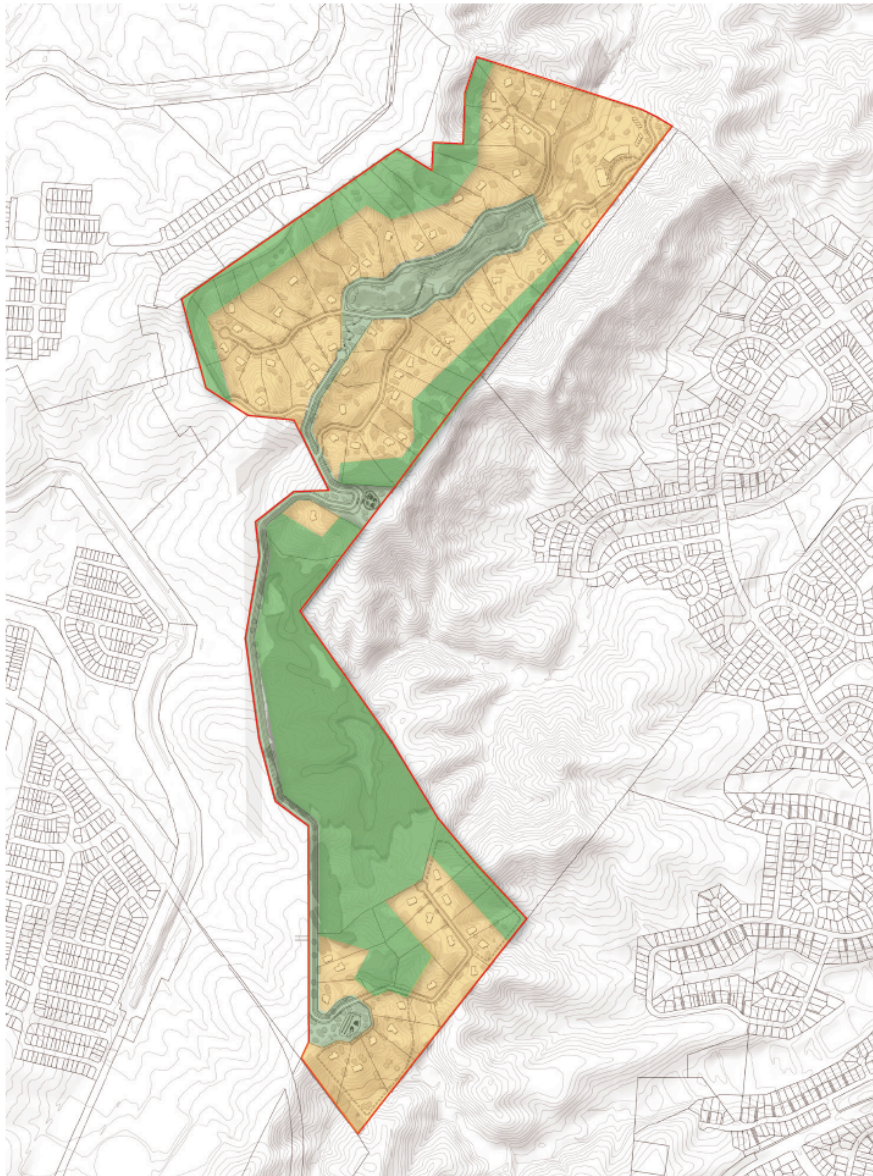


Planning Proposal



Macarthur Grange Golf Course

Address: Lot 18 Raby Road, Kearns, NSW

Prepared on behalf of: Toscu Investment Pty Limited

June 9, 2020

Document control

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Project summary

Applicant	Toscuz Investment Pty Limited
Applicant's address	Suite 10 695 The Horsley Dr, Smithfield NSW 2164
Land to be developed	Macarthur Grange Golf Course
Legal description	Lot 3900 DP1170905
Project description	Planning Proposal for large lot residential development

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Executive Summary

Planning Proposal summary

This Planning Proposal is in support of a long-term sustainable land use strategy for an important component of Campbelltown local government area's Scenic Hills. The Planning Proposal has been designed to preserve the landscape values and local character of the area in perpetuity. The proposal will also provide new public access to significant hilltop locations through a north south green corridor that has longer term potential to link the important regional open space locations of Mount Annan and the Western Sydney Parklands.

