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Department of Planning, Industry and Environment
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Dear Terry

PLANNING PROPOSAL – A SADDLE CLOSE, CURRANS HILL (PART LOT 627 DP 1163903)

1 Introduction

On behalf of Wolin Investments Pty Ltd and Landco (NSW) Pty Ltd (the Proponent), Cardno requests a Rezoning Review of a Planning Proposal submitted to Camden Council on the 8 May 2019 for a parcel of land located at Caulfield Close, Currans Hill.

This documentation has been prepared in accordance with the requirements of 'A guide to preparing local environmental plans.' The Proponent has initiated the review as Council resolved not to support the Planning Proposal at its meeting on 14 April 2020 and written notification was provided to the Proponent on 15 April 2020.

The Planning Proposal sought the amendment to the *Camden Local Environmental Plan 2010* (CLEP), in relation to land, which is part of Lot 627 DP 1163903, Currans Hill. The proposed amendment pertains to a 1.4ha portion of land located in the north western corner of Lot 627, adjacent to Caulfield Close. (**Figure 2-1**).

The Proposed amendment to the Development Standards pertaining to this portion of land is to amend the minimum lot size requirement from 900m² and 1,500m² to 500m².



Figure 1-1 Indicative Subdivision Layout (Source: Cardno)

2 The Site

The site that is the subject to the Planning Proposal is a parcel of land approximately 14,000m² in area located at the current eastern extremity of Caulfield Close, Currans Hill (Figure 1-1). For the purposes of this Planning Proposal, this land parcel is referred to as **the Subject Site**.

Legally, the site is part of a much larger land parcel known as Lot 627 DP 1163903 (No.207B) Turner Road, Currans Hill (Figure 1-2). This larger land parcel has a total area of approximately 343,380m² and is referred to in this Planning Proposal as **the Greater Site**.

a) Site Description

i) Subject site

The subject site is roughly triangular in shape and is accessed via Caulfield Close. It has frontages to Caulfield Close and adjoining residential land to the north, Caulfield Reserve, a local drainage / open space corridor, to the west and south west and undeveloped land to the east. Immediately to the east, the Subject Site is adjoined by a 60m TransGrid electrical easement which runs north-south along the length of the greater site.

The subject site is generally cleared of vegetation apart from a very small portion of remnant Cumberland Plain Woodland in its south western corner adjacent to Caulfield Reserve and a further area of Cumberland Plain Woodland Derived Grassland further to the north east. The land falls gradually from north to south in the general direction of the Caulfield Reserve at an average gradient of approximately 1 in 12 (**Figure 2-1**).



Figure 2-1 The Subject Site - Outlined red (Source: Cardno)

ii) The Greater Site

The Greater Site is currently undeveloped and was historically used for cattle grazing. Consistent with its former uses, the Greater Site is currently vegetated with a mix of grasslands and woodlands. There is a substantial remnant of Cumberland Plain Woodland in the south east portion of the Lot.

Topographically, the Greater Site rises gently from a low point of 105 metres above sea level at the south of the site to a high point of 145 metres at its northern edge. A small hill lies at the northern end of the lot, with the gradient of the slope rising up to the peak, measuring an incline greater than 16% in certain areas.

The State Heritage Listed Sydney Water Upper Canal System traverses the eastern part of the greater site. The northern highest point of the Greater Site supports a recently constructed Sydney Water reservoir tank.

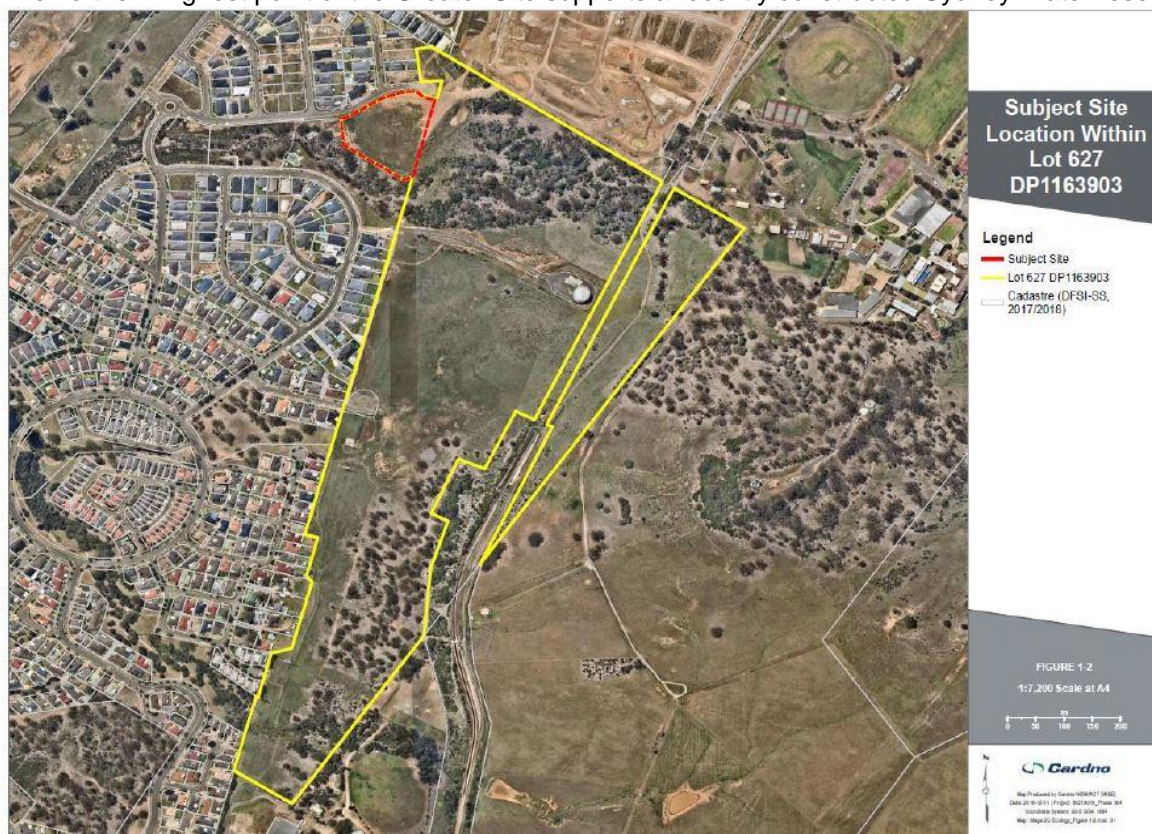


Figure 2-2 Subject site (outlined red) within the context of the Greater Site (outlined yellow) (Lot 627 DP1163903) (Source: Cardno)

3 Background

3.1 Historic Planning Proposal (2018SSW004)

A Planning Proposal was submitted to Camden Council on 13 July 2017 seeking to partially rezone the Greater Site to R1 – General Residential, while partially maintaining the existing Environmental Zone E2 – Environmental Conservation, RU2 Rural Landscape and SP2 Infrastructure.

In October 2017, the Planning Proposal was refused by the Council.

A Request for a Rezoning Review was submitted to the Department of Planning, Industry & Environment (formerly known as the Department Planning & Environment) on 1 November 2017.

The Sydney North Planning Panel did not support the planning proposal. However, the Panel recognised that there is potential and justification for denser development for part of this site. The following comments were noted in the Record of Decision dated 21 May 2018:

... Some more dense residential development of parts of this site might be justified. Notably, there is an existing residential subdivision which would increase the density that Council reports to be consistent with the current zoning which would allow for 23 environmental living lots (DA2014/597). The northern residual lot that would be created by that subdivision could also allow for additional lots to add to those 23, with lot size similar to the adjacent existing approved house lots...

3.2 Pre-Lodgement Meeting – 21 January 2019

Based on the comments and issues documented in the “Record of Decision” dated 21 May 2018, the entire proposal has been revisited and a substantially reduced in scale.

