

Annexure T – Table of Response to Neighbour's Objections

Objection	Issues Raised in the Objections	Current Response in Submission Documents to LCC	Further Response									
OBJECTION 1												
Anglican Church Diocese of Sydney												
O1.1	<i>I am particularly concerned with the increase in traffic past the Anglican Church site along Church Rd. Denham Court. Church Rd is a poorly formed rural road and is not currently suited for an increase in traffic. The traffic report submitted with the DA is quite inadequate.</i>	Church Road is an existing secondary entrance. The development will not result in an increase of live-in volunteers on site. The secondary entrance is intended for light traffic use and will be limited to temporary staff only a few days a week. The Traffic & Parking Assessment report (TPA) dated 31 July 2019 provides calculations and demonstrates that impacts of the proposed development to the surrounding road network will be very minimal and no upgrades are required. The report provides traffic forecast based on RMS REF traffic modelling demonstrating very minimal impact on Church Road. <table><tr><th>Reference</th><th>Information in Submitted Documentation</th></tr><tr><td>SoEE Table 6.2 Clause 20</td><td rowspan="2">Upgrade and use of secondary entrance along Church Road</td></tr><tr><td>SoEE Table 6.3 Clause 6</td></tr><tr><td>Traffic and Parking Report (TPA) 4.2</td><td>Methods to avoid delays and congestion at entry point</td></tr><tr><td>TPA 5.1 & 5.2</td><td>Traffic generation of development and impact</td></tr></table>	Reference	Information in Submitted Documentation	SoEE Table 6.2 Clause 20	Upgrade and use of secondary entrance along Church Road	SoEE Table 6.3 Clause 6	Traffic and Parking Report (TPA) 4.2	Methods to avoid delays and congestion at entry point	TPA 5.1 & 5.2	Traffic generation of development and impact	The secondary entrance from Church Road is currently used for the existing farm, including cattle trucks and the like. Additional response to an RFI from Council Road engineers has been supplied dated 27/09/2019. Council engineers have not identified any inadequacy in the Traffic and Parking Assessment report (TPA) in relation to Church Road, however a revised Issue of this document dated 13th November 2019 has been resubmitted to give further clarification. A peer review has also been completed confirming that the proposal is acceptable on traffic and parking grounds. The updated Traffic and Parking Report provides a comprehensive analysis of traffic generation from the proposal. This assessment analyses car parking demands on site, traffic movements, and the ability for both the subject land, and the surrounding road network to accommodate these demands. The only vehicles utilising the Church Road access will be light vehicles and farm related vehicles, all other heavy vehicles will utilise the main access from Zouch Road. Hence the current road corridor is adequate to cater for these vehicles. The applicant has committed to entry via Zouch Road before 9am for all vehicles related to the filming activities in order to minimise potential impacts on neighbours. Vehicles related to the day cast members will be able to leave via Church Road between the hours of 9am and 6pm business days. The days of
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			operation are limited to 8 business days per month which again limits the potential for impacts on neighbours. The additional vehicle movements generated by the film set are modest in comparison to those generated by the existing, lawful use of the land. Issues raised about the adequacy of existing road warning signs, speed limits along Denham Court and the traffic capacity of the surrounding road network are issues that require input from suitable traffic authorities at a broader level.					
O1.2	<i>I am particularly concerned with the proposed use of the property contrary to the current RU2 Rural Landscape Zoning. 1 objection is that we believe that the proposed use is contrary to the current RU2 Rural Landscape Zoning in that it changes the usage of the land that is at present rural nature and looks to a desert film set with its requirement for sandy, rocky and dusty setting to portray the landscape of approx. 2000 years past.</i>	The SoEE demonstrates the proposed use as a place of public worship, which is permissible under RU2 Zoning. The existing permitted use of the site as a “place of public worship” will not change. The SoEE outlines the intent to transition the instruction and religious training from a paper-based one, to a digital production. The film operations thus facilitate the permitted and dominant land use, just as the printery has for decades. The film operations operate in harmony with the current permitted and dominant land use, not separately to it. Existing and proposed buildings represent a modest proportion of this large site, that will continue to exhibit a rural character. The site will remain a rural buffer amongst growing development. Extensive landscaping is proposed to further enhance this rural character and maintain the scenic views currently enjoyed by the neighbours. <table><tr><th>Reference</th><th>Information in Submitted Documentation</th></tr><tr><td>SoEE 3.2</td><td rowspan="2">Permissible use of site as a place of public worship</td></tr><tr><td>SoEE 3.3</td></tr></table>	Reference	Information in Submitted Documentation	SoEE 3.2	Permissible use of site as a place of public worship	SoEE 3.3	The objection has incorrectly assumed that the proposed replica of an historical Biblical site will require sandy, rocky and dusty setting in the landscape. This is not an accurate representation. The replica of an historical Biblical site is not proposed to replicate a dusty setting. In fact, historically the Bible lands were not barren, but the landscape was once covered with mature trees. Deforestation of large areas has come about because of the devastation of war, the extensive use of timber with no accompanying effort to replenish the forests, and uncontrolled grazing. Denis Baly, in his book <i>The Geography of the Bible</i> (1974, pp. 77, 115, 116), speaks of centuries of neglect, which has resulted in the disappearance of many woodlands and the loss of fertile soil, leaving much of the land rocky and barren. Therefore, the proposed replica of an historical Biblical site will involve relatively low scale works that are setback at a significant distance from the closest residential boundary. With additional landscaping proposed, as detailed in the accompanying landscape plan, so that the proposed film set will have limited
Reference	Information in Submitted Documentation							
SoEE 3.2	Permissible use of site as a place of public worship							
SoEE 3.3								