The Campbelltown Local Planning Strategy from 2014 deals extensively with the Scenic Hills area and includes an action to 'propose and implement a development model for the Scenic Hills'. This has been a guiding principle in the development of this proposal.

The proposal's key principles of preserving ridgetops, providing new public access, maintaining and improving existing vegetation and accommodating rural residential development that is in harmony with the natural environment provides a sustainable development model that could serve as a positive precedent for the preservation of the landscape values of the wider Scenic Hills landscape unit while at the same time enhancing the connectivity of Sydney's Green Grid and providing new places for the public to enjoy.

More than 50% percent of the site is proposed to be zoned for public recreation or environmental conservation purpose with the remainder zoned environmental living, a zone with direct objectives of preserving the Scenic Hills.

The Planning Proposal seeks to implement a long term sustainable strategy to preserve the character of the area with statutory protection for ridgelines, existing significant vegetation and a north south green corridor to be dedicated to Council.

An approximately 6ha hotel and function centre site will provide significant employment opportunities for the surrounding area as well as further opportunities for people to enjoy the scenic qualities of the area.

The 63 residential opportunities available within the 129.5 hectare site represent a unique offering in the LGA, while they will not make a substantial impact on dwelling supply they offer a lifestyle choice not readily available in the surrounding area. Large parcels ranging from 5,000 sqm to several hectares will provide for quiet enjoyment of a scenic bushland setting to small scale agricultural pursuits.

The Planning Proposal represents a unique once in a generation opportunity to provide a long-term sustainable use for the area, that creates significant public benefits and preserves the natural environment.

The key benefits of the proposal are illustrated in the figure overleaf.



Subject site

The site comprises 129.5ha of land being Lot 3900 DP1170905 located in the Macarthur region, approximately 60km south-west of Sydney.

The site forms part of the area known as the Scenic Hills, which has long been identified by Campbelltown Council for protection of its scenic and cultural landscapes and to provide a scenic buffer between urban development within the Campbelltown and Camden LGAs.

The northern section of the site is currently used as the Macarthur Hills Golf Course. The southern portion is vacant land which is used for intermittent and low intensity cattle grazing. Remnant vegetation, including Cumberland Plain Woodland and River-Flat Eucalypt Forest covers parts of the site, with the most significant areas being in the southern portion of the site.

Existing planning controls

The subject site is zoned E3 – Environmental Management under the *Campbelltown Local Environmental Plan 2015* (Campbelltown LEP), and a minimum lot size of 100ha applies. This zoning and minimum lot size control commenced in March 2016 following several years of development and consultation. Council's aim appears to be the preservation of the scenic values of the hills and to provide a buffer between the Turner Road Precinct of the South West Growth Centre in the Camden LGA.

Council has recently exhibited a Planning Proposal to amend the Campbelltown LEP which includes the following:

- Mapping of the Scenic Hills and establishment of assessment criteria
- Expansion of terrestrial biodiversity mapping, including within the site.

The Planning Proposal is consistent with the assessment criteria identified by the amendment and seeks to retain and protect significant vegetation within the site.

Strategic planning context

Campbelltown Council's long held position on the protection of the Scenic Hills is reflected in a number of strategic planning documents at the State and local level.

The Western District Plan includes actions to *Protect and enhance scenic and cultural landscapes* and to *identify and protect ridgelines, scenic and cultural landscapes specifically the Scenic Hills*. The District Plan also recognises the potential for limited growth of rural residential development including to support protection of the Scenic Hills.