On 21 January 2019, Cardno attended a pre-lodgement meeting at Camden Council to discuss the revised proposal to amend the CLEP 2010. The proposal seeks

- rezoning a portion of the land from E4 and E2 to R1;
- amending the minimum lot size from 900sqm and 1,500sqm to 450sqm; and
- establishing a maximum Height of Building of 9.5m

It was envisioned that the proposal would provide an additional 20 - 25 residential lots within the area.

After the meeting, written correspondence was provided by Council, which stated that the following studies would be required to be submitted with the Planning Proposal:

- Traffic Impact Assessment; and
- Bushfire Impact Assessment

Other key information that should also be addressed within the Planning Proposal includes:

- Net community benefits from the proposed developments
- Heritage impacts on Sydney Water Canal (state listed)
- Justification for the proposed minimum lot size
- Clear identification of the site boundary of the subject land

3.3 Planning Proposal

Based on the advice provided by Council, Cardno (NSW/ACT) Pty Ltd have prepared a Planning Proposal on behalf of the landowners, which is a joint venture between Landco (NSW) and Wolin Investments Pty Ltd. The original Planning Proposal was formally lodged with Camden Council on 8 May 2019.

The Planning Proposal sought amendments to the CLEP 2010 in relation to the land described as lot 627 DP 1163903, Currans Hill. The proposed amendments pertain to a small portion of the Greater Site, only (approximately 1.4 ha in extent) located in the north western corner of the site, adjacent to Caulfield Close.

Proposed amendments to the north western corner include the following:

- Rezone the site from E4 Environmental Living to R1 General Residential;
- Amend the minimum lot size requirement from 900sqm and 1,500sqm to 450sqm; and
- Introduce a building height of 9.5m onto 860m² (6.5%) of the Subject Site, in order to be consistent with the surrounding building heights, and correct a technical mapping anomaly.

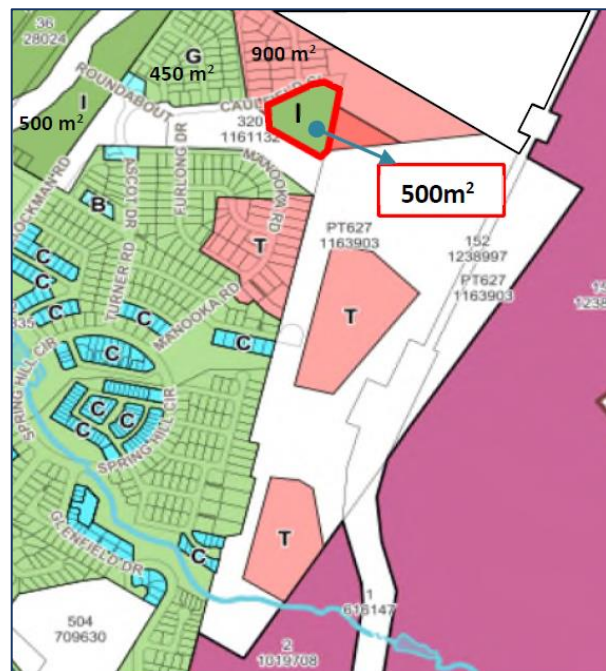
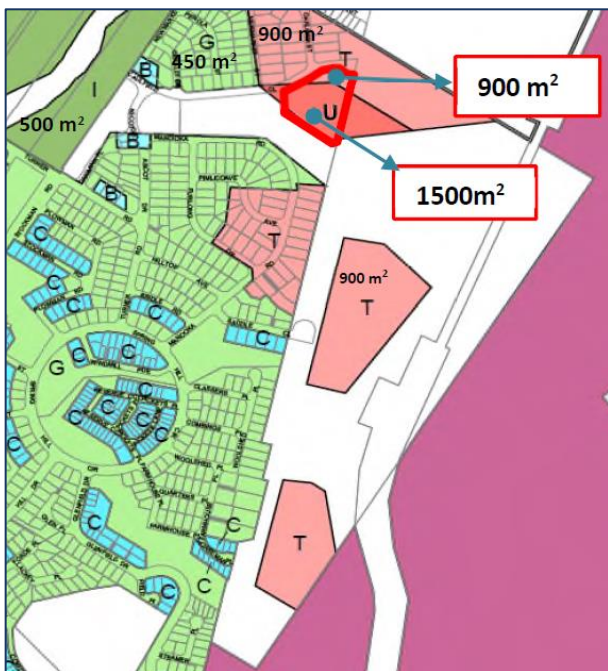


Figure 3-1 Current Minimum Allotment Size (Source: Camden Council)

Figure 3-2 Proposed Minimum Allotment Size (Source: Camden Council)

3.4 Camden Local Planning Panel (CLPP)

On 20 August 2019, CLPP inspected the site and considered the Planning Proposal in a closed session. The Panel's recommendation, finalised on 22 August 2019, was that the Planning Proposal should not proceed to Gateway Determination for the following reasons:

- *It doesn't provide a diversity of lot sizes consistent with the planning of the surrounding area.*
- *The current zoning provides an appropriate transition to the immediately adjoining E2 zoned land containing CPW.*
- *The existing E2 Environmental Conservation zone should be retained, as CPW vegetation has been identified on the E2 zoned land.*

3.5 Meeting with Council Officer – 30 September 2019

Consequent to receipt of the comments from CLPP, the proponent attended a meeting with Camden Council Strategic Planning officers discuss the outcomes of the CLPP meeting and to discuss a way forward for the Planning Proposal. After the meeting, the following written correspondence dated 3 October 2019 was provided by Council's Strategic Planner:

1. *Key discussion*
 - a) *Council officers outlined the outcomes of the Panel's advice, which was consistent with Council officers assessment and not supported.*
 - b) *Council officers recognised that while the planning proposal is not supported in its current format, increased density in the subject area could be supported subject to:*
 - i. *Retaining the current zoning of the site;*
 - ii. *Further investigate/justify on a proposed minimum lot size.*
 - c) *c. Council officer noted that the minimum lot size for E4 zoned land within Manooka Valley ranges in size from 500m² to 1,500m².*
2. *Key actions from the meeting*
 - a) *The proponent is to amend the proposal package addressing Panel's advice and forward to Council.*
 - b) *Council officer would like to report the planning proposal to Council by end of this year."*

3.6 Revised Planning Proposal

Based on the discussion with Council's Strategic Planner, a revised Planning Proposal was submitted to Camden Council on 18 November 2019. The revised Planning Proposal responded to the Panel's advice by retaining the current E2 Environmental Conservation and E4 Environmental Living zoning and by increasing the proposed minimum lot size from 450m² to 500m².

On 28 November 2019, Council's Strategic Planner provided written correspondence in relation to the revised Planning Proposal and requested that an updated traffic study and bushfire assessment study and provide justification for the removal of the small amount of Threatened Ecological Communities in the E2 zoned land. The updated Planning Proposal and supporting documentation were submitted to Council on 2 December 2019.

On 26 February 2020, written correspondence was received by Cardno, which stated that a Councillor workshop was conducted and concerns were raised in relation to the *"the irregular shape of the lots in the indicative subdivision plan, which will unlikely achieve a high quality urban design outcome"*. An indicative subdivision layout plan was provided by Council, which removed the battle-axe lot located at the centre of the site and reduced the overall subdivision to 16 lots.

On 19 March 2020, Cardno submitted a revised subdivision layout to Council, which eliminates the irregular and battle-axe lot while retaining the 17 lots subdivision. The revised layout was considered acceptable by Council's Strategic Planner and addressed the concerns identified in the Councillor workshop. Based on the

revised layout proposed by Cardno, the Planning Proposal was further revised and submitted to Council on 27 March 2020.