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		<table><tr><td>SoEE 3.4</td><td rowspan="3"></td><td rowspan="11">visibility from adjacent properties.</td></tr><tr><td>SoEE 4.3</td></tr><tr><td>SoEE 5.2</td></tr><tr><td>SoEE Table 6.1 Clause 5.9</td><td rowspan="2">Maintenance of rural character of site and neighbours views and preservation of trees or vegetation</td><td rowspan="2"></td></tr><tr><td>SoEE Table 6.3 Clause 5</td></tr><tr><td>SoEE Table 6.3 Clause 1</td><td rowspan="2">Site planning principles incorporated into design</td><td rowspan="2"></td></tr><tr><td>SoEE Table 6.3 Clause 9.9</td></tr><tr><td>SoEE 7.1</td><td>Compatibility of development with proposed usage in RU2 rural zone</td><td></td></tr><tr><td>SoEE 8.5</td><td>Maintenance of visual privacy of neighbours</td><td></td></tr><tr><td>SoEE 8.19</td><td>Detail Landscape design principals</td><td></td></tr><tr><td>Annexure C Sheet 6 of 7 19/2092</td><td>Landscape design drawings demonstrate how strategic screening will maintain views of neighbours</td><td></td></tr></table>	SoEE 3.4		visibility from adjacent properties.	SoEE 4.3	SoEE 5.2	SoEE Table 6.1 Clause 5.9	Maintenance of rural character of site and neighbours views and preservation of trees or vegetation		SoEE Table 6.3 Clause 5	SoEE Table 6.3 Clause 1	Site planning principles incorporated into design		SoEE Table 6.3 Clause 9.9	SoEE 7.1	Compatibility of development with proposed usage in RU2 rural zone		SoEE 8.5	Maintenance of visual privacy of neighbours		SoEE 8.19	Detail Landscape design principals		Annexure C Sheet 6 of 7 19/2092	Landscape design drawings demonstrate how strategic screening will maintain views of neighbours		
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O1.3	2nd objection would be the need to import the required type of fill to provide the correct landscaping required in windy weather this will create dust and other windborne particles at [sic] is not present at this location at this present time.	Regarding dust during construction, the general design follows the natural contours of the site with a balance of cut and fill. Any fill brought to site will be managed as noted in the Erosion and Sediment Control Plan. <table><tr><th>Reference</th><th>Information in Submitted Documentation</th></tr><tr><td>SoEE Table 6.3 Clause 7</td><td rowspan="2">Environmental Impact of proposal</td></tr><tr><td>SoEE 8.20</td></tr><tr><td>SoEE 8.15</td><td>Management of erosion and sediment control during construction phase</td></tr><tr><td>SoEE 8.18</td><td>Description of proposed earthworks</td></tr><tr><td>Annexure B</td><td>Civil drawings and design package</td></tr><tr><td>Annexure C Sheet 6 of 7 19/2092</td><td>Landscape design drawings demonstrate how strategic screening will maintain views of neighbours</td></tr></table>		Reference	Information in Submitted Documentation	SoEE Table 6.3 Clause 7	Environmental Impact of proposal	SoEE 8.20	SoEE 8.15	Management of erosion and sediment control during construction phase	SoEE 8.18	Description of proposed earthworks	Annexure B	Civil drawings and design package	Annexure C Sheet 6 of 7 19/2092	Landscape design drawings demonstrate how strategic screening will maintain views of neighbours	This particular objection has incorrectly assumed that the site will require a loose dust finish. No such finish of this description is proposed. A standard condition of consent can be imposed to confirm this commitment by the applicant. The importation of fill is common in construction, and particularly on rural allotments. Appropriate measures will be taken to limit the capacity for soil to be transported to adjacent properties. These measures can be controlled via conditions of the DA. Moreover, finishing materials will be selected to ensure that windborne dust particles are not created either for the adjacent properties or onsite.											
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O1.4	3rd objection is that we are hard pressed to see how the construction of the film set and its usage is a continuation of the present use of the land given that one of the buildings that contains [sic] the printing press and its supporting materials is at the other side of the property. This is a change of the way the property is to be used resulting in the increase of people, traffic, noise, light spill (especially if they start at 5am as stated in the very light traffic study supplied) to the people living in Church Road.	The SoEE demonstrates that the proposed replica of an historical Biblical site is not based on existing use rights but rather is permissible under RU2 Zoning (please refer to our response to Objection O1.2 above). The property has been used for instruction and religious training for decades; the change is merely to the format of this religious instruction and training. There will be no increase to the number of live-in volunteers and a minimal increase to numbers of commuter volunteers. For information regarding traffic, please refer to our response to Objection O1.1 above. As noted in the Film Management Plan, the user of the proposed film set will give priority to minimising the environmental and social impact of the production on the surrounding area. The filmmakers will avoid producing any offensive noises, vibrations, fumes or other exhaust that would disturb the amenity of the neighbourhood. Special effects, including outdoor lighting, will be carefully controlled in order to minimise any disturbance. <table><tr><th>Reference</th><th>Information in Submitted Documentation</th></tr><tr><td>SoEE 8.6</td><td>Minimising noise impact</td></tr><tr><td>SoEE 8.7</td><td>Numbers of religious volunteer staff proposed</td></tr><tr><td>Annexure E</td><td>Film Management Plan – mitigation of disturbances</td></tr></table>	Reference	Information in Submitted Documentation	SoEE 8.6	Minimising noise impact	SoEE 8.7	Numbers of religious volunteer staff proposed	Annexure E	Film Management Plan – mitigation of disturbances	The overall design concept addresses how noise, and light spillage are baffled and controlled by building location and distance. Additional baffling can be installed to limit light spillage beyond the film set location or boundaries of the site. The grounds of this objection, including light spillage and noise concerns, relates to specific details over the manner in which the film operation component of the use is managed and can be addressed in DA conditions of consent. A standard condition of consent can be imposed stating that the light spill is to comply with the relevant Australian Standards. The TPA has provided development impact data and projected results have acceptable impacts.
Reference	Information in Submitted Documentation										
SoEE 8.6	Minimising noise impact										
SoEE 8.7	Numbers of religious volunteer staff proposed										
Annexure E	Film Management Plan – mitigation of disturbances										
O1.5	Also how is the seemingly massive change going to impact to how liquid waste and run off going to be handled (especially if the present soil is to be replaced with hard surfaces and buildings	There is an existing wastewater treatment facility designed for 750 people. Due to the reduction in irrigation areas, the new capacity will be 456 persons. The proposed final load is 366 persons, which is substantially below system capacity limits. The stormwater system has been designed to effectively manage all	Liquid waste and run-off represent engineering issues that have been adequately addressed in the SoEE.								

