

8 May 2020

General Manager
Campbelltown City Council
91 Queens St
Campbelltown NSW 2560

By Email to: Ante.Zekanoivc@campbelltown.nsw.au

Planning Proposal for amendments to Campbelltown Local Environmental Plan 2015

Thank you for the opportunity to provide comments on the above Planning Proposal for amendments to the Campbelltown Local Environmental Plan. I am writing on behalf of the Australian Botanic Garden Mount Annan (ABGMA) which is part of the Royal Botanic Gardens and Domain Trust.

The ABGMA, is arguably the most significant recreational and tourist destination in the south west of Sydney. Established as a bicentennial project 30 years ago, is Australia's largest botanic garden at 416 hectares and specialises in showcasing and conserving Australian flora. The Australian PlantBank, built in 2013 at a cost of \$19.8 million, has recently received an international award placing it amongst the best in the world. Last year, the NSW Government committed a further \$60 million to build an Herbarium and science institute, the Australian Institute of Botanical Science (formerly the Centre of Innovation in Plant Sciences) at the ABGMA. The completion of this innovative science precinct will firmly place ABGMA and the Trust as one of the leading botanic institutes in the world dedicated to horticulture and conservation research.

As a key stakeholder the Trust has a particular interest in the LEP and how it might be viewed in the proposed amendments and how those provisions have the potential to affect the Garden. We would welcome therefore the opportunity to comment on the proposed amendments to the CLEP.

After reviewing the proposed amendments in its entirety, most do not apply to ABGMA however two of the proposed changes that do directly affect the Garden are:

1. Clause 7.6 - Preservation of the Scenic Hills

We note the provisions included may constrain the Trust's ability to consider appropriate developments in this area. Nevertheless, we understand the heritage importance of the scenic hills landscape and support its recognition through the proposed amendments.

The Trust reserves the right to further respond once community consultation has been undertaken.



2. Clause 7.2 – Expansion of the Terrestrial Biodiversity mapping

It would appear from the map there is a significant area within ABGMA which is designated as significant vegetation however the vegetation identified is African olive. This is considered a noxious weed infestation which the garden has been progressively removing. It should not therefore be designated in the expansion of the terrestrial biodiversity mapping as significant vegetation. Reconsideration of the designation of this area is recommended.

The Botanic Gardens & Centennial Parklands, as part of the Department of Planning, Industry and Environment's Place Design and Public Places portfolio, looks forward to working with Council to firmly establish the Australian Botanic Garden Mount Annan as a key scientific, conservation, recreation and tourist destination at the southern gateway to the Western Parkland City.

Should you have any further enquiries regarding this matter please contact our Planning Project Manager, Louise Farley, on telephone 4634 7957 or email louise.farley@bgcp.nsw.gov.au.

Yours sincerely,



Per

George Salouros

Director Planning, Projects and Commercial Development



The Australian
BOTANIC GARDEN
Mount Annan

Record Reference: 20/134637

14 May 2020

General Manager
Campbelltown City Council
PO Box 57
Campbelltown NSW 2560

Dear Sir/Madam,

RE: REVIEW OF CAMPBELLTOWN LOCAL ENVIRONMENTAL PLAN 2015 PLANNING PROPOSAL

Thank you for the opportunity to review the Planning Proposal which seeks to amend the Campbelltown Local Environmental Plan 2015 to align with the planning priorities of the Western City District Plan.

Council officers have considered the Planning Proposal and associated attachments and offer no objection to the proposal.

The Camden LEP Review project has identified the need for a Visual and Scenic Analysis to be undertaken to inform the Stage 2 Planning Proposal to amend Camden LEP 2010. The Scenic Hills Preservation Area will be included in this analysis. Campbelltown Council will be consulted when this amendment is on public exhibition.

If you have any questions regarding the above, please do not hesitate to contact Martin Cooper, Manager Strategic Planning on (02) 4654 7620.

Yours sincerely,

A handwritten signature in black ink, appearing to read "M. Cooper".

Martin Cooper
Manager Strategic Planning

Our ref: DOC20/327503

Senders ref: Planning Proposal – LEP Review

Ante Zekanovic
Senior Strategic Planner
Council's City Development Division
PO BOX 57
Campbelltown NSW 2560

Dear Sir/Madame,

Subject: Planning Proposal – Review of Campbelltown Local Environmental Plan 2015

Thank you for your letter received 28 April 2020 requesting input from Environment, Energy and Science Group (EES) in the Department of Planning, Industry and Environment on the planning proposal which seeks to amend *Campbelltown Local Environmental Plan (CLEP) 2015* to facilitate the following amendments:

- align CLEP 2015 with the City District Plan, and
- repeal other LEP's and Interim Development Orders so that only one LEP applies to the whole local government area.