3.7 Council Meeting

Council officers assessed the revised draft Planning Proposal and concluded that the amendments demonstrate planning merit to proceed to Gateway Determination for the following reasons:

- *The residential character of the E4 Environmental Living zone and surrounds has changed significantly since the South West Growth Area rezoning in 2007.*
- *The proposed minimum lot size of 500m² is consistent with the character of the surrounding area.*
- *The draft proposal complies with the planning principles for Manooka Valley outlined in the Camden DCP 2019.*
- *The draft proposal will facilitate additional dwellings in proximity to existing infrastructure and facilities.*
- *The draft proposal is consistent with the Region and District Plans, in addition to local strategic plans and their relevant objectives.*

The report recommended that Council to endorse the revised Planning Proposal and be forwarded to DPIE for Gateway Determination.

On 14 April 2020, Council resolved not to support the revised Planning Proposal due to concern relating to the impact on the existing local roads, insufficient public benefits, potential impacts to the highly sensitive environmental area and inconsistent with the original vision of Manooka Valley. Please refer to Section 6 of this letter for further discussion.

4 Strategic Merit

4.1 Greater Sydney Regional Plan: A Metropolis of Three Cities – Connecting People (2018)

Following is an overview and commentary on the applicable planning priorities and objectives contained in the Plan that are of direct relevance to the intent of this Planning Proposal:

Planning Priorities and Objectives	Comment
<i>Objective 10: Greater housing supply</i>	The Planning Proposal will enable a modest number of additional dwellings to be provided on the subject site and contribute to the Western City housing target identified by the NSW Government. The site is specifically suitable to the provision of additional housing due to its adjacency and potential to provide increased public access to existing open space.
<i>Objective 11: Housing is more diverse and affordable</i>	The proposal would potentially enable a greater choice of allotment sizes and housing forms to cater to different needs and lifestyles. It is likely that the proposal will improve housing availability within the locality and will allow for increased housing directly addressing local open space.
<i>Objective 27: Biodiversity is protected, urban bushland and remnant vegetation is enhanced</i>	As illustrated in the layout plan, no Cumberland Woodland (CPW) is proposed to be removed with the exception of 0.05ha of Cumberland Woodland Derived (CPW) Grassland. The removal of CPW Grassland is required to enable the subdivision and development of the subject site. The retention of the CPW Grassland will reduce the subdivision by 5 lots and making the development financially unviable. Furthermore, a Flora and Fauna assessment has been undertaken by Cardno, which indicates that: <ul style="list-style-type: none"> ▪ <i>The projected removal of TEC and threatened fauna habitat from the Subject Site is not considered a significant reduction of the resources in the locality. Large areas of CPW Derived Grassland and habitat for the threatened fauna species are present on the remainder of Lot 627</i>

	<p>DP1163903 to the east and in Manooka Reserve to the south. Development of the Subject Site would not create a barrier to fauna dispersal across the landscape.</p> <ul style="list-style-type: none"> ▪ The development avoids the majority of high value native vegetation and fauna habitat present in Lot 627 DP1163903. The small amount of TEC and potential threatened fauna habitat to be removed from the Subject Site is not considered to represent a significant loss of these resources in the locality. ▪ It is recommended that the E2 zoned lands elsewhere in Lot 627 DP1163903 are managed for conservation purposes. This would more than compensate for the small amount of TEC and potential threatened fauna habitat which would be lost through future development of the Subject site. <p>In summary, the Planning Proposal is not likely to impact on existing urban bushland and remnant vegetation located within the Greater Site.</p>
<i>Objective 28: Scenic and cultural landscapes are protected</i>	<p>The scenic landscape of Camden will be protected as the Planning Proposal involves only a small area of the Greater site, which has defined ecological values and outlooks to the Scenic Hills.</p> <p>The building height control will ensure that consequent housing will not impact on views towards local scenic and cultural landscapes.</p> <p>Existing E2 and E4 zoning provisions will remain applicable to the site to provide a transition to the rural land use and Scenic Hills located to the east of the Site.</p>
<i>Objective 29: Environmental, social and economic values in rural areas are protected and enhanced</i>	<p>Future uses at the site are limited to those permitted under the current E2 and E4 environmental zones. Further, the proposed minimum lot size will provide a transition between existing smaller lots within Currans Hill and adjoining rural lands. The Planning Proposal will facilitate a subdivision form that will enhance access to local open space, consistent with locally relevant environmental and social values and provide opportunities for additional housing that would contribute to the local economy.</p>

Table 5.1 Applicable Planning Priorities and Objectives from A Metropolis of Three Cities

As documented in the Council Report, Council Strategic Planner concurs that the Planning Proposal is consistent with the relevant directions and objectives of the Region Plan.

4.2 Western City District Plan (2018)

The subject site is located within the Western City District Plan (the District Plan) which guide development in the Greater Sydney Western District over a 20 year timeframe. The Planning Proposal will give effect to the Our Greater Sydney 2056: Western City District Plan – Connecting Communities (2018) as illustrated in the table below:

Planning Priorities and Objectives	Comment
<i>Planning Priority W5 – Providing housing supply, choice and affordability with access to jobs, services and public transport</i>	The proposal will enable additional dwellings to be provided on a site that is specifically suited to increased density due to its adjacency to local open space. The modest number of additional dwellings in this suitable location will contribute toward the Western City housing target identified by the NSW Government.
<i>Planning Priority W6 – Creating and renewing great places and local centres and respecting the District's heritage</i>	The form of development that would be facilitated by the Planning Proposal would contribute positively to placemaking by improving access to open space and allowing houses to address the street and adjacent open space. Sydney Water Upper Canal System is a state heritage item and bisects the greater site. The proposal will have no impacts on the canal system as the proposed amendments are located 500m from the canal.

<i>Planning Priority W12 – Protecting and improving the health and enjoyment of the District's waterways</i>	The broader site contains three watercourses of Kenny Creek which are zoned E2 Environmental Conservation and E4 Environmental Living. The proposal will retain the E2 Environmental Conservation and E4 Environmental Living for the watercourses.
<i>Planning Priority W14 – Protecting and enhancing bushland and biodiversity</i>	<p>Current E2 Environmental Conservation and E4 Environment Living zoning provisions will remain applicable to the site.</p> <p>Further, a Flora and Fauna Assessment supports the potential removal of a very small portion of CPW located with the subject site for the following reasons:</p> <ul style="list-style-type: none"> ▪ <i>The development avoids the majority of high value native vegetation and fauna habitat present in Lot 627 DP1163903. The small amount of TEC and potential threatened fauna habitat to be removed from the Subject site is not considered to represent a significant loss of these resources in the locality.</i> ▪ <i>It is recommended that the E2 zoned lands elsewhere in Lot 627 DP1163903 are managed for conservation purposes. This would more than compensate for the small amount of TEC and potential threatened fauna habitat which would be lost through future development of the Subject site.</i>
<i>Planning Priority W15 – Increasing urban tree canopy cover and delivering Green Grid connections</i>	Urban tree canopy of the site will remain unchanged as no trees are proposed to be removed as part of the Planning Proposal. The provision of a new street that would potentially result from the Planning Proposal would increase opportunities for street tree planting, contributing to the urban tree canopy.
<i>Planning Priority W16: Protecting and enhancing scenic and cultural landscapes</i>	<p>The retention of the E2 Environmental Conservation and E4 Environment Living zones will provide a transition to the adjoining rural land and Scenic Hills.</p> <p>The existing Cumberland Plain Woodland located to the east of the proposal will partially screen the residential development when viewed from the nearby rural lands and Scenic Hills. This ensures that the scenic quality of the area is retained.</p> <p>The existing Maximum Height of Building development Standard along with existing controls in the Camden Development Control Plan will further protect local views.</p>
<i>Planning Priority W17 – Better managing rural areas</i>	<p>The site is identified as 'metropolitan urban area' and located adjacent to the 'metropolitan rural area' identified in the Western City District Plan.</p> <p>The Planning Proposal will preserve the metropolitan rural area and rural setting by retaining the E2 and E4 zone provisions. The existing Cumberland Plain Woodland located to the east of the site will provide a transition to the neighbouring rural land and Scenic Hills.</p>
<i>Planning Priority W20 – Adapting to the impacts of urban and natural hazards and climate change</i>	The site is identified as bushfire-prone land. Any future development on the subject site is required to comply with Planning for Bushfire Protection 2006 and referred to Rural Fire Service (RFS) for comments. Further, the future subdivision of the Subject site is likely to include a new perimeter road that would facilitate a permanent Asset Protection Zone adjacent to existing bushland and improve access for fire fighting.

