

Ref: 074-Springfield Rd North

5 February 2025

Department of Planning, Housing & Infrastructure
4 Parramatta Square
12 Darcy St
PARRAMATTA NSW 2150

Attention: Jay Murray

Dear Jay,

Rezoning Review of Planning Proposal (RR-2024-35): Springfield Road North, Catherine Field NSW

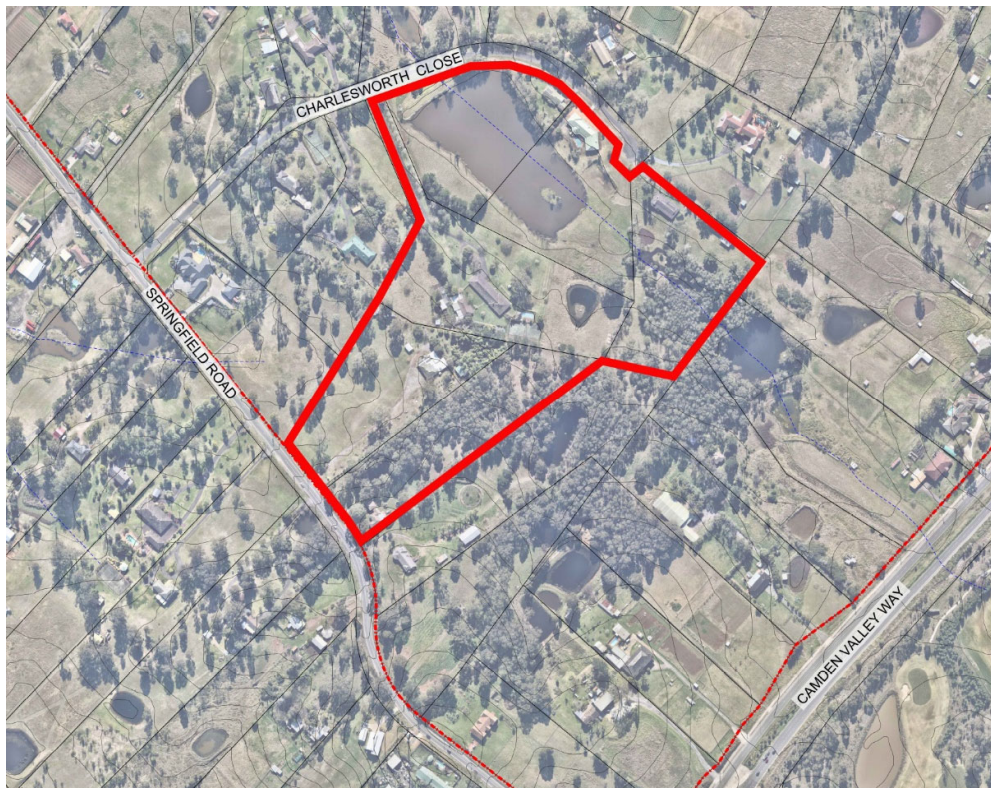
On behalf of Springfield No 1 Pty Ltd (the 'proponent'), we submit information to inform the Rezoning Review (RR-2024-35) of the Springfield Road North Planning Proposal.

The Rezoning Review was initiated as support for the proposal within 115 calendar days of lodgement was not forthcoming. A high-level summary of the key milestones and events for the Planning Proposal from pre-lodgement to the current situation is provided in Section 1 of this letter.

1. Background

The proponent attended a pre-lodgement meeting with Camden Council on 19 July 2021 and Council subsequently issued their pre-lodgement advice letter dated 20 August 2021 (see **Attachment A**).

To inform the pre-lodgement assessment, the proponent presented a proposal to rezone land to deliver 300-400 residential allotments at Springfield Road, Catherine Field NSW (see below).



At the pre-lodgement meeting, Council advised a Planning Proposal that adopted a larger land area would have greater strategic merit. This view was also stated in the subsequent advice letter as it suggested to 'possibly include land up to the Rickard Road extension and Catherine Field Road boundaries' with Camden Valley Way and Springfield Road forming the other boundaries. The written advice in the pre-lodgement letter also listed the technical requirements to successfully lodge a Planning Proposal to rezone the broader area suggested by Council.

The Springfield Road North Planning Proposal was initially lodged via the Planning Portal on 11 April 2022 and Camden Council's formal assessment commenced on 14 August 2023.

Camden Council issued a Preliminary Assessment letter dated 14 April 2023 noting issues with consistency with the South West Growth Area (SWGA) Structure Plan, infrastructure and servicing capacity, local contributions and matters raised in the agency submissions listed above. A copy of the letter from Council is in **Attachment B**.

