

Appendix 6: Springfield Road North Public Agency Consultation

Table 1 Submissions Received

Agency	Date of letter
a. Department of Planning, Housing and Infrastructure (DPHI) (letter regarding servicing)	22 December 2023
Fire and Rescue NSW	18 October 2022
a. NSW Environment Protection Authority (EPA) (first letter)	18 October 2022
b. EPA (second letter)	10 January 2025
Water NSW	21 October 2022
Jemena Gas	14 October 2022
Endeavour Energy	30 October 2022
a. NSW State Emergency Service (SES) (first letter)	7 November 2022
b. SES (second letter)	20 January 2025
a. NSW Rural Fire Service (RFS) (first letter)	14 November 2022
b. NSW RFS (second letter)	30 January 2025
a. Sydney Water (first letter)	14 November 2022
b. Sydney Water (second letter)	11 August 2023
c. Sydney Water (third letter)	28 November 2024
d. Sydney Water (fourth letter)	10 February 2025
a. Transport for NSW (TfNSW) (revised advice)	22 May 2023
b. TfNSW (updated advice)	28 February 2025
a. Department of Climate Change, Energy, Environment and Water (DCCEEW)*	5 December 2022
b. DCCEEW* (second letter)	3 February 2025
<i>*Previously Environment and Heritage Group</i>	
School Infrastructure NSW	19 December 2022
Heritage NSW	13 June 2023

Table 2 – Key Issues and Council Officer Responses

Issue/Recommendation		Officer Response	Proposed Action
Item 1: Department of Planning, Housing and Infrastructure			
1.1	<p>Noted that the Department will consider a proposal where there is confirmed capacity to support the proposed number of homes.</p>	<p>The proposal cannot demonstrate that the whole of the site can be serviced for drinking water and wastewater services that this time.</p> <p>The proponents' proposed interim servicing strategy is to service only lots under their control (approximately 400 lots) in the short term.</p> <p>Most recent advice provided by Sydney Water dated 10 February 2025 provides an updated timeframe of 2031 for the delivery of drinking water and 2030/31 for wastewater services (subject to funding and approvals).</p> <p>Council officers support the proposal being resubmitted to Council for assessment once servicing is confirmed.</p>	No further action at this time.
1.2	<p>Noted that any identified water and wastewater capacity that transfers serviceable lots away from existing rezoned sites would need to be clearly indicated.</p> <p>Advised that the Department will work with Sydney Water to consider capacity in light of rezonings already in the pipeline.</p>	DPHI's position noted.	No further action at this time.

Issue/Recommendation		Officer Response	Proposed Action
1.3	Advised that funding arrangements for required infrastructure (either proponent or Government funded) would need to be confirmed to a high degree of certainty, prior to a Gateway determination being issued.	Land fragmentation within the site will make it difficult to achieve an agreed funding approach between all the land owners.	A Contributions Plan be prepared should the proposal proceed.
1.4	<p>Advised that the Guide to the South West Growth Area provides the framework to prepare and assess planning proposals in the South West Growth Area.</p> <p>Any proposed rezoning will need to demonstrate how it satisfactorily addresses the benchmark criteria contained in the Guide.</p> <p>This will help ensure a timely progression of the proposal through the plan-making process.</p>	The proposal is currently inconsistent with benchmarks in the Guide and updates to the proposal and ILP would be required to make it consistent if the proposal were to proceed.	Updates to the planning proposal and ILP should the proposal proceed.
Item 2: Fire and Rescue NSW			
2.1	FRNSW would have no issues with the land being rezoned for urban use as proposed, as it forms part of the development FRNSW has been preparing for across the South West Growth Area.	Noted.	No further action
2.2	The subject development would be serviced by the current fire station at Narellan, and the new Oran Park fire station when it comes online.	Noted.	No further action
2.3	Future planning for the wider South West Growth Area also has a new fire station proposed in the Catherine Fields North Precinct. It would also provide services to this development when it becomes operational.	Noted.	No further action
2.4	It is understood this development would be making contributions to the cost of land for new fire stations in the wider growth area, as per the Western Sydney	Noted.	The proposal applies to land in an area where Special Infrastructure Contributions

Issue/Recommendation		Officer Response	Proposed Action
	Growth Area Special Infrastructure Contributions order.		apply. If the proposal proceeds, SIC contributions would be payable.
2.5	The Social Infrastructure Assessment is all but silent on the issue of emergency service impacts and needs. Council in its assessments should ensure proponents consult with all service agencies to identify any issues or opportunities to support the provision of these services to new growth areas.	Noted.	Should the proposal proceed, further consultation with agencies would be undertaken during public exhibition.
Item 3: NSW Environment Protection Authority			
3.1	The EPA acknowledges the Traditional Custodians of Catherine Field, the Dharug people. We note according to available information, this proposal encompasses lands that may have been used as a travel route for the Dharawal people. We encourage meaningful engagement with the Aboriginal community in developing and implementing the Precinct.	Noted.	<p>If the proposal proceeds:</p> <ul style="list-style-type: none"> An Aboriginal Cultural Heritage Assessment be prepared and ensure that it includes consideration of the travel routes of the Dharawal people. A Connecting with Country Framework be prepared and that the travel routes of the Dharawal people are considered.
3.2	<u>Road noise and air impacts</u> <ul style="list-style-type: none"> Precinct has a frontage along Camden Valley Way, a state road which connects Greater Sydney to Camden. Noise and air emissions from Camden Valley Way have the potential to impact on future 		<p>If the proposal proceeds:</p> <ul style="list-style-type: none"> Updates to the noise assessment to consider the impact of noise emissions from Camden Valley Way

