

Ms Carolyn Whitten
Strategic Planning Team Leader
Wollondilly Shire Council
PO Box 21
PICTON NSW 2571

Dear Ms Whitten

**PLANNING PROPOSAL PRE-LODGE MENT ADVICE – 1838 BARKERS LODGE ROAD
AND 1455-1475 BURRAGORANG ROAD, OAKDALE**

Thank you for your correspondence dated 6 September 2022 requesting pre-lodgement advice for the above-mentioned planning proposal. The documents have been reviewed and I can provide the following advice.

Understanding of the Planning Proposal

The planning proposal seeks to amend the Wollondilly Local Environmental Plan 2011 as follows:

- Amend the Land Zoning Map from RU1 Primary Production to part R2 Low Density Residential and part C2 Environment Conservation,
- Amend the Lot Size Map from 16ha to:
 - 450m² and 700m²,
 - No minimum lot size for proposed C2 zone.
- Amend the Height of Buildings Map to introduce a maximum building height of 9m for proposed R2 zone,
- Amend the Urban Release Area Map to include the subject site to ensure adequate provision for State and Local Infrastructure.

The proposal seeks to facilitate approximately 160 homes.

Site

The site is 22.7ha. It is southeast of the Oakdale village centre and is located directly adjacent to Willis Park Sportsfield. The site contains 3 separate dwellings, farm buildings and dams with most of the site consisting of cleared grassed areas with several patches of remnant vegetation.

Strategic Context

A Metropolis of Three Cities, Western City District Plan & Metropolitan Rural Area

The site is located within Western City District Plan area and is identified as being within the Metropolitan Rural Area (MRA). Actions of Western City District Plan aim to protect and support the MRA, including for example, agricultural production and mineral resources.

Housing targets at a regional and district level are not expected to be met through additional housing in the MRA, but rather through the new development in identified residential growth areas such as the Wilton and Greater Macarthur Growth areas. Rural towns and villages are not required to play a role in meeting regional or district scale demand for residential growth.

While the scoping report does not consider the objectives of the MRA, it argues the proposal will facilitate housing supply and choice in a relatively affordable area of Greater Sydney and in a location that offers a semi-rural village lifestyle.

Council's position on whether the proposal is needed to address local residential growth for Oakdale needs to be addressed in any planning proposal submitted to the Department for a Gateway determination. Until this matter is addressed by Council, the proposal is generally considered to be inconsistent with 'A Metropolis of Three Cities' and the Western City District Plan.

Wollondilly 2040 – Local Strategic Planning Statement

Planning Priority 5 of the Wollondilly 2040 – Local Strategic Planning Statement (LSPS) relates to housing options that meet local needs and match the local character of towns and villages. Expanding the boundaries of towns and villages will be limited and should only occur to facilitate natural growth.

I note the proposal will facilitate approximately 160 new dwellings which is a 21% increase on Oakdale's 755 dwellings recorded by the census in 2021.

Given the MRA is not expected to contribute to housing targets and the proposal is seeking to expand the boundary of Oakdale, as mentioned above, Council needs to be satisfied the increased number of dwellings and associated population growth represents local growth for Oakdale. Council's position on this local planning matter should be clearly articulated in any planning proposal for the site submitted for a Gateway determination.

Infrastructure (wastewater)

Planning Priority 5 notes infrastructure servicing issues also constrain development.

The scoping study notes existing wastewater reticulation infrastructure in Burragorang Road will have the capacity to service the proposed residential expansion and further capacity will be available following completion of the planned upgrade of the West Camden Water Recycling Plant by December 2023.

Given Council's Local Housing Strategy notes there is current limitations on wastewater infrastructure capacity in Oakdale, Warragamba and Silverdale which limits support for additional residential development in these locations, consultation with Sydney Water is required to confirm they do not object to the proposal proceeding to Gateway.

Management of environmentally sensitive land

Planning Priority 13 seeks to protect biodiversity of value in different landscapes including rural zoned land. The subject site has high environmental values including Shale Sandstone Transition Forest and Cumberland Plain Woodland covering parts of the site.