The Campbelltown Local Strategic Planning Statement also seeks to protect the Scenic Hills and includes actions around protecting the environmental, heritage and agricultural values of the Scenic Hills and to connect the Scenic Hills to the wider open space network.

Whilst the Campbelltown Local Planning Strategy 2014 also seeks to protect the Scenic Hills, it acknowledges the need to propose and implement a development model for the Scenic Hills.

The Planning Proposal is entirely consistent with the Strategic Context for the Scenic Hills as it seeks to impose a long term development model which will maintain the rural and landscape character of the site, retain significant vegetation and identifies opportunities for public access to the site with potential to connect to the wider area.

Proposed Indicative Master Plan

An Indicative Master Plan has been prepared by Architectus to identify potential development of the site whilst protecting the values of the Scenic Hills. The Master Plan has responded to the Site's landform and accommodates site constraints including ecological, riparian and bushfire constraints and services easements.

The Master Plan is based on a vision of a rural landscape and ecologically focussed community that maintains the character and quality of the Campbelltown Scenic Hills.

The Indicative Master Plan is characterised by a rural landscape character, retained native vegetation and scattered buildings that are nestled in the landscape.

The key features of the Master Plan include:

- 63 environmental / rural residential lots ranging from 0.5ha to 2.75ha (1.3ha average lot size), suitable for development with a single dwelling (average lot size 1.3ha)
- A 6ha lot fronting Raby Road to accommodate a potential hotel and function centre uses around the existing club house, subject of future master planning
- A total of 9ha of open space including riparian open space in the southern section of the site and two lookout parks in the northern section of the site taking advantage of key vantage points within the landscape
- A 24ha Hilltop Conservation Reserve protecting the most significant area of Cumberland Plain Woodland
- North south walking and cycling trails of 2.5km linking open space and the conservation reserve with potential to connect to existing walking and cycling paths, wider Sydney Green Grid projects and future connections through the Scenic Hills.

Proposed zoning and planning control amendments

To facilitate the Planning Proposal the following amendments to the Campbelltown LEP are proposed:

- Zoning of the site as follows:
 - E2 Environmental Protection across key areas of contiguous significant vegetation and ridgelines
 - RE1 for the riparian open space and lookout parks
 - E4 Environmental Living across the remainder of the site
- Minimum lot size of 5,000sqm
- Inclusion of the following uses as permissible with consent over the 6ha club house lot: Function centre, Hotel or motel accommodation, and Neighbourhood shop.

Whilst a 5,000sqm minimum lot size is proposed, the average lot size would be much larger and this would be managed through the inclusion of the Indicative Master Plan and subdivision controls within site specific development controls which would guide future development including a requirement that development be generally in accordance with the Indicative Master Plan. It is envisaged this would complement the existing Campbelltown DCP, particularly Part 4 which applies to rural residential development.

Public benefit

The proposal includes significant public benefits including:

- A total of 15ha of land zoned public open space including riparian open space in the southern section of the site and two lookout parks in the northern section of the site taking advantage of key vantage points within the landscape
- A 24ha Hilltop Conservation Reserve protecting the most significant area of Cumberland Plain Woodland and a further 25ha of significant vegetation protected by the E2 Environmental Protection zone on private land
- North south walking and cycling trails of 2.5km linking open space and the conservation reserve with potential to connect to existing walking and cycling paths, wider Sydney Green Grid projects and future connections through the Scenic Hills
- Provision for a new hotel and conference centre providing local services and significant employment opportunities.

The proposal has the potential to support significant public access to parts of the Scenic Hills that are currently in private ownership, aligning with key actions of the Campbelltown LSPS .

The applicant is seeking to engage Council with regard to potential future ownership of proposed open space, the Hilltop Conservation Reserve and walking and cycle paths within the site.

There is potential for this to inform a voluntary planning agreement with Council outlining arrangements for transfer of these items, and offsets arrangements against local infrastructure contribution requirements.

