

TITLE Planning Proposal - Amundsen St Leumeah

Reporting Officer

Manager Environmental Planning

Attachments

1. Location Plan (contained within this report)
2. Landscape Concept Plan and draft indicative allotment layout (contained within this report)
3. Draft Planning proposal (contained within this report)

History

The land contained within the planning proposal is located at the southern end of the area generally known as 'The East Edge Scenic Protection Lands' which is an area located adjacent to the eastern boundary of the Campbelltown Urban Area, and is separated from an extensive regional open space network (that runs along the Georges River) by a reservation for the Georges River Parkway.

There have been numerous representations to Council in the past about the possibility of rezoning the East Edge Scenic Protection Lands to allow for further subdivision.

On 10 May 2004, Council notified the (then) Department of Planning (DoP), of its intention to prepare a Local Environmental Plan (LEP) to rezone the East Edge Scenic Protection Lands, and sought the DoP's requirements in relation to the Local Environmental Strategy (LES).

In a letter dated February 2006, the DoP advised that:

“the Department would not support a Local Environmental Plan based on a Local Environmental Study that was limited to investigating only one option – that of reducing the subdivision standard to one hectare, unless this was found to be the only one that satisfactorily addressed all issues.”

Council subsequently advised the affected land owners of the DoP's response. The land owners raised concerns about the cost of a full LES, which would be significantly higher than that of an LES to only investigate the one hectare option.

On 26 October 2006, senior representatives from Council and the DoP met with the Minister for Planning to discuss the possibility of limiting the scope of the LES to investigate the one hectare only option. The Minister confirmed the Department's position, that any LES for the land would need to consider a range of options (including urban). Council was also invited to work collaboratively with the DoP to refine the scope of the LES but on the basis of a range of options being considered.

At its meeting on 21 November 2006, Council considered a report on the matter and resolved:

- "1. That Council refund the landowners (who made contributions towards the preparation of the Natural Conservation Assessment Study of the Edge Scenic Protection Lands) to the amount of the remaining funds held by Council.
2. That Council not proceed with the Draft LEP amendment seeking the proposed rezoning of the Edge Scenic Protection Lands.
3. That Council investigate the alignment of the urban zoned boundary as it affects the western edge of the Edge Scenic Protection Lands, as part of the Comprehensive LEP, noting that the extent of any potential options for zoning alterations will be minor.
4. That the development of the Campbelltown Comprehensive LEP include consideration of urbanising suitable portions of the Edge Scenic Protection Areas for ecologically sustainable developments west of the western edge of Bensley Road forming the boundary between potentially urbanised land and the environmental protection zone.
5. That Council inform interested parties of the decision."

Following the meeting, a Rescission Motion was lodged. At the following Council meeting on 12 December 2006, the Rescission Motion was carried and a further amendment was moved via a Notice of Motion:

"That a decision in this matter be deferred and that in accordance with the usual practice for the LEP this matter be the subject of a workshop by Councillors where all land uses in the Campbelltown area be considered and report back to Council."

On 30 January 2007, a presentation was made to Councillors about the Preliminary Findings of the Draft Campbelltown Local Planning Strategy. The Edge Scenic Protection Lands were discussed as part of this presentation.

On the 18 October 2011, Council considered a report on the "Draft Visual and Landscape Analysis of the Scenic Hills and the East Edge Scenic Protection Lands" which indicated:

"In some places in the East Edge Scenic Protection Lands, a further increase in the density of development may also be possible providing that the detailed subdivision design and subsequent siting of buildings will not compromise the bushland qualities of the landscape, especially when other issues such as bushfire protection for any dwellings is addressed."

On the 10 April 2012, Council considered a report titled "Supplementary Report on Future Planning Directions for the East Edge Scenic Protection Lands" which specifically discussed the subject site. In this regard the report stated:

"Landscape Unit E-LU5 contains some land (particularly in the north western part of the landscape unit) that is of low conservation value, as the land is largely cleared. A landowner in this area who has land fronting Amundsen Street, Leumeah, and a property developer with an interest in that land, have made regular enquiries about the possible future rezoning of the land for residential use

over at least the last five years. This land is mostly clear of vegetation as the land was previously used for farming. The assumption could be made that the land is therefore suitable for urban development, however, this land is located on the ridgeline and it therefore visually prominent. Most parts of the land also drain towards the Georges River. These are some of the reasons why residential zoning, urban development or subdivision to 4000m², is not appropriate in other parts of the Edge Lands.