I note the previous planning proposal for the site was refused partly as it did not adequately avoid impacts on biodiversity:

The Department has received detailed advice from OEH and recognises the importance of conserving significant vegetation areas and habitat on the site. Without adequate measures to mitigate and offset impacts on threatened species, including SSTF and potentially CPW (both CEECs) and potential squirrel glider habitat, the Department is not satisfied that there is an appropriate regulatory framework in place to offset biodiversity impacts and to ensure biodiversity offsets are achieved through the development application process and, where appropriate, measures taken to mitigate impact. In its current form, the proposal is inconsistent with Direction 2.1 Environmental Zones as it does not include provisions that adequately facilitate the protection and conservation of environmentally sensitive areas. The Department recommends the proposal should not proceed.

These matters have not been addressed and consultation with Environment and Heritage Group (EHG) is required to confirm they do not object to the proposal proceeding to Gateway.

Bushfire

Planning Priority 18 of the LSPS relates to living with climate impacts and contributing to a resilient greater Sydney. The Wollondilly LGA has an extensive bush fire hazard interface and significant areas mapped as bushfire prone land.

The scoping study notes that Planning for Bush Fire Protection 2019 is now in force and would require the preparation of a new Strategic Bush Fire Study. This issue remains unresolved and must be adequately addressed prior to being forwarded to the Department for a Gateway determination.

The previous planning proposal's consistency with the hazard's management approach being implemented under Council's LSPS (Action 18.12) could not be determined at the time. I acknowledge the scoping report states the timing and potential outcomes of Council's Hazards Analysis and Emergency Management Study (HAEMS) is unknown.

If the proposal is submitted to the Department for a Gateway determination, it will need to provide confirmation that:

- the Rural Fire Service does not object to the proposal, and
- Council is satisfied that the proposal should progress ahead of Council's HAEMS.

Wollondilly Local Housing Strategy

Council has an endorsed local housing strategy to support the Wollondilly 2040 LSPS. The Wollondilly Local Housing Strategy (LHS) dated 29 January 2021, indicates that there is capacity in current residential zoned land and planned growth in the Wilton Growth and Greater Macarthur Growth Areas to deliver a pipeline of future housing supply that meets dwelling demand in the LGA, while protecting the rural landscape.

For Oakdale, the LHS notes there is an average supply of 11 dwellings per year over the next 20 years. The LHS does not identify any housing supply gaps that would require additional land to be rezoned.

As noted above in the discussion regarding the LSPS, Council's position on this matter will need to be articulated in any planning proposal submitted to the Department for a Gateway determination.

Wollondilly Rural Lands Strategy

The Wollondilly Rural Lands Strategy (RLS) was finalised in September 2021 and outlines the long-term strategic direction for rural areas in the LGA. The RLS does not generally support rural-residential development unless rural residential development is consistent with Council's adopted LHS. As noted above, the proposal is not consistent with the LHS.

Consultation with other agencies

Before the proposal is referred to the Department for a Gateway determination, consultation with and support from the following agencies/ authorities is required:

- Sydney Water
- NSW Environment and Heritage (for biodiversity matters)
- Rural Fire Service

If you have any more questions, please contact Ms Gwenda Kullen, Manager, Planning and Land Use Strategy, on (02) 9860 1530.

Yours sincerely



4 October 2022

Adrian Hohenzollern
Director (Western)
Planning and Land Use Strategy

Department of Planning and Environment

DOC22/807382

Carolyn Whitten
Wollondilly Shire Council
PO Box 21
PICTON NSW 2571

26 September 2022

Subject: Planning Proposal Pre-Lodgement Advice - 1838 Barkers Lodge Road, 1455 Burragorang Road and 1475 Burragorang Road, Oakdale

Dear Ms Whitten

Thank you for your letter of 6 September 2022 requesting pre-lodgement advice on the above planning proposal.

Please note on 1 April 2022, the Environment, Energy and Science Group (EES) changed its name to the Environment and Heritage Group (EHG) within the Department of Planning and Environment. EHG asks that you send future requests for advice on biodiversity and floodplain risk management matters to the EHG Greater Sydney Branch mailbox at: gs.planning@environment.nsw.gov.au.

EHG has reviewed the Scoping Proposal and recommends the PP be supported by the following:

- resolution of issues identified in the letter from OEH (now EHG) dated 28 September 2017
- resolution of issues identified in the letter from Deputy Secretary, Greater Sydney, Place and Infrastructure (DPE) dated 21 December 2020
- if biodiversity certification is not proposed – a biodiversity assessment undertaken in accordance with Stage 1 and 2 of the [Biodiversity Assessment Method 2020 \(BAM\)](#)
- a flood impact and risk assessment if the site is identified as flood affected in Wollondilly's Draft Shire Wide Flood Study 2021.