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	<i>at the lower parts of the land).</i>	stormwater in accordance with LDCP 2008, Part 1. Detailed stormwater design was included as part of the submitted Development Application. Run-off during construction will be managed as noted in the Erosion and Sediment Control Plan. <table><tr><th>Reference</th><th>Information in Submitted Documentation</th></tr><tr><td>Drawing IP-001</td><td>Irrigation plan for on-site sewage management system. Submitted at LCC's request Friday 13 September 2019.</td></tr><tr><td>SoEE 8.10</td><td>On-site sewerage disposal information</td></tr><tr><td>SoEE 8.11</td><td rowspan="3">Stormwater management information</td></tr><tr><td>SoEE 8.12</td></tr><tr><td>SoEE 8.13</td></tr><tr><td>SoEE 8.20</td><td>Environmental considerations</td></tr><tr><td>SoEE Annexure B</td><td>Civil drawings and design package</td></tr><tr><td>RFI response: 11 October 2019</td><td>Overland Flow Assessment and Flood Risk Management Report and Conceptual Stormwater Quality Management Report (MUSIC modelling report)</td></tr></table>	Reference	Information in Submitted Documentation	Drawing IP-001	Irrigation plan for on-site sewage management system. Submitted at LCC's request Friday 13 September 2019.	SoEE 8.10	On-site sewerage disposal information	SoEE 8.11	Stormwater management information	SoEE 8.12	SoEE 8.13	SoEE 8.20	Environmental considerations	SoEE Annexure B	Civil drawings and design package	RFI response: 11 October 2019	Overland Flow Assessment and Flood Risk Management Report and Conceptual Stormwater Quality Management Report (MUSIC modelling report)	
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O1.6	4th objection is the proposed vehicle changes to the semirural Church Road. The supplied Traffic Report goes into detail about the changes that may occur on eight working days per month without any mention of the size quantity / frequency of support vehicles needed during the building of or usage of the film set. At present it is difficult for heavy trucks to manoeuvre within this dead end road. The traffic usage especially heavy delivery trucks will subject the road's surface to increased wear as well as possible damage to the culvert that we believe is close to the surface at the bottom of the first dip as you drive along from the Denham Court Road intersection. The warning sign is on the right on a telegraph pole which can be hard to see if you are guiding vehicle correctly around the corner especially from Denham Court Road. This also leads to the problem of Denham Court Road's change of speed limit from 60 to 70 kph between the Campbelltown Road roundabout and Church Road intersection. I myself have subjected to a number of near misses as drivers have been accelerating and then realise that I'm slowing down to turn into Church Road. This whole traffic problem needs a more compressive [sic] study of not just Church Road but how the Campbelltown Road, Denham Court Road, Church Road and Zouch Road will change in the not	For comments on the use of the Church Road entry, please refer to our response to O1.1 above. There is no proposed change to existing arrangements to direct all large vehicles and deliveries to the existing Zouch Road site access. The Film Management Plan demonstrates that there is no need for any production-related vehicles to park on any public roads or in nearby neighbourhoods. While outside the influence of the registered owner, IBSA, the TPA for the proposed development has considered the impact of the planned Campbelltown Upgrade project, which includes upgrading the existing Denham Court Road / Campbelltown Road roundabout from single to dual circulating lanes with left turn slips for north and eastbound approaches, as well as upgrading Church Road / Denham Court Road with two through lanes on Denham Court Road and a dedicated right turn lane into Church Road. It demonstrates that the proposed development will have negligible impact on Church Road. <table><tr><th>Reference</th><th>Information in Submitted Documentation</th></tr><tr><td>SoEE 3.6</td><td>Vehicle movement and deliveries to site</td></tr><tr><td>SoEE 8.7</td><td>Access and Traffic</td></tr><tr><td>TPA 3.6</td><td>Campbelltown Road Upgrade Project impacts</td></tr><tr><td>Annexure E</td><td>Film Management Plan – provides mitigation of disturbances</td></tr></table>	Reference	Information in Submitted Documentation	SoEE 3.6	Vehicle movement and deliveries to site	SoEE 8.7	Access and Traffic	TPA 3.6	Campbelltown Road Upgrade Project impacts	Annexure E	Film Management Plan – provides mitigation of disturbances	The current space at the end of Church Road is adequate for a light vehicle to make a U-turn. As stated in our SoEE we have designed our parking so that all personnel, including visitors, have adequate parking on site, including designed overflow parking. Additional information on the empirical car parking demand has been included in the TPA Revision 2 dated 13th November 2019. The parking report has been peer reviewed thus Council can be confident the findings of the updated traffic report are accurate and that adequate parking is provided on site and that the parking arrangements will not cause significant adverse impact on neighbours. Regarding comments about the warning signage and speed limits along Church Road; while we appreciate the concerns, this is a matter for council and RMS. For response regarding “near misses”, please refer to O3.4 below. Also, a construction management plan is the usual way of addressing construction logistics, normally submitted as part of the construction certificate approval and again subject to a standard condition of consent.
Reference	Information in Submitted Documentation												
SoEE 3.6	Vehicle movement and deliveries to site												
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Issue Date: 20/11/2019

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O1.7	<i>Also related to the future usage of the site if adequate onsite parking is not provided then people will park along Church Road and the edges to the road are not really capable of parking cars etc along its length so it will make the driving along it dangerous.</i>	The SoEE demonstrates that that all personnel, including visitors have adequate parking on site. This includes designed overflow parking. The TPA also commented that all vehicles will be accommodated wholly within the subject site and will not require on street parking on Zouch Road or Church Road. The proposed parking exceeds the DCP requirements. It is not anticipated that cars will need to be parked along the length of Church Road. <table><tr><th>Reference</th><th>Information in Submitted Documentation</th></tr><tr><td>SoEE 8.8</td><td>Car parking</td></tr><tr><td>TPA 4.3</td><td rowspan="3">On-site parking requirements</td></tr><tr><td>TPA 4.4</td></tr><tr><td>TPA 4.5</td></tr></table>	Reference	Information in Submitted Documentation	SoEE 8.8	Car parking	TPA 4.3	On-site parking requirements	TPA 4.4	TPA 4.5	It is within the interests of the permit applicant to locate all car parking on site, and the SoEE and the TPA demonstrates that all car parking, including that of visitors etc. is to be located on-site. There is <u>no reliance</u> on on-street car parking. Adequate on site parking is provided for all persons residing on site up to the theoretical maximum permitted by the consent as well as the day cast members arriving to the site in the morning of a film event.
Reference	Information in Submitted Documentation										
SoEE 8.8	Car parking										
TPA 4.3	On-site parking requirements										
TPA 4.4											
TPA 4.5											
Boston Planning Report Objections											
O1.8	<i>The Development Application (as noted in the SEE details [sic] that approval is also sought for filming at the site. It is noted that this is <u>not included</u> in the development description that is available for exhibition purposes.</i>	The 'Proposal Description' in the LCC application form for development and/or construction indicates the scope of the proposed works. The description of the intended use for filming and the background of this development has been detailed in the SoEE, which formed part of the exhibition package. <table><tr><th>Reference</th><th>Information in Submitted Documentation</th></tr><tr><td>SoEE 2.1</td><td>Proposal summary</td></tr><tr><td>SoEE 3.4</td><td>Description of proposed works</td></tr></table>	Reference	Information in Submitted Documentation	SoEE 2.1	Proposal summary	SoEE 3.4	Description of proposed works	The <i>Local Government Filming Protocol 2009</i> produced by the Department of Local Government notes: <i>“The act of filming does not of itself require an approval by councils, nor is it subject to fees. What may require approval...are activities associated with filming where approval is required under legislated or regulatory authority or services are provided to the filmmaker.”</i> ... <i>“Approval from a local council is not required for filming and associated activity which takes place entirely on private land.”</i>		
Reference	Information in Submitted Documentation										
SoEE 2.1	Proposal summary										
SoEE 3.4	Description of proposed works										

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			In this application we are seeking approval for building works related to filming and associated activities. However, the filming itself will take place entirely on private land and therefore does not require Council approval. The permissibility submission by Andrew Martin Planning Pty Ltd deals with the issue of permissibility. The applicant is of the view that the structures and the use for filming purposes, as part of a place of public worship, is permissible with consent. If we are wrong in the assertion that <i>Local Government Filming Protocol 2009</i> relieves an owner the need to obtain development consent then the applicant includes filming activities as an ancillary use as part of the application. The applicant also includes the erection of any necessary structures as part of the application.
O1.9	<i>(4.1 Inadequacy of the SEE)</i> <i>The SEE is silent on the detail of the proposed filming operations that are proposed to occur on the site...While there is some (though limited) detail on the proposed nature of the filming and a complete description of filming activities that are proposed to be carried out has not been provided. This includes:</i>	Please see our responses to O1.9.1 to O1.9.7 below.	The SoEE lodged with the application is a comprehensive document that adequately outlines the details of the application, personnel details, and car parking requirements etc. The addendum SEE applies to the extent of any inconsistency.
O1.9.1	<i>(Dot point 1)</i> <i>Clear description and numeric values of residents on site involved in filming operations</i>	SoEE, page 40 mentions that “overall numbers of religious volunteers will not change”. Accordingly, there will be a re-distribution of personnel (and numbers) to reflect the transition from paper-based instruction and religious training, to an electronic production of publications for religious education purposes.	A description and numeric values of residents on site involved specifically in filming operations is not required to be advertised as part of the Development Application. The approved residential capacity already far exceeds the projected needs from the development. There is no change to the maximum