EES has reviewed the supporting documentation that you have provided and in principle supports the planning proposal and make the following comments.

Terrestrial Biodiversity Map

- EES recommends that a review of Lot 1 DP 603675, (part) Lot 101 DP 842937 and Lot 102 DP 842937 be undertaken for inclusion as 'biodiversity – significant vegetation'. This area is mapped as Shale Sandstone Transition Forest by *The Native Vegetation of the Sydney Metropolitan Area* (OEH 2016) and it is unclear why it has been omitted from the preliminary draft mapping for 'biodiversity – significant vegetation'.
- EES recommends reducing the thickness of the 'LGA Boundary' because it is obscuring some of the 'biodiversity – significant vegetation' mapping.
- EES recommends periodically reviewing the Terrestrial Biodiversity Map to update the LEP with improved mapping of 'biodiversity – significant vegetation'.

Clause 7.20 of the CLEP 2015

EES recommends that Council consider developing a local offsetting strategy to address impacts that do not exceed the Biodiversity Offset Scheme thresholds.

General Comment

EES recommends that Council consider developing mapping to identify areas of urban tree canopy that are providing benefits for climate and native species habitat. EES notes there has been some modelling undertaken of urban tree canopy cover, which is available on the SEED website, i.e. <https://datasets.seed.nsw.gov.au/dataset/greater-sydney-region-urban-vegetation-cover-to-modified-mesh-block>.

Should you have any queries regarding this matter, please contact Bronwyn Smith, Senior Conservation Planning Officer on 9873 8604 or Bronwyn.smith@environment.nsw.gov.au

Yours sincerely

A handwritten signature in black ink that reads "S. Harrison". The signature is written in a cursive, flowing style.

06/05/20

Susan Harrison

**Senior Team Leader Planning
Greater Sydney Branch
Climate Change and Sustainability**



NSW RURAL FIRE SERVICE

Campbelltown City Council
PO Box 57
CAMPBELLTOWN NSW 2560

Your reference: CLEP2015
Our reference: SPI20200306000035

ATTENTION: Ante Zekanovic

Date: Wednesday 18 March 2020

Dear Sir/Madam,

Strategic Planning Instrument

Draft LEP – Planning Proposal

Review of Campbelltown Local Environmental Plan 2015 Planning Portal

I refer to your correspondence dated 03/03/2020 inviting the NSW Rural Fire Service (NSW RFS) to comment on the above Strategic Planning document.

The NSW RFS has considered the information submitted and provides the following comments.

The NSW Rural Fire Service has no objections and raises no concerns in relation to bush fire involved in the proposed amendments to *Campbelltown Local Environmental Plan (LEP) 2015* and the repeal of *Campbelltown (Urban Area) Local Environmental Plan 2002*, *Campbelltown Local Environmental Plan – District 8 (Central Hills Lands)* and Interim Development Order 15 July 2019.

The proposed amendments to the LEP would not have any negative impacts on bush fire planning as noted in *Section 4 Hazard and Risk section 4.4 Planning for Bushfire Protection*. The proposed amendments are considered to be consistent (Section 6) with the Ministerial Directions (s9.1 directions), with no changes or alteration to Councils Bush Fire Prone Land map but only to the Land Zoning, Heritage, Height of Buildings and Lot size maps.

It is noted that the terrestrial biodiversity mapping applicable to the Local Government Area is revised as part of the LEP review. In this regard, any future development on bush fire prone land which are adjacent to or retains biodiversity constrained areas need to specifically consider its compliance with the provisions relevant to the development in accordance with *Planning for Bush Fire Protection 2019* and *Australian Standard 3959 2018 Construction of Buildings in Bushfire Prone Areas*. The requirements for the management of asset protection zones generally conflict with the provisions for biodiversity conservation.

For any queries regarding this correspondence, please contact Craig Casey on 1300 NSW RFS.

