

State Agency Submissions

State Agency Preliminary Comments

On 4 October 2023, a letter was sent to State Agencies requesting preliminary comments on the PP. Of the 11 requests made to relevant State Agencies, 10 preliminary submissions were made to Council. The Department of Education did not provide any comments.

Below is a summary of the comments received by agency:

- **Endeavour Energy**

A submission was made advising that the existing site includes a substation. Along with the submission, additional information was provided that required the applicant to adhere to during any future DA stage. A request was also made that the submission be passed on to the Applicant.

Comment: Response and information provided by Endeavour was provided to the Applicant, as requested.

- **Water NSW**

No Water NSW (WNSW) land or assets occur in proximity to the site and the area is outside the Sydney Drinking Water Catchment. Water NSW had no comments to make in relation to the PP.

Comment: No response required.

- **Transport for NSW**

The Transport for NSW (TfNSW) submission noted that the traffic generation of the PP is less than the existing site conditions. No further assessment requirements were made by TfNSW as the PP is unlikely to have a significant impact on the classified arterial road network.

Comment: TfNSW will provide more detailed comments at later stages of the project, specifically during the public exhibition period.

- **Sydney Trains**

Sydney Trains did not provide any comments in relation to the PP. The submission advised that Council should liaise and request comments from TfNSW.

Comment: Noted. Council contacted TfNSW as part of the preliminary notification.

- **Heritage NSW**

Heritage NSW (HNSW) provided preliminary comments on the PP. The submission advises that the subject site is located in close proximity to a local heritage item and that careful consideration should be made to the relationship with the local heritage item. The item is considered a local item under CLEP 2015, Council is responsible for undertaking the heritage assessment and consideration of any impacts on these items.

Comment: Noted. No response required.

- **South Western Sydney Local Health District**

South Western Sydney Local Health District (SWSLHD) recommended a stronger link between the draft PP and the Reimagining Campbelltown City Centre Master Plan and Campbelltown Collaboration Area Place Plan. Queen Street is a potential key active transport spine for Campbelltown and these strategies highlight the importance of prioritising people who choose to walk, cycle and use public transport.

The submission recommends that the PP give greater consideration to people walking or cycling particularly to local social infrastructure such as schools.

Comment: The revised open space scheme provided by the Applicant identifies linkages from the subject site to adjoining sites. The draft site specific DCP includes a requirement for the provisions of a 3 m wide strip along the Queen Street frontage to be dedicated to Council to encourage walking and cycling. Additionally, the draft site specific DCP identifies site through links between the subject site and adjoining sites.

- **Sydney Water**

The PP is located within the Leumeah Water Supply Zone for water servicing. The submission advises that portable water servicing should be available. The PP is located within the Leumeah Sewerage Catchment Area Management Plan (SCAMP) of the Glenfield catchment for wastewater servicing and that wastewater servicing should be available.

Comment: Preliminary comments provided by Sydney Water indicate that there is potential for servicing of a potential development on the site. However, amplifications, adjustments and/or minor extensions to these services may be required. Further consultation with Sydney Water will occur should the PP progress to future stages.

- **Department of Climate Change, Energy, Environment and Water (formerly Environment and Heritage Group)**

The Department of Climate Change, Energy, Environment and Water (DCCEE) provided a number of comments relating to flooding behaviour at the site and considered that the significant flood affectation had not been adequately addressed in the PP. The submission noted that the PP was inconsistent with the requirements of Section 9.1 Direction – 4.1 Flood Prone Land. DCCEE would be unlikely to support the PP unless significant emergency management constraints can be managed. EHG also advised that the NSW SES should also be consulted regarding its specific requirements for the PP.

DCCEE advised that the commentary regarding the PPs consistency with the relevant Section 9.1 Direction had not been adequately addressed. In order to demonstrate consistency with the Direction the PP would need to meet the objectives of the Direction including consistency with the NSW Government's Flood Prone Land Policy and the principles of the Floodplain Development Manual 2005 and ensure that the provisions of the LEP that apply to flood prone land are commensurate with flood behaviour including consideration of the potential flood impacts both on and off the subject land. It was noted that although the Floodplain Development Manual 2005 had been replaced by the Flood Risk Management Manual 2023, there is consistency on their concepts, principles and intent.

The following key principles had not been considered:

- a. **Understand flood behaviour and flood constraints**

The flooding report had limited discussion about the 1 per cent AEP flood extent and hazard. Further information on existing flood behaviour, flood constraints and flood risk is required.

b. Understand flood risk and how it may change

The existing flood risks and how they may change due to the development and climate change needs to be addressed by undertaking a flood impact assessment in accordance with the NSW Government's Flood Impact and Risk Assessment Guideline (FIRA).

c. Maintain natural flood functions

Council's Stormwater advice letter to the Applicant noted that the site is a floodway, flood storage and flow path. The PP needed to present this information and how these will be maintained. The EHG advise that it is important to understand the natural flow conveyance and storage function of the floodplain.

d. Manage flood risk effectively

The PP is proposing to increase the dwelling density of the land and would result in increasing the exposure to flooding and flood risk on site. EHG advised that the post development flood risk and constraints and the impact of flooding on the future users of the site have not been adequately addressed.

Comment: A copy of DCCEEW's submission was provided to the Applicant to assist in updating the flooding and risk related matters. The flood study has not yet been updated to respond to the concerns identified by DCCEEW. The flood study would need to be updated as prior to requesting Gateway Determination. Further detail regarding the required updated information is outlined below.

Further work will need to be undertaken in relation to flooding demonstrating consistency with the Ministerial Direction for flooding.

The flooding report will need to be updated to include the full range of flooding including lesser events, the 1 per cent AEP event plus climate change and the PMF. The post-development scenario must include the detail of the proposed development, including but not limited to the proposed building, earthworks, landscaping and infrastructure.

Access and egress will also need to be considered as part of the PP and further information will be required.

Should the PP proceed to the public exhibition phase, NSW SES and EHG would also be further contacted to provide comments on the updated flood study and PP. Prior to requesting a Gateway Determination, the Applicant will be required to undertake a detailed flood study and the PP will be updated based on the findings of the flood study.

- **Department of Communities and Justice**

The Department of Communities and Justice (DCJ) advised Council that they have no comments to make on the PP at this stage. DCJ noted that there are a number of assets in the vicinity of the subject site and have requested that future consultation occur if the PP progresses.

Comment: Noted. DCJ will be contacted for comment should the PP progresses and is granted a Gateway Determination.

- **NSW Police Force – Campbelltown Local Area Command**

NSW Police provided a submission on the PP that advised of design features that would result in improvements to minimising criminal activity in and around the site. The submission places an emphasis on Crime Prevention Through Environmental Design (CPTED), lighting CCTV and landscaping in providing a safe space for the community.

Comment: Noted. The details identified within the submission would be more suitable at the DA stage, should the PP proceed in the future.