Table 5.2 Applicable Planning Priorities and Objectives from Western City District Plan

The site is identified as 'urban area' in the Western City District Plan. In our opinion, a strategic planning intention that the land would be developed for urban purposes. Given that the portion of the land subject to this Planning Proposal is a small land parcel that extends west of the greater site into the existing Currans Hill urban lands, it effectively is an infill site which would provide greater support for a denser form of residential development that currently is permitted.


Legend

Lot 627 DP 1163903
 Protected Natural Area
 Metropolitan Rural Area
 Metropolitan Urban Area

Figure 4-1 Excerpt from the Structure Plan, Western Sydney District Plan (Source: Cardno)

As documented in the Council Report, Council Strategic Planner concurs that the Planning Proposal is consistent with the relevant priorities and actions of the District Plan.

4.3 Local Strategic Planning Statement (LSPS)

On 14 April 2020, Camden Council resolved to adopt the Local Strategic Planning Statement (LSPS) to provide a 20-year land use vision for the LGA.

There is no specific action related directly to the subject site. However, the planning proposal will achieve the following priorities contained in the LSPS.

Local Priority	Comment
<i>L1 - Providing housing choice and affordability for Camden's growing and changing population</i>	<p>The proposal may result in an additional 8 dwellings on the subject site and contribute to the housing target identified by the NSW Government.</p> <p>As illustrated on the indicative layout plan, a range of lot sizes has been proposed to enable a variety of affordable housing types to be provided on site. Generous lot dimensions have been provided to allow the lots to accommodate a range of housing types.</p> <p>Additionally, the site is well situated and located within proximity to local open space and employment area located to the west of the site.</p>

<i>L2 - Celebrating and respecting Camden's proud heritage</i>	Sydney Water Upper Canal System is identified as State Heritage Item and located to the 500m east of the site. The item will not be impacted by the proposal as the planning controls for the heritage item will remain unchanged.
<i>L4 - Encouraging vibrant and connected centres which reflect Camden's evolving character</i>	The Planning Proposal would contribute positively to placemaking by improving access and connectivity to open space and allowing houses to address the street and adjacent open space. As illustrated by the indicative layout, each of the lots will be orientated towards the street or open space, which would enable passive surveillance to be provided to Caulfield Reserve and electrical easement.
<i>S1 - Improving the accessibility and connectivity of Camden's Green and Blue Grid and delivering high quality open space</i>	<p>The Planning Proposal would not impact the implementation of Camden's Green Delivery as the zoning for the Sydney Water Upper Canal System (located to the east of the site) will remain unchanged and no development is proposed.</p> <p>As illustrated by the indicative layout, the lots will be orientated towards the green grid, which would enable passive surveillance to be provided.</p> <p>The development avoids the majority of high-value native vegetation and fauna habitat present in Lot 627 DP1163903. The small amount of TEC and potentially threatened fauna habitat to be removed from the Subject site is not considered to represent a significant loss of these resources in the locality.</p> <p>The Planning Proposal may enable street trees to be planted along Caulfield Close, which provides a visual connection with the high-value native vegetation located to the east.</p>

Table 5.3 Applicable Planning Priorities and Objectives from Local Strategic Planning Statement

As illustrated by **Table 5.3**, the Planning Proposal is not inconsistent with the priorities outlined in the adopted Local Strategic Planning Statement prepared by Camden Council.

As documented in the Council Report, Council Strategic Planner concurs that the Planning Proposal is consistent with the relevant Local Priorities and Actions of the LSPS.

4.4 Camden Local Housing Strategy

Camden Council is in the process of preparing a Local Housing Strategy and will seek input on the housing strategies later in 2020. Therefore, no current actions or priorities apply to the planning proposal.

5 Strategic Merit Assessment

The Planning Proposal has strategic merit for the following reasons:

Criteria	Comment
<i>The natural environment (including known significant environmental values, resources or hazards)</i>	<p>The Subject Site is impacted by the following environmental values, resources or hazards.</p> <p><u>Cumberland Plain Woodland</u></p> <p>A Flora and Fauna Assessment (FFA) for the site has been prepared by Cardno which identifies matters for consideration for the Planning Proposal. Surveys conducted as part of this FFA concluded that the Subject Site has been highly modified through recent clearing and is dominated by exposed soil and exotic grasslands. However, a small portion of the TEC Cumberland Plain Woodland (CPW) is present in the south-west as an extension of CPW vegetation in the adjacent Caulfield Reserve. In addition, a portion of the regenerating grasslands of the Subject site were identified as most closely conforming to CPW derived grasslands. CPW is listed as a critically</p>

endangered TEC under the TSC Act and EPBC Act. As illustrated in the indicative layout plan, 0.05ha of CPW Glassland be impacted by the subdivision. It should be noted that the existing CPW will be retained and located adjacent to the extension of Caulfield Close.

No threatened flora species were encountered during the survey and none are considered likely to occur. Significant fauna habitat was observed including a single mature eucalypt and small vegetated pond are present in the south-west of the Subject Site. No threatened fauna species were detected during survey, however, two were considered likely to occur based on the presence of suitable habitat and recent occurrence records from within 5 km:

- > Cumberland Plain Land Snail (*Meridolum corneovirens*) – listed as endangered under the TSC Act; and
- > Green and Golden Bell Frog (*Litoria aurea*) – listed as endangered under the TSC Act and vulnerable under the EPBC Act.

Assessments of the above TEC and threatened species were conducted under the seven-part test methodology (EP&A Act) and/or tests of significance (EPBC Act). These tests concluded that although future development of the Subject Site would result in the removal of the whole occurrence of TEC and threatened fauna habitat from the Subject site, the level of impact is not considered to be significant. The CPW present on the Subject Site represents less than 1 % of this community present in the entirety of Lot 627 DP1163903 and the fauna habitat values present are not limited in the local area. Similar vegetation and fauna habitat are also present within the Caulfield Reserve, which is located to the immediate south of the Subject site.

According to the results of the assessment, no significant impact on any listed entity under the TSC Act and/or EPBC Act is considered likely as a result of future development of the Subject Site and further assessment through a SIS (NSW) or a referral to the federal Minister of the Environment (Commonwealth) would be required to support a future DA.

The Planning Proposal would avoid the majority of high value native vegetation and fauna habitat present in Lot 627 DP1163903. The small amount of TEC and potential threatened fauna habitat to be removed from the subject site is not considered to represent a significant loss of these resources in the locality.

The E2 zoned lands elsewhere in Lot 627 DP1163903 are managed for conservation purposes which would compensate for the small amount of TEC and potential threatened fauna habitat which would be lost through future development of the subject site.

Bushfire

The Subject Site is located on Bush Fire Prone Land Vegetation Category 2 and Vegetation Buffer 100m & 30m. A Bushfire Protection Assessment has been prepared by Travers Bushfire & Ecology which identifies matters for consideration for the Planning Proposal and to highlight the required bushfire protection measures for the site.

The assessment found that bushfire can potentially affect the site from the woodland vegetation associated with the riparian corridor to the south and west and the woodland extending beyond the electrical easement to the east resulting in possible ember attack and radiant heat attack.

The bushfire risk posed to the Planning Proposal can be mitigated if appropriate bushfire protection measures (including APZs) are put in place and managed in perpetuity.

Future development on site is to comply with the following key recommendations as proposed by *Travers Bushfire and Ecology*.