The Draft Planning Proposal was referred to various public authorities and agencies and submissions were received from the following organisations:

- Sydney Water
- Transport for NSW
- Environment and Heritage Group
- SINSW
- Endeavour Energy
- NSW SES
- NSW RFS
- Fire & Rescue NSW

Copies of the written submissions from the above organisations are in **Attachment C**.

Initially, TfNSW and Sydney Water objected to the Planning Proposal. However, with subsequent engagement and technical assessment, we consider these objections to be resolved. The correspondence from TfNSW confirming the objection has been resolved, such that the Planning Proposal can progress to Gateway, is in **Attachment D**.

With Sydney Water, the proponents have been verbally advised by Sydney Water representatives that there is no objection to the Planning Proposal proceeding, and we understand that written correspondence from Sydney Water has or will be submitted directly to Council and DPHI. The revised Sydney Water position is based on various water and wastewater service acceleration options identified in the Assessment Report by GHD and acknowledged by Sydney Water with subsequent discussions between all parties accepting further more detailed modelling work is required to determine with more certainty the amount of spare capacity in both the water and sewer networks, and where they would connect into both networks. Notwithstanding, the Planning Proposal could progress and this additional modelling work can be undertaken after Gateway Determination.

An updated Draft Indicative Structure Plan (ISP) to the version submitted in the initial Planning Proposal was prepared and presented to Council at a meeting on 4 December 2024 (see **Attachment E**). The updated Draft ISP designated a local centre in the general location identified in the South West Growth Area (SWGA) Structure Plan. The updated Draft ISP also designated a primary school to be co-located with the sports fields adjacent to the future Rickard Road transit boulevard and included higher residential densities surrounding the local centre, which enables the delivery of a broader range of housing options within the project include high-yield residential accommodation. That land area assigned for residential uses was reduced by around 5.5 hectares to provide for the local centre and schools and the projected dwelling yield remained around 2,000 homes, which is the yield in the initial Planning Proposal.

At the meeting with Council on 4 December 2024, Council referred to the alignment of Rickard Road that it was working on after the Rickard Road extension project had been reassigned by TfNSW. A copy of the Rickard Road alignment dataset was provided by Council after the meeting.

The Rickard Road alignment provided by Council does not suitably transition into the constructed 'transport boulevard' road of Catherine Park Drive to the south as intended in the SWGA Structure Plan and the Structure Plan in Camden Council's Local Strategic Planning Statement (LSPS). The Rickard Road extension alignment would need to move to approximately 100-150 metres to the northwest to provide a practical and reasonable road design for a key major road in the SWGA. Notwithstanding, it is understood the Rickard Road alignment provided by Council is a 'concept design' and the final design has not been resolved.

In December 2024 two options for a revised Draft ISP were submitted to Camden Council via the Planning Portal. The preferred Draft ISP option (Plan Ref: 074.CF.004.07 dated 30 October 2024) aligns the Rickard Road extension to ensure a proper and orderly connection to the existing Catherine Park Drive (see **Attachment E**). The alternate option adopts the Rickard Road alignment provided by Council. A summary of each option is provided below.

a) Draft Indicative Structure Plan (Plan Ref: 074.CF.004.07 dated 30 October 2024)

Draft ISP dated 30 October 2024 is the preferred option and is the version presented and tabled at a meeting with Camden Council on 4 December 2024 and lodged via the Planning Portal on 17 December 2024 (see **Attachment E**). This option locates the Rickard Road extension to ensure a practical transition to Catherine Park Drive to the south and allow the best design for the future road. This Draft ISP includes a local centre (3.5ha), sports fields facility (5ha), primary school (2ha) to be co-located with sports fields, and local parks (3.56ha).

The Draft ISP includes high, medium and low residential densities with higher residential densities located closer to high levels of amenity and access to planned public transport corridors. The projected dwelling yield is around 2,000 homes.

b) Alternate Draft Indicative Structure Plan (Plan Ref: 074.CF.008.01 dated 11 December 2024)

Draft ISP dated 11 December 2024 is an alternate option and is the least preferred option. The alternate option to the abovementioned Draft ISP was also lodged via the Planning Portal on 17 December 2024 (see **Attachment F**). The alternate option adopts the Rickard Road alignment corresponding with the dataset that was issued by Council after the meeting on 4 December.

The updated version of the Draft ISP also includes a local centre, sports fields, primary school and local parks with high to low density housing. However, some of these facilities have moved to accommodate the alternative Rickard Road alignment provided by Council.

The changed alignment of Rickard Road to the southeast in the alternate Draft ISP does not result in an optimal development outcome for land on the northeast of the new alignment. The land between the revised Rickard Road corridor and the northwestern boundary of the Springfield Road North Planning Proposal site is narrow and an orderly and practical development outcome cannot be achieved within the Planning Proposal site boundary. Accordingly, the alternate Draft ISP includes three additional landholdings on the northwest to achieve a sufficient developable parcel for the project on the northwest side of the Rickard Road corridor. The additional landholdings are listed in **Table 1**.