Yours sincerely,

Kalpana Varghese

Postal address

NSW Rural Fire Service
Locked Bag 17
GRANVILLE NSW 2142

Street address

NSW Rural Fire Service
4 Murray Rose Ave
SYDNEY OLYMPIC PARK NSW 2127

T (02) 8741 5555
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General Manager
Campbelltown City Council
PO Box 57
Campbelltown NSW 2560
council@campbelltown.nsw.gov.au

Dear Ms Deitz,

Thank you for the opportunity to comment on the Planning Proposal to amend Campbelltown Local Environmental Plan (CLEP) 2015.

South Western Sydney Local Health District (SWSLHD) recognises that the built and social environment can significantly influence health and wellbeing outcomes and acknowledges the important role the CLEP has in achieving a safe, active, healthy and connected community.

We are extremely pleased to see the inclusion of a health aim and health objectives in the proposed amendments to the CLEP. SWSLHD has worked with Campbelltown City Council on the Health Impact Assessment addressing proposed density changes and believes that the inclusion of a health aim and objectives in the CLEP will help to ensure that development is located appropriately, positively supports healthy living and minimises negative health impacts.

Population Health, SWSLHD would also be interested in supporting Council with a Health and Wellbeing Strategy for any new master planned greenfield developments to further explore how health is incorporated into planning processes below the LEP. Wollondilly Shire Council have recently developed such a strategy for Wilton.

The following comments and recommendations are designed to provide constructive feedback on the proposed amendments to the CLEP. Should you require further information, please contact Jennie Pry, Manager Healthy Places SWSLHD at Jennie.Pry@health.nsw.gov.au.

Regards,

Mandy Williams
Acting Director Population Health

South Western Sydney Local Health District acknowledges the traditional owners of the land.

General Correspondence

Email: SWSLHD-ESU@health.nsw.gov.au

Website: www.swsllhd.health.nsw.gov.au

South Western Sydney Local Health District

ABN 46 738 965 845

Liverpool Hospital Eastern Campus
Locked Bag 7279 Liverpool BC 1871
Tel 612 8738 6000 Fax 612 8738 6001

Draft Planning Proposal Campbelltown Local Environmental Plan (LEP) Review

Section/Heading /Page Number	Comments/Recommendations
Inclusion of additional aims under Clause 1.2 of CLEP	<p>The Aims of the CLEP should include language that demonstrates a clear commitment to a safe, active, healthy and connected community as outlined in the Campbelltown Local Strategic Planning Statement. Promoting health considerations within planning is also consistent with the Western District Plan.</p> <p>Suggested wording for the Aim:</p> <p>“to protect and promote the health and wellbeing of current and future residents of Campbelltown”</p>
Inclusion of health objectives in certain zones	<p>The zone objectives should include language that demonstrates a clear commitment to promoting healthy living in Campbelltown, and is consistent with the health aim. Suggested objectives below also take into consideration current language in the CLEP.</p> <p>Zone, R2, Low Density Residential, Zone R3 Medium Density Residential, Zone R4 High Density Residential, and Zone R5 Large Lot Residential</p> <ul style="list-style-type: none"> - To achieve healthy, accessible, attractive, and safe residential areas <p>Zone B1 Neighbourhood Centre</p> <ul style="list-style-type: none"> - To achieve healthy, accessible, attractive and safe neighbourhood centres <p>Zone B2 Local Centre</p> <ul style="list-style-type: none"> - To achieve healthy, accessible, attractive and safe local centres <p>Zone B3 Commercial Core</p> <ul style="list-style-type: none"> - To achieve healthy, accessible, attractive and safe commercial cores <p>Zone B4 Mixed Use</p> <ul style="list-style-type: none"> - To achieve healthy, accessible, attractive and safe mixed use areas. <p>Zone B5 Business Development</p> <ul style="list-style-type: none"> - To maximise public transport patronage and encourage walking and cycling. - To achieve healthy, accessible, attractive and safe business areas <p>Zone B7 Business Park</p> <ul style="list-style-type: none"> - To maximise public transport patronage and encourage walking and cycling. - To achieve healthy, accessible, attractive and safe business areas

Section/Heading /Page Number	Comments/Recommendations
	<p>While the draft planning proposal only proposes health objectives in the residential and business zones, SWSLHD would like to see health considered in other zone objectives too. This is consistent with the Campbelltown LSPS and actions to assist in achieving net-zero greenhouse gas emissions.</p> <p>Examples are listed below.</p> <p>Zone RU2 Rural Landscape, Zone RU5 Village, and Zone RU6 Transition:</p> <ul style="list-style-type: none"> - To promote healthy living by ensuring that land is available for local production and consumption of fresh foods (e.g. artisan food and drink industry, roadside stalls, markets) <p>Zone IN1 General Industrial and Zone IN2 Light Industrial</p> <ul style="list-style-type: none"> - To maximise public transport patronage and encourage walking and cycling. <p>Zone RE1 Public Recreation</p> <ul style="list-style-type: none"> - To maximise public transport patronage and encourage walking and cycling. <p>Zone RE2 Private Recreation</p> <ul style="list-style-type: none"> - To maximise public transport patronage and encourage walking and cycling.