- > A perimeter road (8m carriageway width) is to be provided adjacent to all bushland areas and
- > APZs have been recommended in compliance with BAL29. APZs are to be measured from the exposed wall of any dwelling toward the hazardous vegetation. The minimum APZ must be achievable within all lots fronting the bushfire hazard.
- > Fuel management within the APZs is to be maintained by regular maintenance of the landscaped areas, mowing of lawns in accordance with the guidelines provided by the RFS.
- > Building construction standards are to be applied for future residential dwellings in accordance with Australian Standard AS3959 Construction of buildings in bushfire-prone areas (2009).

The majority of the developable area is located outside of the APZ which is consistent with the recommendations. Dwellings fronting Caulfield Reserve and transmission easement will be outside of the APZ as a front setback requirement of 4.5m applies to the subject lots. Refer to for the Bushfire Assessment Report.

Cardno has prepared an indicative subdivision plan to illustrate the potential benefits of the proposed changes to the existing lot size. The indicative layout is provided as one possible development scenario. Numerous other options may apply and any of these would be subject to the Development Approval process. The indicative plan includes a new perimeter road consistent with the bushfire consultant's recommendations. It is notable that the commercial viability of construction of this perimeter road would be likely contingent on achieving lot yields that would not be possible under the current permissible minimum lot size.

Contamination

As part of DA2014/560-1, a contamination assessment of the entire site was undertaken by GeoEnviro Consultancy in June 2014. The key findings of this report are as follows:

- > The test pit investigation indicates the site to be predominantly underlain by natural ground comprising topsoil and topsoil/fill up to about 300mm thick overlying natural medium to high plasticity Silty Clay overlying shale at depths up to about 2.3m below existing ground surface.
- > The laboratory test results indicate concentrations of contaminants of concern to be within the acceptable levels. Elevated concentrations of Manganese were detected however the Manganese was found to be naturally occurring as background levels and therefore considered acceptable.
- > The report concluded that the likelihood of gross ground chemical contamination on the site was considered low.
- > As the site was not subjected to any recent activities that may have resulted in contamination, GeoEnviro were of the opinion that the contamination status of the site remains unchanged and therefore the site is suitable for the proposed residential subdivision and development subject to removal of surface and buried rubbish fill as had been previously recommended, and which is proposed.

Camden Council granted development consent for DA/2014/560/1 on 24 November 2014. However, the approval was never enacted.

	<p>The site is not identified as contaminated land by the NSW Environment Protection Authority (EPA) contamination register. Also, low and medium density residential developments are located to north and west of the Subject site. Therefore, the Subject Site is unlikely to be contaminated.</p>
<p><i>The existing uses, approved uses and likely future uses of land in the vicinity of the land subject to a proposal</i></p>	<p><u>Existing Uses</u></p> <p>The Subject Site is currently undeveloped land and is generally cleared of vegetation apart from a very small portion of remnant Cumberland Plain Woodland in its south western corner adjacent to Caulfield Reserve and a further area of Cumberland Plain Woodland Derived Grassland further to the north east. The land falls gradually from north to south in the general direction of the Caulfield Reserve at an average gradient of approximately 1 in 12 (Figure 2-2).</p> <p>The Subject Site has frontages to Caulfield Close and adjoining residential land to the north, Caulfield Reserve, a local drainage / open space corridor, to the west and south west and undeveloped land to the east. Immediately to the east, the Subject Site is adjoined by a 60m TransGrid electrical easement, which runs north-south along the length of the greater site.</p> <p><u>Approved Uses</u></p> <p>A DA for subdivision of the subject site DA/2014/560/1 was lodged on 11 July 2014. The development application was for the subdivision of 9 lots, ranging in size from 995.6sqm to 2,135sqm and 1 residual lot. Development consent was issued by Council on 26 November 2014. However, the development consent was never enacted. Refer to Attachment F for a copy of the consent.</p> <p>Another DA's relating to the Greater Site have also been approved.</p> <p>A subsequent DA for subdivision of the site DA 2014/597 was lodged in July 2014, with the consent granted on the 27th February 2015. The consent was for "Staged subdivision of land to create 23 residential lots, 2 public reserve lots and 2 residue lots and the provision of drainage, landscaping and associated works". The development consent was never enacted.</p> <p>A further DA for Stage 3 Bulk Earthworks (Early Works), DA 2014/597 "Sediment basin, tree removal, sediment and erosion control measures and erection of temporary fences" was approved by Council on the 24th May 2016.</p> <p>As a result of the above approval, some minor drainage and associated works have been undertaken on the site.</p>

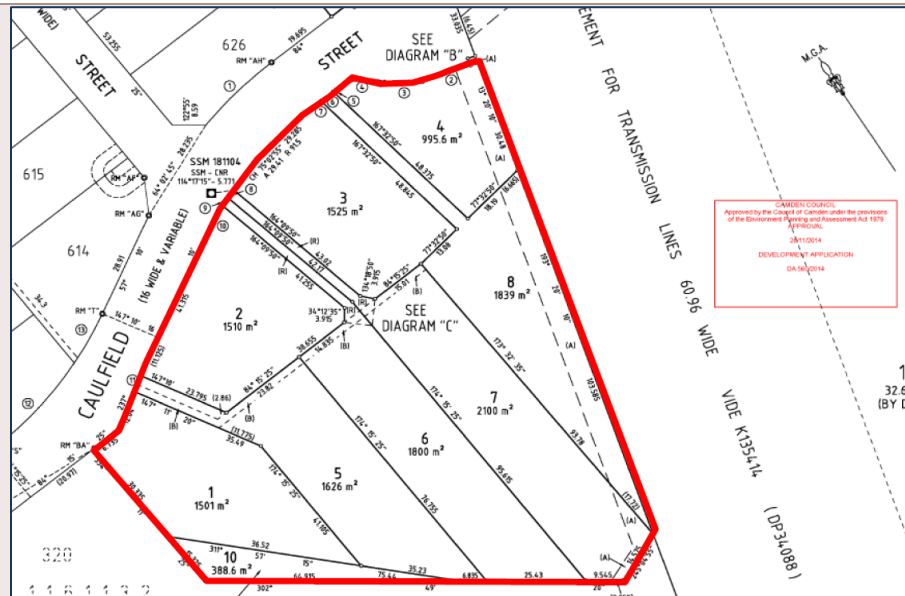


Figure 5-1 Approved subdivision plan under DA/2014/560/1 (Source: Camden Council)

Future uses of land in the vicinity of the land

Turner Road Precinct – Gregory Hills

The site is located adjacent to the southern boundary of the suburb of Gregory Hills. Gregory Hills forms part of the Turner Road Precinct situated within the South West Priority Growth Area.

The Turner Road Precinct consists of up to 4,020 new homes, a new 15,000sqm town centre, 77ha of open space and 96ha of employment land.

Land within Gregory Hill is zoned R1 General Residential with a minimum lot size of 125sqm. A significant proportion of the land within Gregory Hill has been subdivided with a site area between 400 – 500 sqm. The proposed lot size of 500sqm is substantially greater than the minimum allotment size of 125sqm and consistent with the subdivided lots within the Gregory Hill.

The residential character of the E4 Environmental Living zone and surrounds has changed significantly since the South West Growth Area rezoning in 2007.

Due to the modest increase in density, the Subject Site would not impact the developability of land located within Gregory Hill.