However, it could be argued that the part of the land with direct frontage to Amundsen Street (namely part of Lot 1 DP 795498 and part of Lot 2 DP 126471) could be potentially be suitable for some increase in development density. The existing lots are respectively 1.84 hectares and 2.4 hectares in size.

This site is generally cleared and a significant portion drains away from the Georges River (directly). Land on the opposite side of Amundsen Street is developed for urban housing.

It is considered from initial investigation that some additional new lots may potentially be able to be created on that part of the land which drains away from the Georges River towards Amundsen Street and where no significant vegetation exists.

Any such development proposal for that part of the land would need to be more fully investigated and achieve a master planned outcome including:

- drainage of stormwater from development to Amundsen Street and away from the Georges River
- connection to mains sewer
- no new dwellings or outbuildings to be located on that part of the land, east of the ridgeline that traverses the site
- that part of the site between the ridgeline and Hansens Road to be revegetated with appropriate endemic species reflective of existing endangered ecological communities in the locality, in accordance with a vegetation rehabilitation/management plan, taking appropriate account of the management of bushfire risk
- a limit on the height of any future development to one storey only
- the design, siting and finish (materials and colours) of buildings and structures undertaken in such ways to minimise the visual prominence of development.

As Lots 1 and 2 were previously used for farming, an appropriate site contamination assessment would need to be carried out to establish whether or not any parts of the land need to be remediated. Such assessment would need to be carried out as part of the more detailed site investigation.

If Council were to support the investigation of additional limited development on the existing cleared land fronting Amundsen Street, in the terms described above, it would need to be made clear that such development is not a precedent for its consideration of other proposals for further encroachment into other parts of the Edgelands, for further subdivision and urban development.

Any such detailed investigation would need to be at no expense to Council and be submitted for formal consideration as soon as possible to enable co-ordination with Council's consideration of the preparation of the Comprehensive LEP."

Council subsequently resolved:

“That Council advise the owners of Lot 1 DP 795498 and Lot 2 DP 126471, Amundsen Street Leumeah, that it is prepared to consider the submission of a detailed investigation into the possible future development (for residential purposes) of part of the land, but only in accordance with the terms set out in the above report, and that such submission shall be received by Council by no later than 30 June 2012.”

Since that time Council staff have been working with the land owner and their consultants to identify the suitability and capability of the land for further residential development. While a preliminary submission was received within the specified timeframe, it was considered prudent to consider additional key constraints on the land being the heritage significance of the old farmhouse and the impact on the visual landscape, prior to preparing a more detailed planning proposal.

Detailed technical reports on these matters were completed in November 2013 and November 2014 respectively and form part of the submitted preliminary planning proposal recently lodged to rezone Lot 1, DP 795498, Lot 2, DP 126471, No 82 - 102 Amundsen Street Leumeah and Lot 1, DP 709918, No. 86 Amundsen Street Leumeah, to permit the development of the site for residential purposes. A location map of the proposed site is provided in Attachment 1.

As investigations into the suitability and capability of this land were progressing independently of the CLEP 2014, it was decided that the most effective way to progress this matter was by way of a separate planning proposal. Subsequently this site was listed as a ‘Deferred Matter’ in the draft CLEP 2014. Consequently Council received a preliminary planning proposal on behalf of the land owners in December 2014 and staff have since worked with the applicant to progress the planning proposal to this stage.

Councillors received a briefing on the proposed rezoning at Council's briefing night on 28 July 2015.

Report

Property Description: Lot 1, DP 795498, Lot 2, DP 126471, No 82 - 102 Amundsen Street Leumeah

Owner: Mrs Jessie Maude Newham and Mrs Edith Marie Clarke

Property Description: Lot 1, DP 709918, No. 86 Amundsen Street Leumeah

Owner: Mr William Leslie Toole and Mrs Alexandra Toole

Applicant: Michael Brown Planning Strategies

Council has received a preliminary planning proposal, on behalf of the two property owners, to rezone land at Amundsen Street Leumeah, to permit the development of the site for residential purposes.

The Site

The subject site includes Lot 1, DP 795498, and Lot 2, DP 126471, No 82 - 102 Amundsen Street Leumeah, owned by Mrs J. Newham and Mrs E. Clarke, and Lot 1, DP 709918, No. 86 Amundsen Street Leumeah, owned by Mr W. Toole and Mrs A. Toole. The site is

bounded by Leumeah Rd to the south, Hansens Rd to the east, Amundsen Street to the west and residential development within the suburb of Leumeah to the north as shown in Attachment 1.