8 May 2020

Contact: *Stuart Little*
Telephone: *02 9865 2449*
Our ref: *D2020/35925*

General Manager
Campbelltown City Council
PO Box 57
CAMPBELLTOWN NSW 2560

Attention: Ante Zekanovic

Dear Sir/Madam,

RE: Planning Proposal to amend Campbelltown Local Environmental Plan 2015

I refer to the recent public exhibition of the Planning Proposal to amend Campbelltown Local Environmental Plan 2015 (CLEP 2015), which has the primary objective of ensuring that the CLEP is consistent with the directions of the Western City District Plan.

WaterNSW notes that the Proposal seeks to repeal other LEPs and Interim Development Orders (IDOs), which apply to various 'deferred matters' so that only one LEP applies to the Campbelltown Local Government Area (LGA). Other changes are also proposed to protect the environment, incorporate health objectives, protect the scenic hills and amend other clauses contained within the CLEP 2015.

As raised in our 2019 submission to the Draft Local Strategic Planning Statement (LSPS), WaterNSW's Upper Canal corridor traverses through Council's LGA. The Canal conveys bulk water from Pheasants Nest and Broughton Pass Weirs through to Sydney Water's water filtration plant at Prospect Reservoir. The Upper Canal corridor is a Controlled Area declared under the *Water NSW Act 2014* and *Water NSW Regulation 2013*, and public access is prohibited.

In addition, approximately 1,170 ha of the Campbelltown LGA (south-eastern part) overlaps with the Sydney Drinking Water Catchment. This includes part of the Woronora Special Area and Lake Woronora water storage area (Woronora Dam), which are owned and managed by WaterNSW. These areas are designated as Schedule 1 Special Area under the *Water NSW Act 2014* and *Water NSW Regulation 2013*. Both the Upper Canal and Lake Woronora (forming part of the item known as 'Woronora Dam') have State Heritage significance and are listed under Schedule 5 of the CLEP.

General

It appears that the Planning Proposal is responding directly to the District Plan rather than the Local Strategic Planning Statement (LSPS) which is given limited attention in the Planning Proposal. WaterNSW requests clarification as to whether an additional LEP Review is proposed as informed by all the provisions of the new LSPS.

Biodiversity Mapping

As part of the LEP review process, Council is proposing to expand its Terrestrial Biodiversity Mapping that gives effect to Clause 7.20 Terrestrial Biodiversity of Campbelltown LEP 2015. In summary this clause provides ecologically-based heads of consideration that need to be

considered before consent is issued. These include requirements for developments to avoid, minimise, mitigate and offset impacts to terrestrial biodiversity.

The biodiversity mapping includes that part of the Woronora Special Area that occurs within the Campbelltown LGA (excluding the Reservoir), parts of the Upper Canal Corridor, and other land adjoining the Corridor. The extension of the biodiversity mapping across the LGA supports management objectives of the Special Area to protect water quality and maintain ecological integrity. In addition, it will also help reduce development pressure on the Upper Canal, thereby protecting the Corridor and water quality within the Canal.

However, WaterNSW is concerned that the biodiversity mapping includes areas within the Upper Canal Corridor. WaterNSW requests Council exclude the Upper Canal Corridor from the biodiversity mapping, as the Corridor provides critical water supply infrastructure and is primarily managed for water supply purposes. The mapping may raise community expectations that parts of the Corridor need to be managed for biodiversity conservation purposes rather than for water supply. Any biodiversity outcomes need to be secondary to the primary purpose of water supply. Vegetation along the corridor may need to be removed for operational and maintenance purposes or for future water supply augmentation.

To improve biodiversity outcomes, WaterNSW is willing to work with Council to help facilitate the use of natural wildlife corridors where these already occur in the landscape. This includes where the Canal lies underground in a tunnel, and natural wildlife habitat corridor linkages occur at the surface, and where naturally vegetated gullies are traversed by an aqueduct.