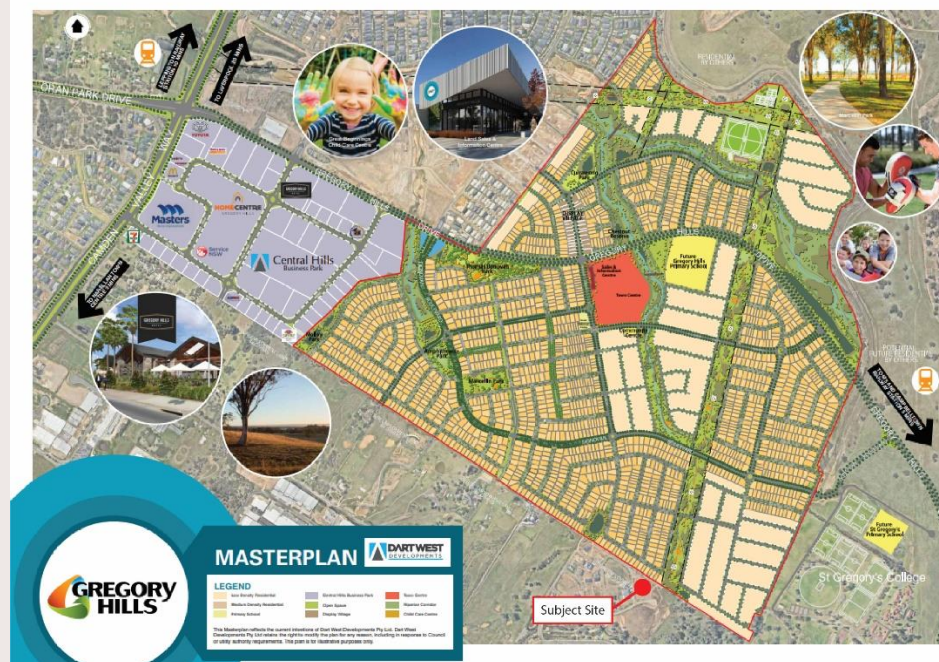


Figure 5-2 Gregory Hills Masterplan (Source: Dart West Development)

Currans Hill

Land located to the west of the site is zoned as R1 General Residential and E4 Environmental Living with a minimum lot size of 450sqm and 900sqm. The majority of the developed lots consist of single storey detached dwelling.

Properties located to the south of Currans Hill Reserve mainly comprises of single storey detached dwelling. These dwellings are constructed recently and unlikely to subject to future redevelopment.

Electrical Easement

The Subject Site is located to the west of the 60m TransGrid electrical easement, which runs north-south along the length of the Greater Site. The electrical easement is unsuitable for future redevelopment.

The services and infrastructure that are or will be available to meet the demands arising from the proposal and any proposed financial arrangements for infrastructure provision.

The Planning Proposal aims to reduce the current permitted minimum lot size across the Subject Site to 500m², which will allow for its subdivision into approximately 17 residential lots under the existing E2 and E4 zoning provisions. This yield would represent a modest increase in lot yield in comparison to the currently approved subdivision of 10 lots, including 1 residual lot.

It is not anticipated that the proposal will place significant pressure or demand on existing public infrastructure.

Utilities

The Subject Site is located adjacent to other residential development, which is serviced by utilities and essential services.

Utility providers would be consulted as part of any Gateway Determination to determine the existing and future capacity of the site.

Traffic

A Traffic Impact Assessment Report (prepared by Cardno) was submitted as part of the Planning Proposal. The findings of the TIA are as follows:

- > *"It is anticipated that Spring Farm Parkway Extension will alleviate the traffic issues on Narellan Road.*
- > *Nearest bus stop is approximately 1km from the subject site with a bus service to Campbelltown running every 30 minutes during peak hours.*
- > *The proposed increase of 10 dwellings would equate to 1 vehicle movement every 5 minutes which would have a negligible impact on the surrounding local road network and not be of a noticeable difference to the existing neighbourhood.*
- > *Assessment done on Currans Hill Drive / Spring Hill Circle indicate that no significant impact on the road network will be caused by the proposed development.*
- > *Assessment done on Glenfield Drive / Spring Hill Circle indicate that no significant impact on the road network will be caused by the proposed development".*

As shown on the indicative layout plan, the proposal would enable the development of a perimeter road along Caulfield Reserve. This may improve public access to Caulfield Reserve and enable passive surveillance from the street and new dwellings oriented toward the Reserve. Moreover, the proposal would facilitate a road edge to Caulfield Close consistent with the remainder of its northern and southern boundaries.

Road Networks

The subject site is 1.5 km north of Narellan Road, an arterial road connecting with the Hume Motorway to the south-east and Camden Valley Way to the north-west. The Hume Motorway then connects with the Westlink M7 Motorway and the M5 Motorway further north at the Sir Roden Cutler Interchange.

Planning and building for the progressive upgrade of major arterial roads within the South West Priority Growth Area are underway. Major arterial roads to be upgraded in the area include:

- > Spring Farm Parkway Extension. This is a proposed link road from the Menangle Park development area to Menangle Road. This 2.5 kilometre road, will form part of the future Spring Farm Parkway linking the Camden Bypass, the M31 Hume Motorway and Menangle Road, Menangle Park. It is anticipated that the Spring Farm Parkway will alleviate traffic issues on Narellan Road.
- > Camden Valley Way;
- > Narellan Road; and
- > The Northern Road.

Bus

A number of bus routes provide direct service to Currans Hill:

- > 890 – Campbelltown to Harrington Park via Narellan;
- > 891 – Mount Anna to Campbelltown via Currans Hill, and
- > 896 – Campbelltown to Oran Park via Gregory Hills.

Bus stops located on Narellan Road, approximately 750 m south of the site, provide access to Camden, Campbelltown, Spring Farm, and Picton. Other

bus routes from Campbelltown and Camden provide access to various regional areas of Sydney and NSW.

The Turner Road Growth Centre Precincts Development Control Plan indicates that bus routes connecting Gregory Hill to Currans Hill (via Manooka Valley) have been proposed, which is approximately 500m from the subject site. The proposed bus routes would provide services to Oran Park, Harrington Park, and Campbelltown/Macarthur. The final location of the bus stops is still to be determined.

Social Infrastructure

The site is supported by the following existing community infrastructure within close proximity of the site:

> Educational facilities:

- Currans Hill Primary School – 10 Tramway Drive, Currans Hill;
- Mount Annan Christian High School – 248 Welling Drive, Mount Annan;
- Elizabeth Macarthur High School – 38 Waterworth Drive, Narellan Vale;
- Western Sydney University Campbelltown Campus – Narellan Road, Campbelltown
- TAFE Campbelltown – 181 Narellan Road, Campbelltown;
- University of Sydney Cobbitty Campus – Nepean River Road, Cobbitty; and a range of private and religious educational institutions.

> Health facilities:

- Campbelltown Hospital – Therry Road, Campbelltown;
- Campbelltown Private Hospital – 42 Parkside Crescent, Campbelltown; and
- Camden Hospital – Menangle Road, Camden.

The Subject Site is located within an urban area and is serviced by existing and planned infrastructure, which is capable of accommodating the increased density.

6 Key Issues Identified by Camden Council

The revised Planning Proposal was assessed by Council officers and supported for the following reasons:

- > *The residential character of the E4 Environmental Living zone and surrounds has changed significantly since the South West Growth Area rezoning in 2007.*
- > *The proposed minimum lot size of 500m² is consistent with the character of the surrounding area.*
- > *The draft proposal complies with the planning principles for Manooka Valley outlined in the Camden DCP 2019.*
- > *The draft proposal will facilitate additional dwellings in proximity to existing infrastructure and facilities.*
- > *The draft proposal is consistent with the Region and District Plans, in addition to local strategic plans and their relevant objectives.*

The report recommended that Council endorse the revised Planning Proposal and it be forwarded to DPIE for Gateway Determination.

On 14 April 2020, Council unanimously voted against the Council officers' recommendation due to concerns relating to the following:

- > Impact on the existing road network;
- > Insufficient public benefits;
- > Impacts to the highly sensitive environmental area;
- > Inconsistent with the original vision of Manooka Valley; and
- > Camden Local Planning Panel did not support the Planning Proposal.

The issues identified by Council will be further discussed below.

Impact on the existing road network

A Traffic Impact Assessment (dated 26 March 2020) prepared by Cardno was submitted as part of the revised Planning Proposal.

