Appendix 4: Assessment against key strategic documents

Section	One – Assessment against Region Plan	2
Α.	Greater Sydney Region Plan	2
Section	Two: Assessment against District Plan1	3
В.	Western City District Plan1	3
Section	Three: Assessment against the South West Growth Area Structure Plan Guide 2	4
C.	Guide to the South West Growth Area and updated Structure Plan December 2022 2	4
Section	Four: Assessment against Local Plans	2
D.	Camden Community Strategic Plan	2
E.	Camden Local Strategic Planning Statement	9
F.	Camden Local Housing Strategy4	5
G.	Camden Green and Blue Grid Vision4	9
Н.	Camden Centres and Employment Land Strategy5	1
Section	Five: Consistency against State Environmental Planning Policies	2
Section	Six: Assessment against Section 9.1 Ministerial Directions	6





Section One – Assessment against Region Plan

A. Greater Sydney Region Plan

The Greater Sydney Region Plan (the Region Plan) was released by the Greater Sydney Commission (GSC) on 18 March 2018. The Region Plan has a vision and plan to manage growth and change for Greater Sydney in the context of economic, social and environmental matters.

Objective	Consistency	Comment
A city supported by infr	astructure: Infrastructure	e supporting new developments
Objective 1: Infrastructure supports the cities	e three No	The SRN site is located in the Catherine Fields Precinct of the SWGA.
		Currently there is no structure/master plan for the Catherine Fields Precinct to guide infrastructure investment.
		Further broader planning of the Catherine Fields Precinct is required to ensure growth aligns with the infrastructure plans and priorities of state agencies and Council.
		Sydney Water's current advice (dated 10 February 2025) is that the site will not be serviced for drinking water services until at least 2031 and 2030/2031 for wastewater services (subject to funding and approvals).
d Collaboration		The draft proposal indicates the construction of the future Rickard Road extension and Springfield Road realignment will support traffic flows generated by the proposed development. Both roads are at early concept design stage, and there is uncertainty about funding and delivery timeframes. There are concerns that existing and future residents may be adversely impacted by the additional vehicle traffic generated by this proposal, should additional east-west roads into Oran Park not be constructed to support housing growth.
Infrastructure and		It is recommended that the draft proposal is not progressed until the funding and timeframes for the delivery of strategic road corridors and drinking water and wastewater services are confirmed.





Objective	Consistency	Comment
Objective 2: Infrastructure aligns with forecast growth – growth infrastructure compact	No	A precinct-scale structure plan is required to coordinate infrastructure delivery and the orderly and sequenced growth of the Catherine Fields Precinct.
		<u>Water and Wastewater</u> Sydney Water has advised that they are not able to service the site with water and waste water services at this time and that the current priority is to service already rezoned land they have committed to servicing in the SWGA.
		The proposal estimates development delivery to take place from 2026 with 200 dwellings uptake per year. This does not align with Sydney Water's current growth servicing plan for 2024- 2029, which shows the Catherine Fields Precinct in the strategic planning stage during this period.
		The proponent has been working to identify network capacity and enter into an interim servicing agreement with Sydney Water.
		However, this agreement will only cover land under the control of the proponent comprising of approximately 400 future lots.
		Sydney Water's current advice (dated 10 February 2025) is that the site will not be serviced for drinking water services until at least 2031 and 2030/2031 for wastewater services (subject to funding and approvals).
		If the proposal proceeds, there is a risk that a large amount of land rezoned for residential uses (approximately 80% of the site) will remain undeveloped until at least 2031.
		<u>Electricity</u> Endeavour Energy have confirmed that the subject site can be serviced for electricity by connecting to existing networks, providing the developer provides additional ducts along the boundary of the ultimate site, including Camden Valley Way, Catherine Fields Road and the Rickard Road extension.
		<u>Road networks</u> The draft proposal indicates the construction of the future Rickard Road



Objective		Consistency	Comment
			extension and Springfield Road realignment will support traffic flows generated by the proposed development. Both roads are at early concept design stage, and there is uncertainty about funding and delivery timeframes. There are concerns that existing and future residents may be adversely impacted by the additional vehicle traffic generated by this proposal, should additional east-west roads into Oran Park not be constructed to support housing growth. It is recommended that the draft proposal is not progressed until the funding and timeframes for the delivery of strategic road corridors are confirmed.
	3: Infrastructure neet future needs	Undetermined	Should the proposal proceed, consideration into adaptability and smart technology will be given in the final design of the ILP and development controls.
Objective optimised	4: Infrastructure use is	Νο	Sydney Water have indicated that they are concentrating on delivering services to rezoned areas of the precinct. Any agreements to service the proposal site ahead of these areas may result in the capacity planned for existing precincts being redirected to the site. The draft ILP also relies on future and currently unfunded road extensions to manage traffic in and around the vicinity of the site. If development occurs ahead of these road extensions. There are concerns that existing and future residents may be adversely impacted by the additional vehicle traffic generated by this proposal. Broader precinct planning of the Catherine Fields Precinct is required to ensure that infrastructure delivery is appropriately sequenced and financed.
A collabo	rative city: Working tog	ether to grow a	Greater Sydney
realised by	5: Benefits of growth collaboration of nts, community and	No	Further collaboration is required between government agencies to plan for growth in the whole of the Catherine Fields Precinct, prior to rezoning land. This will help to ensure that infrastructure aligns with growth and is appropriately sequenced and financed.



camden

Obj	ective	Consistency	Comment		
	A city for people: Celebrating diversity and putting people at the heart of planning				
	Objective 6: Services and infrastructure meet communities' changing needs		Without greater collaboration between Council and state agencies to undertake the broader planning of the Catherine Fields Precinct, this objective cannot be achieved.		
		Νο	SINSW have advised that combined with the Springfield Road South (SRS) Precinct, the proposal will require a new primary school and will create an additional demand for secondary school spaces. SINSW have also noted that this demand cannot be absorbed by existing secondary schools in the location. A primary school has been identified on the site. However, it is unclear how demand for secondary school places will be addressed.		
			The Social Infrastructure Plan prepared by WSP (dated February 2022), identifies Liverpool and Campbelltown hospitals and existing community health centres are within proximity to the site. However, the cumulative demands on health services from precincts in the Camden growth areas needs to be understood on a broader scale and health services need to be planned accordingly.		
	Objective 7: Communities are healthy, resilient and socially connected	No	Improvements are required to the road and lot design to facilitate connectivity and walkability within the precinct. Proposed social infrastructure for the precinct is below Council benchmarks. Additional open space is required to be delivered onsite and an Employment Land and Retail Demand Analysis is required to understand the need for a mixed use employment corridor along Camden Valley Way as identified in the South West Growth Area Structure Plan.		
Liveability	Objective 8: Greater Sydney's communities are culturally rich with diverse neighbourhoods	No	If the proposal proceeds, early consultation is required with the Aboriginal Community in undertaking an Aboriginal Cultural Heritage Assessment (as requested by Heritage NSW), and in the development of Connecting with Country development controls and updates to the ILP.		



Objective		Consistency	Comment
			Further consideration is required to identify additional passive and active space within the proposal site and the wider Catherine Fields Precinct.
	Objective 9: Greater Sydney celebrates the arts and supports creative industries and innovation	No	If the proposal proceeds, an Employment Land and Retail Demand Analysis is required to support the proposed local centre, and understand the need for a mixed use employment corridor along Camden Valley Way. A Connecting with Country Strategy is required, and further consideration of how development controls and the ILP can support arts and cultural expression, is needed.
	Housing the city: Giving people	housing choices	
	Objective 10: Greater housing supply		Water and Wastewater servicing is not available to the site at this time.
			Sydney Water and DPHI have prioritised the servicing of already rezoned land and precincts nearing rezoning, where servicing has already been committed.
			Sydney Water's current advice (dated 10 February 2025) is the site will not be serviced for drinking water services until at least 2031 and 2030/2031 for wastewater services (subject to funding and approvals).
		Νο	If the proposal proceeds before this time, there is a risk any interim servicing solution could borrow capacity from other precincts/areas already rezoned and/or nearing rezoning, and thereby impact, planned housing delivery already in the pipeline.
			Rezoning land before servicing is available could artificially inflate calculations of land available for housing.
			Rezoning land where servicing is not available may also impact future purchasers who will not be able to develop their land until servicing is available. They may also have to cover substantial costs in connecting sites to trunk infrastructure.



Objective	Consistency	Comment
Objective 11: Housing is more diverse and affordable	Νο	There is a lack of diversity in housing mix. The extent of medium to high density residential appears excessive and not proportionate to surrounding released precincts. Affordability impacts due to extra impost of infrastructure servicing is also a consideration. Wider precinct planning could identify developable land and required infrastructure, and provide a more rational approach to rezoning land within this area. This in turn would have a flow on effect on housing diversity, mix and affordability.
A city of great places: Designing	places for peop	le
Objective 12: Great places that bring people together	No	There is a proposed undersupply of open space onsite. Further consideration of the proposed local centre and the need for a mixed use employment area is also required. SINSW has advised that the proposal will require a new primary school to be located on site and that the additional demand for secondary school places will need to be accommodated outside of the existing secondary schools in the area. A primary school has been identified on the updated ILP. However, a location for a secondary school to accommodate the additional demand has not been explored. Improvements to road and lot layout are needed to improve connectivity and walkability across the site.
Objective 13: Environmental heritage is conserved and enhanced	No	If the proposal proceeds, further information is required to inform assessment under this objective. An Aboriginal Cultural Heritage Assessment, a Connecting with Country Strategy and a comprehensive Visual and Scenic Landscape Study, would be required.
A well-connected city: Developin	ng a more access	ible and walkable city
Objective 14: A Metropolis of Three Cities – integrated land	No	The proposal states that residential areas will be able to access public transport (bus stop) within 400m of



Objective		Consistency	Comment
	use and transport creates walkable and 30-minute cities		homes. However, it is unclear how this distance has been measured.
			The current ILP also shows a disconnection between open spaces, green links and the street network. If the proposal proceeds, street cross sections and updates to the ILP would be required.
			TfNSW are currently preparing a South Western Sydney Transport Structure Plan (TSP). The TSP seeks to align future land uses with transport infrastructure and service delivery. If the proposal proceeds, it would be assessed against the plan (subject to its availability).
	Objective 17: Regional connectivity is enhanced	No	Further work is required by the NSW Government to plan for regional transport connections that will support growth in the Catherine Fields Precinct.
	Jobs and skills for the city: Crea	ting the conditio	ns for a stronger economy
	Objective 23: Industrial and urban services land is planned, retained and managed	No	A local centre and a mixed use employment area has been identified on the SWGA Structure Plan on the subject site.
			Updates to the ILP have identified a local centre, however, the mixed use corridor along Camden Velley Way has not been incorporated.
			If the proposal proceeds, an Employment Land and Retail Demand Analysis is required to understand the investment and business opportunities for the subject site and the need for the local centre and a mixed use employment corridor.
	A city in its landscape: Valuing g	ireen spaces and	landscape
	Objective 25: The coast and	No	If the proposal proceeds, additional
bility	waterways are protected and healthier		work and updates to the ILP are required to ensure waterways are protected, residential development is not planned on flood affected land, and riparian lands are retained and returned to their natural state (wherever possible).
Sustainability	Objective 26: A cool and green parkland city in the South Creek corridor	Undetermined	The Water Cycle Management Strategy prepared by Craig and Rhodes (dated March 2022) concluded that the management measures proposed for



Obj	ective	Consistency	Comment
			the site, including its network of flood detention basins and bioretention basins, are effective in ensuring that there would be no adverse impacts in the entire Upper South Creek catchment from the site to Bringelly Road. However, if the proposal proceeds, further studies such as a landscape master plan and an urban heat report and strategy, are required to ensure the proposal meets this priority.
	Objective 27: Biodiversity is protected, urban bushland and remnant vegetation is enhanced	No	The Biodiversity Assessment prepared by AEP (dated 15 March 2022) has identified vegetation on the site to be consistent with Critically Endangered
			Ecological Community Cumberland Plains Shale Woodland.
			The assessment also concludes that areas of this vegetation exceeding 4ha do not meet the criteria for conservation in size under the Growth Centres Assessment.
			However, officer review has identified that adequate ground truthing across the site has not been conducted in the preparation of this assessment. The vegetation remnant is considerable in size at approximately 12 ha. Therefore, this vegetation remnant should be further considered for retention.
			The report also excludes a large stand of remnant vegetation on Lot DP 215520, that can be seen from Springfield Road. The boundary of the vegetation remnant appears to extend further east than delineated in the report.
			If the proposal proceeds, an updated assessment would be required to investigate the whole site. A site consistency report would be requested to demonstrate compliance with the conditions of the South West Growth Centre Biodiversity Certification Order.
			A portion of land has been identified for Riparian protection. However, more consideration of returning existing dams back to natural watercourses, and connecting them across the site, is required.