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	<p>residential receivers within the proposed Precinct.</p> <ul style="list-style-type: none"> • Advise that the noise assessment should be reviewed to ensure the development will comply with applicable noise limits. • Vehicle air emission impacts (road noise and air emissions) have addressed in the proposal and should be considered at the strategic planning stage. • Recommend using Development Near Rail Corridors and Busy Roads – Interim Guideline (Department of Planning, 2008) for guidance. 		<p>and ensure compliance with applicable noise limits.</p> <ul style="list-style-type: none"> • An air quality assessment be prepared and that this assessment considers vehicle emissions
	<p><u>Contaminated land</u></p> <ul style="list-style-type: none"> • The preliminary site investigation (PSI) did not find contamination that would prevent the site from being made suitable for the proposed development. • It is recommended that a Detailed Site Investigation be undertaken on any identified potential areas of environmental concern at the development approval stage. • Recommends future development applications can demonstrate the land is suitable for the proposed use, or can be made suitable, either by remediation or by the way the land is used, as per the Resilience and Hazards SEPP 2021 and the Managing Land Contamination Planning Guidelines SEPP 55–Remediation of Land (EPA and Department of Urban Affairs and Planning, 1998). 	<p>EPA comments are noted.</p> <p>The PSI has also been reviewed by Council officers (with local knowledge) who have identified that some historic land uses have been omitted from the assessment. ILP Option B also contains additional properties that have not been considered.</p> <p>If the proposal proceeds, an updated PSI should be requested and further consultation with the EPA should be undertaken on the findings.</p>	<p>An updated PSI and undertake further consultation with the EPA, should the proposal proceed.</p>

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Item 4: Water NSW			
4.1	The subject site is not located on or near any WaterNSW land or assets and is unlikely to impact on WaterNSW's infrastructure or operations. As such WaterNSW does not have any comments or particular requirements for the proposal going forward.	Noted.	No further action required.
Item 5: Jemena			
5.1	<p>Jemena's closest high pressure natural gas transmission pipeline is the Eastern Gas Pipeline, which is located approximately 1.3km due east of the intersection of Catherine Fields Road and Camden Valley Way.</p> <p>As such, Jemena does not anticipate that the proposed development will impact Jemena's high pressure natural gas pipeline, and vice versa. Consequently, Jemena does not wish to provide objections or further comments on the planning proposal.</p>	Noted.	No further action required.
Item 6: Endeavour Energy			
6.1	Asset Planning & Performance Branch has had visibility of this development and do not anticipate there will be any concerns with respect to major transmission feeder easements [132 kilovolt (kV)].	Noted.	No further action required.
6.2	Given the timing of first lots expected from 2026 onwards at a rate of 200 lots per year until the 2080 lots are delivered, there should be no issues servicing them from a new mobile zone substation at Catherine Park. The permanent zone substation is expected in 2030/1.	Noted.	No further action required.
6.3	The only request at this stage is for additional ducts to be provided by the developer along the boundary of their ultimate site, in particular along Camden	Noted.	This is to be addressed at the subdivision stage, if the proposal proceeds.

Issue/Recommendation		Officer Response	Proposed Action
	Valley Way, Catherine Fields Road and the extension of Rickard Road (Future Road).		
Item 7: NSW State Emergency Service			
First letter			
7.1	The 'Consistency with Ministerial Directions' section within the Planning Proposal (page 79) states that the site is not subject to flooding. However, this contradicts the studies accompanying the proposal.	Noted, assessment against 9.1 Ministerial Directions has identified that the site is flood affected.	No further action.
7.2	The consent authority will need to ensure that the planning proposal is considered against the relevant Ministerial Section 9.1 Directions, including 4.3 – Flood Prone Land, and that it is consistent with the NSW Flood Prone Land Policy as set out in the NSW Floodplain Development Manual, 2005 (the Manual).	Noted, current assessment has identified that the proposal is inconsistent with Ministerial Direction 4.3 and the NSW Flood Prone Land Policy. Should the proposal be supported to proceed, further work will be required to update modelling and the preferred draft ILP, to ensure compliance can be achieved.	Updates to flood modelling and the preferred draft ILP are required if the proposal proceeds.
7.3	Attention is drawn to the principles outlined in the Manual which are of importance to the NSW SES's role.	Noted see below.	See below.
7.3a.	<u>Principle:</u> Zoning should not enable development that will result in an increase in risk to life, health or property of people living on the floodplain: <ul style="list-style-type: none"> - The site is intersected by small tributaries of Upper South Creek and Rileys Creek. - Some of the proposed Medium and Low density residential development is situated within the existing 1% AEP flood extent. - The proposed management of the flood impacts includes a series of 8 detention basins and in accordance with the Growth 	Noted. Should the proposal proceed, updated flood modelling and a flood impact and risk assessment will be required to ensure that residential areas and road networks are not subject to flooding in a post-development scenario.	A flood impact and risk assessment, that considers and addresses this principle, will be required if the proposal proceeds.