Consideration of key issues

The Planning Proposal has been supported by a series of technical studies to enable consideration of key issues associated with the proposal, as outlined below.

- Urban design study and visual impact assessment
- Ecological Assessment
- Riparian Assessment

- Bushfire Hazard Assessment
- Traffic and Transport Assessment
- Aboriginal Heritage Assessment
- Contamination Site Investigation
- Utility Infrastructure Assessment.

These studies conclude that the proposal will have minimal impact on the surrounding area and that all issues associated with the proposal can be appropriately managed.

Conclusion

The Planning Proposal is entirely consistent with Council's vision for the Scenic Hill's including the assessment criteria proposed in Council's draft amendment to the Campbelltown LEP. The Planning Proposal will deliver an enhanced biodiversity outcome through the long term protection of significant vegetation and key riparian corridors, and apply a development model to the Scenic Hills securing the long term protection of the landscape and rural qualities of the site.

1 Background

1.1 Previous planning proposal

A Planning Proposal for the site was considered by Campbelltown Council on 16 February 2016, which sought to rezone the site to facilitate development of 529 to 569 lots ranging in size from 450sqm to over 2,000sqm. In summary, it was not supported for the following reasons:

- Inconsistency with Council's policy on the protection of the Scenic Hills
- Inconsistency with the NSW Government's A Plan for Growing Sydney (noting that this has now been superseded by the Greater Sydney Region Plan)
- Inconsistency with Ministerial Directions 2.1 Environment Protection zones and 7.1 Implementing the Metropolitan Plan
- Inconsistency with Campbelltown Local Environmental Plan – Central Hills Lands, noting that this has now been superseded by Campbelltown Local Environmental Plan 2015 (Campbelltown LEP)
- Inconsistency with Campbelltown Local Planning Strategy 2014.

It is understood that there has been continued development pressure in this area known as the Scenic Hills and that with the commencement in March 2016 of the Campbelltown LEP the majority of the area was zoned E3 Environmental Management.

The current proposal is fundamentally different to the previous proposal being an environmental / rural residential concept with potential for only 63 large residential lots ranging from 5,00sqm to 2.75ha (1.3ha average lot size). The proposal is compatible with the landscape and rural character of the scenic hills, would result in minimal visual impact, and retains the important ecological values of the site including native vegetation and riparian corridors. The proposal would also have minimal infrastructure impact with negligible impact on the transport network and would be able to serviced by existing or planned utility infrastructure.

The previous and current master plans are shown in Figure 2 overleaf.