Obj	ective	Consistency	Comment
			If the proposal proceeds, changes would be required to retain additional remnant vegetation, return watercourses and improve and link tree canopy across the site.
	Objective 28: Scenic and cultural landscapes are protected	Undetermined	A comprehensive Visual and Scenic Landscape Study is required to understand the scenic and cultural landscapes and ensure that they are protected.
	Objective 29: Environmental, social and economic values in rural areas are protected and enhanced	No	The SRN site is located on land identified for growth. However, the proposal borders existing poultry farms on the western border. This may lead to odour and noise impacts on new residents, create land use conflicts and impact the viability of these existing rural enterprises. Consultation has not been undertaken with neighbouring properties. Therefore, it is unclear what the future ongoing
			operational plans are for these enterprises. Further consideration is required to ensure operational plans are consistent with the timing of future development. Investigation of potential interim buffer measures may be required.
	Objective 30: Urban tree canopy cover is increased	Undetermined	If the proposal proceeds, a Landscape Master Plan and street cross sections would be required to adequately assess and ensure tree canopy is increased across the site.
	Objective 31: Public open space is accessible, protected and enhanced	No	There is a significant shortfall (approximately 9.18ha) of usable open space proposed to be delivered within the boundaries of the subject site.
			Up to 7.4ha of open space is proposed to be delivered off site via developer contributions. The proponent has indicated that this could be located within existing facilities. However, these facilities are outside the precinct and are already supporting the populations they have been planned for.
			Without adequate precinct planning to understand appropriate contributions and locations for regional and district open space in the Catherine Fields



Consistency	Comment
	Precinct, the whole precinct is at risk of future under supply.
	If the proposal proceeds, additional open space will need to be identified within the site and updates to the Social Infrastructure Plan will be required.
No	The proposal is inconsistent with this objective.
	The green grid diagram shown in Figure 27 of the draft Planning Proposal lacks any detail. It is unclear how this plan is represented on the ILP.
	If the proposal proceeds, further work is required to ensure green links provided on the subject site are contiguous and integrated with the green and blue grid network proposed for the broader Catherine Fields Precinct. Connections to the South Creek Green Grid Priority Corridor, identified in the District Plan, would also be required.
es wisely	
Undetermined	Insufficient information on the impacts of the proposed residential development and the achievement of a low-carbon city and net-zero emissions by 2050 is available.
	If the proposal proceeds, further consideration of this objective would be required.
Undetermined	If the proposal proceeds, a Public Domain and Landscape Masterplan would be required to demonstrate that energy and water flows are retained and reused in the urban environment.
Undetermined	Insufficient information is provided to determine the reuse and recycling of waste.
	If the proposal proceeds, road cross- sections would be required to ensure garbage truck access. Consideration of development controls to encourage a circular economy is also needed.
hanging world	
No	Insufficient information has been provided to determine urban heat and
	No No Undetermined Undetermined Undetermined



Obj	ective	Consistency	Comment
			climate change impacts and mitigation measures.
			If the proposal proceeds, an updated Urban Heat Report is required to better understand how the proposal will mitigate urban heat and address climate change stress.
	Objective 37: Exposure to natural and urban hazards is reduced	No	The current ILP shows residential development and proposed roads on land impacted by flooding. The draft proposal has been referred to the NSW SES. The SES has advised that the proposed evacuation measures are not considered adequate and sheltering in place is not supported.
	Objective 38: Heatwaves and extreme heat are managed	Νο	Insufficient information has been provided to determine urban heat and climate change impacts and mitigation measures. If the proposal proceeds, an updated Urban Heat Report is required to better understand how urban heat will be mitigated and climate change stress addressed.
	Implementation		
	Objective 39: A collaborative approach to city planning	Νο	Broader precinct planning is required to be undertaken, in collaboration with state agencies, to understand future infrastructure needs and to ensure infrastructure aligns with growth and is adequately financed.





Section Two: Assessment against District Plan

B. Western City District Plan

On 18 March 2018, the Western Sydney District Plan (the District Plan) was released by the GSC. The District Plan guides the 20-year growth of the district to improve its social, economic and environmental assets.

Table 2: Assessment against the Western	n City District Plan's relevant objective	S
		<u> </u>

	ective	Consistency	Comment
	Planning Priority W1: Planning	for a city suppo	orted by infrastructure
	Objective 1: Infrastructure supports the three cities.	Νο	Further broader planning of the Catherine Fields Precinct is required to ensure growth aligns with the infrastructure plans and priorities of state agencies and Council. Currently, the site will not be serviced by Sydney Water for drinking water services until at least 2031 and 2030/2031 for wastewater services (subject to funding and approvals).
Infrastructure and Collaboration	Objective 2: Infrastructure aligns with forecast growth – growth infrastructure compact.	No	Water and WastewaterSydney Water has advised that they are not able to service the site with water and waste water services at this time and that the current priority is to service already rezoned land they have committed to servicing in the SWGA.The proposal estimates development delivery to take place from 2026 with 200 dwellings uptake per year. This does not align with Sydney Water's current growth servicing plan for 2024-2029, which shows the Catherine Fields Precinct in the strategic planning stage during this time.The proponent has been working to identify network capacity and enter into an interim servicing of approximately 400 future lots.Most recent advice provided by Sydney Water dated 10 February 2025 (attached) has indicated that the proponent has not fully completed the modelling works as per Sydney Water's criteria and that the proposed viable options for interim drinking water and wastewater services.





		This advice also provides an updated
		timeframe of 2031 for drinking water servicing and 2030/31 for wastewater services (subject to funding and approvals). If the proposal proceeds before this time, there is a risk that a large amount of land rezoned for residential uses (approximately 80% of the site) will remain undeveloped until at least 2031. <u>Electricity</u> Endeavor energy has confirmed that the subject site can be serviced for electricity by connecting to future planned networks. <u>Road networks</u> The draft proposal indicates the construction of the future Rickard Road extension and Springfield Road realignment will support traffic flows generated by the proposed development. Both roads are at early concept design stage, and there is uncertainty about funding and delivery timeframes. There are concerns that existing and future residents may be adversely impacted by the additional vehicle traffic generated by this proposal, should additional east-west roads into Oran Park not be constructed to support housing growth. It is recommended that the draft proposal is not progressed until the funding and timeframes for the delivery of strategic road corridors are confirmed.
Objective 3: Infrastructure adapts to meet future needs.	Undetermined	Should the proposal proceed, consideration into adaptability and smart technology will be needed in the final design of the draft ILP and in development controls.
Objective 4: Infrastructure use is optimised.	No	Sydney Water has indicated that they are concentrating on delivering services to rezoned areas of the precinct. Any agreements to service the proposal site ahead of these areas may result in capacity planned for existing precincts being redirected to the site, which is inconsistent with this objective. The draft ILP relies on future road extensions to manage traffic within the vicinity of the site. Broader precinct planning for the Catherine



Obje	ective	Consistency	Comment
			infrastructure delivery is appropriately sequenced.
	Planning Priority W2: Working	through collabo	ration
	Objective 5: Benefits of growth realised by collaboration of governments, community and business.	No	Further collaboration is required between government agencies to plan for growth in the whole of the Catherine Fields Precinct, prior to rezoning land.
			This will help to ensure that infrastructure aligns with growth and is appropriately sequenced and financed.
	Planning Priority W3: Providing changing needs	g services and s	ocial infrastructure to meet people's
	Objective 6: Services and infrastructure meet communities' changing needs.	No	Without greater collaboration between Council and state agencies to undertake the broader planning of the Catherine Fields Precinct, this objective cannot be achieved.
			SINSW has advised that the proposal will require a new primary school to be located on site and that the additional demand for secondary school places will need to be accommodated outside of the existing secondary schools in the area. A primary school has been identified on the updated ILP. However, a location for a secondary school, to accommodate the additional demand, has not been explored.
Liveability			The Social Infrastructure Plan submitted with the draft proposal identifies Liverpool and Campbelltown hospitals and existing community health centres are within proximity to the site. However, the cumulative demands on health services from precincts in the Camden growth areas needs to be understood on a broader scale and health services need to be planned accordingly.
			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.
	Planning Priority W4: Fostering communities	g healthy, creativ	e, culturally rich and socially connected
	Objective 7: Communities are healthy, resilient and socially connected.	No	Improvements are required to the road and lot design to improve connectivity and walkability within the precinct.



Obje	ective	Consistency	Comment
			Additional onsite open space is required to meet Council benchmarks and the future population. Should the proposal proceed, further detailed design in and around the school and local centre is also required to ensure roads can accommodate bus movements and pedestrian permeability.
	Objective 8: Greater Sydney's communities are culturally rich with diverse neighbourhoods.	No	If the proposal proceeds, early consultation is required with the Aboriginal Community in undertaking an Aboriginal Cultural Heritage Assessment (as requested by Heritage NSW) and in the development of Connecting with Country development controls and updates to the ILP. Further consideration is required to identify additional passive and active open space in the subject site and the wider Catherine Fields Precinct.
	Objective 9: Greater Sydney celebrates the arts and supports creative industry and innovation.	No	If the proposal proceeds, a Centres and Employment Lands Study is required to support the proposed local centre, and justify the omission of mixed use development along Camden Valley Way. A Connecting with Country Strategy is required. Further consideration of how development controls and the ILP can support arts and cultural expression is also needed.
	Planning Priority W5: Providing jobs, services and public trans		y, choice and affordability, with access to
	Objective 10: Greater housing supply.	No	Water and wastewater servicing is not available to the site at this time. If the proposal proceeds, there is a risk the proposal could borrow capacity from other rezoned areas or could result in rezoned lots not being able to be developed for some time. This could artificially inflate housing supply numbers and result in substantive cost imposts on future purchasers of the lots.
	Objective 11: Housing is more diverse and affordable.	No	There is a lack of diversity in housing mix. The extent of medium to high density residential appears excessive and not proportionate to surrounding released precincts.



