

7 August 2018



Mr Gerard Turrisi
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HABERFIELD NSW 2045

By email: gerard@gatassoc.com.au

Dear Sir,

Draft Planning Proposal 500/2018/E-LEPA - 71 St Andrews Road Varroville

I refer to the abovementioned application considered by the Campbelltown Local Planning Panel at its meeting of 25 July 2018. Thank you for your direct representation to the Panel at this meeting.

A review of the application has been undertaken having regard to the advice provided by the Local Planning Panel (attached), and the relevant guidelines for the preparation of planning proposals published by the Department of Planning and Environment (DPE). Prior to Council considering a report on whether to progress the draft proposal to the DPE for Gateway Determination, the following issues are raised for your consideration and reply as appropriate.

1. Consistency with Higher Order Strategic Plans

The Local Planning Panel has requested that additional details are provided to address the current strategic framework established by the Western City District Plan. This request is in accordance with Section 3.8 of the Act which requires that in preparing a planning proposal, the planning proposal authority is to give effect to any district strategic plan applying to the local government area to which the planning proposal relates.

The current proposal does not demonstrate consistency with the Metropolitan Rural Area (MRA), identified under both the Greater Sydney Region Plan 2018 and the Sydney West District Plan. Objective 29 of the Greater Sydney Region Plan states that urban development is not consistent with the values of the MRA. This objective is reflected in Action 79 of the Western City District Plan which limits urban development within the MRA. These outcomes are currently secured through the existing E3 Environmental Management zoning of the site under Campbelltown Local Environmental Plan 2015.

2. Compatibility of E3 Zone with Future Biobanking Area (Conservation Stewardship Site)

The Panel considers that an E3 Environmental Management zoning may not adequately secure the long term ecological integrity of the lands to be retained for environmental purposes.

It is suggested that an E2 Environmental Conservation zone would likely be more compatible with any future biodiversity offset proposed. In addition, it is considered that an alternate zoning of the riparian corridor may be appropriate to better assimilate with the adjoining Willowdale subdivision, given the multi-functional purpose of this area to act as a public open space connection, drainage system and asset protection zone.

3. Ecological Assessment

The fauna and assessment report (Travers: February 2018) appears to underestimate the extent and quality of Cumberland Plain Woodland (CPW) on the site having regard to the field survey method guidelines of the NSW Office of Environment and Heritage. Therefore, the ecological assessment should be revised to comply with relevant legislation, and to properly inform any required biodiversity offsets. It is requested that your ecological consultant directly liaise with Council staff to further explore and resolve this matter.

4. Vehicular Access

Concern is raised regarding the feasibility of road access via the Cornish subdivision given the consent condition of DA 842/2014 issued by Camden Council. Accordingly, the proposal should address the opportunities to provide flood free access via the unformed section of St Andrews Road. The traffic study should also be updated to inform future consultation with Camden Council.

5. Bushfire

The requirement to manage the electrical easement as an asset protection zone will be dependent upon the electrical authority supporting this outcome. Access to the proposed R2 Residential Zone by a single road link would result in a potential bottleneck which is not recommended by the Planning for Bushfire Protection Guidelines 2006. This matter will require consultation and verification from the NSW Rural Fire Service.

The presumption of a dwelling entitlement for the residual E3 zone and biodiversity corridor is not supported due to likely ecological conflicts with vegetation clearance associated with the required asset protection zone, access driveway, and service connections. This issue should be addressed by nominating an alternate environmental zoning as raised by the Local Planning Panel.

6. Flooding / Stormwater Issues

The behaviour of stormwater in the vicinity of the site has changed due to development in the adjoining Cornish Subdivision and Emerald Hill Estates. Therefore, the stormwater and flooding analysis should be updated to consider these changes on the surrounding landscape, match stormwater capacity of the existing riparian corridor in the downstream Willowdale Estate, and demonstrate safe passage of the probable maximum flood (PMF) through the subject land post-development. Flood free lots need only be above the flood planning level. PMF level requires safe evacuation routes.

This may require a significant amount of filling and associated retaining walls to provide flood free lots. It is also considered preferable that stormwater is discharged into the riparian corridor through the proposed R2 lands rather than the biodiversity area.

Upon receipt of a satisfactory response to the above matters, a report will be scheduled for the next available meeting of Council. Should you have any questions, please contact Council's Senior Strategic Planner, Jeff Burton on 4645 4842.

Yours sincerely



Fletcher Rayner
Executive Manager
Urban Release and Engagement