The land uses that abut the site include Biehler Reserve on the southern side of Leumeah Road; three large residential lots (ranging in size from 10,400m² to 20,000m²) on the eastern side of Hansens Road; 13 rear facing standard residential lots set back approximately 15 metres from Amundsen Street to the west (these premises front Wyangala Crescent) and the Leumeah Baptist Church to the north. The total area of the subject site is 4.36 hectares.

Historically the site has been predominantly used for agricultural and grazing purposes and more recently for horse agistment. The site contains three main dwelling houses, one of which was the original farmhouse and has been the subject of a heritage assessment.

The site is currently vegetated with open grassland with some scattered trees located along the eastern boundary. The terrain is undulating and is dominated by a ridgeline along the western side of the site and a 2m-3.5m deep cutting abutting the Leumeah Road boundary.

Zoning

The current zoning of the subject site is 7(d4) - Environmental Protection, 2ha minimum under the provisions of Campbelltown (Urban Area) LEP 2002. The draft CLEP 2014 lists the site as a 'Deferred Matter'. The preliminary planning proposal aims to rezone the subject land to a residential zone and provide for subdivision into approximately 36 residential allotments (zoned R2 – Low Density Residential) with a range of allotment sizes from 500m² to 720m² and two allotments (zoned R5 – Large lot Residential) of 9778m² and 9435m². The proposal only seeks to amend the zoning of No.86 Amundsen Street with no plans being made for subdivision of this 1574m² lot at this stage. The proposal would result in a net increase of 35 lots with an estimated population of approximately 123 people.

Key Planning Issues

Visual

The site was identified in the draft report entitled "Visual Analysis of Campbelltown's Scenic Hills and East Edge Scenic Protection Lands" prepared in 2011 for Council by Paul Davies Pty Ltd in association with Geoffrey Britton (the Visual Study). The site is part of Unit 5 (E-LU5) in the Visual Study.

As mentioned above Council considered a report on the Visual Study at its meeting on 10 April 2012 and indicated that any such development proposal for that part of the subject land would need to be more fully investigated and achieve a master planned outcome including:

- drainage of stormwater from development to Amundsen Street and away from the Georges River
- connection to mains sewer
- no new dwellings or outbuildings to be located on that part of the land, east of the ridgeline that traverses the site
- that part of the site between the ridgeline and Hansens Road to be revegetated with appropriate endemic species reflective of existing endangered ecological communities in the locality, in accordance with a vegetation rehabilitation/management plan, taking appropriate account of the management of bushfire risk
- a limit on the height of any future development to one storey only
- the design, siting and finish (materials and colours) of buildings and structures undertaken in such ways to minimise the visual prominence of development.

With the above criteria in mind the applicant commissioned a detailed visual and landscape assessment of the land by HLS Pty Ltd (Landscape Architects) to conduct a site specific analysis of the site. The assessment recommends that the inclusion of the following design recommendations in the development will ensure that any visual effects will be minimised.

- Ensure Hansens Road is retained as a "Rural Road Construction standard" on the western verge, to maintain trees and reduce adverse visual impacts
- Ensure driveway locations and crossovers to the bushland interface lots are located to minimise vegetation removal.(It should be noted that only one access from Hansens Road is proposed)
- Installation of a rural style (post and rail or similar) fence, max 1200mm high, from the Hansens Road Roundabout splay, along the length of the Hansens Road frontage
- Preparation of a landscape plan for each future rural residential dwelling providing for a bushland setting and planting at the frontage of each dwelling
- Planting of the 8m wide dense native vegetation strip with canopy trees across the site for visual amenity value, plus a 7m wide cleared zone against rear fences. Plant at a density of $1/3\text{m}^2$ as per section "7.1 Suggested Plant List"
- Retention of a 30m wide vegetation zone along the Hansens Road frontage of the "bushland interface" lots
- Planting of a 15m wide canopy zone with trees at $1/3\text{m}^2$, on the roundabout splay to maintain views through trees to larger lot housing beyond, typical of the "bushland interface" within the unit
- Trees to be protected as per AS 4970-2009 Protection of Trees on Development Sites.
- Engage an Arborist to investigate health and determine Tree Protection Zones of two remaining large Eucalypts near the building envelope in larger lots to assist in locating buildings outside TPZs of large healthy trees
- In larger lots, site future dwellings within the nominated building zone, amongst the isolated scattered trees to enable the retention of all trees
- Buildings in larger lots are to be single storey, built in recessive colours to integrate with the bushland, with no high contrast colours or materials
- Planting of a 3m wide native screen planting strip at the top of the earth bank cutting along Leumeah Road to create a permanent screen in this location to replace short-lived wattles. Fence the developed side of the strip with 1800mm high lapped and capped timber fence for safety reasons
- Increase the planting in the 15m wide verge on the western side of Amundsen Street, within an 8m zone, 7m from rear fences, to fill gaps in the scattered tree planting and to create a softer ridgeline. This will also provide some screening between new residential lots and the rear of existing lots on Wyangala Crescent
- Where possible, minimise vegetation clearing for visual reasons. Plant at a density of $1/25\text{m}^2$ (at 5m intervals) as per section 7.1
- Locate services outside of the existing vegetated western verge of Hansens Road
- Minimise clearing for overhead electricity and telecommunication lines where lines cross the verge
- A maximum built height of 8.5m is recommended for those dwellings on the ridgeline, to ensure their visual impacts are minimised with screening by the proposed 15m high canopy trees.