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Reference	Information in Submitted Documentation													
SoEE 3.4	Description of proposed works													
SoEE 8.7	Access and Traffic provides a description of the overall numbers of volunteers													
SoEE 8.8	Car parking													
SoEE Annex E	Film Management Plan – ‘Dates and Times’ section provides the numeric values of the cast and crew.													
O1.9.2	(Dot point 2) Clear description and numeric values of the maximum visitors that will be permitted on site during length of filming. There is discrepancy between the SEE and the supporting Traffic and Parking Assessment regarding visitor numbers. The SEE outlines that there will no increase in the number of religious volunteers on the site. This is inconsistent with the Traffic and Parking Assessment that identifies that some scenes will require 100 volunteers that will mostly be temporary visitors to the site and will commute to the site.	The SoEE states <i>overall</i> numbers of religious volunteers for the site will not increase, providing no further vehicle load on site. The focus of the TPA is the impact on <i>surrounding roads</i> and refers to changes in traffic paths and impact on the <i>neighbourhood</i>. The additional impact of commuters via Church Road are referred to in the TPA. <table><tr><th>Reference</th><th>Information in Submitted Documentation</th></tr><tr><td>SoEE 8.7</td><td>Access and Traffic provides a description of the overall numbers of volunteers not changing</td></tr><tr><td>TPA 4</td><td>Description of Proposal included anticipated numbers to access the site</td></tr></table>	Reference	Information in Submitted Documentation	SoEE 8.7	Access and Traffic provides a description of the overall numbers of volunteers not changing	TPA 4	Description of Proposal included anticipated numbers to access the site		A description and numeric values of residents on site involved specifically in filming operations is not required to be advertised as part of the Development Application. The SoEE adequately addresses the impact the proposed development will have on the previously approved capacity (no change), the TPA addresses the impact on traffic numbers and routes against the current and proposed use of the site. Clarification of the empirical number of commuters and the resulting car parking demand has been included in Section 4.5 of the TPA Revision 2 dated 13th November 2019. The report has been peer reviewed. All volunteers living on site are ordained ministers of religion. There is a fluctuation of volunteer numbers on-site at any given time due to changing needs over the years, however this does not exceed the approved capacity for the site. Please refer to our response to O1.8, for further information.				
Reference	Information in Submitted Documentation													
SoEE 8.7	Access and Traffic provides a description of the overall numbers of volunteers not changing													
TPA 4	Description of Proposal included anticipated numbers to access the site													
O1.9.3	(Dot point 3) Hours and days of operation	The SoEE refers to the Film Management Plan which noted that neighbours will be notified of production plans in advance of the project. During production, activities will be carefully monitored in		The Local Government Filming Protocol 2009 notes: “Councils should usually be able to deal with community concerns by imposing conditions on										

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	for filming. No hours of filming operations have been provided. The days of filming operations have been noted as approximates only. The Traffic and Parking Assessment identifies that for up to 8 days a month filming will occur and details approximate arrival/departure times of visitors. However, this has not been clearly articulated in the SEE and concern is raised that a complete and clear description of the usage and operational details have not been provided and full impacts have not been considered.	order to avoid creating any disturbance for neighbours. Regarding a complete and clear description of the usage and operational details, the SoEE clearly demonstrates either full compliance with the Statement Environmental Planning Policy (SEPP) 2008 or approval is requested as part of the DA. Any further details are simply provided to demonstrate the suitability of proposed works required to facilitate filming, not to justify the filming itself. <table><tr><th>Reference</th><th>Information in Submitted Documentation</th></tr><tr><td>SoEE 4.5</td><td>SEPP 2008 requirements</td></tr><tr><td>SoEE Annex E</td><td>Film Management Plan – ‘Overview’ section</td></tr></table>	Reference	Information in Submitted Documentation	SoEE 4.5	SEPP 2008 requirements	SoEE Annex E	Film Management Plan – ‘Overview’ section	approvals. For example, there may be restrictions on noise or hours of operation, a requirement for environmental protection, or a requirement that the filmmakers advise neighbours about the activity.” If the LCC considers restrictions may be necessary, these will be reflected in the conditions of consent. This objection does not appear to hold weight given that if there was no building work required, then filming would have occurred in harmony with the conditions set out in the SEPP 2008, with the neighbours being notified 5 days in advance. Filming on <i>private land</i> does not require a DA where it complies with the SEPP and therefore the additional and specific details requested in the objection are manifestly excessive. The Film Management Plan which has been prepared already allows for further communication with neighbours and authorities if any impacts are anticipated. As stated the applicant includes the use for completeness if the Council holds that the Local Government Filming Protocol 2009 does not provide the pathway for approval.
Reference	Information in Submitted Documentation								
SoEE 4.5	SEPP 2008 requirements								
SoEE Annex E	Film Management Plan – ‘Overview’ section								
O1.9.4	(Dot point 4) Concern is raised that the Traffic and Parking Assessment identifies for potential for the permanent residents to increase on site within the next 5 years associated with the filming operations. However, the SEE is silent on this matter.	The existing buildings are approved to accommodate up to 464 residents. The rise in permanent residents on site referred to in the TPA is in comparison to current resident levels at the time of writing. The current staff living on site at the time of writing was 219 and if this development is approved, then this number is projected to rise to 366 permanent members of staff over the next 5 years. This rise in resident numbers is not more than the approved capacity for the site, nor is it more than the permanent resident levels have been in the past. Therefore the SoEE is correct in stating that the overall number of religious volunteers for the site will not increase.	Permanent residents on site will not exceed the approved capacity outlined in the existing development approvals for the site. The proposal does not include any additional accommodation as no change to the stated maximum capacity is proposed for the subject site. It has been demonstrated that available car parking on site exceeds the anticipated demand levels, refer O1.6 and O1.9.2.						