The Traffic Impact Assessment (TIA) stated the proposal is forecast to generate an additional 9 peak hour vehicle trips (in addition to the existing approval of 8 dwellings on site). This is equivalent to 1 vehicle movement every 5 minutes, which would have a *"negligible impact on the surrounding local road network and not be of a noticeable difference to the existing neighbourhood"*. Additionally, it is not considered that the additional traffic volume would adversely impact on residential amenity or road safety performance of the local road network.

A SIDRA assessment of Currans Hill Drive/Spring Hill Circle and Glenfield Drive/Spring Hill Circle intersection was undertaken as part of the TIA. The SIDRA results indicated that both of the intersections are expected to *"operate satisfactorily in both AM and PM peak for all assessment scenarios with Level of Service A."*

The TIA was considered by Council officer which concluded that:

"The additional residential density arising from the Planning Proposal will not generate significant traffic impacts on the existing road network. The projected traffic volumes align with the recommended Road and Maritime Services (RMS) environmental threshold for local and collector road. However, the intersection of Narellan and Hartley Road is operating at capacity and further traffic assessment may be required to consider the cumulative impact".

Therefore, the additional density at the Subject Site is unlikely to adverse impact on the traffic movements within Currans Hill.

Insufficient social benefits

The social benefits that arise from the amendments were considered and discussed in the revised Planning Proposal. The Planning Proposal may result in the following social benefit:

- > the construction of the perimeter road as indicated in the layout plan. The commercial viability of construction of this perimeter road would be likely contingent on achieving lot yields that would not be possible under the current permissible minimum lot size.

The perimeter road would:

- > provide increased public access to local open space, specifically Caulfield Reserve;
- > allow increased numbers of houses close to and directly addressing the open space;
- > improve the quality of views from the Reserve towards its residential surroundings; and
- > contribute to community safety by facilitating passive surveillance from the street and the new houses.

Moreover, the proposal would facilitate a road edge to Caulfield Close consistent with the remainder of its northern and southern boundaries. Additionally, the perimeter road will reduce the potential bushfire risks by separating bushland and future residential dwellings which is consistent with the NSW Rural Fire Service (RFS) Planning for Bushfire Protection Guideline 2019.

The proposal is likely to provide a positive impact for the community as it offers greater housing choice and diversity to meet the anticipated population growth of the Camden LGA on a site that has specific qualities that maximise these benefits.

Considering the modest increase in density (i.e. an additional of 8 lots), 1 in our opinion that the potential social benefit generated by the Planning Proposal is adequate and appropriate.

Impacts to the highly sensitive environmental area

A Flora and Fauna Assessment (FFA) prepared by Cardno (including a Seven Part Tests and Tests of Significance) was submitted as part of the Planning Proposal. A summary of the FFA findings is as follows:

Surveys conducted as part of this FFA concluded that the Subject Site has been highly modified through recent clearing and is dominated by exposed soil and exotic grasslands. However, a small portion of the TEC CPW is present in the south-west as an extension of CPW vegetation in the adjacent Manooka Reserve. In addition, a portion of the regenerating grasslands of the Subject Site were identified as most closely conforming to CPW derived grasslands. Finally, a small vegetated pond is present providing limited habitat for native fauna, particularly amphibians.

No threatened flora species were encountered during survey and none are considered likely to occur. Due to the small size of the Subject Site, the entire land area was surveyed with no individuals of any threatened flora species known to occur in the locality documented. The survey was also conducted during an appropriate season (summer) for the detection of the majority of these species.

No threatened fauna species were detected during survey; however, two were considered likely to occur based on the presence of suitable habitat and recent occurrence records from within 5 km, the Cumberland Plain Land Snail and the Green and Golden Bell Frog.

An indicative impact assessment was conducted based on the existing concept plan, which would require removal of all vegetation and habitat from the Subject Site. Assessments of the above TECs and threatened species were conducted under the seven-part test methodology (EP&A Act) and/or tests of significance (EPBC Act). These tests concluded that although future development of the Subject Site would result in the removal of the whole occurrence of TEC and threatened fauna habitat from the Subject Site, the level of impact is not considered to be significant. The CPW present on the Subject Site represents less than 1 % of this community present in the entirety of lot 627 DP1163903 and the fauna habitat values present are not limited in the local area.

Based on this assessment, no significant impact on any listed entity under the TSC Act and/or EPBC Act is considered likely as a result of future development of the Subject Site and further assessment through a SIS (NSW) or a referral to the federal Minister of the Environment (Commonwealth) would be required to support a future DA.

The future development of the Subject Site poses a range of potential secondary impacts during and following development on adjacent areas of retained native vegetation in the downslope Manooka Reserve. However, these impacts can be mitigated through appropriate controls during development as well as environmentally sensitive development design. Manooka Reserve is already bordered by residential development to the west and south and the development of the relatively small Subject Site is not considered likely to significantly exacerbate the existing pressures on this reserve from adjacent residential lands.

A dedicated survey for the Green and Golden Bell Frog is recommended as part of any future DA. This survey would need to be conducted in line with the minimum survey requirements for this species as detailed in the NSW NPWS Environmental Impact Assessment Guidelines.

Submission of any DA after the 25 November 2019 will require assessment through the BAM under the new BC Act, based on a review of the BVMTT for this report. This resource shows the majority of the Subject Site mapped as "biodiversity values". All Part 4 developments on mapped lands require assessment through the BAM.

Based on the results of this assessment, the proposed rezoning of the Subject Site is considered likely to be supported. This approach would avoid the majority of high value native vegetation and fauna habitat present in lot 627 DP1163903. The small amount of TEC and potential threatened fauna habitat to be removed from the Subject Site is not considered to represent a significant loss of these resources in the locality.

It is recommended that the E2 zoned lands elsewhere in lot 627 DP1163903 are managed for conservation purposes. This would more than compensate for the small amount of TEC and potential threatened fauna habitat which would be lost through future development of the Subject Site following rezoning.

Consistent with the recommendation of the FFA, the zoning of the Greater Site will remain unchanged to ensure that the high-value native vegetation and fauna habitat will be conserved to compensate for the

removal 0.05ha of Cumberland Woodland Derived Grassland (i.e. 1% of the community present in the entirety of Lot 627 DP1163903). It should be noted that no other vegetation is proposed to be removed as part of this Planning Proposal.



Figure 6-1 Vegetation communities within the Subject Site (Source: Cardno)

Council Officer supported the retention of the E2 Environmental Conservation zone which will “*preserve the Cumberland Plain Woodland located on the site and its connection to the adjoining Manooka Reserve*”.

Inconsistent with the original vision of Manooka Valley

Schedule 3 of the Camden Development Control Plan 2019 outlines the following planning principles for Manooka Valley, which is addressed by the table below.

Planning Principle	Comment
<i>Manooka Valley will provide a physical and visual transition between rural/scenic protection areas and Currans Hill. The residential zone will be characterised by a range of lot sizes. Lot size and building character within residential precincts will reflect their relationship to adjacent amenities and the provision of housing diversity. Other lots will provide a low key and visually sensitive transition to surrounding rural and scenic protection land.</i>	The Western City District Plan identified the Subject Site as ‘metropolitan urban area’ and bordered the ‘metropolitan rural area’ located to the east. The Planning Proposal will preserve the metropolitan rural area and rural setting by retaining the E2 and E4 zone provisions. The existing Cumberland Plain Woodland located within the Greater Site will provide a transition to the neighbouring rural land and Scenic Hills. This ensures that the scenic quality of the area is retained. Additionally, the existing maximum building height of 9.5m will remain unchanged, which will ensure consistency with the existing dwellings to the west and further protect local views and offer a low key transition to the adjoining rural area.