These recommendations were used to produce a Landscape Concept Plan which resulted in the development of a draft indicative allotment plan (both in attachment 2), which will be refined and potentially modified based on the results of the required additional studies should the preliminary planning proposal progress.

Considering Council's criteria and the recommendations of the site specific visual and landscape analysis the following assessment can be made:

Stormwater Drainage – whilst this is discussed in further detail below, it is considered that the proposal can achieve Council's criteria and would be subject to further detailed analysis should the preliminary planning proposal progress.

Connection to mains sewer - whilst this is discussed in further detail below, it is considered that the proposal can achieve Council's criteria and would be subject to further detailed analysis should the preliminary planning proposal progress.

No structures east of the ridgeline – whilst it is proposed that approximately half of the standard residential allotments and two large lot residential allotments will be located beyond the ridge line the visual and landscape analysis recommends significant vegetative screening and building height controls to address any impacts. A building height of 8.5m is proposed, however this will not limit the height of a residential building to one storey as required by Council and a more appropriate building height would be 6.5m. These matters can be further refined should the preliminary planning proposal progress.

Revegetation of the site east of the ridgeline – The visual and landscape study recommends revegetation with appropriate endemic species reflective of existing endangered ecological communities in the locality. The location of vegetation on site will need to be further addressed as part of the management of bushfire risk which is recommended to be a required additional report should the preliminary planning proposal progress.

Building height of one storey – as discussed above a building height of 6.5m rather than the proposed 8.5m would be required to achieve this criteria and this will be refined should the preliminary planning proposal progress.

Building design, siting and finish – the visual and landscape assessment requires a landscape plan for each large residential allotment, a building height of one storey with recessive and no high contrasting building colours to be used. These controls along with a number of other building standards recommended by the visual and landscape assessment will (should the preliminary planning proposal progress) be incorporated into a site specific Development Control Plan for the site.

Therefore it is considered that given the above the issues of visual and landscape impacts can be addressed by way of additional controls which will be formalised and incorporated in future LEP and DCP amendments should the preliminary planning proposal progress.

Flora and Fauna

The site has been used for agricultural purposes for many years, and particularly for horse agistment and cattle grazing, which has resulted in only scattered canopy trees associated with Shale Sandstone Transition Forest on the eastern side of the ridge. It is proposed to retain (and supplement) as much existing significant vegetation as possible via the creation of the proposed large lots. While there have been no sightings of threatened species at the site there is the potential for Koalas and the Cumberland Plain Land Snail to exist on site.

At this stage, no assessment of potential threatened species has been undertaken; however, it is recommended that the Gateway Determination require a flora and fauna study to be completed.

Transport and Access

The draft indicative allotment layout proposes access to the majority of lots within the site via Amundsen Street which is a local road. The section of Amundsen Street which abuts the subject site currently contains a bitumen road without formalised kerb and gutter. The upgrade of this section of Amundsen Street will take place as part of any future subdivision applications of the land should the planning proposal progress.

Heritage - Non Indigenous

The subject lands are not listed as containing a heritage item, however, the farmhouse on Lot 2 DP 126471 No 102 Amundsen Street has some historical connections with the development of the area. In this regard John Oultram (Council Heritage and Design Consultant) undertook an assessment of the dwelling. The following summarises that assessment:

- The property is not representative of the early development of the area being built in 1928
- The property is representative of the type of Inter War smallholding found in many areas of outer Sydney that were purchased by local workers for hobby farms
- The house is of very limited significance
- The property would not meet the threshold for listing as a heritage item in the LEP
- The house and property have no features of note that would require retention.