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	<p>Centres Development Code (NSW Government, 2006) fill at or above the Flood Planning Level 1% AEP plus 500mm freeboard).</p> <ul style="list-style-type: none"> - It is noted in the report that in some instances the basin outlet size does not accommodate PMF flows. - In the post development scenario, the lots near the Camden Valley Way may be impacted by frequent flooding (a 5% AEP flood as per map 07 Water Cycle Management Strategy Report) as the culverts are unable to convey the flow during such an event. - Similarly for the area near Basin 04 (Water Cycle Management Strategy Report, page 26). - In addition, some proposed lots and roadways are identified as vulnerable to flooding in a PMF. 		
7.3b.	<p><u>Principle</u>: Risk assessment should consider the full range of flooding, including events up to the Probable Maximum Flood (PMF), and not focus only on the 1% AEP flood.</p>	Noted. A flood impact and risk assessment, that considers the full range of flooding, will be required if the proposal proceeds.	A flood impact and risk assessment, that considers and addresses this principle, is required if the proposal proceeds.
7.3c.	<p><u>Principle</u>: Risk assessment should have regard to flood warning and evacuation demand on existing and future access/egress routes:</p> <ul style="list-style-type: none"> - Consideration should also be given to the impacts of localised flooding on evacuation routes, particularly as this area is prone to 	Noted. A flood impact and risk assessment, that considers localised flooding on evacuation routes, will be required if the proposal proceeds.	A flood impact and risk assessment, that considers and addresses this principle, is required if the proposal proceeds.

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	flash flooding and will have little warning prior to the onset of flooding.		
7.3d	<p><u>Principle</u>: Evacuation must not require people to drive or walk through flood water:</p> <ul style="list-style-type: none"> - Ideally the access/egress routes should provide rising road access and/or be passable up to at least a 1 in 500 year local flooding level (including Camden Valley Way). - The indicative layout indicates that the proposed east-west roads throughout the precinct are unable to provide access above the 5% AEP flood to Camden Valley Way, and the Camden Valley Way is cut in a frequent event to the north and south of the site (Upper South Creek Flood Study, 2012). - NSW SES would be happy to meet with Council and DPE to discuss these evacuation routes. - Consideration should be given to adjust the indicative layout to better enable safe evacuation with rising road access from the precinct. 	Noted. A flood impact and risk assessment, that considers access and egress routes for safe evacuation, will be required if the proposal proceeds.	A flood impact and risk assessment, that considers and addresses this principle, is required if the proposal proceeds.
7.3e.	<u>Principle</u> : In the context of future development, self-evacuation of the community should be achievable in a manner which is consistent with the NSW SES's principles for evacuation. Future development must not conflict with the NSW SES's flood response and evacuation strategy for the existing community.	Noted. A flood impact and risk assessment that considers safe self-evacuation will be required if the proposal proceeds.	A flood impact and risk assessment, that considers and addresses this principle, will be required if the proposal proceeds.
7.3f.	<u>Principle</u> : Development strategies relying on deliberate isolation or sheltering in buildings	Noted. A flood impact and risk assessment, that does not rely on	A flood impact and risk assessment, that considers and

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	<p>surrounded by flood water are not equivalent, in risk management terms, to evacuation:</p> <ul style="list-style-type: none"> - 'Shelter in place' strategy is not an endorsed flood management strategy by the NSW SES for future development. Such an approach is only considered suitable to allow existing dwellings that are currently at risk to reduce their risk, without increasing the number of people subject to such risk. 	shelter in place strategies, will be required if the proposal proceeds.	addresses this principle, will be required if the proposal proceeds.
7.3g.	<u>Principle</u> : Development strategies relying on an assumption that mass rescue may be possible where evacuation either fails or is not implemented, are not acceptable to the NSW SES.	Noted. A flood impact and risk assessment that ensures mass rescue is not needed, will be required if the proposal proceeds.	A flood impact and risk assessment, that considers and addresses this principle, is required if proposal proceeds.
7.3h.	<u>Principle</u> : The NSW SES is opposed to the imposition of development consent conditions requiring private flood evacuation plans rather than the application of sound land use planning and flood risk management.	Noted. A flood impact and risk assessment that shows that future development can occur without the need for individual flood evacuation plans, will be required if the proposal proceeds.	A flood impact and risk assessment, that considers and addresses this principle, will be required if the proposal proceeds.
7.3i.	<u>Principle</u> : NSW SES is opposed to development strategies that transfer residual risk, in terms of emergency response activities, to NSW SES and/or increase capability requirements of the NSW SES.	Noted. A flood impact and risk assessment that does not shift the onus onto the SES in an emergency response event, will be required if the proposal proceeds.	A flood impact and risk assessment, that considers and addresses this principle, will be required if the proposal proceeds.
7.3j.	<u>Principle</u> : Consent authorities should consider the cumulative impacts any development will have on risk to life and the existing and future community and emergency service resources in the future.	Noted. A flood impact and risk assessment that considers the cumulative impact of development on risk to life and emergency services, will be required if the proposal proceeds.	A flood impact and risk assessment, that considers and addresses this principle, will be required if the proposal proceeds.