Obje	ective	Consistency	Comment
			Affordability issues, due to extra impost of infrastructure servicing, is also a consideration.
			Wider precinct planning could identify developable land and required infrastructure and provide a more rational approach to rezoning land within this area. This in turn would have a flow on effect on housing diversity, mix and affordability.
	Planning Priority W6: Creating respecting the District's herita		reat places and local centres, and
	Objective 12: Great places that bring people together.	No	Improvements are required to the road and lot design to increase connectivity and walkability within the precinct.
			Additional social infrastructure for the precinct is required to meet Council benchmarks and the future population.
			Further detailed design in an around the school and local centre is also required to ensure roads can accommodate bus movements and pedestrian permeability.
			If the proposal proceeds, updates to the ILP and Social Infrastructure Plan will be required.
	Objective 13: Environmental heritage is identified, conserved and enhanced.	No	If the proposal proceeds, further information is required to inform assessment under this objective.
			This work would include an Aboriginal Cultural Heritage Assessment, a Connecting with Country Strategy and a comprehensive Visual and Scenic Landscape Study.
	Planning Priority W7: Establisl liveable, productive, and susta		e and transport structure to deliver a Parkland City
ivity	Objective 14: A Metropolis of Three Cities – integrated land use and transport creates walkable and 30-minute cities.	Νο	The draft proposal states that residential areas will be able to access public transport (bus stop) within 400m of homes. However, it is unclear how this distance has been measured.
Productivity			The current ILP also shows a disconnection between open spaces, green links and the street network. If the proposal proceeds, street cross-sections and updates to the ILP would be required.
			Transport for NSW are currently preparing a South Western Sydney Transport Structure Plan (TSP). The TSP seeks to



camden

Objective	Consistency	Comment
		align future land uses with transport infrastructure and service delivery. If the proposal proceeds, it would be assessed against the plan.
Objective 17: Regional connectivity is enhanced.	No	Further work is required by the NSW Government to plan for regional transport connections that will support growth in the Catherine Fields Precinct.
Planning Priority W8: Leverage Airport and Badgerys Creek A		ortunities from the Western Sydney
Objective 20: Western Sydney Airport and Badgerys Creek Aerotropolis are economic catalysts for Western Parkland City.	Undetermined	Potential key roads (subject to Investigation) linking the site to the Western Sydney Airport (WSA) and the Badgerys Creek Aerotropolis, have been identified on the SWGA Structure Plan. If the proposal proceeds, an Employment
		Land and Retail Demand Analysis would be required to understand the economic opportunities associated with the WSA and Aerotropolis.
Objective 24: Economic sectors are targeted for success	Undetermined	If the proposal proceeds, an Employment Land and Retail Demand Analysis would be required to understand potential key economic sectors to be targeted.
Planning Priority W9: Growing	and strengtheni	ng the metropolitan cluster
Objective 20: Western Sydney Airport and Badgerys Creek Aerotropolis are economic catalysts for Western Parkland City.	Undetermined	Potential key roads (subject to investigation) linking the site to the WSA and the Badgerys Creek Aerotropolis, have been identified on the SWGA Structure Plan.
		If the proposal proceeds, an Employment Land and Retail Demand Analysis C would help to understand the economic opportunities associated with the WSA and Aerotropolis.
Objective 22: Investment and business activity in centres.	Undetermined	A local centre and a mixed use employment area have been identified on the SWGA Structure Plan as being located on the subject site.
		Updates to the ILP have identified a local centre. However, the mixed use corridor along Camden Velley Way has not been incorporated.
		If the proposal proceeds, an Employment Land and Retail Demand Analysis would be required to understand investment and business opportunities for the subject site



Obj	ective	Consistency	Comment		
			and the need for the local centre and a mixed use employment corridor.		
	Planning Priority W10: Maximising freight and logistics opportunities and planning and managing industrial and urban services land				
	Objective 16: Freight and logistics network is competitive and efficient.	Undetermined	The subject site is in proximity to the future Rickard Road extension.		
			If the proposal proceeds, an Employment Land and Retail Demand Analysis and updated Traffic report and modelling will be required to ensure the subject site does not impede future freight and logistics networks.		
	Objective 23: Industrial and urban services land is planned, retained and managed.	No	The SWGA Structure Plan identifies a potential local centre and a mixed-use employment corridor along Camden Valley Way.		
			The updated ILP has incorporated a local centre. However, the mixed use employment area is not shown.		
			If the proposal proceeds, an Employment Land and Retail Demand Analysis is required to support the location and size of the local centre and the need for a mixed use employment corridor.		
	Planning Priority W11: Growing investment, business opportunities and jobs in strategic centres				
	Objective 22: Investment and business activity in centres.	Undetermined	If the proposal proceeds, an Employment Land and Retail Demand Analysis is required to understand investment opportunities for the subject site.		
	Planning Priority W12: Protecting and improving the health and enjoyment of the District's waterways				
Sustainability	Objective 25: The coast and waterways are protected and healthier.	No	If the proposal proceeds, additional work and updates to the ILP are required to ensure waterways are protected, residential development is not planned on flood affected land, and riparian lands are retained and returned to their natural state (wherever possible).		
Sust	Planning Priority W13: Creating a Parkland City urban structure and identity, with South Creek as a defining spatial element				
	Objective 26: A cool and green parkland city in the South Creek corridor.	Undetermined	The Water Cycle Management Strategy (prepared by Craig and Rhodes) concluded that there would be no adverse impacts on the entire South Creek catchment from a water management perspective.		



camden

Obje	ective	Consistency	Comment
			However, further studies including a landscape master plan and urban heat report and strategy, are required should the proposal proceed, to ensure the proposal meets this priority.
	Planning Priority W14: Protect	ing and enhancir	ng bushland and biodiversity
	Objective 27: Biodiversity is protected, urban bushland and remnant vegetation is enhanced.	No	The Biodiversity Assessment prepared by AEP (dated 15 March 2022) has identified vegetation on the site to be consistent with Critically Endangered Ecological Community Cumberland Plains Shale Woodland. The assessment also concludes that areas of this vegetation exceeding 4ha do not meet the criteria for conservation under the Growth Centres Assessment.
			ground-truthing across the site has not been conducted in the preparation of this assessment. The vegetation remnant is considerable in size at approximately 12 ha in size. Therefore, this vegetation remnant should be further considered for retention.
			The report also excludes a large stand of remnant vegetation on Lot DP 215520 that can be seen from Springfield Road. The boundary of the vegetation remnant appears to extend further east than delineated in the report.
			If the proposal proceeds, an updated assessment would be required to investigate the whole site. A site consistency report would also be required to demonstrate compliance with the conditions of the South West Growth Centre Biodiversity Certification Order, as this has not been provided to date.
			A portion of land has been identified for Riparian protection. However, more consideration of returning existing dams back to natural watercourses and connecting them across the site, is required, should the proposal proceed.
			If the proposal proceeds, changes would be required to retain additional remnant vegetation, return watercourses to a natural state, and improve and link tree canopy in across the site.



Obj	ective	Consistency	Comment
	Planning Priority W15: Increase connections	ing urban tree ca	nopy cover and delivering Green Grid
	Objective 30: Urban tree canopy cover is increased.	Undetermined	If the proposal proceeds, a Landscape Masterplan and street cross-sections would be required to adequately assess and ensure tree canopy is increased across the site.
	Objective 32: The Green Grid links parks, open spaces, bushland and walking and cycling paths.	No ing and enhancir	The proposal is inconsistent with this objective. The green grid diagram shown in Figure 27 of the draft proposal lacks any detail. It is unclear how this plan is represented on the ILP. If the proposal proceeds, further work is required to that ensure green links provided on the subject site are contiguous and integrated with the green and blue grid network proposed for the broader Catherine Fields Precinct. The further work would also need to facilitate connections to the South Creek Green Grid Priority Corridor identified in the District Plan.
	Objective 28: Scenic and cultural landscapes are protected.	Undetermined	A comprehensive Visual and Scenic Landscape Study is required to understand the scenic and cultural landscapes and ensure that they are protected.
	Planning Priority W17: Better n	nanaging rural a	reas
	Objective 29: Environmental, social and economic values in rural areas are protected and enhanced.	No	The SRN site is located on land identified for growth. However, the proposal borders existing poultry farms on western border. This may lead to odour and noise impacts on new residents, create land use conflicts and impact the viability of these existing rural enterprises. Consultation has not been undertaken with neighbouring properties. Therefore, it is unclear what the future ongoing operational plans are for these enterprises. Further consideration is required to ensure operational plans are consistent with the timing of future development and investigation of potential interim buffer measures may be required.



Obje	ective	Consistency	Comment
	Planning Priority W18: Deliveri	ing high quality o	open space
	Objective 31: Public open space is accessible, protected and enhanced.	Νο	There is an onsite shortfall of active and passive open space within the site (approximately 9.18ha).
			7.4ha of this shortfall is proposed to be delivered off site via developer contributions.
			The proponent has indicated that this could be located within existing facilities. However, these facilities are outside the precinct and are already supporting the populations they have been planned for. Without adequate precinct planning to understand appropriate contributions and locations for regional and district open space in the Catherine Fields Precinct, the whole precinct is at risk of future under supply.
			To ensure the future community (that would result from this proposal should it proceed) has adequate provision of active and open space in the absence of broader precinct planning, additional open space to meet Council benchmarks will need to be identified within the SRN site. This should also be accompanied by updates to the Social Infrastructure Plan.
			The allocation of additional land for onsite open space may impact the viability of the proposal. Therefore, it is recommended that the proposal does not proceed until broader precinct planning is undertaken for the Catherine Fields Precinct.
	Planning Priority W19: Reducin efficiency	ng carbon emissi	ons and managing energy, water and waste
	Objective 33: A low-carbon city contributes to net-zero emissions by 2050 and mitigates climate change.	Undetermined	Insufficient information on the impacts of the proposed residential development and the achievement of a low-carbon city and net-zero emissions by 2050, is available. If the proposal proceeds, further consideration of this objective would be required.
	Objective 34: Energy and water flows are captured, used and re-used.	Undetermined	If the proposal proceeds, a Public Domain and Landscape Masterplan would be required. This would need to include measures to ensure energy and water flows are retained and reused in the urban environment.



Obje	ective	Consistency	Comment	
	Objective 35: More waste is re-used and recycled to support the development of a circular economy.	Undetermined	Insufficient information is provided to determine the reuse and recycling of waste. If the proposal proceeds, road cross- sections would be required to ensure garbage truck access. Consideration of development controls to encourage a circular economy, would also be required.	
	change	.g to the impuet		
	Objective 36: People and places adapt to climate change and future shocks and stresses.	Νο	Insufficient information has been provided to determine urban heat and climate change impacts and mitigation measures. If the proposal proceeds, an updated Urban Heat Report is required to better understand how the proposal will mitigate urban heat and address climate change stress.	
	Objective 37: Exposure to natural and urban hazards is reduced.	Νο	The current draft ILP shows residential development and proposed roads on land impacted by flooding. The draft proposal has been referred to the NSW SES. SES has advised that evacuation measures are not considered adequate, and sheltering in place is not supported.	
	Objective 38: Heatwaves and extreme heat are managed.	No	Insufficient information has been provided to determine urban heat and climate change impacts and mitigation measures. If the proposal proceeds, an updated Urban Heat report is required to better understand how the proposal will mitigate urban heat and address climate change stress.	
uo	Planning Priority W21: Preparing Local Strategic Planning Statements informed by local strategic planning			
Implementation	Objective 39: A collaborative approach to city planning.	No	Broader precinct planning is required to be undertaken, in collaboration with state agencies, to understand future infrastructure needs and to ensure infrastructure aligns with growth and is adequately financed.	



Section Three: Assessment against the South West Growth Area Structure Plan Guide

C. Guide to the South West Growth Area and updated Structure Plan December 2022

The Guide to the South West Growth Area (the Guide) and updated Structure Plan was published in December 2022 and provides a framework for precinct planning in the South West Growth Areas.

The Guide provides a set of Key Criteria and Guiding Principles to consider in the preparation and assessment of Planning Proposals. These are considered in the table below.

Theme	Criteria	Council officer comment
Starting with Country		
Understanding of cultural values	Demonstrate how the proposal has been informed by engagement with the Aboriginal community.	Tharawal Local Aboriginal Land Council (TLAC) were not available to attend the heritage field survey conducted by Austral Archaeology in the preparation of the Aboriginal Cultural Heritage Due Diligence Assessment. Therefore, limited engagement has been undertaken with the Aboriginal community in the preparation of this draft proposal.
		If the proposal proceeds, further consultation with the Aboriginal community would be required in the preparation of an Aboriginal Cultural Heritage Assessment and in the development of a Connecting with Country Framework.
Master planning	Reference the Starting with Country Map (Figure 12) and address any elements that apply to the planning proposal site.	The SRN site is located within the boundary of the Wianamatta headwaters culturally important location, as shown on the Starting with Country Map. The draft proposal has not addressed the map at this time. No areas of significance were identified as part of the Due Diligence Assessment that was undertaken, even though parts of the site contain elements that indicate further investigation such as riparian lands and ridgelines.
		Heritage NSW has advised that a Due Diligence Assessment is not considered appropriate. If the proposal proceeds, an Aboriginal Cultural Heritage Assessment and a Connecting with Country Framework would be required.