The report recommends that, if the cottage is to be demolished:

1. It be the subject of archival photographic recording in accordance with the Heritage Branch guidelines for digital capture.
2. An oral history be taken from the current occupier of the property detailing its later history, development and use.
3. These records (and a copy of this report) be lodged with a suitable archive (e.g. the Local History Library).

Given the above it is considered subject to the above recommendations being implemented by the applicant that non-indigenous heritage is not a constraint to the future rezoning of the land.

Heritage - Indigenous

At this stage detailed investigation into indigenous heritage have not been undertaken however further investigation and consultation with Aboriginal stakeholders would be required as part of the preparation of documentation to support the proposed rezoning of the site, should Council decide to support the proposal. A search of the Office of the Environment and Heritage Aboriginal Heritage Information Management System has shown that there are no records of Aboriginal sites or places in or near the site.

Servicing

Initial investigations have indicated that the adjacent residential areas are serviced with water, sewer, stormwater drainage and electricity. However, further confirmation would be required prior to the rezoning of the subject land. With the exception of the two large residential lots, which are suitably sized to accommodate stormwater disposal on site, all of the remaining lots fall way from the Georges River.

Community Infrastructure

Given the minimal impact in population resulting from the proposed rezoning it is considered that the additional demand on services could be accommodated within the existing community services/facilities in adjoining suburbs (e.g. schools and playing fields).

Land Contamination

At this stage detailed investigation into land contamination have not been undertaken however further investigation would be required to confirm that there is no contamination on the site and confirm its suitability for residential development, should Council decide to support the proposal.

Conclusion

The rezoning of the subject site presents an opportunity for the delivery of additional residential land within the Campbelltown LGA.

The planning proposal process under which this rezoning is being considered, is designed to ensure that preliminary information provided in support of the planning proposal (rezoning), is provided to a level that enables the Council to make a decision on whether or not the proposal has sufficient merit for progression through to the Department of Planning and Environment's Gateway Panel.

The Gateway Panel's purpose is to make a decision (determination) on whether or not the draft planning proposal lodged by the Council has sufficient merit to move to stage 2 of the process, being the detailed assessment and exhibition stage. As this planning proposal is in the first stage of the planning proposal assessment process, Council needs to be initially satisfied that the proposal has sufficient merit, before such a proposal is forwarded to the Gateway for its determination.

In this regard, based on the information provided by the applicant to date, Council officers have deemed it appropriate to prepare a draft planning proposal for Council's consideration and subject to the endorsement of the Council, its lodgement with the Department of Planning and Environment for determination by the Gateway Panel (see draft planning proposal at Attachment 3).