Table 1: Additional Landholdings

Land Details	Address
Lot 1 DP518472	130 Springfield Road Catherine Field NSW 2557
Lot 1342 DP801720	125 Catherine Fields Road Catherine Field NSW 2557
Lot 1341 DP801720	127 Catherine Fields Road Catherine Field NSW 2557

The combined land area of the three landholdings is approximately 6 hectares. If there is no support for the inclusion of these parcels, the land can be removed from the revised Draft ISP and will not be included in the Planning Proposal. However, it is considered this will result in a compromised development outcome for land on the northwest of the Rickard Road alignment.

Whilst the alternate Draft ISP dated 11 December 2024 adopts the Rickard Road alignment preferred by Council, it is not considered this version is the optimal outcome for the project. With a better understanding of land uses in the locality and the intended development for land within the Springfield Road North site and land to the south, the alignment in the Draft ISP dated 30 October 2024 is considered a significantly better outcome as it will provide for a transit boulevard that can transition into Catherine Park Drive to the south without any bends and turns between Springfield Road and Catherine Park Drive, which would be detrimental to land use efficiency and good road design and would create irregular land boundaries for future development within the Catherine Field Precinct.

2. Summary of Strategic Merit

An assessment of the Strategic Merit Test criteria is in **Table 2**. As the land uses and future major road alignments are generally consistent with both options of the enclosed Draft ISPs at a high level, it is considered that the following responses to the strategic merit test criteria could apply in both cases.

Table 2: Summary of Strategic Merit Test

Strategic Merit Test Criteria	Response
<i>Give effect to the relevant regional plan outside of the Greater Sydney Region, the relevant district plan within the Greater Sydney Region, and/or corridor/precinct plans applying to the site. This includes any draft regional, district or corridor/precinct plans released for public comment or a place strategy for a strategic precinct including any draft place strategy; or</i>	<p>The Draft ISP is consistent with the directions, objectives and planning priorities in the Greater Sydney Region Plan (see Attachment G) and Western City District Plan (see Attachment H).</p> <p>The Draft ISP is consistent with the SWGA Structure Plan as it locates a local centre and provides the intended major transport connections.</p>
<i>Demonstrate consistency with the relevant LSPS or strategy that has been endorsed by the Department or required as part of a regional or district plan; or</i>	<p>The Planning Proposal is consistent with the Camden Council LSPS and Council's Local Housing Strategy. The site is within an area designated as a 'Future Urban Area (SWGA) – Housing Capacity' and consistent with the relevant Local Priorities (see Attachment I).</p>
<i>Respond to a change in circumstances that has not been recognised by the existing planning framework</i>	<p>The Planning Proposal will deliver new urban growth in an area identified and planned for new housing that is supported by existing and future infrastructure to support growth within the SWGA. The proposal is wholly consistent with the existing strategic planning framework.</p> <p>An assessment of water and wastewater capacities completed in consultation with Sydney Water indicates that there appears to be sufficient water and wastewater capacity and servicing options available such that Sydney Water is content for the Planning Proposal to proceed to Gateway, subject to further modelling being undertaken prior to finalisation of the Planning Proposal. This overcomes the issue that was otherwise faced with delays in the delivery of essential water and wastewater infrastructure in the SWGA.</p> <p>Greater Sydney is experiencing the growing pressures of a housing crisis. Since the lodgement of the Planning Proposal in April 2022, there has been a decline in the rate of production of new housing and house prices and rents have continued to rise. Whilst Federal and State governments are implementing policies and committing resources to increase housing supply within Greater Sydney, the existing strategic planning framework has not been changed in response to the housing crisis. The Planning Proposal will assist in providing much-needed housing within an area long earmarked for residential development, thereby responding to a change in circumstances (i.e. the housing crisis) that has not yet been recognised by the existing strategic planning framework.</p>

3. Summary of Site-specific Merit

An assessment of the Site-specific Merit Test criteria is in **Table 3**. As with the strategic merit test, both Draft

ISPs can reasonably apply to the assessment of the site-specific criteria below.