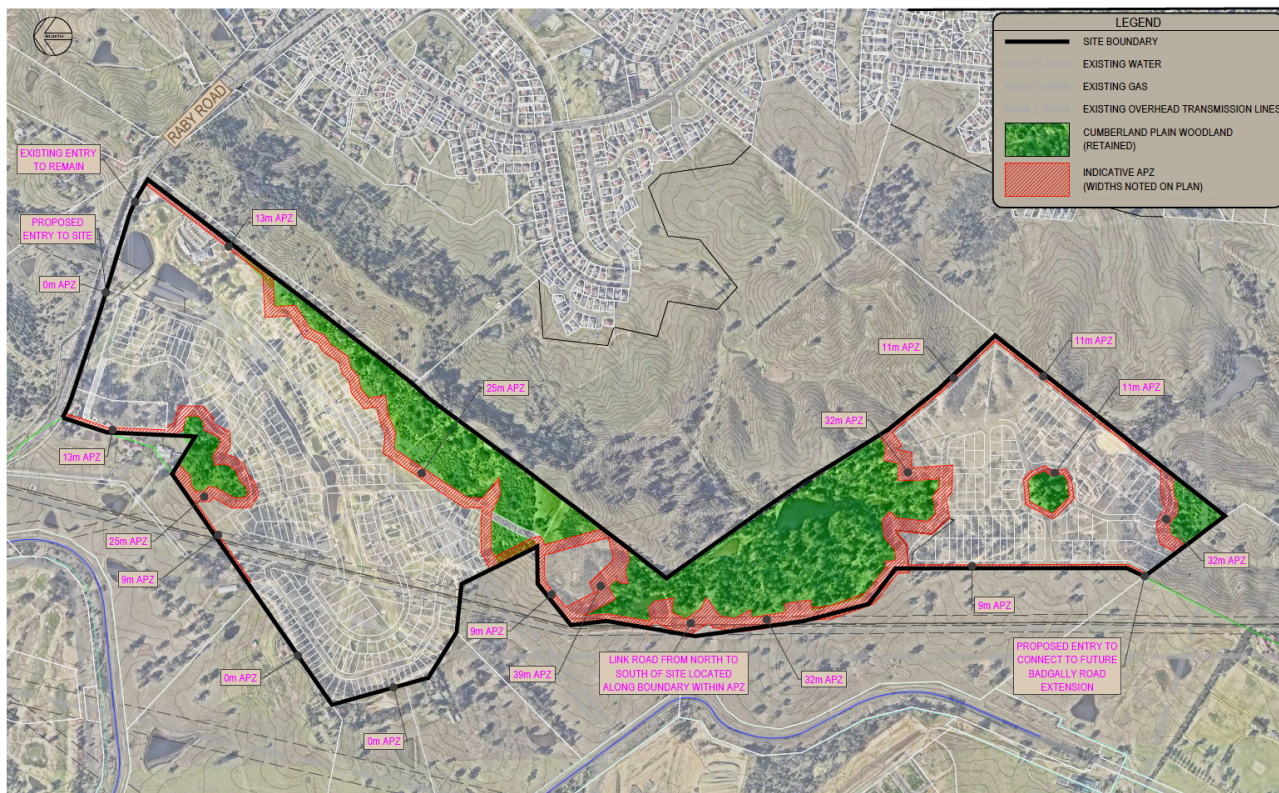


Figure 1 – 2016 proposal 529-569 lots ranging from 450sqm to 2,000sqm+ (Source: Cardno)