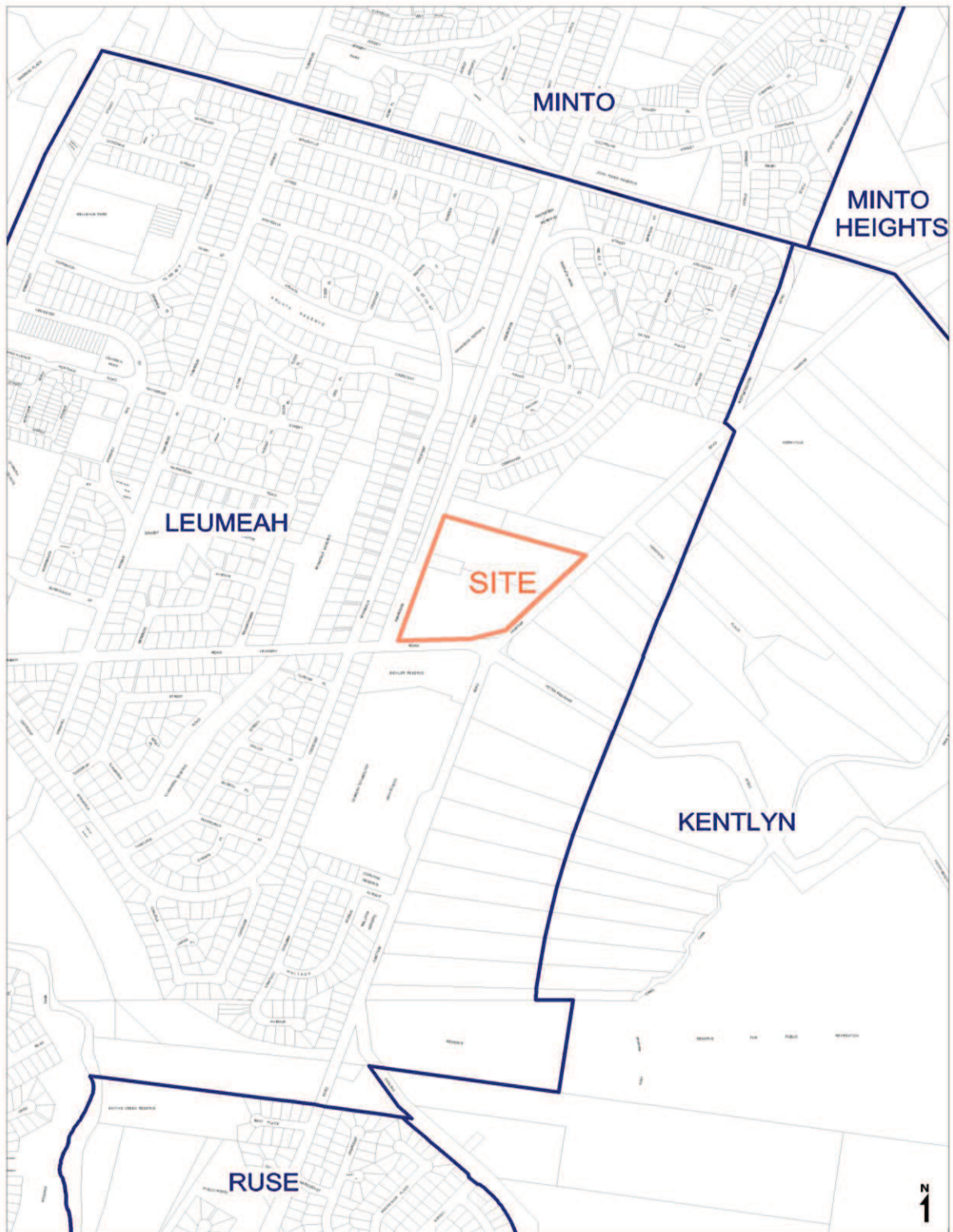
On receipt of a draft planning proposal, the Gateway Panel will consider the draft proposal and will determine whether or not the draft proposal should proceed to full assessment and exhibition, and if so, under what circumstances. If the draft planning proposal is supported by the Gateway Panel and it determines that the proposal can proceed to the next stage, then the Gateway determination will advise what further studies are required, which State or Commonwealth Public Authorities will need to be consulted, and the times within which the various stages of the procedure for the making of the proposed rezoning plan (LEP) are to be completed, including the sequencing of the public exhibition. These studies will need to address in detail, the key planning issues discussed in this report, e.g. flora and fauna, bushfire risk, indigenous heritage, contamination and any additional matters required by the Gateway Panel.

Where the draft planning proposal is supported by both the Council and the Gateway Panel, subject to the applicant satisfying the conditions of any Gateway approval, a further report will be prepared for Council's consideration prior to the public exhibition of any planning documentation for this proposed rezoning.

Officer's Recommendation

1. That Council forward the draft planning proposal for the rezoning of Lot 1, DP 795498, Lot 2, DP 126471 and Lot 1, DP 709918, Amundsen Street, Leumeah, to the Department of Planning and Environment for a Gateway Determination.
2. That Council advise the applicant of Council's decision.

ATTACHMENT 1



Location Plan

Proposed Rezoning of Land - Amundsen Street LEUMEAH

ATTACHMENT 2

Part 1 - Landscape Concept Plan



Figure 7: Landscape Concept Plan

ATTACHMENT 3

Planning Proposal

Subject: 1. Draft Campbelltown (Urban Area) Local Environmental Plan 2002 – Amendment No 29 – Leumeah or
2. Draft Campbelltown Local Environmental Plan 2014 – Amendment No. 1

Part 1 – Objectives or Intended Outcomes

The objective of this planning proposal is to enable 43,624m² of environmental protection land at Leumeah to be developed for approximately 35 residential allotments.

Part 2 – Explanation of the Provisions

The planning proposal applies to land at Leumeah known as Lot 1, DP 795498, Lot 2, DP 126471 and Lot 1, DP 709918, Amundsen Street, Leumeah. A location map is shown at attachment 1.