Table 3: Assessment against the South West Growth Area Structure Plan GuideThemeCriteriaCouncil officer comment





Theme	Criteria	Council officer comment
Future community outcomes	Will the planning proposal provide for future social and cultural opportunities for the Aboriginal community?	The draft proposal was lodged prior to DPHI releasing the Connecting with Country Framework in 2023. It does not address the framework at this time. Opportunities to share cultural knowledge are yet to be explored in consultation with local Aboriginal stakeholder groups. It is recommended that if the draft proposal proceeds, the framework for the proposal is developed, and Aboriginal stakeholders are engaged in the planning and design process.
Deliver housing supply	y and choice	
Housing Supply	Provide details on how the planning proposal will deliver housing supply and diversity	The draft proposal seeks to rezone land for up to 2,000 dwellings before the relevant infrastructure is available. This could delay the timely and efficient delivery of housing supply.
		Broader planning for the Catherine Fields Precinct is required to identify urban capable land and future population infrastructure requirements. This planning is needed to inform housing supply targets for the Catherine Fields Precinct.
Housing affordability	Include details on how the planning proposal will deliver housing affordability and choice.	There is a lack of diversity in housing mix. The extent of medium to high density residential appears excessive and not proportionate to surrounding released precincts.
		Affordability issues, due to extra impost of infrastructure servicing, is also a consideration.
		Wider precinct planning could identify developable land and required infrastructure, and provide a more rational approach to rezoning land within this area. This in turn would have a flow on effect on housing diversity, mix and affordability.
Provide opportunities	for jobs closer to home	
Local and Neighbourhood Centres	Address Indicative locations of New Local Centres in the Structure Plan. Demonstrate how the proposal delivers new walkable neighbourhoods to achieve the 15-minute neighbourhood principles.	A local centre and a mixed use employment area are identified on the SWGA Structure Plan on the subject site. Updates to the ILP have identified a local centre. However, the mixed use corridor along Camden Velley Way has not been incorporated. If the proposal proceeds, an Employment Land and Retail Demand Analysis would be required to understand the investment and business opportunities for the subject site and the need for the local centre and a mixed use employment corridor.



Theme	Criteria	Council officer comment
		The ILP also shows a disconnection between open spaces, green links and the street network. If the proposal proceeds, street cross-sections and updates to the ILP to improve connectivity and walkability within the precinct, would be required.
Overall open space	Achieve an overall minimum of 2.83 hectares per 1,000 people.	 There is a significant shortfall (approximately 9.18ha) of usable open space proposed to be delivered within the boundaries of the subject site. Up to 7.4ha of open space is proposed to be delivered off site via developer contributions. The proponent has indicated that this could be located within existing facilities, however these sites are outside the precinct and are already supporting the populations they have been planned for. Without adequate precinct planning to inform appropriate contributions and locations for regional and district open space in the Catherine Fields Precinct, the whole precinct is at risk of future under supply. If the proposal proceeds, updates to the Social Infrastructure Plan to identify additional open space within the site, will be required.
Local parks (Equivalent to 'neighbourhood open space' in Camden Council's Spaces and Places Strategy)	Ensure there is one local park: 2,500 people Low and medium density (min size is 0.5ha) High density (min size is 0.3ha)	 The proposal will generate demand for 2.9 playgrounds. The submitted proposal seeks to deliver 2-3 playgrounds within passive open spaces areas, with further detailed design and the exact location of these parks to be considered during the development stage. Land within the riparian corridor is also proposed to be embellished with footpaths to further contribute to passive open space calculations. It is unclear whether the same provision is proposed with the updated draft ILP options. Council's Spaces and Places Strategy does not support using riparian land in open space calculations and further consideration of the number of parks is also required. If the proposal proceeds, updates to the Social Infrastructure Plan are required to ensure appropriate land and provision for local parks.





Theme	Criteria	Council officer comment
District parks	Ensure there is 1 district park: 5,000 people or 1ha per 1,000 residents (min size is 1.5 ha)	An off-site contribution is proposed (subject to Council endorsement) to existing district facilities located within Catherine Park Estate, Oran Park (such as Julia Reserve or Oran Park Leisure Centre), Gledswood Hills, Narellan Sports Hub or planned within Lowes Creek Maryland. These sites are outside the Catherine Fields Precinct and are already supporting the populations they have been planned for. Without adequate precinct planning to inform appropriate contributions and locations for regional and district open space in the Catherine Fields Precinct, the whole precinct is at risk of future under supply. If the proposal proceeds, updates to the Social Infrastructure Plan to further consider delivery of district park level open space, will be required.
Sports fields	1:1850 people	Benchmarks in Council's Places and Spaces Strategy require 3.1 sports fields to meet demand from the proposed population. However, only 2 sports fields are proposed onsite with one proposed offsite. It is not clear where this additional sports field will be delivered off site and without the broader precinct planning for the Catherine Fields Precinct, it would be prudent to ensure this additional sports field is delivered onsite. Updated information on proposed sports fields has not been provided with the updated ILP. If the proposal proceeds, updates to the Social Infrastructure Plan are required to ensure adequate provision of sports fields and appropriate funding mechanisms.
Sports courts / multicourt	1:2000 people	The original proposal identified that two multi- purpose courts are proposed to be delivered within one of the potential neighbourhood parks. Updated information on proposed sports courts has not been provided with the updated ILP. If the proposal proceeds, updates to the Social Infrastructure Plan are required to ensure adequate provision of sports courts and appropriate funding mechanisms.
Improve riparian corri	dor and waterway health	and biodiversity connectivity
Biodiversity Certification	Demonstrate how the	The entire subject site is biodiversity certified as part of the South West Growth Centre





Theme	Criteria	Council officer comment
Theme	Criteria proposal has addressed the non- certified areas.	Council officer commentBiodiversity Certification Order (dated December 2007).The Biodiversity Assessment prepared by AEP (dated 15 March 2022) has identified vegetation on the site to be consistent with Critically Endangered Ecological Community Cumberland Plain Shale Woodland. The assessment also concludes that areas of this vegetation exceeding 4ha do not meet the criteria for conservation under the Growth Centres Assessment.Officer review has identified that adequate
		If the proposal proceeds, an updated assessment would be required to investigate the whole site. A Site Consistency Report and draft development controls would also be required to demonstrate compliance with the conditions of the South West Growth Centre Biodiversity Certification Order.
Connectivity – Blue and Green Grid	Demonstrate how the proposal can extend green connections across the Growth Area, further to implementing the Green Grid. Consideration should be given to the retention of existing waterbodies as potential natural detention basins, which may aid in flood mitigation.	The subject site is located in the Catherine Fields Precinct of the South West Growth Area. Currently, no broader planning for the Catherine Fields Precinct has been undertaken to understand the precinct-scale 'green grid network' and priority locations to connect future residential areas to key destinations such as schools, the local centre, open spaces and public transport hubs. If the proposal proceeds, further work is required to ensure green links provided on the subject site are contiguous and integrated with the green and blue grid network proposed for the broader Catherine Fields Precinct. Work is also required to facilitate connections to the South Creek Green Grid Priority Corridor identified in the District Plan.



Theme	Criteria	Council officer comment
Be resilient to climate	change	
Tree canopy cover	Demonstrate how the proposal protects existing native vegetation and provides opportunities for revegetation.	Opportunities to retain existing native vegetation (Cumberland Plain Woodland) and revegetate, have not been sufficiently investigated. If the proposal proceeds, an updated Biodiversity Assessment, a Site Consistency Report and draft development controls, a Landscape Masterplan and road cross- sections would be required, to ensure tree canopy cover is retained and enhanced.
Plan for connected co	mmunities	
Local and regional	Demonstrate there is either existing infrastructure or delivery mechanisms to deliver the required types of infrastructure necessary to support the future community arising from the proposal.	Water and WastewaterSydney Water has advised that they are not able to service the site with water and waste water services at this time and that the current priority is to service already rezoned land they have committed to servicing in the SWGA.The proposal estimates development delivery to take place from 2026 with a 200 dwellings uptake per year. This does not align with Sydney Water's current growth servicing plan for 2024-2029, which shows the Catherine Fields Precinct in the strategic planning stage during this period.The proponent has been working to identify network capacity and enter into an interim servicing agreement with Sydney Water. However, this agreement will only cover land under the control of the proponent (comprising approximately 400 future lots).Sydney Water's current advice (dated 10 February 2025) is that the site will not be serviced for drinking water until at least 2031 and 2030/2031 for wastewater (subject to funding and approvals).If the proposal proceeds, there is a risk that a large amount of land rezoned for residential uses (approximately 80% of the site) will remain undeveloped until at least 2031. <i>Electricity</i> Endeavour Energy has confirmed that the subject site can be serviced for electricity by connecting to future planned networks. <i>Road networks</i>
		The draft proposal indicates that the construction of the future Rickard Road extension and Springfield Road realignment



Theme	Criteria	Council officer comment
		will support traffic flows generated by the proposed development. Both roads are at early concept design stage, and there is uncertainty about funding and delivery timeframes. There are concerns that existing and future residents may be adversely impacted by the additional vehicle traffic generated by this proposal, should additional east-west roads into Oran Park not be constructed to support housing growth. It is recommended that the draft proposal is not progressed until the funding and timeframes for the delivery of strategic road corridors are confirmed.
Plan for social infrastr	ucture	
Education (primary)	Primary School (K-6) : 1:2000 - 6000 dwellings, Minimum 1.5ha	SINSW has advised that the proposal will require a new primary school to be located onsite and that the additional demand for secondary school places will need to be accommodated outside of the existing secondary schools in the area. A primary school has been identified on the updated ILP. However, a location for a secondary school to accommodate the additional demand has not been explored. If the proposal proceeds, further detailed design in and around the primary school is required to ensure roads can accommodate bus movements and pedestrian permeability. Updates to the Social Infrastructure Plan are also required to address the need for secondary school places within the Catherine Fields Precinct.
Education (secondary)	Secondary School (7- 12): 1 school per:4, 500 - 10000 dwellings, minimum 2.5ha	SINSW has advised that the proposal will generate additional demand for secondary school places and that these will need to be accommodated outside of the existing secondary schools in the area. Updates to the Social Infrastructure Plan are required to address the need for secondary school places within the Catherine Fields Precinct.
Ambulance, Police, and Fire and Rescue	Demonstrate consultation to understand implications of response times.	The draft proposal does not adequately address emergency service impacts and needs. SES have noted that the draft ILP shows residential land and road networks on land within the PME, with no adequate plan for



Theme	Criteria	Council officer comment
		Consultation has also been undertaken with NSW Fire and Rescue who have noted that contributions towards fire services will be required. The proponent needs further consultation with other emergency service agencies to understand the demand the proposal will likely generate for individual services.
Community Facilities (local)	Local (Equivalent to 'neighbourhood community facility' in Camden Council's Spaces and Places Strategy) Approx 1:10,000 people Min. 2,000sqm - 2,500sqm	Population figures for the updated ILP have not been provided, and so it is not clear what the demand for local level facilities will be. If the proposal proceeds, updates to population figures and the Social Infrastructure Report will be required to ensure adequate provision.
Community Facilities (district)	District (Equivalent to 'local community facility' in Camden Council's Spaces and Places Strategy) Approx 1: 20-25,000 people Min. 1,500sqm – 2,400sqm	Population figures for the updated ILP have not been provided, and so it is not clear what the demand for district level facilities will be. If the proposal proceeds, updates to population figures and the Social Infrastructure Report will be required to ensure adequate provision.





Section Four: Assessment against Local Plans

D. Camden Community Strategic Plan

The Connecting Camden Community Strategic Plan 2036 (the CSP) acknowledges that Camden's urban landscape is changing and that there is a need to ensure that everyone has access to quality environments that are well planned and designed, maintained and built to last for future generations. The CSP also acknowledges that the green spaces, natural and rural landscapes and waterways, are special spaces with cultural and heritage values to the community.

Table 4: Assessment against the Camden Community Strategic Plan's relevant	
objectives	

Obje	ctive	Consistency	Comment	
ing	W1 Our community is welcoming and inclusive, everyone feels included and involved			
stion - Welcoming	LB1.1 Embrace a Smart Community approach.	Undetermined	Should the proposal proceed, consideration into adaptability and smart technology will be required in the final design of the ILP and in development controls.	
Key Direction	LB1.3 Promote and improve digital inclusion and equity across our community.	Undetermined	Information not available to assess this objective.	
	W2 Our community is healthy and active with access to open space, facilities and services that support wellbeing			
	W2.1 Promote and facilitate programs and services that support good community health and wellbeing.	Undetermined	Community health and wellbeing programs and services matters are not considered to be relevant to the draft proposal. These matters are usually considered later once a community has been established.	