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		<table><tr><th>Reference</th><th>Information in Submitted Documentation</th></tr><tr><td>SoEE 8.7</td><td>Access and Traffic provides a description of the overall numbers of volunteers not changing</td></tr><tr><td>TPA 4.1</td><td>Description of Proposal included anticipated numbers of volunteers on site</td></tr></table>	Reference	Information in Submitted Documentation	SoEE 8.7	Access and Traffic provides a description of the overall numbers of volunteers not changing	TPA 4.1	Description of Proposal included anticipated numbers of volunteers on site			
Reference	Information in Submitted Documentation										
SoEE 8.7	Access and Traffic provides a description of the overall numbers of volunteers not changing										
TPA 4.1	Description of Proposal included anticipated numbers of volunteers on site										
O1.9.5	<i>(Dot point 5)</i> No details have been provided on the equipment, sound, lighting and other materials to support the filming operations have been detailed within the SEE.	The Film Management Plan addresses the equipment, sound, lighting and other materials to support the filming operations.		Refer to O1.8 and O1.9.3 for response.							
		<table><tr><th>Reference</th><th>Information in Submitted Documentation</th></tr><tr><td>SoEE Annex E</td><td>Film Management Plan</td></tr></table>	Reference	Information in Submitted Documentation	SoEE Annex E	Film Management Plan					
Reference	Information in Submitted Documentation										
SoEE Annex E	Film Management Plan										
O1.9.6	<i>(Dot point 6)</i> The SEE is silent on wastewater consideration and whether the existing wastewater system is capable of supporting the increase in visitors on the site.	Please refer to O1.5.		Please refer to O1.5.							
O1.9.7	<i>(Dot point 7)</i> There is no acoustic and light spill assessment and considerations.	Please refer to O1.4.		Please refer to O1.4.							
O1.10	<i>(4.2 Planning approval pathway and development characterisation)</i> <i>The supporting SEE does not give a proper and complete description of the appropriate planning approval pathway for the proposed development and has not demonstrated that the proposed development such as</i>	A preview and a summary of the approval pathway is provided in the SoEE: <table><tr><th>Reference</th><th>Information in Submitted Documentation</th></tr><tr><td>SoEE 2.1 Table 2</td><td>Project Reference Details. Note information in row heading: Permissible Under</td></tr><tr><td>SoEE 10 Table 9</td><td>Basis for Consent of Proposed Works</td></tr></table> Also, please see our responses to O1.10.1 to O1.10.5 below.		Reference	Information in Submitted Documentation	SoEE 2.1 Table 2	Project Reference Details. Note information in row heading: Permissible Under	SoEE 10 Table 9	Basis for Consent of Proposed Works	The SoEE has taken into consideration Pre-DA discussions with LCC Senior Planner and the relevant statutory planning framework. It has been informed and reviewed by Legal and Environmental and Planning consultants and thus includes detailed legal analysis demonstrating that the film operation is in complete harmony with the permitted and dominant land use. The SoEE and permissibility letter clearly provides that	
Reference	Information in Submitted Documentation										
SoEE 2.1 Table 2	Project Reference Details. Note information in row heading: Permissible Under										
SoEE 10 Table 9	Basis for Consent of Proposed Works										

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	<i>the filming operations are a permissible use on the site.</i> ... <i>This includes:</i>		the filming operations form part of the broader use of the land for instruction and religious training. The existing printery operations on site are to be scaled down, and are in part being replaced with digital operations (film). This is further supported by the SoEE that confirms many persons previously on-site for printery operations are either to be re-trained in film production or replaced with trained personnel. This form of transition is not unique to religious education only, as evident by a similar transition occurring with many forms of printed media (i.e. newspapers offering on-line subscriptions etc). The proposed film operations are integral to this transition. Critically, the film operations function in harmony with this dominant land use, not separately to it. It is important to note the filming is not a separate land use, but one that is an ancillary and fundamental part of the instruction and religious training as part of a "place of public worship".
O1.10.1	<i>(Dot point 1)</i> <i>The proper characterisation of the development</i>	The SoEE clearly details the connection between filming operations and the place of public worship on pages 6 and 12, with page 12 specifically referencing the religious website, jw.org. This website includes examples of productions that will be filmed on site. Pages 6 and 12 of the SoEE reinforce the transitioning of operations on site from paper based to digital based religious education. The filming operation is solely for instruction and religious training as part of the use of the land for a place of public worship. In addition, the SoEE made reference to the case of IBSA v Liverpool City Council, Appeal No 30014 of 1990. This stated that <i>"The Court is satisfied on the evidence that Bethel</i> [the subject site of this	Excerpts from the case of IBSA v Liverpool City Council, Appeal No 30014 of 1990 <i>"The Court is satisfied on evidence that Bethel is a place.... most activities would be in the broad sense for the purpose of religious teaching and training"</i> <i>"the publication of instructive booklets in 20 languages for distribution in Australia and Pacific Island groups, in the opinion of the Court, must be seen as part of the teaching mission of the Association"</i> The above Court case, demonstrated that the activities of instruction and religious training are integral to the

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		planning application] <i>is a place which is conducive to right mindedness and most activities would be in the broad sense for the purpose of religious teaching and training.</i>" <table><tr><th>Reference</th><th>Information in Submitted Documentation</th></tr><tr><td>SoEE 2.1</td><td>Background to Application</td></tr><tr><td>SoEE 3.2</td><td>References to abovementioned case (IBSA v</td></tr><tr><td>SoEE 3.4</td><td>Liverpool City Council, Appeal No 30014 of 1990</td></tr></table>	Reference	Information in Submitted Documentation	SoEE 2.1	Background to Application	SoEE 3.2	References to abovementioned case (IBSA v	SoEE 3.4	Liverpool City Council, Appeal No 30014 of 1990	use of the land to “disseminating the Christian message” The present DA proposal of moving from printed form of “disseminating the Christian message” to the digital audio-visual form is integral and appropriate to the place of public worship. Since the beginning of the 20th century, the registered owner, International Bible Students Association (IBSA), has produced films for teaching and disseminating the Christian message in Australasia. An example of this is the ‘Photo Drama of Creation’, where it <i>“was the first major screenplay which incorporated synchronized sound (recorded speech), moving film, and magic lantern color slides.”</i> – American Movie Classics, "Timeline of Greatest Film History Milestones'..."1914", retrieved on 18 October 2019. This film was shown to a combined audience of 454,900 at 651 sessions throughout Australia, Fiji and New Zealand. The Australasia Audio Video department has also continued to pioneer and produce short films for the purpose of instruction and religious training. The sole purpose of the proposed replica of an historical Biblical site is for instruction and religious training, which will allow for filming based on Bible themes, highlighting religious principles and lessons that can be benefit people today. The Court in the above-mentioned case held that: • <i>“in a spiritual institution such as Bethel there is little distinction to be drawn between teaching and training, and prayer and manual and occupational activities”.</i>
Reference	Information in Submitted Documentation										
SoEE 2.1	Background to Application										
SoEE 3.2	References to abovementioned case (IBSA v										
SoEE 3.4	Liverpool City Council, Appeal No 30014 of 1990										

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			There is an integral relationship between the place of worship and the proposed filming operation. As stated in the SoEE page 18: <i>“the proposed works will continue the use of the site for this purpose, namely the purpose of “religious teaching and training”. While the purpose remains the same, it is proposed that the methods used will change to move with modern advancements in education and the dissemination of information”.</i> This permitted use has included printery facilities that for decades have facilitated the printing, binding and shipping of Bible based literature for instruction and religious training. The manner in which such religious instruction and training is transmitted has moved from paper-based publications to a more digital-based education program. Therefore, the proposed works fully satisfy the definition of “Place of Public Worship” and the use is permissible under the RU2 zoning.						
O1.10.2	(Dot point 2) Whether the proposed use is permissible or ancillary to a place of public worship	For background pertaining to permissible use, please refer to O1.10.1. Accordingly, as noted in the SoEE, the elements of the development set out below, satisfy the definition of permissible use: - new office building - replica of an historical Biblical site <table><tr><th>Reference</th><th>Information in Submitted Documentation</th></tr><tr><td>SoEE 2.3</td><td>Table 4 – Summary of Pre-Development Application Meeting</td></tr><tr><td>SoEE 4.3</td><td>Permissible Use Related to Land Use Zoning</td></tr></table>	Reference	Information in Submitted Documentation	SoEE 2.3	Table 4 – Summary of Pre-Development Application Meeting	SoEE 4.3	Permissible Use Related to Land Use Zoning	Please refer to our response in O1.10.1
Reference	Information in Submitted Documentation								
SoEE 2.3	Table 4 – Summary of Pre-Development Application Meeting								
SoEE 4.3	Permissible Use Related to Land Use Zoning								