EHG's pre-lodgement advice and recommendations are provided at Attachment 1.

If you have any queries regarding this matter, please do not hesitate to contact Dana Alderson, Senior Project Officer Planning at dana.alderon@environment.nsw.gov.au.

Yours sincerely,



Susan Harrison
Senior Team Leader Planning
Greater Sydney Branch
Biodiversity and Conservation

Department of Planning and Environment

Attachment 1 - EHG Planning Proposal Pre-Lodgement advice for 1838 Barkers Lodge Road, 1455 Burragorang Road and 1475 Burragorang Road, Oakdale

EHG has reviewed the Scoping Proposal 1838 Barkers Lodge Road, 1455 Burragorang Road and 1475 Burragorang Road, Oakdale prepared by Gyde for Morehuman Property Group dated 30 August 2022 (Scoping Proposal) and understands that the Planning Proposal (PP) will seek to amend the *Wollondilly Local Environmental Plan 2011* (LEP) to permit up to 160 lots of low density and large lot residential, as well as retention of vegetation in an environmental conservation zone.

EHGs expectations and requirements to inform preparation of the PP are set out below.

Previous proposal

EHG notes that the development area for this new PP is largely the same as the previous proposal for the site and as such is likely to have similar impacts on biodiversity, including the Shale Sandstone Transition Forest Critically Endangered Ecological Community. EHG recommends resolution of issues identified by OEH (now EHG) in its letter dated 28 September 2017 and DPE in its letter dated 21 December 2020 in relation to the previous PP (Attachment 2).

Biodiversity

The identification of land for development should avoid and minimise impacts to biodiversity values. To demonstrate that the PP has adequately addressed biodiversity, it must:

- assess and document the biodiversity values of the site and the impacts of the PP on biodiversity, both on and near the site
- identify the land to be conserved for biodiversity (conservation land) with proposed zoning and land uses consistent with conservation
- protect conservation land in perpetuity through minimum lot sizes, buffers within development land, and ownership and management arrangements to provide for protection of conservation land in perpetuity.

Biodiversity certification

EHG recommends that biodiversity certification (biocertification) be considered as part of land use planning for the site. Biocertification provides certainty for developers and the community as to the biodiversity and development outcomes for the site. Fact sheets on the biodiversity certification process are available on the [EHG website](#).

Assessment requirements

An assessment of the environmental and biodiversity values present on the subject site is required to inform the zoning and potential development layout including the identification of areas of environmental and biodiversity value to be avoided and conserved. If biodiversity certification is not proposed, EHG recommends that the biodiversity assessment for the PP be undertaken in accordance with Stage 1 and 2 of the [BAM 2020](#), including the most up to date survey guidelines available at: <https://www.environment.nsw.gov.au/topics/animals-and-plants/biodiversity-offsets-scheme/accredited-assessors/assessor-resources>

Protection of conservation land

Land use zoning

Land containing biodiversity values identified for protection should be zoned C2 Environmental Conservation with permissible land uses consistent with the long-term protection and conservation of the values. EHG considers that uses inconsistent with the C2 zone include but are not limited to:

- active recreation (including playgrounds, amenities, sports fields, dog exercise parks)
- water detention basins

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- asset protection zones (APZs)
- building identification and business identification signage
- ecotourism facilities
- information and education establishments
- child care centres
- car parks
- batters.

Design principles

The PP should be consistent with the following design principles:

- prevent fragmentation of conservation land through a minimum lot size which does not allow further subdivision (other than to subdivide off conservation land from development land)
- prevent impacts from development on conservation land by:
 - o ensure active open space is provided within the development land
 - o provide buffers to conservation land within the development via a perimeter road, shared cycle/pedestrian paths or open space
 - o ensure stormwater and effluent systems do not discharge into existing or proposed conservation land
 - o ensure APZs sited on development land
- retention of existing vegetation within development land for amenity and urban cooling.

Management of conservation land

The PP is to propose ownership and management arrangements for protection of conservation land in perpetuity in one of the following ways:

- biodiversity stewardship agreement (BSA)
- conservation agreement
- public ownership managed for biodiversity conservation
- funded vegetation management plan under a voluntary planning agreement.