Obje	ective	Consistency	Comment	
Key Direction – Healthy & Active	W2.2 Improve access to public spaces and places for people of all ages and abilities.	Νο	The draft ILP shows a significant shortfall of onsite useable open space (i.e. 9.18ha shortfall) and proposes a potential onsite community facility to be located with the proposed double oval. Improvements are required to the road and lot design to improve connectivity and walkability within the SRN site and broader precinct. Detailed design in an around the school and local centre is also required to ensure roads can accommodate bus movements and pedestrian permeability. A lack of local community facilities within the SRN site and the proposed payment of contributions for community facilities outside of the Catherine Fields Precinct will result in the future population having to travel longer distances at additional costs to access these facilities. This will adversely impact on the potential social and health benefits of these facilities.	
	W3.3 Address community needs through the provision of services and facilities targeting specific user groups.	No	The draft ILP shows a significant shortfall of onsite useable open space (i.e. 9.18ha shortfall) and does not propose onsite community facilities. If the proposal proceeds, updates to the Social Infrastructure Plan and draft ILP are required.	
	LB1 Our community harnesse innovations	es local creativity,	, and supports new technologies and	
	LB1.1 Embrace a Smart Community approach.	Undetermined	Information is not available to assess this objective.	
	LB1.3 Promote and improve digital inclusion and equity across our community.	Undetermined	Information is not available to assess this objective.	
	LB2 Our public spaces and places are vibrant and accessible			
Key Direction - Liveable	LB2.1 Ensure homes, infrastructure and facilities are well planned, delivered and maintained to create high quality urban and rural environments that meet our diverse needs and respond to our climate.	Νο	A structure plan for the broader Catherine Fields Precinct is required to consider and plan new neighbourhoods that can meet the diverse needs of future residents. Improvements to the draft ILP are required to deliver access to a high- quality urban environment.	



Objective		Consistency	Comment			
	LB2.2 Enhance town centres and public spaces.	Undetermined	A local centre and a mixed use employment area have been identified on the SWGA Structure Plan on the subject site. Updates to the ILP have identified a local centre. However, the mixed use corridor along Camden Velley Way has not been incorporated. If the proposal proceeds, an Employment Land and Retail Demand Analysis would be required to understand the investment and business opportunities for the subject site and the need for the local centre and a mixed use employment corridor. A Landscape Masterplan would also be required and consideration of enhancing public spaces would occur at this time.			
	LB2.3 Identify and maintain city heritage and culture.	No	An Aboriginal Cultural Heritage Assessment is required to ensure potential areas of significance are protected. Further work and consultation with Aboriginal stakeholders is also required to prepare a connecting with Country Strategy to inform the final ILP and future development control plan.			
	LB3 Our transport network is efficient, safe and integrated – locally and regionally					
	LB3.1 Improve public transport links, roads, and transport options that support a growing community.	No	The draft proposal states that residential areas will be able to access public transport (bus stop) within 400m of homes. However, it is unclear how this distance has been measured. The current draft ILP also shows a disconnection between open spaces, green links and the street network. If the proposal proceeds, street cross sections and updates to the draft ILP would be required. Transport for NSW is currently preparing a South Western Sydney Transport Structure Plan (TSP). The TSP seeks to align future land uses with transport infrastructure and service delivery. If the proposal proceeds, it would be assessed against that plan.			



	Consistency	Comment			
P1 Our business community is strong, thriving and connected at local, regional,					
P1.1 Create diverse environments for business and workers to grow and thrive.	Undetermined	A local centre and a mixed use employment area have been identified on the SWGA Structure Plan on the subject site.			
		Updates to the ILP have identified a local centre. However, the mixed use corridor along Camden Velley Way has not been incorporated. If the proposal proceeds, an Employment Land and Retail Demand Analysis would be required to understand the investment and business opportunities for the subject site and the need for the local centre and a mixed use employment corridor.			
P1.2 Attract investment into he region.	Undetermined	If the proposal proceeds, an Employment Land and Retail Demand Analysis would be required to understand the investment and business opportunities for the subject site and the need for the local centre and a mixed use employment corridor.			
P1.3 Facilitate business and ndustry growth and support new ways of working.	Undetermined	If the proposal proceeds, an Employment Land and Retail Demand Analysis would be required to understand the investment and business opportunities for the subject site and the need for the local centre and a mixed use employment corridor.			
P2 Our LGA provides diverse local job opportunities, supported by skills and training pathways to employment					
P2.1 Strengthen education, raining and career pathways.	Undetermined	If the proposal proceeds, an Employment Land and Retail Demand Analysis would be required to understand the investment and business opportunities for the subject site and the need for the local centre and a mixed use employment corridor.			
P2.2 Partner with industry and NSW Government to build a strong and diverse local economy.	Undetermined	If the proposal proceeds, an Employment Land and Retail Demand Analysis will be required to support the proposal and ILP.			
P3 Our LGA is a desirable location for new and emerging industries, businesses and entrepreneurs					
P3.1 Support small, local and start-up businesses.	Undetermined	If the proposal proceeds, an Employment Land and Retail Demand Analysis will be required to support the proposal and ILP.			
	 Pational and international level P1.1 Create diverse environments for business and vorkers to grow and thrive. P1.2 Attract investment into he region. P1.3 Facilitate business and ndustry growth and support new ways of working. P2 Our LGA provides diverse bathways to employment P2.1 Strengthen education, raining and career pathways. P2.1 Strengthen education, raining and career pathways. P3 Our LGA is a desirable local economy. P3 Our LGA is a desirable local economy. P3.1 Support small, local and 	Pational and international levels P1.1 Create diverse environments for business and vorkers to grow and thrive. Undetermined P1.2 Attract investment into he region. Undetermined P1.3 Facilitate business and ndustry growth and support lew ways of working. Undetermined P2 Our LGA provides diverse local job opportu- bathways to employment Undetermined P2.1 Strengthen education, raining and career pathways. Undetermined P3.0 ur LGA is a desirable location for new and expreneurs Undetermined P3.1 Support small, local and Undetermined			



Obje	ective	Consistency	Comment
	B1 Our natural environment a enhanced for community enjo	e protected, well maintained and	
Key Direction – Balanced	B1.1 Invest in environmental protection, restoration and urban greening.	No	Issues with the Biodiversity Assessment Report submitted with the draft proposal are raised (see assessment against objective 27 of the District Plan above). If the proposal proceeds, an updated assessment would be required to investigate the whole site. A site consistency report would be required to demonstrate compliance with the conditions of the South West Growth Centre Biodiversity Certification Order.
	B1.2 Maintain, protect and increase Camden's tree canopy.	No	If the proposal proceeds, a Landscape Master Plan and street cross-sections would be required to adequately assess and ensure tree canopy is increased across the site.
	B1.3 Manage the impact and integration of population growth responsibly within our natural environment.	No	If the proposal proceeds, further work is required to ensure the population growth anticipated will have as minimal impact on the natural environment as possible. This includes an updated Biodiversity Assessment, a landscape Masterplan, a scenic landscape study, street cross- sections, retention and reinstatement of natural watercourses and updates to the ILP.
	B1.5 Maintain and enhance the natural environment.	No	Opportunities to retain existing native vegetation (Cumberland Plain Woodland) and revegetate have not been sufficiently investigated. If the proposal proceeds, an updated Biodiversity Assessment, a Site Consistency Report, a Landscape Masterplan and road cross-sections, would be required to ensure tree canopy cover is retained and enhanced. Additional work and updates to the draft ILP would also be required to ensure waterways are protected and riparian lands are retained and returned to their natural state.


Obje	ective	Consistency	Comment
		ated into the desig	gn of our towns, villages, suburbs and
	<i>places</i> B2.1 Preserve and enhance the natural assets of the city.	Νο	If the proposal proceeds, further work is required to ensure the natural assets of the city are preserved and enhanced. Further work would include an updated Biodiversity Assessment, a Landscape Masterplan, a Scenic Landscape Study, street cross-sections, retention and reinstatement of natural watercourses, and updates to the draft ILP.
	B2.2 Embed sustainability principles in the design, construction and maintenance of our buildings and places.	No in Camden are w	Insufficient information has been provided to determine urban heat and climate change impacts and mitigation measures. If the proposal proceeds, an updated Urban Heat Report is required to better understand how the proposal will mitigate urban heat and address climate change stress.
	bs chinale inipacts and risks		en manageu
	B3.1 Build community resilience to climate change impacts.	Undetermined	Insufficient information has been provided to determine urban heat and climate change impacts and mitigation measures. An Urban Heat Report is required to better understand how the proposal will mitigate urban heat and address climate change stress.
	B3.2 Deliver effective climate mitigation and adaption measures.	Undetermined	Insufficient information has been provided to determine urban heat and climate change impacts and mitigation measures. An Urban Heat Report is required to better these matters. Additionally, the current draft ILP shows residential development and proposed roads on land impacted by flooding. The draft proposal has been referred to the NSW SES who have advised that the proposed evacuation measures are not considered adequate and sheltering in place is not supported.





Obje	ective	Consistency	Comment	
	B4 Our community is resourced, efficient and able to meet our vision and objectives			
	B4.1 Develop a pathway to net zero carbon.	Undetermined	Insufficient information provided to determine the impacts of the proposed residential development on the achievement of a low-carbon city and net- zero emissions. If the proposal proceeds, further consideration of this objective would be required.	
	B4.2 Collect and manage waste effectively and efficiently.	No	If the proposal proceeds, road cross sections would be required to ensure garbage truck access. Consideration of development controls to encourage a circular economy would also be required.	
	B4.3 Encourage energy and resource efficiency opportunities.	Undetermined	Any future dwellings will be required to demonstrate compliance with the BASIX and NaTHERS Standards for energy and water efficiency.	
	L1 Our Council is a leading council in the Western Parkland City, influencing metropolitan planning and decision-making			
Key Direction – Leading	L1.2 Build and strengthen partnerships across Government and Industry	Undetermined	Broader precinct planning is required to be undertaken in collaboration with state agencies to understand future infrastructure needs and to ensure infrastructure aligns with growth and is adequately financed.	





E. Camden Local Strategic Planning Statement

The Local Strategic Planning Statement (LSPS) was adopted by Council on 14 April 2020. The LSPS is a 20-year planning vision and includes land use, transport and sustainability objectives to demonstrate how the Camden LGA will change to meet the community's needs over the next 20 years.

elevant priorities Local Priority	Consistency	Comment			
Infrastructure and Collaboration					
Infrastructure and Collaboration Local Priority I1: Aligning infrastructure delivery with growth	No	Water and WastewaterSydney Water has advised that they arenot able to service the site with water andwaste water services at this time and thatthe current priority is to service alreadyrezoned land they have committed toservicing in the SWGA.The proposal estimates developmentdelivery to take place from 2026 with 200dwellings uptake per year. This does notalign with Sydney Water's current growthservicing plan for 2024-2029, whichshows the Catherine Fields Precinct inthe strategic planning stage during thisperiod.The proponent has been working toidentify network capacity and enter intoan interim servicing agreement withSydney Water.			
		However, this agreement will only cover land under the control of the proponent (comprising approximately 400 future lots).			
		Sydney Water's current advice (dated 10 February 2025) is the site will not be serviced for drinking water until at least 2031 and 2030/2031 for wastewater (subject to funding and approvals).			
		If the proposal proceeds, there is a risk that a large amount of land rezoned for residential uses (approximately 80% of the site) will remain undeveloped until at least 2031.			
		<u>Electricity</u> Endeavour Energy have confirmed that the subject site can be serviced for electricity by connecting to future planned networks.			

Table 5: Assessment against the Camden Local Strategic Planning Statement's relevant priorities





Local Priority	Consistency	Comment
		Road networksThe draft proposal indicates the construction of the future Rickard Road extension and Springfield Road realignment will support traffic flows generated by the proposed development. Both roads are at early concept design stage, and there is uncertainty about funding and delivery timeframes.There are concerns that existing and future residents may be adversely impacted by the proposal, should additional east-west roads into Oran Park not be constructed to support housing growth.It is recommended that the draft proposal is not progressed until the funding and timeframes for the delivery of strategic road corridors are confirmed.
Local Priority I2: Connecting Camden through integrated transport solutions	No	The draft proposal indicates the construction of the future Rickard Road extension and Springfield Road realignment will support traffic flows generated by the proposed development. Both roads are at early concept design stage, and there is uncertainty about funding and delivery timeframes. There are concerns that existing and future residents may be adversely impacted by the additional vehicle traffic generated by this proposal, should additional east-west roads into Oran Park not be constructed to support housing growth. It is recommended that the draft proposal is not progressed until the funding and timeframes for the delivery of strategic road corridors are confirmed. The draft proposal states that residential areas will be able to access public transport (bus stop) within 400m of homes. However, it is unclear how this distance has been measured. The current draft ILP also shows a disconnection between open spaces, green links and the street network. If the proposal proceeds, street cross-sections and updates to the draft ILP would be required.