Table 3: Summary of Site-Specific Merit Test

Site Specific Merit Test Criteria	Response
<i>the natural environment on the site to which the proposal relates and other affected land (including known significant environmental areas, resources or hazards)</i>	<p>The site has been investigated and assessed for various environmental considerations including biodiversity, riparian corridors and heritage.</p> <p>The land is within an area that is biodiversity certified and assessment of the riparian areas within the site confirms that a 1st Order stream meets the NRAR Waterfront Guidelines assessment criteria and needs to be preserved. The riparian protection area is to be revegetated in accordance with the NRAR Guidelines (refer to 'Riparian Assessment Report: Planning Proposal to Rezone Land within the South West Growth Area, Catherine Field Precinct, Catherine Field, NSW' by AEP Consulting dated 15 March 2022).</p> <p>The main environmental hazard consideration is the threat from bushfire. An assessment of bushfire submitted with the Planning Proposal confirms the Planning Proposal can meet the required bushfire safety standards.</p> <p>The Planning Proposal will restore areas of the natural environment in an urban context, comply with biodiversity certification requirements and properly manage all environmental hazards (refer to Report on 'Preliminary Site Investigation (Contamination) Catherine Field Planning Proposal. Charlesworth Close, Springfield Road, Camden Valley Way & Catherine Field Road, Catherine Field NSW' by Douglas Partners dated April 2022).</p>
<i>the built environment, social and economic conditions</i>	<p>It is well documented that Sydney is currently in a housing supply crisis and federal and State governments have initiated numerous strategies to increase housing supply. With new additional housing in the Catherine Fields Precinct, there will be a greater critical mass of local residents that will assist in accelerating the delivery and economic sustainability of key retail, commercial, health, education and community facilities and services that are existing and have been planned for the area.</p> <p>The Draft ISP also includes greater diversity in housing and with the provision for a local centre, provides greater opportunities to deliver affordable housing options.</p> <p>The traffic assessment (refer to 'Catherine Fields Traffic Report' by Colston Budd Rogers & Kafes Pty Ltd dated March 2022) concludes that there are no impacts that cannot be satisfactorily resolved, and the proposed outcome has convenient access to existing major transport infrastructure in the SWGA that has been delivered to support new urban growth (i.e. Camden Valley Way and traffic signals at the intersections with Camden Valley Way at Springfield Road and at Catherine Fields Road). In addition, the Planning Proposal will contribute to major road upgrades for the Rickard Road extension, Springfield Road to a 4-lane sub-arterial road and upgrade of Catherine Fields Road to a 2-lane collector road.</p>
<i>existing uses, approved uses, and likely future uses of land in the vicinity of the land to which the proposal relates</i>	<p>The site is within an identified area for future urban growth and housing supply (being the SWGA) and the broader area of the Catherine Field Precinct is also identified for this purpose. Land to the south is subject to a separate Planning Proposal for urban development and land to the north and west is to be developed for this purpose in the future. Land to the east is being developed to provide new housing.</p> <p>Land in the vicinity is either new urban development or planned for new housing in State and local planning strategies.</p>

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

Adequate infrastructure is and will be available for the Planning Proposal with the planned delivery of infrastructure for the South West. The site fronts Camden Valley Way, a major arterial road in the SWGA, and is near a broad range of social and community services in Gregory Hills, Narellan and Oran Park.

The Draft ISP will deliver a new double sports field and four new local parks with over 5 hectares of active open space and 3.5 hectares of local parks to be provided within the site. A new public school site is also proposed, and local development contributions for new local roads and upgrades, and other infrastructure will support the final rezoning.

Assessment of water and wastewater capacities in consultation with Sydney Water indicates that there appears to be sufficient water and wastewater capacity and servicing options available such that Sydney Water is content for the Planning Proposal to proceed to Gateway, subject to further modelling being undertaken prior to finalisation of the Planning Proposal.

The rezoning will also deliver a section of the Rickard Road extension and contribute to the upgrades of major roads in the locality, such as Springfield Road.

The Planning Proposal meets the site-specific merit requirements.

4. Conclusion

The updated Draft ISP dated 30 October 2024 is the preferred development outcome for the Springfield Road North Planning Proposal. This Draft ISP will deliver around 2,000 homes in the Catherine Field Precinct that will be supported with local retail, sporting fields, local parks, education facilities and necessary infrastructure. The Springfield Road North project area is of a scale that can provide all the essential land use elements and infrastructure requirements to establish and sustain a new community.

The project site is in an identified area for urban growth, we deliver schools, active and recreation facilities and significant servicing and transport infrastructure. In addition, the proposal will deliver new housing for south west Sydney. Accordingly, the proposal meets the strategic and site-specific requirements and should be progressed to Gateway Approval.

All information enclosed with this letter and all documents and plans requested by DPHI have been submitted on the Planning Portal and accompany this letter. We welcome any opportunity to discuss the documents, plans and information to assist DPHI in understanding the proposal, supporting information and historical events.

Feel free to contact me on 0477 474 091 if there are any questions or if you wish to discuss this further.

Yours faithfully
Urbanco Group Pty Ltd



Guy Evans
Director

Cc Joseph Jacob Springfield No 1 Pty Ltd
 Pierre Jacob Springfield No 1 Pty Ltd
 Adrian Miller Colliers Engineering & Design