

Further to my oral submission at the Public Hearing, I wanted to express my concerns over topics that weren't covered due to time constraints.

**Lack of detail regarding Community Use:** The applicant is "selling" the opportunity for the facilities to be shared with the community but there is no solid information on how often.

The Wastewater report dated March 2025 states:

1. "Site use is generally limited to students and teachers on weekdays during school term".
2. "**Occasional** community use of the sports field and community hall outside of typical school hours and on weekends is anticipated".

The Transport report dated May 2025 stated: "The sports field will be available for use from 8:20 AM to 9:00 PM Monday to Friday, and from 9:00 AM to 9:00 PM on weekends. While these hours allow for broad access, use of the field outside of standard school hours **will primarily** be by Minarah College sports teams, typically twice per week between 5:00 PM and 9:00 PM for around 40 weeks per year. dismissal. The field may also be available for external hire on an **infrequent basis**, but only when not in use by Minarah College sports teams. **Any external use will be occasional and secondary to school activities**, primarily for small-scale training rather than competitive matches. The field may also occasionally be used for a weekend event by an external club or for school-run events such as the **annual school fete**."

The Department Planning Assessment report dated November 2025 states: "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".

I demand a clear indication of exactly how much "community use" will be allowed for.

**Further, Catherine Field currently has a basketball court, a tennis court, open picnic area with bbq, pre-school and a fully functioning baseball field, which I might add, does not have effluent being disbursed underneath! I don't see this proposal adding any value to the community at all.**

### **Interruption to historical "Quiet Enjoyment"**

The proposed **four-stage development** of Minarah College represents a substantial and unreasonable interference with the **quiet enjoyment** of our properties. By introducing persistent noise, traffic congestion, and loss of privacy into a historically quiet rural area, the project creates a permanent legal nuisance. Furthermore, the extensive construction timeline across these four stages ensures that this interference is not merely a short-term inconvenience but a multi-year disruption to the 'reasonable peace, comfort, and privacy' that we are entitled to as a resident of Catherine Field.

## Current road conditions

I have included with my submission, a Government Information (Public Access) report detailing community notification to Camden Council regarding pot holes and request for road repairs in and around the site. These roads include Barry avenue, Catherine Field road, Chisholm road and Springfield road.

## Parking

Figure 8 - Comparative site plan

Spaces	Old	New	Difference	Required
Northern Carpark	68	37	-31	
Southern carpark	62	66	4	
<b>Total Parking</b>	<b>130</b>	<b>103</b>	<b>-27</b>	<b>156</b>

	New Submission		New Submission	
	Head count	Spaces	Head count	Spaces
<b>1 parking space per staff member</b>	51	51	99	99
<b>1 parking space per 10-20 secondary students</b>	652	43	652	43
<b>1 parking space per 20-30 primary students (505)</b>	328	13	328	13
	<b>1031</b>	<b>108</b>	<b>1079</b>	<b>156</b>

Claimed in new EIS report	Head-count		Spaces	
	Head-count	Spaces	Head count	Spaces
☑ 1 car parking space per full-time equivalent (FTE) staff member, plus ☑ vehicles, a drop-off / pick-up area and buses as appropriate	51	51	90	90
1 car parking space per 100 students, plus ☑	980	10	950	10
1 car parking space per 5 students in Year 12 where	50	10	50	10
1 car parking space per 4 children for ELC ☑ Adequate	60	15	60	15
	<b>1081</b>	<b>86</b>	<b>1090</b>	<b>110</b>

A typical ratio might be:

- 1 parking space per staff member
- 1 parking space per 10-20 secondary students
- 1 parking space per 20-30 primary students (505)

Excludes drop off P/U

Avg 15 used

Only FTE numbers quoted PTE ignored

EIS claimed Jobs page 56 "Statutory Context"

It is evident that the application has allowed for minimal on site parking on site. Project overview claims: **“96 on-site parking spaces are proposed, which accommodates 51 spaces for staff members, 15 spaces of the early learning centre and 30 spaces for students. Of the 96 on-site parking spaces, 9 accessible spaces are proposed”**.