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Objection	Issues Raised in the Objections	Current Response in Submission Documents to LCC	Further Response								
O1.10.3	(Dot point 3) whether existing use rights need to be relied upon	Current response has been clarified	Please refer to the town planner's report from Andrew Martin Planning Pty Ltd, and the addendum to the SoEE The existing use rights pathway in the original SoEE for the alterations to the printery building was followed based on advice from Pre-DA meeting with LLC, reference number PL-30/2019. After subsequent advice from Andrew Martin Planning Pty Ltd, an addendum to the SoEE will adjust the planning approval pathway demonstrating that the proposed development is a permissible use within the land zone. As previously mentioned, film operation does not function separately to the dominate land use. The film operation is consistent with the transition in the way instruction and religious training is produced from printed booklets to video production. The land use remains the same. The proposed works (alterations and additions) involve re-modelling existing buildings (former printery building) for which there will be little physical change.								
O1.10.4	(Dot point 4) whether the development is capable of satisfying existing use right provisions	Please refer to our response to O1.10.3.	Please refer to our response to O1.10.3.								
O1.10.5	(Dot point 5) whether the development is suitable within the site and whether the development accords with the land use zone objectives	Section 3.3 for the SoEE details the suitability of the site for the proposed works. Regarding whether the development accords with the land use zone objectives, please refer to our response to O1.2 above. <table><tr><th>Reference</th><th>Information in Submitted Documentation</th></tr><tr><td>SoEE 3.3</td><td>Suitability of Site</td></tr><tr><td>SoEE 5.2</td><td>Maintenance of rural character of site and neighbours views and preservation of trees or vegetation</td></tr><tr><td>SoEE Table 6.1 Clause 5.9</td><td></td></tr></table>	Reference	Information in Submitted Documentation	SoEE 3.3	Suitability of Site	SoEE 5.2	Maintenance of rural character of site and neighbours views and preservation of trees or vegetation	SoEE Table 6.1 Clause 5.9		Please also refer to response to O1.2 above. The purpose of the RU 2 – Rural Landscape Zone includes an allowance “to provide for a range of compatible land uses...”. Historical and consistent development application approvals for this site over the past 40 years have reinforced the suitability of the land as a place of public worship for the purpose of instruction and religious
Reference	Information in Submitted Documentation										
SoEE 3.3	Suitability of Site										
SoEE 5.2	Maintenance of rural character of site and neighbours views and preservation of trees or vegetation										
SoEE Table 6.1 Clause 5.9											

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Objection	Issues Raised in the Objections	Current Response in Submission Documents to LCC		Further Response
		SoEE Table 6.3 Clause 5		training.
		SoEE 7.1	Compatibility of development with proposed usage in rural zone	References to not maintaining an agricultural use is not only inaccurate but also fails to give adequate consideration to the fact that the site is zoned RU2 and the permissible uses include “places of public worship”. As well as satisfying the RU2 Zone purpose of providing “for a range of compatible land uses”, this proposal also contributes to maintaining “the rural landscape character of the land”. Proposed works are low scale, well setback from side boundaries, and will be complemented by an extensive landscaping outcome detailed in the comprehensive landscape plans accompanying this application. Even with an approvals as sought in the subject application more than adequate area remains available on the site for bonifide agricultural pursuits.
O1.11	<i>(4.3 Inadequate reports)</i>	As referenced in the SoEE, the property has annual approval to operate an on-site wastewater treatment facility as granted by Liverpool City Council in a letter dated 30 August 2018 (Reference Number: OSM-3141). The proposed works do not seek any changes to this, hence no report is required. For response regarding “inconsistencies” in the SoEE and the TPA, please refer to our response to O1.1 and O1.9.2. For response regarding “inadequacy” of the TPA, please refer to our response to O1.1 and O1.9.2. The following table also includes reports that were submitted to LCC as part of the DA application and subsequent RFI responses:		The application to Council encompasses numerous reports and plans, that when read in totality, offer a full and comprehensive understanding of the entire proposal. Regarding acoustic and light spill concerns please refer to our response to O1.9.3. Standard conditions of consent will suffice in relation to these matters. For comments on the adequacy of the TPA, please refer to our response to O1.1 and O1.9.2.

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		<table><tr><th>Reference</th><th>Information in Submitted Documentation</th></tr><tr><td>SoEE 8.10</td><td>Wastewater Treatment facility information</td></tr><tr><td>Annexure L</td><td>Bushfire Assessment Report</td></tr><tr><td>Annexure N</td><td>Traffic and Parking Assessment</td></tr><tr><td>Drawing IP-001</td><td>Irrigation plan for on-site sewage management system. Submitted at LCC’s request Friday 13 September 2019.</td></tr></table>	Reference	Information in Submitted Documentation	SoEE 8.10	Wastewater Treatment facility information	Annexure L	Bushfire Assessment Report	Annexure N	Traffic and Parking Assessment	Drawing IP-001	Irrigation plan for on-site sewage management system. Submitted at LCC’s request Friday 13 September 2019.		
Reference	Information in Submitted Documentation													
SoEE 8.10	Wastewater Treatment facility information													
Annexure L	Bushfire Assessment Report													
Annexure N	Traffic and Parking Assessment													
Drawing IP-001	Irrigation plan for on-site sewage management system. Submitted at LCC’s request Friday 13 September 2019.													
OBJECTION 2														
Submission 1 - Development application 12 - 14 Zouch Road Denham Court														
O2.1	1. It is correct that the Church has permission to operate as a place of worship. The present use is an “existing right”.	Please refer to our response to O1.10.1, O1.10.2 and O1.10.3.		Please refer to O1.10.1, O1.10.2 and O1.10.3.										
O2.2	2. The application before Council for approval of “an historical Bible Site” is not consistent with a place of “public worship” and is not an extension of the existing right .It is in fact a large film studio.	Please refer to our response to O1.10.1, O1.10.2 and O1.10.3.		Please refer to O1.10.1, O1.10.2 and O1.10.3.										
O2.3	3. The proposed development is inconsistent with the objectives of RU 2 – Rural Landscape zone in so far as it is not compatible with the rural character of the land and dose not maintain the feasibility of agriculture uses pursuant to Section 4.15(1) (a) (i) of the Environmental Planning and Assessment Act 1979.	Please refer to our response to O1.2 and O1.10.5.		Please refer to O1.2 and O1.10.5.										
O2.4	4. We strongly object to any opening of Church Road to the subject property for the following	Please note that we are not applying for the “opening” of Church Road. It is an existing secondary entrance. Please refer to our response to O1.1		Please refer to our response to O1..										