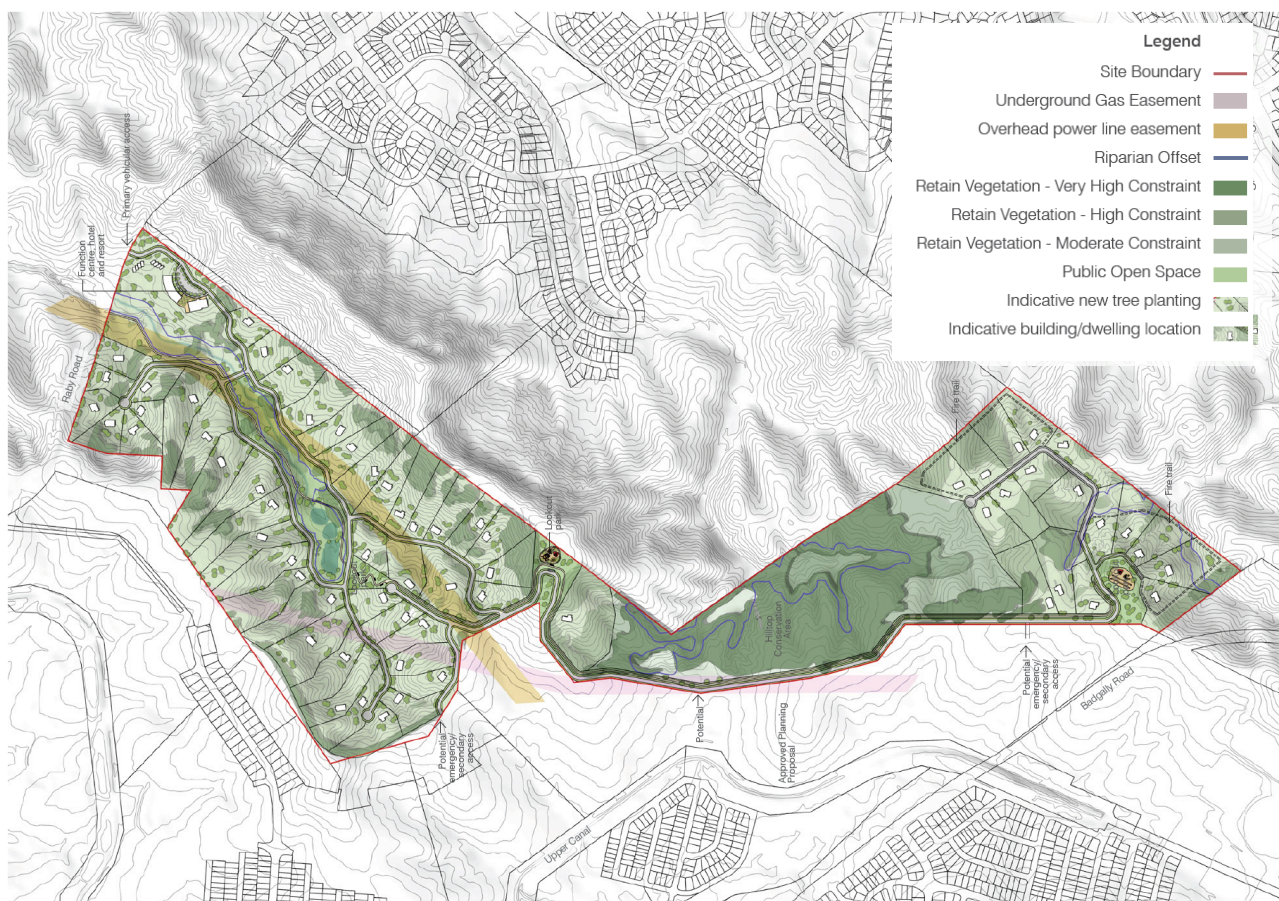


Figure 2: Current proposal for 63 dwellings and > 50% open space and environmental conservation

2 Site description and context

2.1 Subject site

The site comprises Lot 3900 DP1170905 located in the Macarthur region, approximately 60km south-west of Sydney as shown in Figure 3. The key features of the site are outlined in the Table 1 below and shown in Figure 4.

Table 1: Site details

Feature	Description
Land area	129.5 hectares
Current zoning	E3 Environmental Management
Minimum lot size	100 hectares
Existing Access	Single access to Macarthur Grange Golf Course via Raby Road
Existing land use	The northern section of the site is currently used as the Macarthur Hills Golf Course. The southern portion is vacant land which is used for intermittent and low intensity cattle grazing.
Vegetation	Remnant vegetation, including Cumberland Plain Woodland and River-Flat Eucalypt Forest covers parts of the site. The northern portion of the site is largely cleared with remnant vegetation is mainly on the ridgelines near the eastern and western boundaries and along the central riparian corridor. The southern part of the site is more heavily vegetated including a large area of high quality Cumberland Plain Woodland. There is also extensive weed species across the site.
Topography	The landform is characterized by steep hillsides. The site boundaries are located on or near ridgelines. The northern parts of the site are situated within a steep valley. The southern parts of the site are more open and undulating with views across the district.
Creeks and waterbodies	A number of existing riparian corridors traverse the site which connect a series of constructed dams which are used for irrigation of the golf course.
Easements	A high pressure gas pipeline easement and overhead electricity transmission lines easement traverse the site north south.