The claim is that the proposal has sufficient parking is misleading and deceptive as the references to staff in the EIS state 51 FTE without mention of or, calculations for PTE or ancillary staff. Given the statements around staffing at Minarah College Green Valley campus which has approximately 1,000 students and 90 staff giving a ratio of 11.1 to 1. The calculations on the supplied numbers in the revised EIS would produce a student to staff ration of **19.4 to 1** indication an understatement of approximately 48 staff. Furthermore, the revised EIS also states (P56, Statutory Relevance) **“The proposal will not promote diversity and employment opportunities in relation to primary industry uses, however it will provide broader long-term employment opportunities for construction workers and school staff. The proposed development represents a significant investment in Catherine Field, that will provide significant construction jobs, approximately 99 jobs, once operational”**. This is clearly a serious error in the EIS regarding understatement of parking requirements for this SSDA.

## **Offsite Parking**

There is strictly no opportunity for offsite parking on Catherine Field Rd. Due to the complete absence of kerbing and guttering, drainage and footpaths this will result in an extremely dangerous situation developing so: Where do the staff/students park when all the provided spaces are taken? I suspect they will take the Kiss & Ride spaces and/or park dangerously on Catherine Field Rd.

Combine this with hidden swales on the edges of Catherine Field road, it is expected that more vehicle accidents will occur.



Tim Lewis from Ason Group during the Public Hearing on Tuesday 3<sup>rd</sup> February that the “shuttle buses” will be used to alleviate traffic and queuing concerns. The DPHI Assessment report only makes mention of one singular 12.5m bus to shuttle students from Minto & Leppington train station. This singular bus will only be implemented from stage 3 when the school is at full capacity. Why isn't there plans to introduce this bus at Stage 1 and then effectively introduce further buses as the school population grows. Or, as the community suspects, there will be zero buses and the residents and road users will have to put up with overpopulated roads and increased traffic incidents?

## **Flooding**

The Minarah College flood plan fails to meet the **legal duty of care** owed to its students and staff. Under Australian law, school authorities have a non-delegable duty of care to take all reasonable steps to protect students from foreseeable risks of injury. As highlighted in the DPHI Assessment Report, the site's southern boundary is highly vulnerable to **overland flooding**. Approving a plan that relies on "**Shelter-in-Place**" (**SIP**) as a backup—essentially trapping 980 children in a flood zone—represents a fundamental breach of this duty. The landmark case of **Bhavsar v Blacktown City Council** (involving the Trustee for BCA Unit Trust) reinforces this. The Land and Environment Court's judgment in January 2026 stated that “The key issue in the proceedings is the suitability of the site for the proposed child care centre use having regard to the risk to life from flash flooding as a result of overland flooding. The proposal relies on a Flood Evacuation Response Plan (FERP) which outlines a shelter in place strategy for overland flooding”. The court ruled that SIP strategies are often "unacceptable" because they depend on human behaviour and "perfect" timing during a crisis, **which cannot be guaranteed**.

Furthermore, Minarah College's proposed secondary response—evacuating nearly 1,000 students on foot along **Catherine Field Road**—is a failure of the school's duty to provide a safe exit. The **DPHI report** and **Camden Council** have both noted that this road lacks footpaths and kerbing, turning into a "flowing river" during storms. Forcing children to navigate high-velocity water on an unpaved road is a foreseeable hazard that exposes the school to massive legal liability. This risk is further intensified by the **on-site sewage system**; if floodwaters cause the system to overflow, the school would be in breach of its duty to maintain a healthy and safe environment, potentially exposing the children to contaminated effluent.

The **NSW State Emergency Service (SES)** explicitly advises against developments that may require mass rescue operations. Because the site has only **one access point**, a flood could easily cut off all entry and exit, leaving emergency services unable to fulfill their role. By proceeding with a "third-tier" response that ignores these cumulative dangers, the development fails the "reasonable person" test. It places administrative convenience over the **non-delegable duty** to ensure that every child can be evacuated safely and reliably before a disaster occurs.