The subject site is currently zoned Environmental Protection under the provisions of Environmental Planning Instrument (EPI) *Campbelltown (Urban Area) Local Environmental Plan 2002* (CLEP 2002) with a minimum residential subdivision standard of 2 hectares. A copy of the existing zoning map is shown at attachment 2.

The main EPI for the Campbelltown Local Government Area is *Campbelltown (Urban Area) Local Environmental Plan 2002* (CLEP 2002) which is currently being incorporated into the draft *Campbelltown Local Environmental Plan 2014* (CLEP 2014). The subject site is currently listed as a 'Deferred Matter' under the draft CLEP 2014.

Depending on the timing of the completion of the draft CLEP 2014 this planning proposal may become an amendment to CLEP 2014.

A number of detailed technical studies would be required to be prepared to inform a final planning proposal. These would include the following matters:

- Flora and fauna
- Transport and access
- Indigenous heritage
- Bushfire risk
- Contamination
- Geotechnical conditions
- Infrastructure, Stormwater and Sewer Services

The outcome of these studies would be used to define the zone boundaries and applicable planning controls within the subject site, and the final planning proposal would include the proposed amendments to CLEP 2002 or draft CLEP 2014 that would be required to accommodate these changes.

Part 3 – Justification

Section A – Need for the planning proposal

1. Is the planning proposal a result of any strategic study or report?

While the planning proposal is not a result of any strategic study or report, it will however deliver on a number of outcomes consistent with both state and local government planning documents including:

- Conservation and enhancement of the natural landscape
- Utilization and embellishment of existing physical and human infrastructure
- Contributing housing stock to help meet housing targets provided in the Sydney Metropolitan Strategy
- Promoting housing choice and diversity thereby responding to the needs of Campbelltown's community.

As noted in Part 2 further technical studies will be prepared to ensure that the subject site is capable of being developed for residential purposes.

2. Is the planning proposal the best means of achieving the objectives or intended outcomes, or is there a better way?

Council is towards the end of the process of preparing a comprehensive local environmental plan (CLEP 2014) under the provisions of the Standard Instrument – Principal Local Environmental Plan, to cover the entire Campbelltown Local Government Area. As sufficient information to justify the change in zoning of the land was not available at the time of advertising the CLEP 2014 it was considered that the best means of achieving the rezoning of the land was via an independent planning proposal. Depending on timing of the progress of CLEP the proposal is to either amend *Campbelltown (Urban Area) Local Environmental Plan 2002* or CLEP 2014.

3. Will the net community benefit outweigh the cost of implementing and administering the planning proposal?

The planning proposal would result in a modest increase in the supply of new housing located on the eastern boundary of the Campbelltown urban area, and within close proximity to the major regional city centre of Campbelltown/Macarthur. This is compatible with the State Government's desire for the release of additional residential land on the fringes of existing urban areas.

There will be no need for new infrastructure to service the proposed additional 35 residential allotments beyond that provided by the developer. This development will therefore be at no cost to Government at any level.

It is anticipated that the net community benefit of the planning proposal in providing much needed housing for the population growth of Sydney would outweigh any implementation and administration costs involved.

Section B – Relationship to strategic planning framework

4. Is the planning proposal consistent with the objectives and actions contained within the applicable regional or sub-regional strategy (including the Sydney Metropolitan Strategy and exhibited draft strategies).

Metropolitan Plan for Sydney 2036

The Metropolitan Plan for Sydney 2036 (MPS) recognises that there will be a need for 770,000 additional homes by 2036.

Draft South West Subregional Strategy

The draft South West Subregional Strategy (SWSS) aims to provide 24,653 additional dwellings by 2031, with 4,700 of these dwellings proposed to be developed in greenfield sites within the Campbelltown LGA.

A Plan for Growing Sydney (New Metro Plan)

This Plan was announced on 14 December 2014 and contains a number of key actions, goals and directions to drive Sydney's growth to 2031.

Of relevance to this planning proposal is Goal 2: A city of housing choice, with homes that meet our needs and lifestyles. Under Goal 2 there are four Directions as follows:

Direction 2.1: Accelerate housing supply across Sydney

Direction 2.2: Accelerate urban renewal across Sydney – providing homes closer to jobs

Direction 2.3: Improve housing choice to suit different needs and lifestyles

Direction 2.4: Deliver timely and well planned greenfield precincts and housing

As this planning proposal aims to provide 35 residential allotments on the eastern boundary of the Campbelltown urban area, it is considered that it is consistent with the aims of the MPS, draft SWSS and the New Metro Plan.