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Second letter			
7.4	<ul style="list-style-type: none"> Refer to previous advice and note and appreciate the changes made to the proposed master plan layouts. Recommend careful consideration is given to the locations of proposed medium to high density residential development as these appear to be located in the area of highest flood risk. Recommend undertaking sensitivity testing for the overtopping or potential failure of the proposed detention basins, including demonstration of any further works undertaken to drainage corridors. Recommend proposed green space and riparian corridors are appropriately sized to prevent the footprint of residential development entering areas of high flood risk. Reiterate that NSW SES does not support any strategy which requires people or vehicles to enter flood water. 	Noted. Should the proposal proceed, updated flood modelling, updates to the water cycle management plan and a flood impact and risk assessment, will be required to ensure that residential areas and road networks are not subject to flooding in a post-development scenario.	<p>A flood impact and risk assessment that considers and addresses all matters raised by the NSW SES, will be required if the proposal proceeds.</p> <p>Updates to flood modelling and the Water Cycle Management Plan, if the proposal proceeds.</p>
Item 8: NSW Rural Fire Service (RFS)			
First letter			
8.1	The planning proposal is considered to be generally in accordance with the provisions of Planning for Bush Fire Protection 2019 (PBP), subject to the recommendations provided in the Bushfire Threat Assessment being implemented.	Noted, Planning for Bushfire Protection will be further considered at the development application stage for the subdivision.	No further action at this stage.
Second letter			
8.2	<ul style="list-style-type: none"> The NSW RFS has reviewed the two options draft ILP options. 	Updated advice for the NSW RFS is noted.	An updated bushfire assessment and corresponding amendments to the preferred

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	<ul style="list-style-type: none"> The provision of a school in both the options will require a revised bush fire assessment report that considers the provisions of special fire protection purpose (SFPP) development, as per Chapter 6 of PBP 2019 and Addendum to PBP 2022. The proposed lots zoned as drainage and open space will need to have a Plan of Management to avoid creating future bush fire hazard within the area. Dead end roads within the proposed public road layout must be avoided as much possible. The medium to high density residential areas will need to address the provisions of Chapter 5 and section 8.2.2 of PBP 2019. Asset Protection Zones must be wholly within the boundaries of the development site. The pre DA advice is not intended to provide pre approval of bush fire risk assessment to support a development application. The aim of the service is to identify any potential issues in relation to bush fire risk assessment before a formal development application is lodged. The advice issued is preliminary in nature and no detailed assessment of the site or development is undertaken at this stage. 	If the proposal proceeds, an updated bushfire assessment and potential updates to the preferred draft ILP will be required to address the matters raised in this advice.	draft ILP, will be required, should the proposal proceed.
Item 9: Sydney Water			
Original letter			
9.1	Objection Objection raised. Due to the constraints in the existing water and wastewater networks to service the	Noted, objection has been withdrawn in updated advice.	See updated advice action.

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	proposed site, Sydney Water does not support the proposed rezoning.		
9.2	<p>Water Servicing The proposed site is located within the Leppington Elevated Water Supply Zone. There is no capacity in the water supply zone to service the proposed development.</p> <p>Sydney Water is carrying out planning studies for Options Assessment to identify water truck infrastructure required to service growth in the supply zone.</p>	Noted. Advice is consistent with updated advice.	See updated advice action.
9.3	<p>Wastewater Servicing The proposal site is located within the Leppington Elevated Water Supply Zone and there is no capacity in the water supply zone to service the proposed development.</p> <p>A new wastewater pump and staged amplifications are required to service the catchment. The delivery of the staged infrastructure estimates from circa 2028 onwards subject to funding approval for both pump station and trunk infrastructure.</p> <p>Based on the infrastructure delivery uncertainties and timescales, the proposed rezoning would not be supported by Sydney Water for a considerable period of time.</p>	Noted. Advice is consistent with updated advice.	See updated advice action.

Issue/Recommendation		Officer Response	Proposed Action
Second letter			
9.4	Water The site is within the Leppington Elevated Water Supply zone for water services. Sydney Water has confirmed that they are currently concentrating on servicing zoned areas within the catchment and that services will not be available to the unzoned areas until 2028/29.	Noted, this advice is consistent with the current Sydney Water Growth Servicing Plan 2024-2029.	Recommend not to support the proposal until servicing can be secured.
9.5	Wastewater The site is within the Lowes Creek catchment for wastewater services. Sydney Water has confirmed that a new pumping station and staged amplifications are required to service this area, and the delivery of this infrastructure is estimated to be from 2028/29 (subject to approval).	Noted. This advice is consistent with the current Sydney Water Growth Servicing Plan 2024-2029.	Recommend not to support the proposal until servicing can be secured.
9.6	Alignment Sydney Water also note that the proposal anticipates development delivery to take place from 2026 with a 200 dwelling uptake per year. This does not align with the Sydney Water planning. After meeting with the proponent, no valid opportunities have been identified to accelerate servicing at this time.	Noted. Advice has been provided to the proponent.	Recommend not to support the proposal until servicing can be secured.
9.7	Given a lack of alignment with proposed demand and infrastructure delivery, Sydney Water has indicated that they are not able to support the rezoning for a considerable period of time.	Noted. Advice has been provided to the proponent.	Recommend not to support the proposal until servicing can be secured