Note that the retention of vegetation within development lots (including large lot residential) in the absence of one of the above ownership and management arrangements is not considered an appropriate response to the conservation of biodiversity.

Flooding

The Shire-wide flood study for Wollondilly Shire identifies flood affected areas for the full range of flooding up to and including the probable maximum flood. The proponent should obtain the flood information for the full range of flooding including flood behaviour, risk and constraints from Council and if the site is flood affected a flood impact and risk assessment (FIRA) is required.

The FIRA should:

- Outline existing flood behaviour that is compatible with Council's abovementioned flood study.
- Identify developed flood behaviour. The developed scenario should include the proposed development with key details of the final proposal, including development type and density changing runoff characteristics, infrastructure and proposed modification to waterways or floodplain landform or vegetation.
- Identify the impacts of the proposed development on the flood behaviour and on flood risk to the existing community.
- Identify the impacts and risks of flooding on the development and its users.

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- Identify how these impacts can be managed to minimise the growth in risk to the community due to the development. This includes details of any management measures to be implemented to minimise the impacts and risks posed to the existing and future community due to development.
- Provide an assessment of the residual impacts of the project (that management measures cannot manage) on and off the site.

End of Submission

Attachment 2 – OEH advice on 'Land adjoining Oakdale Sportsfields' Planning Proposal dated 28 September 2017

Mr Ben Taylor
Chief Executive Officer
Wollondilly Shire Council
PO Box 21
PICKTON NSW 2571

strategic@wollondilly.nsw.gov.au

Attention: Ms Carolyn Whitten

Request For Scoping Proposal Pre-Lodgement Advice – Barkers Lodge & Burragorang Roads,
Oakdale

Dear Mr Taylor

Thank you for your correspondence of 6 September 2022 and the opportunity to provide comment on the scoping proposal for the proposed rezoning at Barkers Lodge and Burragorang Roads, Oakdale.

The NSW Department of Primary Industries (DPI) Agriculture collaborates and partners with our stakeholders to protect and enhance the productive and sustainable use and resilience of agricultural resources and the environment.

The subject site is mapped as part of a large contiguous area of draft State Significant Agricultural Land (SSAL), with the balance of the site also being mapped with biodiversity values, including an area of Shale Sandstone Transition Forest, identified as a critically endangered ecological community under the *NSW Biodiversity Conservation Act 2016* and *Commonwealth Environment Protection and Biodiversity Conservation Act 1999*.

The site is also mapped as Class 4 Land and Soil Capability (LSC) which has high potential for grazing and is suitable for pasture improvement. Limitations can be managed by well-planned and carefully implemented conservation farming practices.

We note the proposal is inconsistent with the Greater Sydney Regional Plan, Western City District Plan, and the Wollondilly Local Strategic Planning Statement as the subject site is within the Metropolitan Rural Area and outside the identified Growth Areas of Wilton and Greater Macarthur.

The proposal is also inconsistent with the Wollondilly Local Strategic Planning Statement which identifies land yet to be developed for low density residential (approximately 122 lots) and 'environmental living' development (approximately 10 lots) at Oakdale. The Wollondilly Local Housing and Rural Lands Strategies have not identified Oakdale for further residential release stating there is currently enough supply to meet future demands projected over the next 20 years.

The NSW Agriculture Commissioner's report identified key issues, one of which was stakeholder concern around the effectiveness of strategic planning in influencing development decisions, and those small incremental changes were obscuring a more significant cumulative change that was irreversible and inconsistent with stated policy and planning.

It further provides that ad-hoc rezoning throughout rural zones fragments the landscape which can affect land prices, impede agricultural expansion, and lead to land use conflict. The cumulative impact of this can also have a serious impact on confidence to invest in local agricultural production and supply chains.

We suggest Council closely considers the merit in the proposal proceeding without strategic justification and the precedent this may set.

Should you require clarification on any of the information contained in this response, I have arranged for Helen Willis, Agricultural Land Use Planning Officer to assist you. Helen can be contacted by email at landuse.ag@dpi.nsw.gov.au.