In southern Campbelltown, east of the Hume Highway, there are two tunnels and five aqueducts areas that may help facilitate the east-west movement of fauna. We identified these areas in previous correspondence to Council dated 23 February 2018 regarding the Natural Assets Corridors. The following points raised in that correspondence are also relevant:

- The Upper Canal is zoned SP2 Water Supply System, enabling the water supply to be operated and maintained without the need for development consent. WaterNSW requires this SP2 zoning to be retained.
- WaterNSW has been undertaking a fencing replacement program along sections of the Upper Canal which may impede the movement of fauna. The fencing replacement terminates at the bridges associated with each of the aqueducts. Bushland in these gullies can act as wildlife corridors to facilitate the east-west movement of land-based fauna.
- Opportunities should be encouraged to direct land-based fauna away from the open water parts of the Upper Canal in order to avoid drownings and water quality impacts.

WaterNSW also makes the following comments on the biodiversity mapping:

- The Proposal would benefit by:
 - explaining how the biodiversity mapping relates to other biodiversity initiatives undertaken by Council, including previous Natural Asset Corridor mapping and associated principles, and
 - more clearly articulating the scale of resolution and criteria used in the mapping.
- While the biodiversity mapping responds to Planning Priority W14 of the Western District Plan (i.e. providing opportunities for nature-based recreation and enhanced liveability), it is important to note that public access to the Woronora Special Areas and the Upper Canal Corridor is prohibited (except where the Upper Canal occurs within a tunnel)..
- WaterNSW has produced [*Guidelines for Development Adjacent to the Upper Canal and Warragamba Pipelines*](#) which provides guidance on the issues that must be considered when designing, planning or assessing development or activities on land adjacent to, or

within the Upper Canal corridor. The Guidelines address matters such as security, operation, fencing, stormwater management and erosion and sediment control.

Health-Based LEP Aims and Zoning Objectives

WaterNSW supports the proposed inclusion of health and wellbeing-based aims in the LEP, and the inclusion of health-based objectives within residential zones and business zones. Such provisions will help minimise risk of contaminants being generated in the construction and operational phases of development, and possibility of those materials entering the open waters of the Upper Canal.

The concept of health and wellbeing could also be extended to include safety. This would help ensure developments incorporated appropriate safety measures to safeguard workers and employees as well the community through good development design. For WaterNSW, this would reinforce the need to protect the Upper Canal from trespass during the construction of operational phases for those developments occurring adjacent to the Upper Canal Corridor.

WaterNSW suggests that:

- the new LEP aim for health embrace the concept of *environmental health*, and be extended to include the concept of *safety* as well as the health and well-being of the community
- the proposed health-based zoning objectives be extended to include *industrial zones* as well as residential and business zones. This is because industrial zones can generate chemical and heavy metal contaminants, and present pollution risks to people and the environment during construction and operation.

‘Deferred Matters’

The Proposal seeks to repeal of Campbelltown (Urban Area) Local Environmental Plan 2002, Campbelltown Local Environmental Plan – District 8 (Central Hills Lands), Interim Development Order No. 15 and Interim Development Order No. 29. The intent is to address the ‘deferred matters’ covered by those instruments and integrate those lands into the CLEP 2015, thus providing one LEP for the LGA. WaterNSW supports this rationalisation of planning instruments.

The property at 717 Appin Road, Gilead, (‘Meadowvale’) comes close to the Upper Canal Corridor along its western front, albeit buffered by RU2 land on a separate address. Most of the allotment drains towards Nepean Creek which flows underneath the Canal at the Nepean aqueduct. Only the very north-western corner has a moderate risk of overflow entering the open waters of the canal. It is proposed to amend the CLEP to provide a consistent zoning with neighbouring properties and equivalent to CLEP 2002. Specifically, it is proposed to rezone the land from ‘NU 40’ 1 Non-urban (40 ha) under IDO 15 to RU2 under the CLEP and afford the land a Minimum Lot Size (MLS) of 40 ha and a maximum building height of 9m. As a heritage listed item known as ‘Meadowvale’ is also situated on the lot, the relevant heritage map is also proposed to be updated. WaterNSW has no objection to this rezoning and the associated changes to the LEP.

Land at ‘Blairmount’ is also proposed to be rezoned to various zonings including E3 Environmental Management at the LGA boundary. We note the proposed zonings are an interim rezoning arrangement as the ‘Blairmount’ land is subject to a separate Planning Proposal request. The Upper Canal lies some 500 m west of Blairmount and in the adjoining Camden LGA. At the location closest to the Canal, the boundary of both Blairmount and the Campbelltown LGA follows the ridgeline with the ‘Blairmount’ land draining eastward, away from the Canal. WaterNSW has no objection to the rezoning of Blairmount and the associated changes to the LEP.