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Third Letter			
9.8	<ul style="list-style-type: none"> Note the proponents are now carrying out water and wastewater investigations separately but have engaged GHD to undertake water and wastewater modelling. GHD will examine Sydney Waters' potential interim water and wastewater servicing options for their developments in the understanding that this could identify accelerated servicing opportunities to support the proposal. Springfield Road North proposes the rezoning of approximately 104 hectares, resulting in 2,080 lots. GHD studies outlined interim servicing options for 400 lots by 2029 as part of Springfield Road North. Sydney Water has been working with GHD and received a published version of their assessment reports in late October 2024. Review has noted that the assessments have not yet fully completed the required modelling works. The reports provide only potential overviews of servicing possibilities but have not yet completed the modelling required to prove whether the solutions are viable. Sydney Water are still indicating delivery of drinking water services to the area by 2031. Will continue to review servicing opportunities and timescales and will continue to collaborate with the proponents when they complete the modelling works, and to explore suitable 	Sydney Water's update is noted.	No further action at this time.

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	interim servicing solutions until the long-term infrastructure is in place.		
Fourth Letter			
9.9	<ul style="list-style-type: none"> • Purpose of the letter is to provide an update. • Modelling work for both drinking water and wastewater servicing has not been fully completed to address Sydney Water's criteria, and the proponents' consultants have not yet proposed viable options for interim drinking water and wastewater services. • The current anticipated delivery of drinking water services to the area is 2031, and 2030/2031 for waste water services. (subject to funding and approvals). • The proponents are currently proposing that up to 1,200 accelerated dwellings (combined for SRN and SRS) be built, prior to the ultimate water servicing being anticipated to be available. • Sydney Water continues to work with the proponents. • Should Council wish to progress the planning proposal, then a meeting is requested to understand how the relevant planning controls, public health considerations and safeguarding measures for home buyers will be addressed. 	Sydney Water's update is noted.	<p>Recommend the proposal does not proceed until Water and Wastewater servicing of the whole site SRN site can be achieved.</p> <p>Further consultation with Sydney Water regarding servicing the proposed school and local centre is required, if the proposal proceeds.</p>

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Item 10: Transport for NSW			
<i>Revised Advice</i>			
10.1	TfNSW raised no objection to the draft proposal proceeding to Gateway Determination, and formally rescinded previous advice (dated 14 December 2022).	<p>TfNSW's previous advice letter raised concerns that the proposal was premature from a planning and infrastructure perspective because it sought to rezone land without the guidance of a broader precinct plan, and prior to TfNSW's South Western Sydney – Transport Structure Plan being completed.</p> <p>TfNSW rescinded their objection on 22 May 2023, stating that Council and the relevant Planning Authority is best placed to determine the proposal's strategic planning merit.</p> <p>TfNSW's updated position is noted.</p> <p>The updated ILP Option B appears to show the correct alignment for the Rickard Road extension.</p> <p>Both updated ILP options have been referred to TfNSW for comment. TfNSW has advised that Option B shows the exhibited alignment of the proposed Rickard Road Extension, and has provided additional matters for Council's consideration in the assessment of the proposal.</p>	<p>Traffic impact modelling and assessment is an outstanding matter to be resolved, subject to the proposal being supported to proceed.</p> <p>Continue to engage with TfNSW, should the proposal proceed.</p>

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Updated Advice			
10.2	Rickard Road alignment <ul style="list-style-type: none"> Option B draft ILP is aligned with the publicly exhibited Rickard Road Strategic Route Assessment Preferred Route Option Report (ARUP dated 7 September 2020) (Rickard Road Option Report 2020), note that Luke's Lane currently serves to connect Springfield Road to Copper Drive and Catherine Park Drive, however, the identified strategic Rickard Road extension corridor will be located further to the southeast of Luke's Lane. the Rickard Road corridor has been identified as a future rapid bus corridor. consider minimising bends and turns to support efficient bus operations. recommend that the the preferred ILP is consistent with the Springfield Road South precinct to ensure consistent alignment integration and bus operation efficiency of Rickard Road. notes the proposed roundabout intersection in the Dec ILP (Option B) along the Rickard Road Extension (i.e. mid way between the future signalised intersections of Catherine Fields Road / Rickard Road and Springfield Road / Rickard Road). notes that the Rickard Road Strategic Route Assessment Preferred Route Option Report (ARUP dated 7 September 2020) identifies the preferred option as a 34.9m wide corridor with 	<p>TfNSW advice is noted and will be further considered should the proposal be supported to proceed.</p> <p>Detailed design of the school site will also be required, as well as updates to the relevant studies, modelling and the preferred draft ILP.</p> <p>Further consultation with TfNSW will also be required.</p>	<p>Updates to the planning proposal package, specialist studies, traffic modelling and preferred draft ILP option are required to consider matters raised in TfNSW's latest advice, should the draft proposal be supported to proceed.</p>

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	<p>capacity for up to six lanes (i.e. four general traffic and two bus lanes), any proposed new intersection (such as the one listed above) must be designed with this cross section and future lane configuration in mind.</p> <ul style="list-style-type: none"> • concern the proposed roundabout will likely result in a large roundabout footprint, due to the future lane requirements. • strongly advise Council to identify the land requirements / footprint for such an intersection. This will likely go beyond the current proposed corridor requirements identified for the Rickard Road extension and impact adjacent land proposed for housing / open space / drainage. <p>Land use</p> <ul style="list-style-type: none"> • The proposed location of the primary school in Option B is adjacent to the Rickard Road corridor and has the potential to impact on child pedestrian safety and respiratory health. This location may also cause traffic disruptions at pick up and drop off times on the higher order roads. <p>Traffic performance</p> <ul style="list-style-type: none"> • The existing roundabout at Luke's Ln/Springfield Road is located approximately 120m northwest of the proposed future signalised intersection in Rickard Road/Springfield Road (Rickard Road Option Report 2020). Austroads Guide to Traffic Management Part 6 – Table C12 2 advises 		