Local Priority	Consistency	Comment
		Transport for NSW is currently preparing a South Western Sydney Transport Structure Plan (TSP). The TSP seeks to align future land uses with transport infrastructure and service delivery. If the proposal proceeds, it would be assessed against that plan (subject to its availability).
Local Priority I3: Planning for the delivery of the North South Rail and South West Rail Link Extension	N/A	Not applicable to the Planning Proposal
Local Priority I4: Working in partnership to deliver a more liveable, productive and sustainable Camden	No	If the proposal proceeds, additional work and updates to the draft ILP will be required to increase open space, plan for tree canopy, ensure waterways are protected, ensure residential development is not planned on flood affected land, and that riparian lands are retained and returned to their natural state. More work will also be required to ensure the ILP reflects the vision for a walkable neighbourhood and addresses the SWGA Structure Plan.
Liveability		
Local Priority L1: Providing housing	No	There is a lack of diversity in housing mix.
choice and affordability for Camden's growing and changing population.		-
		The extent of medium to high density residential appears excessive and not proportionate to surrounding released precincts.
		residential appears excessive and not proportionate to surrounding released
		residential appears excessive and not proportionate to surrounding released precincts. Affordability issues, due to extra impost of infrastructure servicing, is also a
		residential appears excessive and not proportionate to surrounding released precincts. Affordability issues, due to extra impost of infrastructure servicing, is also a consideration. Wider precinct planning could identify developable land and required infrastructure and provide a more rational approach to rezoning land within this



Local Priority	Consistency	Comment
Local Priority L3: Providing services and facilities to foster a healthy and socially connected community	No	The significant shortfall of open space, and uncertainty of where community facilities can be delivered, is likely to have a negative impact on building and fostering social capital and community cohesion.
Local Priority L4: Encouraging vibrant and connected centres which reflect Camden's evolving character	No	A local centre and a mixed use employment area have been identified on the SWGA Structure Plan on the subject site.
		Updates to the ILP have identified a local centre. However, the mixed use corridor along Camden Valley Way has not been incorporated.
		If the proposal proceeds, an Employment Land and Retail Demand Analysis would be required to understand the investment and business opportunities for the subject site and the need for the local centre and a mixed use employment corridor.
Local Priority L5: Supporting cultural infrastructure to promote cultural and creative spaces	Undetermined	Broader precinct planning of the Catherine Fields Precinct is needed to identify future community demand and locations for key cultural infrastructure and land use planning opportunities to support creative industries.
		Should the proposal proceed, a Connecting with Country Strategy will be required. Further consideration of how development controls and the draft ILP can support arts and cultural expression will also be needed.
Productivity		
Local Priority P1: Increasing the quantity and diversity of local jobs, and improving access to jobs across the Western City District	No	A local centre and a mixed use employment area have been identified on the SWGA Structure Plan on the subject site.
		Updates to the ILP have identified a local centre. However, the mixed use corridor along Camden Velley Way has not been incorporated.
		If the proposal proceeds, an Employment Land and Retail Demand Analysis would be required to understand the investment and business opportunities for the subject site and the need for the local centre and a mixed use employment corridor.



Local Priority	Consistency	Comment
Local Priority P2: Creating a network of successful centres	No	A local centre and a mixed use employment area have been identified on the SWGA Structure Plan on the subject site. Updates to the ILP have identified a local centre. However, the mixed use corridor along Camden Velley Way has not been
		incorporated. If the proposal proceeds, an Employment Land and Retail Demand Analysis would be required to understand the investment and business opportunities for the subject site and the need for the local centre and a mixed use employment corridor.
Local Priority P3: Strengthening the Strategic Centres of Narellan and Leppington	No	A local centre and a mixed use employment area have been identified on the SWGA Structure Plan on the subject site.
		Updates to the ILP have identified a local centre. However, the mixed use corridor along Camden Velley Way has not been incorporated.
		If the proposal proceeds, an Employment Land and Retail Demand Analysis would be required to understand the investment and business opportunities for the subject site and the need for the local centre and a mixed use employment corridor.
Local Priority P4: Ensuring a suitable supply of industrial and urban services land	N/A	Industrial and urban services land do not form part of the draft proposal.
Local Priority P5: Leveraging industry opportunities created by Camden's proximity to the Western Sydney Airport and Aerotropolis	N/A	Industrial and urban services land do not form part of the draft proposal.
Local Priority P6: Leveraging Camden's natural and cultural assets to promote local agricultural production and increase tourism	No	The SRN site is located on land identified for urban growth. However, the proposal borders existing poultry farms on western border. This may lead to odour and noise impacts on new residents, create land use conflicts and impact the viability of these existing rural enterprises.
		Consultation has not been undertaken with neighbouring properties. Therefore, it is unclear what the future ongoing operational plans are for these enterprises.





Local Priority	Consistency	Comment
		Further consideration is required to ensure operational plans are consistent with the timing of future development, and investigation of potential interim buffer measures may be required.
Sustainability		
Local Priority S1: Improving accessibility and connectivity of Camden's Green and Blue Grid and delivering high quality open space	No	A landscape master plan and updates to the draft ILP are required to better connect the green and blue grid.
Local Priority S2: Protecting and enhancing the health of Camden's waterways, and strengthening the role and prominence of the Nepean River	No	Additional work and updates to the draft ILP are required to ensure waterways are protected and riparian lands are retained and returned to their natural state.
Local Priority S3: Protecting Camden's Rural Land	N/A	The site is within the SWGA boundary and has been identified to support future urban growth.
Local Priority S4: Protecting and restoring environmentally sensitive land and enhancing biodiversity	No	Additional work and updates to the draft ILP will be required to ensure waterways are protected and riparian lands are retained and returned to their natural state.
Local Priority S5: Reducing emissions, managing waste and increasing energy efficiency	Undetermined	There is insufficient information available on the impacts of the proposed residential development and about how emissions could be reduced, waste managed, and energy efficiency increased. If the proposal proceeds, further consideration of this objective would be required.
Local Priority S6: Improving Camden's resilience to hazards and extreme weather events	No	If the proposal proceeds, an Urban Heat Report and Strategy will be required to better understand how the proposal will respond to climate change stresses. Residential development is proposed on land impacted by flooding. The proposed strategy to manage stormwater is not sufficient to manage all storm and flooding events.



F. Camden Local Housing Strategy

The Local Housing Strategy (LHS) was adopted in October 2021 and sets out Council's vision for housing in the Camden Local Government Area (LGA) over the next 10 and 20 years. It draws on a body of evidence to create a set of housing priorities and objectives specific to the Camden LGA, with associated implementation actions and timeframes.

Council officer's assessment of the proposal against the relevant objectives of the LHS is summarised in **Table 6.**

Objective	Consistency	Comment	
Priority 1 – Providing housing capacity and coordinating growth with infrastructure			
Objective 1: There is sufficient planning capacity to meet forecast housing demand	No	Sydney Water has advised that they are not able to service the site with water and waste water services at this time and that the current priority is to service already rezoned land they have committed to servicing in the SWGA.	
		The proposal estimates development delivery to take place from 2026 with 200 dwellings uptake per year. This does not align with Sydney Water's current growth servicing plan for 2024-2029, which shows the Catherine Fields Precinct in the strategic planning stage during this period.	
		The proponent has been working to identify network capacity and enter into an interim servicing agreement with Sydney Water.	
		However, this agreement will only cover land under the control of the proponent comprising of approximately 400 future lots.	
		Sydney Water's current advice (dated 10 February 2025) is the site will not be serviced for drinking water until at least 2031 and 2030/2031 for wastewater (subject to funding and approvals).	
		If the proposal proceeds, there is a risk that a large amount of land rezoned for residential uses (approximately 80% of the site) will remain undeveloped until at least 2031.	
Objective 2 : Precincts in the SWGA are planned and released to align with infrastructure provision	No	Under the collaborative planning and 'proponent led rezoning' approach, precincts are no longer released in coordination with all state agencies.	

Table 6: Assessment against the Camden Local Housing Strategy's relevant objectives



Objective	Consistency	Comment
		Therefore, broader precinct master planning for the whole of the Catherine Fields Precinct has not been progressed at this stage. This master planning work is required to inform all rezoning proposals and ensure that infrastructure provision is available at the time of rezoning.
Priority 2 – Delivering resilient, heal	thy and connecte	ed communities
Objective 3: Housing is well- designed and environmentally sustainable	No	If the proposal proceeds, an Urban Heat Report and Strategy and Landscape Masterplan will be required to ensure that the proposal can deliver sustainable housing.
Objective 4: Neighbourhood design supports healthy and connected communities that are better placed	No	If the proposal proceeds, further work is required to the ILP to connect green spaces, reduce density, improve walkability and lot design.
Objective 5: Increase Camden LGA's green cover and urban tree canopy	Undetermined	If the proposal proceeds, a Landscape Masterplan and street cross-sections would be required to adequately assess and ensure tree canopy is increased across the site.
Priority 3 – Delivering the right hous	sing in the right l	ocation
Objective 6: Housing density is strategically located to activate town centres, promote walkability and optimise infrastructure	No	The extent of medium to high density residential appears excessive and not proportionate to surrounding released precincts. A local centre and a mixed use employment area have been identified on the SWGA Structure Plan on the subject site. Updates to the ILP have identified a local centre. However, the mixed use corridor along Camden Velley Way has not been incorporated. If the proposal proceeds, an Employment Land and Retail Demand Analysis would be required to understand the investment and business opportunities for the subject site and the need for the local centre and a mixed use employment corridor. If the proposal proceeds, further work is required to the ILP to connect green spaces, reduce density, improve walkability and lot design.



Objective	Consistency	Comment
Objective 7: Housing growth in established areas is incremental, and preserves character and heritage values	N/A	The subject site is located within the South West Growth Area.
Objective 8: Protect Camden LGA's Rural Lands	Νο	The SRN site is located on land identified for growth. However, the proposal borders existing poultry farms on western border. This may lead to odour and noise impacts on new residents, create land use conflicts and impact the viability of these existing rural enterprises.
		Consultation has not been undertaken with neighbouring properties. Therefore, it is unclear what the future ongoing operational plans are for these enterprises.
		Further consideration is required to ensure operational plans are consistent with the timing of future development, and investigation of potential interim buffer measures may be required.
Priority 4 – Increasing housing choi	ce and diversity	
Objective 9: The mix of housing types matches the changing needs	No	There is a lack of diversity in housing mix.
and preferences of the community		The extent of medium to high density residential appears excessive and not proportionate to surrounding released precincts. T
		The proposed density mix for the R2 zoned land in the original ILP would also support small lot residential development in higher density areas, which is inconsistent with the aims of the LHS. It is unclear whether similar density and zoning is proposed in the revised draft ILP options. If the proposal proceeds, the proposed housing density, zoning and where this should be located location would require further consideration.
Objective 10: Housing is inclusive and caters for an ageing population and People with Disability	N/A	Senior's housing and housing for People with Disability is not relevant to the draft proposal.
		Senior's housing and group homes are permissible with consent in the proposed Zone R2 Low Density Residential.
		Consistency against this objective will be addressed at development stage.



Objective	Consistency	Comment
Priority 5 – Addressing housing affo	ordability	
Objective 11: Support housing that encourages affordability across the housing continuum	Undetermined	Infrastructure servicing costs to support interim wastewater solutions will contribute to higher development costs and be passed to future home buyers. Costs for insuring homes on flood affected lots will also impact ongoing housing affordability.
Objective 12: Facilitate the delivery of affordable rental housing	No	The draft proposal does not include affordable rental housing.





G. Camden Green and Blue Grid Vision

The Camden Green and Blue Grid Vision was adopted in April 2023 and sets out a plan to strategically join green open spaces, riparian land, biodiversity corridors and natural bushland along existing creeks, rivers and waterways across the Camden LGA.

Council officer's assessment of the draft proposal against the relevant principles of the Vision, is outline below.