Sincerely



Nita Scott
A/Manager, Agricultural Land Use Planning

4 October 2022



PRE-DA ADVICE SUMMARY

Applicant: Carolyn Whitten
Strategic Planning Team Leader, Sustainable Growth, Wollondilly Shire Council

Subject: 1838 Barkers Lodge Road, 1455 & 1475 Burragorang Road Oakdale
PRE-DA20220909000165

Details of the proposal

☐ SFPP

☐ Residential subdivision

☒ Other

Pre Lodgement Advice

Bush fire protection issues discussed

☐ Hazard Assessment

☐ Asset Protection Zones

☐ Access

☐ Construction Standards

☐ Services

☐ Emergency and Evacuation Planning

Documentation / plans referenced

- Scoping Proposal prepared by GYDE (dated 30/08/2022 & Version: Final)

Advice Provided

- The NSW Rural Fire Service has reviewed the information provided and advises that future stages of the development and subsequent referrals must be supported by a bush fire report prepared by a suitably qualified bush fire consultant which addresses the relevant sections of *Planning for Bush Fire Protection 2019*.
- Given the proposal would significantly increase the density on the subject site, a traffic report prepared by a suitably qualified traffic consultant, which demonstrates safe evacuation of the occupants and firefighting personnel, needs to be provided with the future stages of the proposal.
- It should be noted that the concept subdivision plan, included in the scoping report, has not been subject to a detailed bush fire risk assessment by the NSW Rural Fire Service as part of this referral.

Disclaimer

RFS advice is based on information provided and policy and legislative requirements applicable at the time. The advice should be copied into, or referenced in, any subsequent development application.

All efforts are made to identify issues of relevance and likely concern with the preliminary proposal. However, the comments and views in this document are based only on the plans and information submitted for preliminary assessment and discussion at the pre-DA meeting. You are advised that: -

- The views expressed may vary once detailed plans and information are submitted and formally assessed in the development application process, or as a result of issues contained in submissions by interested parties;
- Given the complexity of issues often involved and the limited time for full assessment, no guarantee is given that every issue of relevance will be identified;
- Amending one aspect of the proposal could result in changes which would create a different set of impacts from the original plans and therefore require further assessment and advice; and,
- The Pre-DA advice given does not bind Council officers, the elected Council members, or other parties to the DA process.

Submitted by:

Surbhi Chhabra
Development Assessment and Planning Coordinator
Planning and Environment Services (East)
Built and Natural Environment

Approved by:

Kalpana Varghese
Acting Manager
Planning and Environment Services (East)
Built and Natural Environment

Date: 30 December 2022

18 October 2022

Our Ref: 199748, 179797, 202934

Carolyn Whitten

Strategic Planning Team Leader
Sustainable Growth
Wollondilly Shire Council
carolyn.whitten@wollondilly.nsw.gov.au

RE: Pre-Lodgement Planning Proposal report CM DD128.2022.00000011.001

at 1838 Barkers Lodge Road & adjoining land, Oakdale

Thank you for consulting with Sydney Water regarding Pre-lodgement Planning Proposal Scoping Report CM DD128.2022.00000011.001 at 1838 Barkers Lodge Road & adjoining land, Oakdale, which proposes amendments to the Wollondilly LEP 2011 to rezone the subject land from RU1 Primary Production to part R2 Low Density Residential and part C2 Environmental Conservation. The proposal would result in a yield of up to 160 lots (approximately 500 additional residents). Sydney Water has reviewed the scoping report and supporting material and provides the following comments to assist in progressing the lodgement and in planning the servicing needs of the proposed development.

Water Servicing

- There should be adequate capacity in the water system to service the proposed development.
- Amplifications, adjustments, and/or minor extensions may be required.

Wastewater Servicing

- Sydney Water has recently completed a wastewater planning assessment which indicates that the overall system has capacity to service the proposed residential subdivision.
- **The proponent is required to undertake planning investigations to identify a preferred servicing scheme for their proposed subdivision. This may include options assessment and/or potential wastewater modelling depending on the options available to service the site. It is our recommendation that the proponent engages with Sydney Water directly via the WSC process to finalise and develop these investigations.**

Protection of Assets

- The proposed development site is traversed by multiple wastewater mains. Where proposed works are in close proximity to a Sydney Water asset, the developer may be required to carry out additional works to facilitate their development and protect the wastewater mains. Subject to the scope of the development, servicing options may

involve adjustment/deviation, and or compliance with the guidelines for building over/adjacent to Sydney Water assets.