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	<p>that roundabouts shouldn't be located in close proximity to traffic signals where traffic flows leaving the roundabout would be interrupted by the downstream traffic control which could result in queueing back into the roundabout. This issue should be further investigated and satisfactorily resolved within the detailed design of the Rickard Road upgrade and the road/intersection infrastructure planning associated with both the Springfield Road North and Springfield Road South Precincts.</p> <p>General</p> <ul style="list-style-type: none"> Consider the Guidelines for Public Transport Capable Infrastructure in Greenfield Sites, developed by TfNSW in 2018 and address both the road network design and road infrastructure requirements, and supports good road design in greenfield sites so that public transport can be successfully delivered. 		
Item 11: Department of Climate Change, Energy, Environment and Water (DCCEEW) (Previously Environment and Heritage Group) - Conservation Programs, Heritage and Regulation (CPHR)			
11.1	<p>Recommends Council assess and consider the Springfield Road North and Springfield Road South planning proposals together rather than in isolation. Note that this would offer a greater opportunity to retain the existing Cumberland Plain Woodland Critically Endangered Community (CPW) located in the southern portion of the Springfield Road North site. For example, the medium density development proposed on and around the CPW on the northern site could be shifted to the southern site to achieve</p>	<p>Both proposals will be independently assessed. However, if both proceed, vegetation retention and wildlife corridors will be considered from a strategic level across both sites.</p>	<p>Consider connectivity between the two sites, should both the proposals proceed.</p>

Issue/Recommendation		Officer Response	Proposed Action
	the same overall density but allow the CPW to be retained.		
11.2	<p>Sydney Region Growth Centres Biodiversity Certification Order:</p> <p>The SRN site is subject to the Order to confer biodiversity certification on the SEPP (Sydney Region Growth Centres) 2006.</p> <p>Contrary to Table 1 of the Biodiversity Certification Assessment Report (pp.18-25), the Planning Proposal Authority must address all relevant biodiversity measures (RBMs) of the Order, including:</p> <ul style="list-style-type: none"> • retention and protection of a minimum 2000ha of existing native vegetation (ENV), either within certified areas and/or the non-certified areas (RBM 6); • retention of ENV during precinct planning (RBMs 7-9); • precinct plans provide for the appropriate reuse of plants (including but not limited to seed collection) and topsoil from development sites, that contain known or potential native seed bank, and address the re-location of native animals from development sites prior to development commencing (RBM 19), and • during or before any public exhibition of draft precinct plans, an assessment of consistency of the proposed precinct plan with the conditions of biodiversity certification is to be made publicly available (RBM 35). 	<p>Noted. The Biodiversity Assessment needs to be updated if the proposal proceeds and a consistency assessment is also required. Internal review of the biodiversity assessment has identified errors in the methodology, with vegetation condition assessments not being subject to ground-truthing and some vegetation not being included in the survey.</p>	<p>Request an updated biodiversity assessment and consistency report, if the proposal proceeds.</p>

Issue/Recommendation		Officer Response	Proposed Action
11.3	<p>The site is entirely biodiversity certified and as such there is no requirement to protect native vegetation within the site. However, it is recommended that:</p> <ul style="list-style-type: none"> the exhibited proposal is supported by a consistency report to demonstrate compliance with RBM 35 of the Order, and DCP controls are developed to address the requirements of RBM 19 of the Order. 	Noted. if the proposal proceeds, a consistency report and draft DCP controls will be required.	Request a consistency report if the proposal proceeds and develop DCP controls address the requirements of RBM 19 of the Order.
11.4	<p>Retention and protection of vegetation and riparian corridors</p> <p>Opportunities for the retention of native vegetation should be considered. This could include:</p> <ul style="list-style-type: none"> retention of existing vegetation in riparian areas; locating and designing parks to retain existing vegetation; integrating existing vegetation within subdivision and road design, and the retention of existing stands of vegetation in association with passive recreation areas. <p>The proposal report states that the proposal will protect a riparian area in the west of the site and that a green grid will be implemented via a hierarchy of green spaces. However, these areas make up only 13% of the site and it is unclear what tree canopy cover target will be achieved via the green grid.</p> <p>Supports the protection of riparian areas via Clause 6.2, Appendix 5 of the Western Parkland City SEPP. However, EHG considers that there is a missed opportunity to better retain existing vegetation,</p>	<p>Noted. the Biodiversity Assessment and Riparian Assessment will require updating, if the proposal proceeds.</p> <p>Internal review of these assessments has identified errors in the methodology, with vegetation condition assessments not being subject to ground-truthing, some vegetation not being included in the survey, and dams being considered as human-made rather than being remnants of an original watercourse.</p> <p>The updated assessments will be required to address these errors.</p> <p>Further work will also be required to link riparian and vegetative corridors across the site and to the SRS site.</p> <p>A landscape master plan and street cross-sections will also be required to further assess tree canopy targets.</p>	Further work to link riparian and vegetative corridors and to achieve tree canopy targets, is to be undertaken, should the proposal proceed.