Scenic Hills Mapping

The proposed Scenic Hills mapping runs along the western boundary of the LGA and includes a proportion of the Upper Canal in the south. The mapping also offers a buffer to the Canal where it occurs in neighbouring Camden LGA close to the Campbelltown LGA boundary. A new subclause

to clause 7.2 of the CLEP will apply to the mapped land, restricting development consent from being issued unless the consent authority is satisfied that scenic values and character, views, ridge lines, and environmental values of the land are not impacted by the development.

WaterNSW supports the inclusion of the proposed Scenic Hills mapping and associated clause as it will help alleviate development pressure along the Canal within the mapped areas of the Campbelltown LGA. It will also reduce pressure in proximity to the Canal where it occurs in the neighbouring Camden LGA. WaterNSW would encourage Campbelltown Council to liaise with Camden Council to see if similar Scenic Hills mapping and supporting LEP provisions could be added to the Camden LEP 2010 along the common boundary of the LGAs where the Scenic Hills mapping occurs. This would help reduce the intensity of development of land draining towards the Upper Canal.

Direction 5.2 Sydney Drinking Water Catchment

As the Planning Proposal applies across the entire Campbelltown LGA and as the Biodiversity mapping encompasses lands within the Woronora Special Area, we believe that Direction 5.2 Sydney Drinking Water Catchment (SDWC) is applicable (rather than being “not applicable”, as the proposal states). However, the Direction has only minor implications for the Proposal, in that the part of the LGA which includes the Woronora Special Area is already zoned E2 and SP2. Strategic Land and Water Capability Assessments are not relevant as they are primarily designed to apply to uses on private land. Inclusion of the Woronora Special Area within the biodiversity mapping will assist the protection of water quality and maintenance of ecological integrity within the Special Area and in keeping with the 2015 Special Areas Strategic Plan of Management.

Additional Suggestions – Water Management

Water-related LEP Aims

Both the District Plan and LSPS promote waterway and riparian protection, water efficiency and retention in the landscape, water reuse, and water sensitive urban design (WSUD) principles. Currently, the CLEP 2015 aims are quite broad for water-related issues, seeking to ‘maintain, protect and improve the natural environment including biodiversity and water resources’.

The CLEP may benefit by expanding the LEP aims to include reference to protecting water quality, watercourses and riparian habitats, and possibly extending the aims to reference WSUD, the water cycle, stormwater management, water reuse and efficiency. The Blue Mountains LEP 2015, Leichhardt LEP 2013, and Manly LEP 2013 have wide-reaching and innovative provisions for water conservation and protection which could be used for guidance. This would bolster the LEP aims in keeping with the emphasis given to watercourse protection and water-related issues in the LSPS and District Plan.

Stormwater Management

We note that the CLEP 2015 has a dedicated clause for riparian and land and watercourses, however, it does not currently have a dedicated clause promoting stormwater management and WSUD. WaterNSW considers that Council could explore the adoption of such a clause in the local provisions of their LEP in keeping with a range of other Councils (e.g. Blue Mountains (clause 6.9), Eurobodalla, Ku-ring-gai (clause 6.5), Leichhardt, Lithgow and Sutherland).

Such a clause could aim to protect downstream properties and environments, bushland and waterways from adverse stormwater impacts arising from development sites effects adopt provisions such as WSUD, maximise water permeable surfaces, promote on-site stormwater retention for re-use, integrate stormwater management measures into the landscape and make provision for ongoing management and maintenance of systems on emplaced.

The provision of a dedicated stormwater management clause would give effect to the WSUD provisions of the LSPS including Actions 5.2, 7.16 and 8.25 which generally seek to protect bushland and waterways, and manage urban stormwater runoff. It would also assist delivering

Actions 8.27 to 8.29 that seek to retain water in the landscape, promote urban cooling and protect waterways, riparian vegetation and natural values. It would also further support the key themes of Sustainability and Liveability, promoted in the Planning Proposal in line with the District Plan.

If you have any questions regarding the issues raised in this letter, please contact Stuart Little at stuart.little@waterNSW.com.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'C. Preshaw'.

CLAY PRESRAW
Manager Catchment Protection