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	reasons:		
O2.4.1	(1) Burton, (Road Construction Contractor) for the widening of Campbelltown Road at Edmondson Park, have set up their own compound in Zouch Road immediately opposite the above D.A.-505 site. They have reconstructed Zouch Road from Campbelltown Road to the full frontage length of the above proposed site including all entry/exits. This high quality road construction was to accommodate all heavy construction vehicles to and from their own compound. For these reasons Zouch Road should remain the only entry and exit to the DA-505 site.	As explained in our SoEE and accompanying reports, the proposed additions will have negligible impact on these roads. The entry and exit along Zouch Road will remain as the main entrance for the site. The existing secondary site access will be upgraded. Please refer to our response to O1.1 and O 1.6 for additional information.	Please refer to our response to O1.1 for additional information.
O2.4.2	(11) Church Road is not constructed for heavy vehicles associated with the buildings proposed for this site.	The SoEE and TPA note that Church Road will not be used for heavy vehicles associated with the buildings proposed for this site. Please refer to our response to O1.1 and O 1.6 for additional information.	Please refer to our response to O1.1 and O 1.6 for additional information.
O2.4.3	(111) Church Road has a dangerous T-intersection entry off Denham Court Road, including a shallow culvert, a steep hill entry/exit making it a dangerous blind spot for parishioners to enter and exit the Church parking area.	Please refer to our response to O1.1.	The entry and exit into the Anglican Church parking area is in no way related to this Development Application. The current planned traffic generation times of our development will not overlap with the current traffic generation of the Anglican Church, as we will not be filming on Sundays, the main times that traffic will be generated from the Church, and we will undertake to work with the Church to manage the traffic generation from our site if ever there may happen to be a conflict between the two.

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O2.4.4	(IV) The Church has two Services on Sundays, Bible studies, Working Bees and Funerals on week days. On one funeral occasion 600 people attended filling the parking sites and both sides of Church Road.	The SoEE and TPA noted that we have designed our parking so that that all personnel, including visitors, have adequate parking on-site, including designed overflow parking. Therefore, there will be no impact on parking along Church Road. Refer O1.6 and O1.9.4 for additional information	The Church parking arrangements are in no way related to this Development Application. Please refer to our response to O2.4.3. Refer O1.6 and O1.9.4 for additional information
O2.4.5	(VI) There is a Crane Hire Business that has just opened on the corner of Church Road and Denham Court Road which also causes problems for vehicles entering and exiting Church Road. It should be investigated as to its legality.	This objection is not related to this Development Application.	
O2.4.6	(VIII) This DA 505/2019 proposal would affect the amenity of the area of Church Road and various residences on the eastern side of Denham Court Road north of Church Road, together with noise and dust emanating from the site and traffic to supply the film studio with its needs.	This proposal does not negatively affect the amenity of the subject site's surrounding area – please refer to our comments on landscaping in O1.2 For comments regarding noise, please refer to our response to O1.4. For comments regarding dust, please refer to our response to O1.3. For comments regarding traffic, please refer to our response to O1.1.	Please refer to our comments on landscaping in O1.2 For comments regarding noise, refer to O1.4. For comments regarding dust, refer to O1.3. For comments regarding traffic, refer to O1.1.
OBJECTION 3			
Submission 2 - Objection to development application 12 - 14 Zouch Road Denham Court			
O3.1	1 st objection is that we believe that the proposed use is contrary to the current RU2 Rural Landscape Zoning in that it changes the usage of the land that is at present rural nature and looks to a desert film set with its	Please refer to our response to O1.1.	Please refer to our response to O1.1.

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	requirement for sandy, rocky and dusty setting to portray the landscape of approx. 2000 years past.		
O3.2	2 nd objection would be the need to import the required type of fill to provide the correct landscaping required in windy weather this will create dust and other windborne particles at is not present at this location at this present time.	Please refer to our response to O1.3.	Please refer to our response to O1.3.
O3.3	3 rd objection is that we are hard pressed to see how the construction of the film set and its usage is a continuation of the present use of the land given that one of the buildings that contains the printing press and its supporting materials is at the other side of the property. This is a change of the way the property is to be used resulting in the increase of people, traffic, noise, light spill (especially if they start at 5am as stated in the very light traffic study supplied) to the people living in Church Road. Also how is the seemingly massive change going to impact to how liquid waste and run off going to be handled (especially if the present soil is to be replaced with hard surfaces and buildings at the lower parts of the land).	For comments regarding site usage, please refer to our response to O1.2 and O1.4. For comments regarding volunteer numbers, please refer to our response to O1.9.2. For comments regarding traffic generation, please refer to our response to O1.1. For comments regarding noise, please refer to our response to O1.4. For comments regarding light spill, please refer to our response to O1.4. For comments regarding liquid waste and run off, please refer to our response to O1.5.	For comments regarding site usage, please refer to O1.2 and O1.4. For comments regarding volunteer numbers, please refer to O1.9.2. For comments regarding traffic, please refer to O1.1. For comments regarding noise, please refer to O1.4. For comments regarding light spill, please refer to O1.4. For comments regarding liquid waste and run off, please refer to O1.5. The nature of the replica of an historical Biblical site necessitates that it be located away from existing buildings that are clearly not historical. This separation does not in itself imply a change of use, as its purpose remains to supply religious instruction and training as part of a place of public worship. Specific details on the filming operation (noise, light spillage, waste etc) are film management considerations that can readily be addressed via suitable conditions of any development approval.
O3.4	4 th objection is the proposed vehicle changes to the semirural Church Road. The supplied	For comments regarding traffic generation, please refer to our response to O1.1. For comments regarding parking, please refer to our response to	As per the Campbelltown Road REF and crash analysis at the Campbelltown Road and Denham Court Road intersection, the current crashes are low

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	Traffic Report goes into detail about the changes that may occur on eight working days per month without any mention of the size / quantity / frequency of support vehicles needed during the building of or usage of the film set. At present it is difficult for heavy trucks to manoeuvre within this dead end road. The warning sign is on the right on a telegraph pole which can be hard to see if you are guiding your vehicle correctly around the corner especially from Denham Court Road. This also leads to the problem of Denham Court Road's change of speed limit from 60 to 70 kph between the Campbelltown Road roundabout and Church Road intersection. I myself have subjected to a number of near misses as drivers have been accelerating and then realise that I'm slowing down to turn into Church Road. This whole traffic problem needs a more comprehensive study of not just Church Road but how the Campbelltown Road, Denham Court Road, Church Road and Zouch Road will change in the not so short future. Also related to the future usage of the site if adequate onsite parking	O1.7 For comments in relation to the report on the Submission to Development Application DA505/2019, please refer to our response to O1.8, O1.9, O1.10 and all subclauses.	compared to rest of the network. While there may be near misses, this occurs throughout the road network and is not unique to the site. A full traffic analysis has already been done by the Campbelltown Road upgrade project. Due to the low trip generation of our development and other reasons mentioned in the TPA (refer O1.1), the current traffic study is sufficient for the proposed works.

