construction and operation of the school and is satisfied that the proposed development will have an acceptable impact, subject to conditions. Further details are provided in Section 6.1.2 .

Relevant section	Consideration
(9) Rural residential development	Not applicable.
(10) Urban development	The Department has conducted a comprehensive merit assessment of the proposal and considers that the proposal would not result in any significant adverse environmental impact, subject to conditions to mitigate and manage residual impacts.
(11) Recreation and tourism	The proposed development will not impact on the value of the riverine corridor as a significant recreational and tourist asset.
(12) Metropolitan strategy	Subject to conditions, the proposal will not result in significant adverse impacts on water or air quality both during construction and operation. Adequate waste management has been proposed at each development stage.

State Environmental Planning Policy (Sustainable Buildings) 2022

In accordance with the savings and transitional provisions set out in section 4.2 of the Sustainable Buildings SEPP, the SEPP does not apply to the proposed development as the development application was submitted on the NSW Planning Portal but not finally determined before 1 October 2023.

Camden Local Environmental Plan (CLEP) 2010

CLEP 2010 aims to ensure the Camden local government area retains its valued traditional qualities, character and scenic landscapes while providing for sustainable urban growth.

The Department finds that the project is generally consistent with the relevant provisions of the CLEP 2010. Consideration of the relevant clauses of the CLEP 2010 is provided in **Table 29**.

Table 29 | Consideration of the CLEP 2010

Relevant clause	Consideration
2.3 Zone objectives and Land Use Table	The site is zoned RU4 Primary Production Small Lots. Development for the purpose of an educational establishment is permissible with consent in the RU4 zone. The project is consistent with the objectives of the RU4 zone (see Section 6.1).

Relevant clause	Consideration
2.7 Demolition requires development consent	The project involves the demolition of two dwellings, a secondary detached dwelling, three detached sheds, rainwater tanks and ancillary farm structures. Development consent is sought as part of the SSD application for the proposed demolition activities.
4.3 Height of buildings	The site is subject to a maximum height of buildings control of 9.5m as identified on the Height of Building Map. The Applicant confirmed that all proposed buildings will reach a maximum of two storeys and comply with the 9.5m height limit, with a maximum height of 9.5m (see Figure 23).
4.4 Floor space ratio	There is no floor space ratio control applicable to the site.
5.10 Heritage conservation	The site is not located in proximity to any listed heritage items or heritage conservation areas. The Aboriginal Cultural Heritage Assessment Report submitted with the EIS confirmed that two Aboriginal objects were identified on the site during the test excavation sampling. The recommended conditions ensure these objects are either moved to an agreed reburial site or are managed on-site under a care and control agreement. The Department is satisfied any impacts to Aboriginal heritage can be managed and mitigated, subject to compliance with the recommended conditions (see Section 6.5).

Relevant clause	Consideration
5.21 Flood planning	The consent authority must be satisfied that the development is compatible with the flood function and behaviour of the land, will not adversely affect flood behaviour or the safe occupation and efficient evacuation of people, incorporates appropriate measures to manage risk to life and will not adversely affect the environment. The Department considers the proposal has been appropriately designed having regard to flooding risks and is not likely to create adverse flood impacts on or off the site, and feasible emergency response plan has been developed. In the unlikely event of site occupants are present on site during large scale flood events, a viable Shelter-In-Place (SIP) option will be available as all new buildings will be above the Probable Maximum Flood level and the SIP duration is expected to be acceptable (see Section 6.4). The Department is satisfied that the localised overland flood risks can be appropriately managed for the development in relation to vulnerable persons (students), both on the school sites and in relation to movements to and from the school. This will be achieved through the management provisions detailed in the Flood Emergency Response Plan prepared in consultation with, and taking on board, advice from both NSW SES and CPHR and subject to recommended conditions to mitigate residual risks.
6.2 Public utility infrastructure	The site is within Catherine Field precinct, which is in the early stages of the precinct planning process and yet to undergo rezoning or released for urban development. Nevertheless, the Department assessed the infrastructure and servicing needs of the proposal (see Section 6.1.3) and considers that the site, subject to conditions, will be adequately serviced by utilities and infrastructure. Appropriate interim measures are proposed to address water and wastewater servicing, support the proposed development to operate independently without additional cost to the public or harming the development potential of neighbouring sites. The proposal makes provision for the staged delivery of infrastructure, so stage appropriate works will be in place ahead of the future delivery of precinct wide infrastructure that is dependent on the rezoning of the wider precinct.

Relevant clause	Consideration
7.4 Earthworks	The proposed school building follows the site's existing topography, minimising the need for excessive cuts and fills. The Applicant has provided a DSI and a RAP that identified areas of potential contamination on the site, defined the extent of areas requiring remediation, set out the relevant remediation criteria and outlined the preferred remediation and validation methodology. Subject to conditions, the Department is satisfied that the site can be made suitable for the proposed development. The Department is satisfied that, subject to conditions, the proposed earthworks are unlikely to cause any detrimental effect on existing drainage patterns and soil stability in the locality, the likely future use of redevelopment on site, soil quality, the amenity of adjoining properties, potential relics or any watercourse, drinking water catchment or environmental sensitive area. The Department recommends that the entire site be remediated at Stage 1.

Other matters

In accordance with section 2.10 of the Planning Systems SEPP, Development Control Plans do not apply to SSD. Regardless, objectives of relevant controls under the Camden Development Control Plan 2019, where relevant, are considered in **Section 6**.

Appendix E – Recommended instrument of consent

Recommended instrument of consent:

<https://www.planningportal.nsw.gov.au/major-projects/projects/minarah-college>