

Camden Residents' Action Group

Incorporated

Camden – Still a Country Town

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NSW Independent Planning Commission
10 February 2026

Dear Commissioner,

Re: Minarah College SSD 30759158

Two-storey educational establishment (school) for 980 Kindergarten to Year 12 students, inclusive of a 30-student school for specific purpose and a 60-student early learning centre, proposed to be constructed in four stages.

We submit that it is not in the community interest that Minarah College's proposal be approved in its current form because it is on an unserviced rural road, relies on an inappropriate on-site sewage system for almost 1,000 students, will generate unacceptable noise, traffic and construction impacts over many years, and risks pre-empting proper precinct planning and more suitable school sites within the South West Growth Area.

1. Strategic planning and public interest

From a Camden community viewpoint, this proposal is premature and contrary to orderly and economic development of the South West Growth Area. The site sits within fragmented rural land at Catherine Field that has not yet been through precinct planning, with no clear structure for future land uses or infrastructure sequencing. Approving a large K–12 school here would effectively dictate future planning outcomes for this part of the SWGA, forcing later rezonings and infrastructure to work around a private institution rather than through an integrated precinct plan.

There are already released and/or rezoned precincts, and others currently being rezoned along The Northern Road and in Leppington, that are far better locations for a school of this scale, because they can be co-located with centres, open space and planned higher-order roads and utilities. In contrast, the subject land is zoned RU4 Primary Production Small Lots, and a 980-student school does not advance the zone objectives of supporting primary industry or minimising land use conflict with adjoining rural uses.

2. Site services, sewage and public health

For a community of nearly 1,000 students plus staff, it is unacceptable that there is no commitment from Sydney Water to provide sewer to this site, and that the proposal relies instead on a large on-site sewage management system on unsewered rural land. We understand that conservative wastewater generation rates have not been used and that key water-intensive components such as canteen, kitchens, science labs etc are either excluded or under-counted.

Most concerning from a public health perspective is that the effluent management area is proposed to double as the school sports field from Stage 2, with no meaningful buffer between irrigated effluent and areas used by children. Treated effluent from the proposed aerated system will still contain nutrients and bacteria, and using the playing field as the disposal area significantly increases the risk of disease transmission and failure of the land-application area due to compaction and heavy use. This arrangement cannot satisfy the statutory performance standards under the Local Government (General) Regulation 2021, which require preventing contact with effluent in ordinary activities and avoiding soil and environmental degradation. The community should not be expected to accept a high-risk sewage solution for a high-demand land use of regional significance.

3. Amenity, noise and construction impacts

The proposal will markedly alter the existing rural character and amenity of the Catherine Field community for decades, both during construction and operation. Operational noise modelling shows that even with extensive acoustic barriers, outdoor play areas will exceed acceptable criteria at several neighbouring residences from Stage 2 and significantly at Stages 3–4, on sites where current background noise in this rural area is very low. Residents face an increase of up to around 16 dB above existing ambient levels during school operation, which is a noticeable and intrusive change in a quiet rural setting.

Construction impacts of course are even more severe: the Construction Noise and Vibration Management Plan indicates exceedances of 30–40 dB above criteria at nearby dwellings across multiple stages, with construction expected to extend over roughly a decade, potentially out to 2041. Even with mitigation, it cannot be considered unreasonable for existing residents to endure such high levels of noise and disturbance for this length of time, particularly given the narrow rural road network and lack of buffers. From a local community perspective, these impacts are disproportionate to any alleged public benefit of the project.

4. Traffic, safety and rural road capacity

Catherine Fields Road is currently a narrow rural road, with no shoulder, kerb and gutter, footpaths or lighting, and is not designed to carry concentrated school traffic and buses for a 980-student K–12 campus. Children and staff will be heavily car- and bus-dependent because there are no realistic opportunities to walk or cycle safely, placing immense pressure on Camden Valley Way and the Catherine Fields Road intersection at school peaks.

Council’s traffic engineers support a channelised right-turn bay, bus bays and a shared path, but emphasise that all road upgrade works on Catherine Fields Road must be completed before the school opens, not deferred to later stages, to avoid dangerous interaction between construction, school traffic and the existing rural road environment. Concerns are also raised about the practicality and detail of the proposed shuttle-bus arrangement to Leppington and Minto stations, including unrealistic turn-around times and lack of a clear commitment to a bus fleet sufficient to materially reduce car use. Without guaranteed and enforceable upgrades and a robust, early-delivered bus program, residents face congestion, safety risks at the rural intersection and ongoing maintenance burdens on a road never designed for this intensity of use.^{[1][2]}

5. Built form, character and landscape

While the building architecture has been through a design review process, the overall form and perimeter treatment are poorly suited to a rural landscape and community expectations. The project introduces a substantial, urban-scaled school complex into a still-rural setting, with the Department’s own assessment acknowledging it will be one of the first non-rural developments of its scale and will alter the surrounding rural character. The development is unexpected and inappropriate in the existing landscape and likely to sit in isolation for many years before any surrounding urban development occurs.

A key concern for residents is the proposal to surround almost the entire site with 1.8–2.0 m Colorbond fencing, primarily for acoustic reasons, with only narrow landscape strips in front of it. This is inconsistent with typical rural fencing (post-and-rail or post-and-wire) and will present a hard, visually intrusive edge to the community, without sufficient vegetation to soften views from Catherine Fields Road and adjoining properties. Alternative fencing and landscape approaches used at other rural community facilities, such as setting acoustic fencing inside the boundary with substantial outer landscape buffers, have not been seriously pursued.

6. Community benefit, shared use and alternatives

The community recognises the growing need for schools and facilities in Camden LGA, but the benefits claimed for this proposal are poorly defined, uncertain and do not outweigh the local impacts and planning problems identified above. Commitments to shared community use of the hall and playing fields remain high-level and lack clear conditions about hours, access arrangements, maintenance responsibilities and how such use would be balanced with the effluent-disposal function of the sports field. In a rapidly growing area with high demand for genuine public facilities, the community expects stronger, enforceable arrangements if a project is to be justified in the public interest.^{[2][1]}

Importantly, the community's objection is not to the concept of Minarah College itself but to this particular site and design at this time. There are more appropriate, serviced or soon-to-be-serviced locations within already released or actively rezoned precincts of the SWGA where a school of this scale can be integrated with town centres, open space and planned infrastructure, avoiding long-term conflict with rural residents and ad-hoc infrastructure solutions. The community therefore urges that the current SSD be refused, or at minimum significantly redesigned and relocated through the precinct planning process so that school provision is aligned with proper infrastructure sequencing, rural amenity, and the broader public interest in Camden LGA.

Yours sincerely



Glenda Davis

President