## Site Servicing

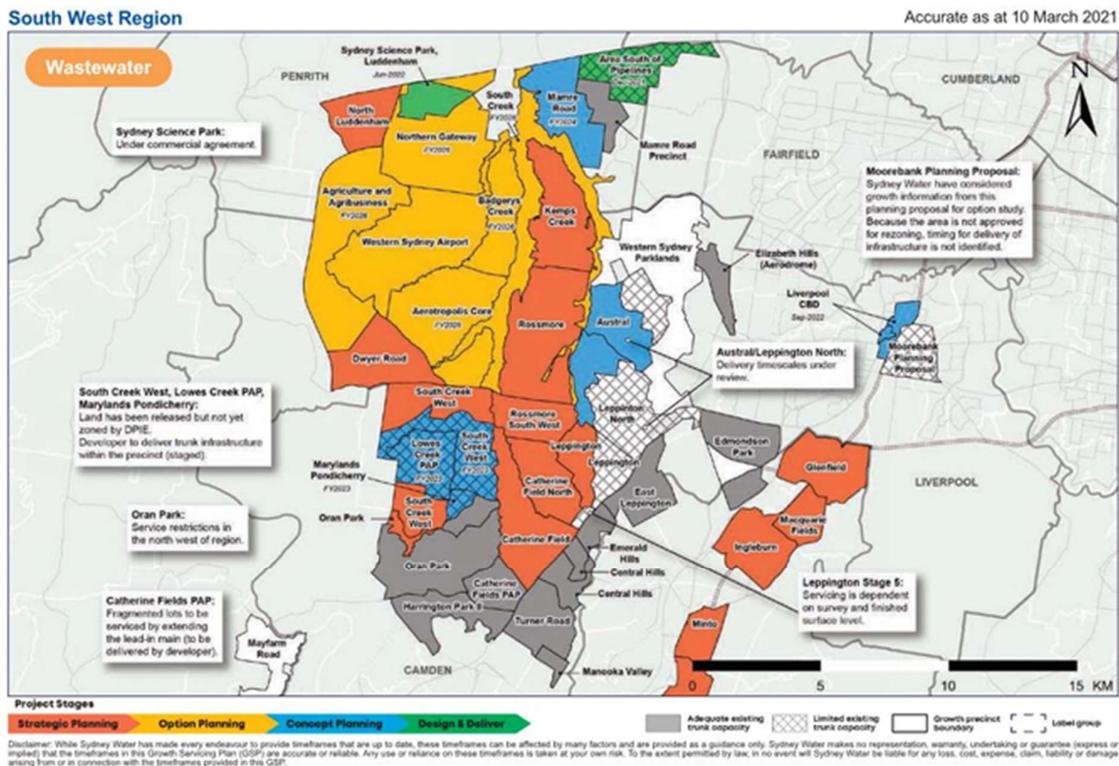
Sydney Water advised that full water servicing for the proposed development is feasible following 2030 Leppington trunk infrastructure upgrades. Until then, **the proposed temporary break water tank can only be filled using Sydney Water supply between 9pm to 5am.**

Sydney Water mandates that such tanks only refill during off-peak hours (9 pm to 5 am) to protect the upstream network, confirming the tank's role as a temporary buffer during high-demand daylight hours rather than a long-term storage solution.

A 35 kL (35,000 litre) break tank serving 1,000 people will last between **1.5 and 4 hours** based on average Sydney water usage rates, assuming no water is flowing into the tank during that time.

## JHA's Hydraulic and Electrical Services report revised 4<sup>th</sup> April 2025 Page 6

It should be noted that while the Catherine Fields area on the Sydney Water growth servicing plan is in a 'strategic planning' stage there is no formal guarantee that this infrastructure will eventually become available or an associated completion timeline with the infrastructure. Based on lack of guarantee from Sydney Water, on-site wastewater treatment (by others) should be sized to accommodate the full wastewater demand.



## Other

The establishment of Minarah College at Catherine Field lacks a clear strategic justification given the high density of existing educational services in the area. There are currently six comparable schools within a 15km radius, many of which—such as Al-Faisal, Bellfield College, and Unity Grammar—are actively expanding their capacities. With these local institutions collectively adding more than 6,400 new student places, the region faces a potential oversupply of independent schools. Rather than meeting an urgent infrastructure deficit, this project threatens to erode the local rural character.

### **Critical Fire Safety and Emergency Access:**

The proposed site layout poses a severe risk to public safety. Catherine Field is a bushfire-prone area, yet the narrow road and internal design mean that **emergency services, particularly fire trucks, will struggle to access the rear of the property** during peak times. If the drop-off and pick-up zones are full of idling traffic and buses, there is no viable secondary access for heavy emergency vehicles to reach the back of the site to combat a fire or assist in an evacuation.

### **No Light Management Plan**

Alaine Roff from Urbis made comment during the public hearing that there will be four floodlights overlooking the sports field which will be 16.5m high from ground height. Given that the buildings are only proposed to be 9.5m high, this will sure be a tremendous light spill onto neighbouring properties up until 9pm at night. There is no available “Light Management Plan” as has been used in other projects. **I demand a Light Management Plan be presented before any final decisions are made.**