This advice is not final approval of our requirements. If you require any further information, please contact the Growth Planning Team at urbangrowth@sydneywater.com.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'K. Leitch', with a large, sweeping flourish extending to the right.

Kristine Leitch

Commercial Growth Manager

City Growth and Development, Business Development Group

Sydney Water, 1 Smith Street, Parramatta NSW 2150

28 September 2022

Contact: *Stuart Little*
Telephone: *0436 948 347*
Our ref: *D2022/114585*

Ms Carolyn Whitten
Strategic Planning Team Leader
Sustainable Growth
Wollondilly Shire Council
PO Box 21
Picton, NSW, 2571

Dear Ms Whitten,

RE: Request for Scoping Proposal Pre-Lodgement Advice – No 1838 Barkers Lodge Road & Adjoining Land, Oakdale

Thank you for your letter of 6 September 2022 advising us of the above Scoping Proposal for land at Oakdale and seeking our Pre-lodgement advice for an intended Planning Proposal.

We understand that the Proposal would seek to rezone land from RU1 Primary Production to R2 Low Density Residential and C2 Environmental Conservation. Changes are also proposed for the Minimum Lot Size (MLS) with the Proposal seeking to reduce the MLS from 16 ha to 450 m²/750 m² for the proposed R2 zone and applying a 'no MLS' to the C2 zone. Amendments to the height of buildings and urban release area maps of the *Wollondilly Local Environmental Plan 2011* (LEP) are also proposed. We understand that the Proposal would give rise to 160 residential lots and the conservation of 3.4 ha of land adjoining Willis Park.

The site lies within the Sydney Drinking Water Catchment. Section 9.1 Direction 3.3. Sydney Drinking Water Catchment is relevant to the Planning Proposal with respect to protecting water quality.

Our comments on the Scoping Report and the information needed at Planning Proposal stage are provided in Attachment 1 while Attachment 2 includes a relevant Strategic Land and Water Capability Assessment map for the site. We ask that the Planning Proposal and supporting document be referred to us Pre-Gateway as required by Direction 3.3.

The information we provide here should not be treated as indicative support or otherwise for the Proposal as we do not have sufficient information at this stage to be able to make an informed decision on its merits. Also, while we have endeavoured to cover the relevant water quality risk related issues here, additional issues may arise, or further information be required, at Planning Proposal stage.

Should you have any questions on the matters raised in this letter, please contact Stuart Little at stuart.little@watarnsw.com.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "Alison Kniha", with a stylized flourish at the end.

ALISON KNIHA
Catchment Protection Planning Manager

ATTACHMENT 1 –COMMENTS

Zoning and Minimum Lot Size Plans

The Scoping Proposal does not currently include indicative maps showing the location of the proposed R2 and C2 zones or the corresponding MLS arrangements. It is unknown how the proposed zoning arrangement responds to site constraints including water quality risks and the presence of watercourses as discussed below. Relevant zoning and MLS maps will need to be included in the Planning Proposal at the time it is referred to us.

Direction 3.3 Sydney Drinking Water Catchment

The site lies within the Sydney Drinking Water Catchment (SDWC) as recognised by the Proposal (p. 8). As such, the Planning Proposal will need to consider and comply with s 9.1 Ministerial Direction 3.3 Sydney Drinking Water Catchment. This includes Council referring the Proposal to WaterNSW for consultation prior to Gateway and describing the means by which the Planning Proposal gives effect to the water quality protection principles set out in the Direction.

Direction 3.3 requires Planning Proposals to be consistent with Chapter 8 of the State Environmental Planning Policy (Biodiversity and Conservation) 2021 (the B&C SEPP) and consider the outcomes of relevant Strategic Land and Water Capability Assessments (SLWCAs). The site is located within an area classified under the Water NSW Regulation 2020 as being 'Special Area Schedule 2', reflective of the site's location with respect to Lake Burragorang and Warragamba Dam. This status further emphasises the need to protect water quality in this area.

With regards to Chapter 8 of the B&C SEPP, new development in the SDWC is required to have a neutral or beneficial effect (NorBE) on water quality. This is relevant to sewerage and stormwater (see below).