Issue/Recommendation		Officer Response	Proposed Action
	<p>particularly in the southern part of the site where there is a large area of CPW.</p> <p>Recommends:</p> <ul style="list-style-type: none"> existing vegetation which is a priority for retention (such as CPW) is mapped and retained through development controls, and The green grid is implemented via DCP mapping and controls, including a canopy cover target. 		
11.5	<p>Flooding</p> <p>Recommend that Council confirm whether the site is flood affected and if so, a flood impact and risk assessment (FIRA) should be prepared to support the proposal.</p> <p>The FIRA should:</p> <ul style="list-style-type: none"> Outline existing flood behaviour that is compatible with Council's flood study(ies). Identify developed flood behaviour. The developed scenario should include the proposed development with key details of the final proposal, including development type and density changing runoff characteristics, infrastructure and proposed modification to waterways or floodplain landform or vegetation. Identify the impacts of the proposed development on the flood behaviour and on the flood risk to the existing community. Identify the impacts and risks of flooding on the development and its users. 	Noted. Should the proposal proceed, a FIRA will be required.	Require a FIRA if the proposal proceeds.

Issue/Recommendation		Officer Response	Proposed Action
	<ul style="list-style-type: none"> Identify how these impacts can be managed to minimise the growth in risk to the community due to development. This includes details of any management measures to be implemented to minimise the impacts and risks posed to the existing and future community due to development. Provide an assessment of the residual impacts of the project (that management measures cannot manage) on and off the site. 		
11.6	<p>Waterway Health Noted that the following resources developed by EHG, as part of the Wianamatta-South Creek Catchment, could inform the PP:</p> <ul style="list-style-type: none"> Mapping the natural blue grid elements of Wianamatta-South Creek - high ecological value waterways, riparian vegetation communities and other water dependent ecosystems. Performance criteria for protecting and improving the blue grid in the Wianamatta-South Creek Catchment - water quality and flow related objectives for use as environmental standards in land use planning. Review of water sensitive urban design strategies for Wianamatta-South Creek. Wianamatta-South Creek stormwater management targets. Technical guidance for achieving Wianamatta-South Creek stormwater management targets. 	Noted. This information will be provided to the proponent, if the proposal proceeds.	Include this information in a request for information to the proponent, if the proposal proceeds.
Second letter			

Issue/Recommendation		Officer Response	Proposed Action
11.7	<ul style="list-style-type: none"> Conservation Programs, Heritage and Regulation (CPHR) has reviewed Council's request and notes the documentation referred for review does not contain any additional information to address CPHR's (then EHG's) advice. CPHR advises that its 5 December 2022 advice remains relevant and has no comment on the draft ILP Options A and B. CPHR can review a revised planning proposal that addresses the matters raised and is accompanied by a Growth Centres biodiversity certification consistency report. 	Updated advice from DECCEW – CPHR division, is noted.	<p>Undertake actions as per previous advice.</p> <p>Request that a Growth Centres biodiversity certification consistency report be prepared, if the proposal proceeds.</p> <p>Undertake further consultation with CPHR once matters raised in the previous submission have been addressed and a Growth Centres biodiversity certification consistency report has been provided.</p>
Item 12: Schools Infrastructure NSW (CONFIDENTIAL)			
12.1	<p>Confirmed that the number of students projected to be generated by both proposals (Springfield Road North and South) will result in the need for additional school infrastructure.</p> <p>Request that a school site be provided to service both proposals, and that all necessary servicing and transport infrastructure required to support the school site, be provided prior to delivery.</p> <p>Advise that the combined indicative dwelling yield of the draft proposals generates a total enrolment demand on the area's existing school facilities that is beyond the scale that could be reasonably met through expansion or upgrades.</p>	<p>The updated ILP options identify a primary school to be located in proximity to a local centre. The updated ILPs have been referred to SINSW and Council officers are waiting on their updated advice.</p> <p>A location for a secondary school to accommodate the additional demand within the Catherine Fields Precinct, has not been explored.</p>	<p>Continue to engage with SINSW regarding the proposed primary school.</p> <p>Updates to the Social Infrastructure Plan are also required to address the need for secondary school places within the Catherine Fields precinct, if the proposal proceeds.</p>

Issue/Recommendation		Officer Response	Proposed Action
	Noted that the proposals cannot rely on school infrastructure- (planned in surrounding precincts) to accommodate the demand for government school spaces, as the surrounding infrastructure is needed to accommodate the dwelling growth within those catchments.		
12.2	SINSW cannot support the proposals without the provision of additional education infrastructure.	Should the proposal proceed, further consultation with SINSW will be undertaken regarding the location of the proposed primary school.	Undertake further consultation with SINSW, should the proposal proceed.
12.3	SINSW are willing to assist in the identification of an appropriate location for a school site.	Noted. Should the proposal proceed, further consultation will be carried out with SINSW.	Engage with SINSW, should the proposal proceed.
12.4	<p>Request that amendments are made to the Social Infrastructure Assessment, in consultation with SINSW, that include:</p> <ul style="list-style-type: none"> - Comments regarding enrolment and capacities of surrounding schools are removed as they are not correct at the time of writing. - Add the upgrade to Leppington Public School. - Remove the learning space and student estimate in regard to Oran Park. <p>Indicative Standards = government primary school – minimum 1.5ha developable land area, and government secondary school - minimum 2.5ha developable land area.</p>	Noted. Should the proposal proceed, updates to the Social Infrastructure Assessment will be required.	Require that the Social Infrastructure Assessment be updated, should the proposal proceed.
12.5	<p>Active Transport and Access</p> <p>Request that the Catherine Fields Precinct (as a whole) be supported by robust transport planning, guided by the Movement and Place Framework</p>	Should the proposal proceed, further detailed design in and around the school and local centre is also required to ensure roads can	Undertake detailed design of the school site and local centre, should the proposal proceed.