	<p>The PP will facilitate a subdivision form that will enhance access to local open space.</p>
<p><i>The visual impact of development on Manooka Valley's landscape setting will be minimised. A high level of scenic quality will be achieved by protecting significant watercourses, significant trees, ridgetops and steep slopes from any adverse effects of development. The design of roads, landscaping, open spaces, water cycle management systems, houses and other elements of the urban landscape, will positively respond to these aims. The public open space design and water cycle management system will be environmentally sensitive, will contribute to the maintenance of downstream water quality and will recognise the importance of revegetated riparian corridors in the locality.</i></p>	<p>The landscape setting of Manooka Valley will remain mostly unchanged as the Subject Site is highly modified through recent clearing and is dominated by exposed soil and exotic grasslands. The Planning Proposal only requires the removal of a small amount (i.e. 0.05ha) of the TEC CPW at the south western edge of the Subject Site.</p> <p>In accordance with the recommendation of the FFA, the zoning of the Greater Site will remain unchanged to ensure that the high-value native vegetation and fauna habitat will be conserved to compensate for the removal of the Cumberland Woodland Derived Grassland. Furthermore, the existing Cumberland Plain Woodland located to the east of the proposal will partially screen the residential development when viewed from the nearby rural lands, Scenic Hills, Sydney Water Upper Canal and Kenny Creek. This ensures that the scenic quality of the area is retained.</p> <p>The Planning Proposal may result in the construction of a perimeter road, which enables street trees to be planted. The detailed design of the perimeter road and street planting will be considered during the subdivision development application.</p>
<p><i>A variety of publicly accessible open space areas, suitable for a range of passive recreation opportunities will be available to residents. Pedestrians and cyclists will have convenient access throughout the precinct and connections to surrounding precincts.</i></p>	<p>No new open space areas are proposed as part of the Planning Proposal.</p> <p>Six lots will be orientated towards the Caulfield Reserve, which would enable additional passive surveillance to be provided, which would improve the usability of the Reserve and enhance the user experience.</p> <p>The Planning Proposal may result in the construction of a perimeter road, which provides increased public access to local open space, specifically Caulfield Reserve.</p>
<p><i>A significant area of endangered Cumberland Plain Woodland has been set aside for restoration and revegetation. A Village Common will be created within an attractive and functional creek line. An integrated stormwater management system will help make Manooka Valley an attractive, environmentally sustainable neighbourhood.</i></p>	<p>As discussed earlier, the Planning Proposal only requires the removal of a small amount (i.e. 0.05ha) of the TEC CPW at the south western edge of the Subject Site.</p> <p>A Flora and Fauna Assessment (FFA) prepared by Cardno (including a Seven Part Tests and Tests of Significance) was submitted as part of the Planning Proposal. The FFA concluded that the proposal would avoid the majority of high-value native vegetation and fauna habitat present in lot 627 DP1163903. The small amount of TEC and potentially threatened fauna habitat to be removed from the Subject Site is not considered to represent a significant loss of these resources in the locality.</p> <p>Consistent with the recommendation of the FFA, the zoning of the Greater Site will remain</p>

	unchanged to ensure that the high-value native vegetation and fauna habitat will be conserved.
<p><i>The detailed design of the public domain in Manooka Valley, and its seamless integration with the private domain of each dwelling, is critical to achieving this vision. For this reason, control of the neighbourhood's streets and open spaces is rigorous. It has been planned and designed to respond to the natural features of the site, and to integrate innovative integrated water cycle management techniques. The combination of a thoughtful public domain design and its integration with the private domain of each dwelling will make Manooka Valley a great place to live.</i></p>	<p>The Planning Proposal may result in the construction of a perimeter road, which enables street trees to be planted. The detailed design of the perimeter road and street planting will be provided for the subdivision development application.</p> <p>Additionally, the perimeter road (8m carriageway width) would facilitate a permanent Asset Protection Zone adjacent to existing bushland and improve access for fire fighting.</p>

As illustrated in the above table, the Planning Proposal is not inconsistent with the planning principles for Manooka Valley. Further, the residential character of the E4 Environmental Living zone and surrounds has changed significantly since the South West Growth Area rezoning in 2007, as illustrated in Figure 6-2, 6-3 and 6-4. The original vision envisaged for Manooka Valley may need to be amended to reflect the changing nature of the surrounding developments and the introduction of the Growth Centre.



Figure 6-2 Aerial Photograph of Subject Site – 29 December 2009 (Source: Nearmap)



Figure 6-3 Aerial Photograph of the Subject Site – 30 June 2014 (Source: Nearmap)



Figure 6-4 Aerial Photograph of the Subject Site – 15 April 2020 (Source: Nearmap)

Council officer concurs that the proposed minimum allotment size is consistent with the surrounding character of the areas as the following statement was included in the Council Report dated 14 April 2020:

“The proposed 500m² minimum lot size is consistent with the surrounding residential character of the area, which consists of residential lot sizes ranging from 387m² to 1,299m² on land to the north. Furthermore, other land zoned E4 Environmental Living in Manooka Valley has a minimum lot size ranging from 500m² to 900m².”

Camden Local Planning Panel did not support the Planning Proposal.

On 22 August 2019, the Local Planning Panel recommended that the original Planning Proposal should not proceed to Gateway Determination for the following reasons:

- *It doesn't provide a diversity of lot sizes consistent with the planning of the surrounding area.*
- *The current zoning provides an appropriate transition to the immediately adjoining E2 zoned land containing CPW.*
- *The existing E2 Environmental Conservation zone should be retained, as CPW vegetation has been identified on the E2 zoned land.*

Consequent to receipt of the comments from CLPP, the proponent attended a meeting with Camden Council Strategic Planning officers to discuss the outcomes of the CLPP meeting and a way forward for the Planning Proposal. After the meeting, the following written correspondence dated 3 October 2019 was provided by Council's Strategic Planner:

3. Key discussion

- d) *Council officers outlined the outcomes of the Panel's advice, which was consistent with Council officers assessment and not supported.*
- e) *Council officers recognised that while the planning proposal is not supported in its current format, increased density in the subject area could be supported subject to:*
 - iii. *Retaining the current zoning of the site;*
 - iv. *Further investigate/justify on a proposed minimum lot size.*
- f) *Council officer noted that the minimum lot size for E4 zoned land within Manooka Valley ranges in size from 500m² to 1,500m².*

4. Key actions from the meeting

- c) *The proponent is to amend the proposal package addressing Panel's advice and forward to Council.*
- d) *Council officer would like to report the planning proposal to Council by end of this year."*

Based on the discussion with Council's Strategic Planner, a revised Planning Proposal was submitted to Camden Council on 18 November 2019. The revised Planning Proposal responded to the Panel's advice by retaining the current E2 Environmental Conservation and E4 Environmental Living zoning and by increasing the proposed minimum lot size from 450m2 to 500m2.

7 Conclusion

This letter has been prepared to support the Rezoning Review request to DPIE in relation to the Planning Proposal located at A Saddle Close, Currans Hill. This Planning Proposal is consistent with the objectives of the Greater Sydney Region Plan and South West District Plan by enabling additional density to be provided to a site that is well serviced by existing and future infrastructure while not adversely impacting the existing development located at Currans Hill and Gregory Hill. The reduction to the minimum allotment size would enable additional housing to be provided, which will facilitate affordable housing. As indicated in the indicative layout plan, generous site areas and dimensions are provided to allow a range of housing types to be developed in an area adjacent to high quality open space.

Since early 2019, the Proponent has engaged with Council to facilitate the amendments of the planning controls for this site, which is evidenced by the various meetings and amendments to the planning proposal and indicative layout plan. The current Planning Proposal has been prepared in response to comments provided by Sydney North Planning Panel, on review of the previous Rezoning Review request (PGR_2017_CAMDE_001_00). The Panel expressed its opinion that there is merit for additional density to be provided on this site. Additionally, Council officers supported the proposed amendments and recommended that the Planning Proposal be submitted to the Department of Planning, Industry and Environment for Gateway determination. As demonstrated throughout this letter, the Planning Proposal has demonstrated strategic and site-specific merit as outlined in "A Guide to Preparing Local Environmental Plans" and should be supported by the Panels and submitted for a Gateway Determination.

Yours sincerely,



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