With regards to SLWCA outcomes, we provide the relevant SLWCA map in Attachment 2 on the basis of the site supporting residential sewer development. The SLWCA map shows that the water quality risks associated with the site vary from LOW to HIGH with the areas of HIGH risk being associated with the existing watercourse/drainage feature in the southern centre of the site. Areas of HIGH risk generally have a LOW capability for development. Areas of LOW and MODERATE risk have a HIGH and MODERATE capability for development, respectively. These results should be considered in the zoning configuration and MLS layouts.

Sewerage and Water Servicing

This issue of servicing is relevant to the Planning Proposal in establishing a reasonably likelihood that later subdivision and development of the area will be able to deliver a neutral or beneficial effect (NorBE) on water quality based on the zoning and MLSs proposed.

The Planning Proposal will need to be able to clearly demonstrate that the site can be serviced with reticulated sewer and water and that there is sufficient capacity in the STP for a development of this size. We note that the Scoping Report states that recent wastewater servicing investigations have identified that existing sewer reticulation infrastructure will have the capacity to service the proposed residential expansion. This contrasts with the Wollondilly Local Housing Strategy (2021), which indicates that there is limited wastewater capacity in the Oakdale, Warragamba and Silverdale network, limiting the ability of the network to support additional residential development in these locations. Comments regarding the capacity of the reticulated network to sustain the development intensity proposed would need to be supported by information regarding the nature of the investigations conducted.

The West Camden Water Recycling Plant is at full capacity. The Scoping Proposal states that wastewater treatment capacity will be available following completion of the planned upgrade of the Plant by December 2023. Relevant information such as this should be incorporated into Planning Proposal.

The Planning Proposal should indicate whether the existing residence(s) occurring on the site are currently serviced by sewer or whether they rely on on-site wastewater management systems. This is potentially relevant to the issue of contamination risk (see below).

Watercourses

A first order water course occurs in the south of the site draining west to east and another on the northern edge of the site. It appears that three farm dams also occur on the site, a large farm dam exists in the south-east, another west of it, and one in the north. Any future Planning Proposal should describe the watercourses and other water features (e.g. farm dams) on the site. It should also distinguish between those farm dams intended to be removed or those intended to be retained (where this is reasonably known). The Proposal will also need to explain how it is responsive to watercourses, farm dams and any other related water features.

Stormwater Management

While we appreciate that the subdivision layout plan is conceptual only, it appears that an extensive internal road network is being considered. This would give rise to extensive stormwater management measures being required for the road network. Several points are relevant here:

- The Scoping report indicates that the existing large dam in the southeast part of the site will be re-purposed as a stormwater detention basin to be contained within a drainage reserve. It is unclear how much of the site this would be able to service. The anticipated role of the dam in stormwater management would need to be more clearly articulated at Planning Proposal stage. The future Planning Proposal should also indicate whether other farm dams would be removed (as suggested by the conceptual subdivision layout plan) or retained on the site and used for stormwater management purposes.
- A supporting Water Cycle Management Study incorporating stormwater modelling is likely to be needed at Planning Proposal stage to demonstrate conceptually how stormwater could be managed on the site and have a reasonable chance of being able to deliver a NorBE at subdivision DA stage. In this regard, we note that the Scoping Report refers to a concept stormwater and water quality management report prepared for a previous Planning Proposal and that it concluded that stormwater runoff could be managed by maintaining overland flow paths with dedicated drainage and easements in conjunction with conventional underground drainage infrastructure. The relevance of that report for this new Proposal has yet to be established. Stormwater modelling may need to be redone if the impervious area generated by the new design is significantly different to that examined earlier.

Contamination Risk

The Planning Proposal will need to address any potential contamination over the site from past uses. Consideration would need to be given to any existing on-site systems associated with current dwellings and effluent management areas if the site is currently unsewered. We note that a stage 1 contamination assessment was undertaken as part of the previous Planning Proposal for the site. The relevance and information of that report, if it is to be used, would need to be established at Planning Proposal stage.