5. Is the planning proposal consistent with the local council's Community Strategic Plan, or other local strategic plan?

The planning proposal is not inconsistent with the *Campbelltown 2025 Looking Forward* long term town planning strategy, nor with the draft *Local Planning Strategy*, as the planning proposal seeks a rezoning outcome that is consistent with the surrounding land uses. The planning proposal is also not inconsistent with Campbelltown's draft *Community Strategic Plan 2012 - 2022*, which contains an objective of a strong local economy.

Council's Residential Strategy accompanies a suite of planning documents to support draft CLEP 2014. The Strategy has the following recommendations:

"The Residential Strategy Review and this emergent Strategy indicate that future dwelling targets for 2031 can be achieved with current zonings, their minor rationalisation and the release of identified greenfields and incremental phasing of new centres and transit focused infill growth nodes.

Additionally, the need for diverse housing forms, adaptable housing and more affordable housing should be acknowledged.”

It is considered that the proposed development of the land is consistent with the above recommendations as this Planning Proposal seeks to rezone for a range of residential purposes via a minor rationalisation of existing zones using a master planning approach.

6. Is the planning proposal consistent with applicable state environmental planning policies?

It is considered that the planning proposal is consistent with all applicable state environmental planning policies (SEPPs) being:

SEPP No 55 – Remediation of Land

SEPP No 60 – Exempt and Complying Development

SEPP Affordable Rental Housing 2009

SEPP, Building Sustainability Index – BASIX 2004

SEPP Exempt and Complying Development Codes 2008

SEPP Housing for Seniors or People with a Disability 2004

Deemed SEPP No 2 (SREP 2) – Georges River Catchment

However, please note that the technical studies required to be prepared to inform the final planning proposal for public exhibition purposes, would address the issue of consistency with all relevant SEPPs.

7. Is the planning proposal consistent with applicable Ministerial Directions (s117 directions)?

It is considered that the planning proposal is either consistent or justifiably inconsistent with all applicable s117 directions being:

1.5 Rural Lands

2.1 Environment Protection Zones

2.3 Heritage Conservation

3.1 Residential Zones

3.3 Home Occupations

3.4 Integrating Land Use and Transport

4.4 Planning for Bushfire Protection

6.1 Approval and Referral Requirements

6.3 Site Specific Provisions

7.1 Implementation of the Metropolitan Plan for Sydney 2036).

Please also note that the technical studies required to be prepared to inform the final planning proposal for public exhibition purposes would address the issue of consistency with all relevant s117 directions.

Section C – Environmental, social and economic impact.

8. Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the proposal?

The ecological values of the subject site are highly degraded due to extensive clearing, and continuing agricultural activities. However, the site does exhibit some canopy trees consistent with Shale Sandstone vegetation, which is proposed to be retained and supplemented with additional plantings. Whilst there have been no sightings of threatened species on site there is the potential for Koalas and the Cumberland Plain Land Snail to exist on site. These issues would be addressed in the relevant technical studies required for the final planning proposal.

9. Are there any other likely environmental effects as a result of the planning proposal and how are they proposed to be managed?

Other likely environmental effects such as bushfire hazard would be addressed within the relevant technical studies required for the final planning proposal.

10. How has the planning proposal adequately addressed any social and economic effects?

The planning proposal aims to provide additional housing within easy access of the regional city centre of Campbelltown/Macarthur. It also aims to provide additional housing adjacent to existing residential areas within easy access to public transport services / routes, and community facilities and amenities. With the limited number of additional lots created it is considered that the additional demand on services could be accommodated within the existing community services/facilities in adjoining suburbs (e.g. schools and playing fields).

Section D – State and Commonwealth interests.

11. Is there adequate public infrastructure for the planning proposal?

Initial investigations have noted that the adjoining residential areas adjoining this site can be serviced with water, sewer, stormwater drainage, electricity and telecommunication facilities. However, the relevant technical studies required for the final planning proposal would address availability of adequate public infrastructure to service the proposed future development of this site.

12. What are the views of State and Commonwealth public authorities consulted in accordance with the gateway determination?

This issue should be addressed when Council receives the gateway determination as part of the community consultation phase of the planning proposal.

Part 4 – Community Consultation

It is considered that a public exhibition period of a minimum of 28 days should be undertaken, however ultimately this will be a matter for the Gateway Determination.