Issue/Recommendation		Officer Response	Proposed Action
	<p>(MAPF) and its Built Environment Performance Indicators. This planning should include:</p> <ul style="list-style-type: none"> • preparation of an Access and Movement Strategy; • physical separation between pedestrians, cyclists and heavy vehicles; • default lower vehicle speeds (e.g. school streets); • access for all ages and abilities, such as ambulant disabilities and prams; kerb outstands and refuge crossings (particularly around schools); • pedestrian signs on all approaches to intersections; • weather-protected bus departures zones, and • for local roads: lower vehicle speeds to 15km/h in High Pedestrian Activity Areas or 40km/h within Schools Zones. 	accommodate bus movements and pedestrian permeability.	
Item 13: Heritage NSW			
13.1	<p>General</p> <ul style="list-style-type: none"> • Before finalising the planning proposal, Council should be satisfied that all necessary heritage assessments have been undertaken and that any impacts have been sufficiently addressed. 	Noted. Should the proposal proceed, further information will be required from the proponent to assist Council in the assessment process.	Require an Aboriginal Cultural Heritage Assessment, a Connecting with Country Strategy, and a comprehensive Visual and Scenic Landscape Study, should the proposal proceed.
Aboriginal Cultural Heritage			
13.2	Aboriginal Cultural Heritage considerations under the National Parks and Wildlife Act 1974:	Noted. Should the proposal proceed, an Aboriginal Cultural Heritage Assessment, and a Connecting with	Should the proposal proceed, require an Aboriginal Cultural Heritage Assessment, and a

Issue/Recommendation		Officer Response	Proposed Action
	<ul style="list-style-type: none"> No registered Aboriginal sites have been found within the study area. However, 110 sites registered in the AHIMS database were found within a 3km radius of the study area, including in close proximity on land adjacent to the study area. An Aboriginal Cultural Heritage Due Diligence report (Austral Archaeology, 2022) has been prepared for the proposal. We advise Council that an assessment under the 2010 Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW is not considered an archaeological assessment or substitute for a comprehensive Aboriginal cultural heritage assessment report. An Aboriginal cultural heritage assessment and consultation with the Aboriginal community need to occur early in the planning process to identify Aboriginal cultural heritage values that may occur within the proposal area and establish how this may constrain future development. It is recommended that a comprehensive Aboriginal cultural heritage assessment is needed, and should inform this planning proposal. Early assessment provides the best opportunity to identify and protect Aboriginal cultural heritage values. It also provides certainty to all parties about any future Aboriginal cultural heritage management requirements. 	Country Strategy (that has been prepared in consultation with the Aboriginal community), will be required to assist Council in this assessment.	Connecting with Country Strategy that has been prepared in consultation with the Aboriginal community.

Issue/Recommendation		Officer Response	Proposed Action
	<ul style="list-style-type: none"> It is important that any management, mitigation and conservation mechanisms are developed at the planning proposal stage to help mitigate the cumulative impact of development in this region on Aboriginal cultural heritage. 		
European Heritage			
13.3	<p>State heritage and historic archaeology considerations under the Heritage Act 1977:</p> <ul style="list-style-type: none"> The study area does not contain any heritage items that are listed on the NSW State Heritage Register. However, there are four heritage items in proximity and listed on the State Heritage Register: <ul style="list-style-type: none"> Gledswood – SHR #01692 Raby – SHR #01694 Oran Park – SHR #1695 Upper Canal System– SHR #01373 The study area itself appears to have little to no evidence indicating the presence of historic heritage or archaeology and the historical archaeological potential of the site has been assessed as Low. The study area is in proximity to a number of items of State heritage significance. While the Preliminary Historic Heritage Assessment (Austral Archaeology, 2022) states that there will be no visual impact to these properties arising from the new development, it is noted that the justification for this statement has not been documented in the report. 	Noted. Should the proposal proceed, a comprehensive Visual and Scenic Landscape Study will be required, with the outcome being used to inform final height of building controls.	Require a comprehensive Visual and Scenic Landscape Study, should the proposal proceed.

Issue/Recommendation		Officer Response	Proposed Action
	<ul style="list-style-type: none"> Unless the distance and topography of the study area in relation to the heritage properties entirely rules out any potential visual impacts, it is recommended that a significant views/visual assessment is undertaken to identify significant views from the surrounding properties and the impacts of the proposed development on those views. The outcome of this assessment should also inform height limits for the new development, where appropriate, in consideration of heritage impacts on significant views. 		