Urban Release Area

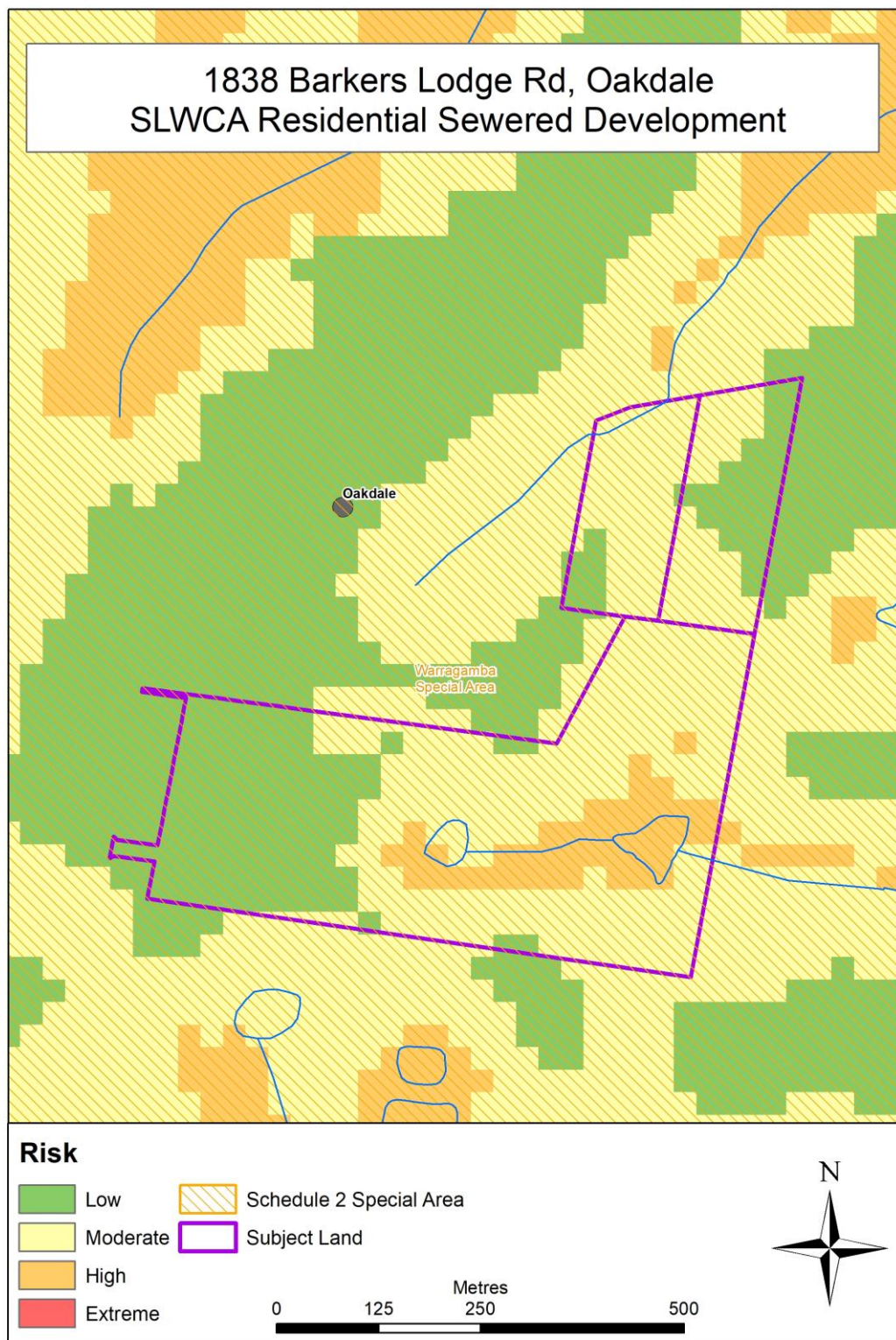
The Scoping Proposal notes that the Urban Release Area map of the *Wollondilly Local Environmental Plan 2011* would need to be amended. The matters of servicing (raised above) are relevant in this regard and a servicing strategy may be needed.

C2 Zoning and Minimum Lot Size

Any future Planning Proposal will need to explain how the zoning and MLS choice, and the layout of these planning overlays, respond to the water-related features and water quality risk on site.

The future Planning Proposal would benefit by explaining why the C2 zone would have no MLS. The approach would seem to allow the management of the C2 area to be split into multiple properties under split zoning arrangements at later DA stage. This may compromise the effective management of the C2 land for its biodiversity and water quality values. It would also be useful to explain if any relevant development control plan (DCP) provisions would apply to the C2 land.

ATTACHMENT 2 - MAP



Map 1. Strategic Land and Water Capability Assessment (SLWCA) for Residential Sewered Development at 1838 Barkers Lodge Rd, Oakdale