Table 7: Assessment against the Camden Green and Blue Grid Vision's relevant	
principles	

Principles	Consistency	Commont
Principles	Consistency	Comment
1. Create linear open space green grid corridors to promote walking, cycling and public transport usage, and to provide important habitat corridors for animals and wildlife.	Undetermined	Detailed cross-sections and a Public Domain Landscape Masterplan are required to support the design of the draft ILP and proposed green grid connections.
3. Create more east-west links of trees and vegetation across the local grid to connect Town Centres and river and creek systems – This will provide a stepping stone of habitats for animals to move between as well as provide shade for people to move about their local area.	No	The draft ILP proposes to retain a small portion of an existing riparian corridor. However, more work is required to link this area to connect the site to the South Creek corridor.
4. Keep existing farm dams and wetlands when designing new and future suburbs – these will provide a water source for wildlife and create a focal point within new open spaces for people to enjoy.	Undetermined	The Water Cycle Management Strategy does suggest retaining some existing farm dams and reconfiguring them as detention basins to serve a stormwater drainage function. The proponent suggests vegetation and trees planted within drainage areas will contribute to the green grid. More consideration of other dams that are proposed to be filled is required. Council officers consider these dams to be part of the original natural drainage system across the site and that they should be retained for this purpose.
8. Retain and restore vegetation around South Creek when planning for development.	No	Further work to retain and re-establish vegetation on the site is required.
9. Connect key destinations within towns by planting trees along new roads, active transport routes (e.g. walking and cycling tracks), near future railway stations and near community and retail centres, to create a series of local green grid loops.	Undetermined	Currently, there is no structure/master plan for the broader Catherine Fields Precinct that identifies the location of key destinations. A Catherine Fields Precinct Structure Plan would assist to ensure that green links created within the SRN site strategically connect to tree-lined paths, cycleways, recreation trails, riparian



Principles	Consistency	Comment
		corridors and biodiversity areas located outside of the site's boundary.
10. Use rivers and creeks as the main structure for the local green grid, promoting South Creek as a strong blue grid connection.	No	Opportunities to connect the SRN site to the adjoining SRS site, via a linking green corridor, requires further investigation.
11. Protect and restore bushland.	No	Substantial stands of native vegetation have not been identified in the Biodiversity Certification Assessment prepared by AEP. A thorough site investigation across the whole of the SRN site has not been conducted. Council officers are not confident with the assessment and believe that more vegetation should be retained across the site.
12. Investigate ways to retain water in the environment by incorporating Water Sensitive Urban Design (WSUD) into new builds, public domain projects and during the master planning for new suburbs.	Undetermined	The draft proposal identifies that urban heat island mitigation strategies will be undertaken on the site, including the retention of water in the landscape. However, the shortfall of onsite open space and lack of detailed street designs would undermine the achievement of these mitigation strategies. An Urban Heat Report is required to better understand how the proposal will mitigate urban heat and address climate change.
16. Use Infrastructure 'Grey Grid' Corridors to extend recreation opportunities, active transport corridors and tree canopy cover.	Undetermined	A Public Domain Landscape Masterplan is required to support the design of the draft ILP and proposed green grid connections.
17. Promote South Creek as a strong blue grid connection and plant trees and vegetation along these waterways to protect and stabilise their banks and strengthen adjoining riparian land.	No	A small part of the South Creek tributary is within the SRN site, with this part of the site proposed to be developed.





H. Camden Centres and Employment Land Strategy

The Camden Centres and Employment Land Strategy was adopted in March 2022 and sets out a plan for Camden LGA's retail centres and industrial and urban services land for the next 20 years. Table 8 assesses the proposal against the strategy's relevant principles.

Principles	Consistency	Comment
Direction 1 – A network of successf	ul, integrated and	d attractive retail centres
Principle 1: A defined retail centres hierarchy	Undetermined	Updates to the ILP have identified a local centre on the site.
Principle 2: Retail centres are vibrant, safe, accessible and distinctive	Undetermined	If the proposal proceeds, an Employment Land and Retail Demand Analysis would help to understand the investment and business opportunities for the subject site
Principle 3: Retail centres are innovative, environmentally sustainable and planned to mitigate natural hazards	Undetermined	and the need for, and place in the hierarchy of, the local centre.
Principle 4: A planning framework that supports retail centres	Undetermined	
Direction 4 – Capitalise on existing	and future infras	tructure
Principle 13: Land use and infrastructure planning is aligned	No	The SRN site cannot be serviced with drinking water and wastewater services at this time. Broader planning of the Catherine Fields Precinct is required to ensure growth aligns with infrastructure and is adequately financed.
Principle 14: Retail centres and employment land productivity is maximised around existing and planned rail stations, rapid bus service routes and major road corridors	Undetermined	Updates to the ILP have identified a local centre in proximity to the future Rickard Road extension and a proposed primary school. Further detailed design in and around the school and local centre is required to ensure roads can accommodate bus movements and pedestrian access to active transport options in and around the centre.
		The SWGA Structure Plan also identifies a mixed use employment area along Camden Valley Way. This has not been shown on the updated ILP.
		If the proposal proceeds, an Employment Land and Retail Demand Analysis would also be required to support the proposed location of the local centre and the need for a mixed use employment corridor along Camden Valley Way.

 Table 8: Assessment against the Camden Centres and Employment Land Strategy





Section Five: Consistency against State Environmental Planning Policies

The State Environmental Planning Policies (SEPPs) are policies that set key rules and requirements for development across the State or specific to an LGA,

The draft Planning Proposal provides an assessment against the SEPPs.

Council officer's assessment of the proposal against the relevant SEPPs is summarised in **Table 9.**

 Table 9: Assessment against relevant State Environmental Planning Policies (SEPPs)

 SEPP

Refer to chapters below.
Part of the SRN site is zoned R5. However, all vegetation is mapped as South West Biodiversity Certified Land, so the chapter does not apply.
Does not apply to the Camden LGA.
Does not apply to the Camden LGA.
Does not apply to the Camden LGA.
Sydney Harbour Catchment The site is not within this catchment.
Sydney Drinking Water Catchment The site is not within this catchment.
<u>Georges River Catchment</u> The catchment only applies to a small area within the Camden LGA and the SRN site is outside that area.
<u>Hawkesbury-Nepean River Catchment</u> The SRN site is mapped as being within the Hawkesbury Nepean sub catchment.
The draft proposal seeks an ultimate wastewater strategy to connect to future Sydney Water sewerage services, with an interim servicing arrangement being investigated.
Sydney Water have advised that wastewater servicing is not available at this time. Current advice (dated 10 February 2025) is the site will not be serviced for wastewater until at least 2030/2031 (subject to funding and approvals).
If the proposal proceeds, a servicing commitment or agreement to an interim serving arrangement is required from Sydney Water.



SEPP	Officer Comments
	 The draft ILP and following studies/investigations will also need to be updated/prepared to ensure that the proposal does not negatively impact on water quality and flow within the catchment: Water Cycle Management Plan Flood Modelling and preparation of a Flood Impact and Risk Assessment (FIRA). Riparian Lands Assessment. Salinity Assessment. The SRN site does not include any mapped scenic riverine area.
Chapter 13 Strategic Conservation Planning	None of the land within the SRN site has been mapped as Avoided Land or Land for Strategic Conservation under the SEPP. Therefore, this Chapter is not relevant to the draft proposal.
State Environmental Planning Policy (Exempt and Complying Development Codes) 2008	The proposal will not impede the provisions of this SEPP. The proposal will assist in the application of this SEPP by introducing land zones to facilitate urban development.
State Environmental Planning Policy (Housing) 2021	The SEPP provides an exempt and complying development pathway for development within identified land use zones. The draft proposal does not affect implementation of the provisions of the SEPP.
State Environmental Planning Policy (Industry and Employment) 2021	Assessment is provided under chapters below.
Chapter 2 Western Sydney Employment Area	Does not apply to Camden LGA.
Chapter 3 Advertising and Signage	The proposal will not impede the application of this chapter.
State Environmental Policy (Planning Systems) 2021	Refer to chapters below.
Chapter 2 State and Regional Development	Not relevant to the proposal.
Chapter 3 Aboriginal Land	Does not apply to the Camden LGA.
Chapter 4 Concurrences and Consents	The proposal does not affect the implementation of this chapter.
State Environmental Planning Policy (Precincts- Western Parkland City) 2021	Refer to chapters below.
Chapter 2 State Significant Precincts	Not relevant to the draft proposal.
Chapter 3 Sydney Region Growth Centres	The site is located within the Camden Growth Areas boundary and is currently zoned under the Camden LEP 2010.



SEPP	Officer Comments
	The draft proposal intends include the SRN site within the SEPP and rezone it for residential development.
	If the proposal proceeds to finalisation, the existing general provisions of the SEPP will apply and new provisions specific to the SRN site will be created.
Chapter 4 Western Sydney Aerotropolis	The SRN site is mapped as being within the 13km Wildlife Buffer Zone and the 30km Wind Turbine Buffer Zone. Any future development will be subject to the relevant controls in this chapter.
State Environmental Planning Policy (Primary Production) 2021	Refer to chapters below.
Chapter 2 Primary production and rural development	The draft proposal seeks to rezone land in a designated growth area for residential development. Therefore, the SEPP is not relevant to the draft proposal.
State Environmental Planning Policy (Resilience and Hazards) 2021	Refer to chapters below.
Chapter 3 Hazardous and Offensive Development	No hazardous land uses are proposed.
Chapter 4 Remediation of land	A Preliminary Site Investigation Report was submitted with the draft proposal. The investigation focuses on land which the proponent has options over. A large portion of the site has not been investigated on the ground.
	Further investigation of all sites within the proposal area is required before compliance with the requirements of this chapter can be determined.
State Environmental Planning Policy (Resources and Energy) 2021	Refer to chapters below.
Chapter 2 Mining, petroleum production and extractive industries	Not relevant to the draft proposal.
Chapter 3 Extractive Industries in Sydney Area	Not relevant to the draft proposal.
State Environmental Planning Policy (Sustainable Buildings) 2022	Refer to chapters below.
Chapter 2 Standards for residential development—BASIX	The standards under this chapter relate to the future development assessment stage and are not applicable to the draft proposal.
Chapter 3 Standards for non-residential development	The standards under this chapter relate to the future development assessment stage and are not applicable to the draft proposal.



camden

SEPP	Officer Comments
Chapter 4 Miscellaneous	The standards under this chapter relate to the future development assessment stage and are not applicable to the draft proposal.
State Environmental Planning Policy (Transport and Infrastructure) 2021	Refer to chapters below.
Chapter 2 Infrastructure	The proposal applies to privately owned land. Therefore, the draft proposal will not impact the implementation of this chapter.
Chapter 3 Educational Establishments and childcare facilities	SINSW has identified a need for both a primary school and secondary school places to service the future population of the SRN site. The development of any future school on the site will be subject to the provisions of this chapter.
Chapter 4 Major Infrastructure corridors	The TFNSW preferred alignment of the Rickard Road extension corridor runs through the site and is shown in draft ILP Option B.
	Further assessment under the SEPP may be required at a future development application stage.





Section Six: Assessment against Section 9.1 Ministerial Directions

The Ministerial Directions are requirements under the Environmental Planning and Assessment Act 1979. Planning Proposals are required to consider and maintain consistency with these Directions.

The draft Planning Proposal provides an assessment against the s9.1 Ministerial Directions.

