

Proposed School Development – Catherine Field

Project: Minarah College SSD 30759158

Position: Strongly Object/Against

Submitted by:

Name: [REDACTED]

Address: [REDACTED]

1. Introduction and Scope of Submission

This submission objects to the proposed school development at Catherine Field on planning, infrastructure capacity, and site suitability grounds only.

It does not oppose the proposal based on the type, identity, or faith of the school. The objection is confined to whether the existing and planned infrastructure can safely and sustainably accommodate a development of this scale and intensity.

For the reasons outlined below, the proposal fails to satisfy key requirements of the *Environmental Planning and Assessment Act 1979* (EP&A Act), particularly sections 4.15, 4.16 and 1.3, and should be refused.

2. Statutory Framework

Under section 4.15 of the EP&A Act, the consent authority must consider:

- the likely impacts of the development (s 4.15(1)(b));
- the suitability of the site for the development (s 4.15(1)(c)); and
- the public interest (s 4.15(1)(e)).

In determining the application, the Commission must also ensure that any approval is capable of being lawfully conditioned under section 4.16, and that the decision is consistent with the objects of the Act in section 1.3, including the promotion of orderly and economic development and community welfare.

3. Scale and Intensity of the Proposal

The proposal seeks approval for a school accommodating up to 980 students, comprising:

- 505 primary school students (Kindergarten to Year 6);
- 385 high school students (Years 7 to 12);

- 60 Early Learning Centre places;
- 30 SSP enrolments; and
- 51 full-time equivalent staff.

The development includes an OOSHC facility and multiple buildings, sports facilities, and community-use infrastructure.

This scale represents a high-intensity institutional use, generating substantial daily traffic movements and ongoing operational impacts.

4. Traffic Generation, Access and Road Safety

(s 4.15(1)(b))

All vehicular access to the site is provided via a single entry and exit point onto Catherine Fields Road, with no alternative access or redundancy.

The site layout includes:

- 30 on-site pick-up/drop-off (DOPU) bays (13 + 17);
- 7 indented bus bays;
- private on-site bus parking; and
- operation of 12.5-metre chartered buses.

These facilities are designed for high-turnover, short-dwell movements, resulting in intense merging and re-entry demand onto Catherine Fields Road during peak periods.

While internal circulation is provided, all vehicles ultimately enter and exit via Catherine Fields Road, concentrating impacts on a road already experiencing growth-related pressure and commuter demand.

The reliance on internal queuing and on-site circulation does not address external road network capacity constraints, particularly at key intersections connecting Catherine Fields Road to the broader network.

The proposal therefore gives rise to unacceptable traffic efficiency and road safety impacts, including increased congestion, queuing, and conflict between private vehicles, buses, service vehicles, and vulnerable road users.

5. Extended Operating Hours and Cumulative Impacts

In addition to standard school operations, the proposal includes:

- community use of the sports field between 8:20am and 9:00pm on weekdays;
- weekend use of the sports field between 9:00am and 9:00pm; and
- community use of the multi-purpose hall until 9:30pm on weekends.

These extended hours confirm that traffic impacts will not be limited to school arrival and departure periods but will occur during evenings and weekends.

This results in cumulative traffic and amenity impacts, increasing pressure on the local road network beyond what is typically associated with a school operating solely during standard hours.

6. Infrastructure Servicing Constraints and Prematurity

(s 4.15(1)(b) and s 4.15(1)(c))

The site layout confirms reliance on an on-site sewage treatment plant and Effluent Management Area (EMA), rather than reticulated sewer infrastructure.

A development of this scale, intensity, and duration of use is not appropriately serviced by interim or private infrastructure solutions. The reliance on non-reticulated servicing introduces ongoing risks relating to capacity, maintenance, environmental performance, and regulatory compliance.

The absence of guaranteed, fully delivered essential infrastructure at the time of operation demonstrates that the site is not suitable for the proposed development and that the proposal represents premature development.

7. Conditions of Consent Cannot Resolve the Impacts

(s 4.16)

The identified impacts cannot be resolved through conditions of consent without reliance on:

- future infrastructure upgrades beyond the control of the consent authority;
- deferred funding or third-party delivery; or
- ongoing operational management to compensate for infrastructure inadequacy.

Conditions cannot guarantee the timely delivery of major road or servicing infrastructure, nor can they cure fundamental network and servicing constraints. Where acceptable outcomes depend on matters outside the certainty of the approval, consent cannot lawfully be granted.

8. Public Interest and Objects of the Act

(s 4.15(1)(e) and s 1.3)

Approving the development would transfer the burden of infrastructure shortfall and safety risk onto the local community.

This outcome is inconsistent with:

- promoting the social welfare of the community;
- facilitating ecologically sustainable development; and
- ensuring orderly and economic use and development of land.

The proposal is therefore not in the public interest.

9. Conclusion

For the reasons outlined above, the proposed development:

- will result in unacceptable traffic and infrastructure impacts (s 4.15(1)(b));
- is not suitable for the site (s 4.15(1)(c));
- cannot be adequately addressed through lawful and enforceable conditions (s 4.16); and
- is not in the public interest (s 4.15(1)(e)).

Accordingly, the application should be refused.

Kind regards,