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	is not provided then people will park along Church Road and the edges to the road are not really capable of parking cars etc along its length so it will make the driving along it dangerous. The traffic usage especially heavy delivery trucks will subject the road's surface to increased wear as well as possible damage to the culvert that we believe is close to the surface at the bottom of the first dip as you drive along from the Denham Court Road intersection. Please also find a copy of a copy of [sic] a report on the "Submission to Development Application DA505/2019" apart from raising a number of question for other areas it supports the problems as out lined in my 3rd and 4th objection above .		

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Objection	Issues Raised in the Objections	Current Response in Submission Documents to LCC	Further Response
OBJECTION 4			
Submission 3 - Objection to development application 12 - 14 Zouch Road Denham Court			
O4.1	<i>3. The proposed road construction will lessen the appearance of the rural area that we all enjoy. The quiet enjoyment that we and our neighbours have could also be effected by noise, dust and vehicles coming and going into the property. Church Road could be used as parking on both sides of Church Road.</i>	This proposal does not negatively affect the amenity of the subject site's surrounding area refer comments on landscaping in O1.2 For comments regarding noise, please refer to our response to O1.4. For comments regarding dust, please refer to our response to O1.3. For comments regarding traffic, please refer to our response to O1.1.	Please refer to our comments on landscaping in O1.2 For comments regarding noise, refer to O1.4. For comments regarding dust, refer to O1.3. For comments regarding traffic, refer to O1.1.
O4.2	<i>4. The proposal is not an extension of the place of worship but is an industry which over time would increase in size and further contaminate the amenity of the area. It does not fall within the zoning of the subject property namely RU.2.</i>	This proposal does not negatively affect the amenity of the subject site's surrounding area refer comments on landscaping in O1.2 For comments regarding rural zoning, please refer to our response to O1.2.	Please refer to our comments on landscaping in O1.2 For comments regarding rural zoning please refer to our response to O1.2.
O4.3	<i>5. The provisions of RU.2. should be enforced and the application refused, particularly because in Church Road and the immediate properties have been turned into industrial usage namely "The Mattress Factory" in 185 Campbelltown Road and a Crane Industry on the corner of Church Road and Denham Court Road .</i>	For comments regarding rural zoning, please refer to our response to O1.2.	For comments regarding rural zoning, please refer to our response to O1.2.
O4.4	<i>6. Under no circumstances should Council approve a rear entrance to and from the subject property</i>	The entrance in question is an existing entrance. Please refer to our response to O1.1.	Please refer to our response to O1.1.

Annexure T – Table of Response to Neighbour’s Objections

Objection	Issues Raised in the Objections	Current Response in Submission Documents to LCC	Further Response
	<i>`for its convenience' when there are two large entrances on Zouch Road. Any extension of existing roads in the property should occur by use of the roads already in the property.</i>		
OBJECTION 5 Email Objection - (FW: Ref: Objection of Lot 2, DP1111318, 12-14 Zouch Road Denham Court NSW 2565 DA 505/2019 International Bible Students Association)			
O5.1	<i>1. The property of 12-14 Zouch Road Denham Court is zoned RU2 Rural Landscape...we fail to understand how this DA for the construction of “an historical Bible Site” is within the guidelines of the existing use of ‘Place of public worship’. In fact, the application is leading us to understand it is the intention to have a film set and operational film studio to produce video content and media distribution from the site and location.</i> <i>We fail to understand how a proposed “Historical Bible Site” is going to be maintaining the rural landscape character of the land as it is currently.</i> <i>The religious holy lands of Jerusalem are far from pastures of green rolling hills. Rather a dry sandy desert land with very little fauna and flora nor green pastures.</i>	For comments regarding site zoning, please refer to our response to O1.2. For comments regarding existing use and permissible use, please refer to our response to O10.1, O10.2, O10.3. For comments regarding rural landscape character, please refer to our response to O1.2.	For comments regarding site zoning, please refer to O1.2. For comments regarding existing use and permissible use, refer to O10.1, O10.2, O10.3. For comments regarding rural landscape character, refer O1.2.

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O5.2	<i>Inadequate conditions and existing hazards of Church Road make it not suitable for access from Church Road.</i>	Please refer to our response to O1.1	Please refer to our response to O1.1
O5.2.1	a. The Road surface of Church Road is not suitable for the increased traffic, especially for the increase of Heavy vehicular traffic down the road.	Please refer to our response to O1.1.	Please refer to our response to O1.1.
O5.2.2	b. Church Road is a 'No through road' with inadequate signage displaying this to traffic. The current sign is positioned approximately 15metres in from the intersection of Denham Court Road and Church Road on the right-hand side mounted on the telegraph pole and is in extremely poor condition.	This objection is not related to this Development Application.	Please refer to our response to O3.4 for comments.
O5.2.3	c. There is no existing cul-da-sac nor turning bay for vehicles at the end of Church Road. Then to increase the traffic and congestion at the end of this road will create challenges for the traffic and especially for the two- adjoining neighbours.	Please refer to our response to O1.6.	Please refer to O1.6.
O5.2.4	d. Denham Court Road is 70km and with the most recent increase of traffic from the residential development surrounding Denham Court we now have a very hazardous entry point from Denham Court Road into Church	Please refer to our response to O1.6.	Please refer to O1.6.

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	Road. Denham Court road is a single lane road so when having to stop on Denham Court Road to turn right onto Church Road, we often must hope that a vehicle doesn't crash into the back of you. Or potentially hit the gravel off the edge of Denham Court road and hit the telegraph pole directly in line with the stopping point and entry to Church Road.		
O5.2.5	e. Church Road already has St Mary's Anglican Church which is a significant site with important heritage and history for Denham Court and Liverpool. The church and its parishioners already have a challenge in being able to safely enter and leave from their parish grounds due to the existing substandard conditions of Church Road. From the shallow culvert, blind spot upon the approach of the church entry and the steep incline from street level into their driveway. The parish has two Sunday services, Bible studies, working bees and other religious celebrations including funerals where there can be at least a hundred or even more parishioners in attendance. The traffic report provided with the Development application is not	Please refer to our response to O1.1, O1.6, O1.11, O2.4.3, O2.4.4.	Please refer to O1.1, O1.6, O1.11, O2.4.3, O2.4.4.

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Objection	Issues Raised in the Objections	Current Response in Submission Documents to LCC	Further Response
	detailed enough and really has not taken into consideration the true current usage and the impact of the development and growth of residents and road usage due to the growth of the South Western corridor.		
O5.2.6	f. Increased number of vehicle accidents/crashes on Denham Court Road Denham Court. Although we don't have any statistics that we can source to support this point, I would urge Liverpool Council to take the time to look into and assess the increased risk for motor vehicles travelling up and down Denham Court Road Denham Court since the changes to the development a growth of surrounding areas within the South West corridor. There has been multiple times that we have personally witnessed cars having crashed off Denham Court Road and having travelled through property fences and hitting telegraph poles or trees.	Please refer to our response to O3.4.	Please refer to O3.4.
O5.3	3.The reconstructed Zouch Road from Campbelltown Road provides a high-quality road constructed to endure the increased traffic and additional heavy vehicle traffic. Why is the existing entry/exits and large street frontage on Zouch Road	Please refer to our response to O1.1 and O2.4.1.	Please refer to O1.1 and O2.4.1.

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	not appropriate to remain as the only entry and exit to the DA-505 site?		