Council officer's assessment of the proposal against the relevant Directions is summarised in **Table 10.**

S9.1 Direction Title	Consistency	Assessment of Consistency	
Focus Area 1: Planning Systems			
Focus Area 1: Planning Systems			
1.1 Implementation of Regional Plans	Νο	The consistency of the draft proposal with the Greater Sydney Region Plan and Western City District Plan is provided in Section One and Two of this assessment. The draft proposal is considered to be inconsistent with a number of provisions within these plans, and therefore, with this direction.	
1.2 Development of Aboriginal Land Council Land	N/A	Rezoning of land owned by an Aboriginal Land Council is not proposed, so the Direction is not applicable.	
1.3 Approval and Referral Requirements	Undetermined	It is unlikely that the proposal will lead to future development applications for designated development. However, concurrence may be required at the subdivision DA stage as the draft ILP proposes new road access points onto the future Rickard Road extension, connections to Sydney Water services, development on land mapped as bushfire prone, and land within the flood planning level. It also proposes works in proximity to riparian areas. Formal consultation with agencies has not been undertaken to date. However, preliminary advice has raised concerns from a number of agencies that would need to be addressed before approval from the Minister could be sought. Therefore, consistency of the draft proposal with this Direction cannot	

Table 10: Assessment against the relevant s9.1 Ministerial Directions





S9.1 Direction Title	Consistency	Assessment of Consistency	
1.4 Site Specific Provisions	Yes	The draft proposal does not introduce any site-specific provisions and so is consistent with this direction.	
1.4A Exclusion of Development Standards from Variation	Yes	The draft proposal does not include provisions to exclude development standards from variation under Clause 4.6 of a Standard Instrument (Principal) LEP or equivalent provision of any other environmental planning instrument.	
Focus Area 1: Planning Systems - Pla	ice-based		
1.10 Implementation of the Western Sydney Aerotropolis Plan	Yes	The draft proposal is not inconsistent with this Plan.	
		The SRN site is located approximately 13km south of the future Western Sydney Airport (WSA) and is not located on land that is in an Australian Noise Exposure Forecast (ANEF) contour of 20 or greater.	
		The SRN site is also located within the wildlife buffer, wind turbine buffer and Obstacle Limitation Surface (OLS). Any future development application will need to consider impacts on these areas.	
1.21 Implementation of South West Growth Area Structure Plan	Νο	The draft proposal is inconsistent with this direction. The SWGA Structure Plan shows a mixed use employment corridor along Camden Valley Way, which has not been addressed by the proposal.	
		The draft proposal is also inconsistent with benchmarks and other key elements of the accompanying Guide to the South West Growth Area. A full assessment of the draft proposal against this guide is provided in Section Two.	
Focus Area 2: Design and Place			
There are no current Directions	N/A	N/A	
Focus Area 3: Biodiversity and Conservation			
3.1 Conservation zones	Νο	The entire subject site is biodiversity certified as part of the South West Growth Centre Biodiversity Certification Order (dated December 2007).	



S9.1 Direction Title	Consistency	Assessment of Consistency
		The Biodiversity Assessment prepared by AEP (dated 15 March 2022) has identified vegetation on the site to be consistent with Critically Endangered Ecological Community Cumberland Plain Shale Woodland. The assessment also concludes that areas of this vegetation exceeding 4ha do not meet the criteria for conservation under the Growth Centres Assessment. Officer review has identified that adequate ground-truthing across the site has not been conducted in the preparation of this assessment. The vegetation remnant is considerable in size at approximately 12ha. Therefore, this vegetation remnant should be further considered for retention. Further opportunities to retain priority vegetation such as Cumberland Plain Woodland (CPW), particularly in the southern part of the site where there is a large area of CPW (Biodiversity Report, p. 10) should also be further investigated. If the proposal proceeds, an updated Biodiversity Assessment would be required to investigate the whole site and a Site Consistency Report would be required to demonstrate compliance with the conditions of the South West
		Growth Centre Biodiversity Certification Order. Although a portion of land is proposed for riparian protection within the SRN site, Council officers have identified flaws in the methodology of the Riparian Assessment. Not all water bodies were adequately physically investigated and the assessment was based on a constructed drainage system rather than on the natural drainage system that existed prior to the construction of
		the dams. Council officers consider the existing dams to have once been part of the natural stream, and that they should be returned to their natural form as part of the wider drainage system.



S9.1 Direction Title	Consistency	Assessment of Consistency
		If the proposal proceeds, the Riparian Assessment is to be updated to address methodology issues and to further consider the original natural drainage system of the site and how this can be reinstated.
		This approach is considered to be consistent with Department of Climate Change, Energy, Environment and Water (DCCEEW) (formerly Environment and Heritage Group (EHG) advice, as well as Council's LSPS, Local Housing Strategy, Blue and Green Grid Vision and the 9.1 Direction.
3.2 Heritage conservation	Νο	The Due Diligence Assessment submitted with the draft proposal is not considered to be adequate for a planning proposal.
		Heritage NSW has advised that a comprehensive Aboriginal Cultural Heritage assessment, which has been prepared in consultation with the Aboriginal community, is required to inform the proposal.
3.5 Recreation Vehicle Areas	N/A	Recreational vehicle areas are not proposed and this direction is not applicable.
3.6 Strategic Conservation Planning	N/A	No land within the proposal site has been identified as Avoided Land or as a Strategic Conservation Area under the State Environmental Planning Policy (Biodiversity and Conservation) 2021. Therefore, this direction is not applicable to the proposal.
3.7 Public Bushland	N/A	The proposal applies to privately owned land, so this direction is not applicable.
3.10 Water Catchment Protection	Undetermined	The site is within the South Creek West catchment of the broader Hawksbury Nepean Catchment, so the direction applies.
		Further work is required to determine the draft proposal's impacts on the catchment and risks to flood and water quality.





S9.1 Direction Title	Consistency	Assessment of Consistency
		A portion of riparian land has been identified for retention in the draft ILP. However, some existing dams on the site that are thought to have been natural watercourses are proposed to be filled and developed.
		Should the proposal proceed, an updated ILP is required to address this water course matter. Updates to the water cycle management plan and flood modelling will also be required.
Focus Area 4: Resilience and Hazards	5	
4.1 Flooding	No	The Water Cycle Management Assessment prepared by Craig and Rhodes (dated March 2022), has identified that parts of the site will be subject to the Probable Maximum Flood (PMF) following development. The NSW SES has advised that there will be evacuation issues from this area and shelter in place strategies are not supported.
		The SES has identified that a portion of proposed residential development is situated within the existing 1% AEP flood extent and that proposed detention basins are not sufficient to manage flooding in these locations.
		The SES also note that in the post- development scenario, some lots may be impacted by frequent flooding (a 5% AEP), as the proposed culverts will be unable to convey the flow during such an event.
		If the proposal proceeds, flood modelling (that considers any updates to the draft ILP in response to all issues raised throughout this assessment), will be required to ensure that consistency with this direction can be achieved.
4.3 Planning for Bushfire Protection	Undetermined	The subject site is identified as partially bushfire prone. The Bushfire Assessment prepared by AEP (dated 15 March 2022) has identified APZ's across the ILP ranging from BAL 12.5 to BAL FZ, with the FZ running outside the riparian area.



S9.1 Direction Title	Consistency	Assessment of Consistency
		If the proposal proceeds, the Bushfire Assessment would need to be revised. It would also need to consider other changes required to the draft ILP to retain additional biodiversity on the site.
4.4 Remediation of Contaminated Land	No	The Contamination Assessment undertaken by Douglas Partners (dated April 2022), found eight potential areas of environmental contamination (PAECs). These are due to nursery and agricultural uses, rural uses, chemical and fuel storage, old buildings and pipes. The assessment concluded that based on the inspection undertaken, the likelihood of significant contamination constraints to the development is low and that the site is considered suitable for the proposed rezoning. The study methodology included a desktop assessment using aerial photography, database searches and a walkover covering 6 of the 46 properties. These 6 properties represent less than 20% of the total land subject to the draft proposal. Council has identified from aerial mapping that there may be at least 5 commercial businesses located within the larger site that are not mentioned or discussed in the assessment report. These businesses and the remaining properties require an on-site assessment in order to identify and understand if any additional PAECs are evident on the land and if they cause potential development constraints. Onsite investigation of land proposed for recreational uses is also required to understand the potential for contamination on each site and if further
		requirements under Council's Constrained Lands Policy apply.
4.5 Acid Sulphate Soils	Νο	The Salinity Investigation undertaken by Douglas Partners (dated April 2022), found from the limited sampling that soils are mildly aggressive to concrete,



S9.1 Direction Title	Consistency	Assessment of Consistency
		moderately aggressive to steel, moderately saline and dispersive.
		Based on these findings, a preliminary Salinity Management Plan (SMP) was provided to address the findings to date.
		It was also recognised that higher levels of salinity impact may exist in other areas on the larger site. However, these areas were not accessible. Further salinity investigations will need to be undertaken at the development assessment stage for a future subdivision.
		The Salinity Assessment and Preliminary Management Plan is based on limited assessment of 6 properties, representing less than 20% of the total land subject to the draft proposal.
		The sampling regime does not attempt to meet the minimum sampling required under the "Site Investigation for Urban Salinity" booklet where up to 2-4 samples per hectare (shallow profile) and 0.5-1 (detailed profile) is recommended to understand a site where moderately intensive construction is proposed.
		Further, higher levels of salinity and possible aggressivity to construction materials are expected to be identified on the larger SRN site. This should be more clearly understood prior to rezoning the land.
		Should the proposal proceed, an updated Salinity Investigation and Management Plan will be required to address the identified matters.
Focus Area 5: Transport and Infrastru	icture	
5.1 Integrating Land Use and Transport	Νο	The draft proposal states that residential areas will be able to access public transport (bus stop) within 400m of homes. However, it is unclear how this distance has been measured.
		The draft ILP also shows a disconnection between open spaces,



camden

S9.1 Direction Title	Consistency	Assessment of Consistency
		green links and the street network. If the proposal proceeds, street cross- sections and updates to the ILP would be required. Transport for NSW are currently preparing a South Western Sydney Transport Structure Plan (TSP). The TSP seeks to align future land uses with transport infrastructure and service delivery. If the proposal proceeds, it
		would need to be assessed against that plan.
5.2 Reserving Land for Public Purposes	No	The draft proposal seeks to rezone and reserve land for acquisition for the Rickard Road extension, local drainage and public open space.
		Updates to the ILP have revised the location of land for these purposes and also introduced land for a public primary school.
		However, corresponding updates to the SEPP maps have not been provided to identify appropriate land use zones for these lands or the land reserved for acquisition.
		If the proposal proceeds, updates to the proposed SEPP maps will be required and further assessment against this direction will be undertaken.
5.3 Development Near Regulated Airports and Defence Airfields	Undetermined	The SRN site is located approximately 13km south of the future Western Sydney Airport (WSA) and is not located on land that is in an ANEF contour of 20 or greater.
		If the proposal proceeds, the noise assessment would need to be updated to consider future airport noise.
		The subject site is located within the wildlife buffer, wind turbine buffer and Obstacle Limitation Surface (OLS) of the future WSA, so consideration of development controls to address these matters may also be required.





S9.1 Direction Title	Consistency	Assessment of Consistency
Focus Area 6: Housing		
6.1 Residential Zones	No	Sydney Water's current advice (dated 10 February 2025) is that the site will not be serviced for drinking water services until at least 2031 and 2030/2031 for wastewater services (subject to funding and approvals). There is also lack of diversity in the proposed housing mix with the extent of medium to high density residential considered to be excessive and not proportionate to surrounding released precincts. The draft proposal has not sufficiently demonstrated that the land can be adequately serviced or that the proposal encourages housing diversity. Therefore, it is inconsistent with Direction 6.1.
Focus Area 7: Industry and Employm	ent	
7.1 Employment Zones	Undetermined	A local centre and a mixed use employment area have been identified on the SWGA Structure Plan on the subject site. Updates to the ILP have identified a local centre. However, a proposed land use zone for the centre has not been provided. The mixed use corridor along Camden Velley Way has not been incorporated into the ILP update. If the proposal proceeds, an Employment Land and Retail Demand Analysis would be required to understand the investment and business opportunities for the subject site and the need for the local centre and a mixed use employment corridor. Updated SEPP maps, that identify a proposed land use zone for the centre, are also required.



S9.1 Direction Title	Consistency	Assessment of Consistency	
Focus Area 8: Resources and Energy	Focus Area 8: Resources and Energy		
8.1 Mining, Petroleum Production and Extractive Industries	N/A	Not relevant to the planning proposal.	
Focus Area 9: Primary Production	-		
9.1 Rural Zones	No	The SRN site is located on land identified for growth. However, the proposal borders existing poultry farms on the western border. This may lead to odour and noise impacts on new residents, create land use conflicts and impact the viability of these existing rural enterprises. Consultation has not been undertaken with neighbouring properties. Therefore, it is unclear what the future ongoing operational plans are for these enterprises. Further consideration is required to ensure operational plans are consistent with the timing of future development and investigation of potential interim buffer measures may be required.	