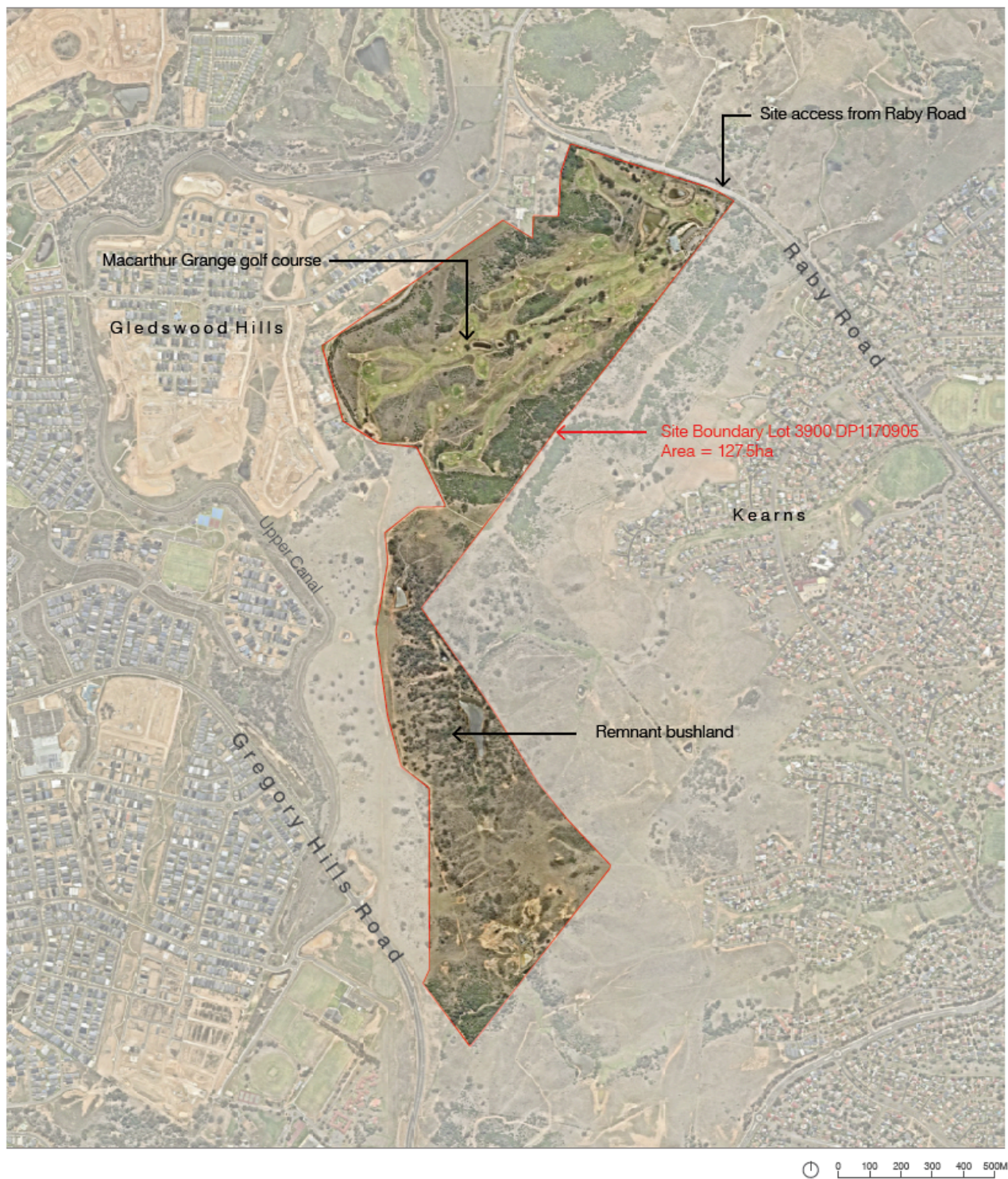


Figure 3: Subject site (Source: Architectus)



Figure 4: Site analysis (Source: Architectus)

2.2 Surrounding context

The site is located within Campbelltown LGA, with the boundary of Camden LGA running alongside the western frontage of the site.

The site forms part of the area known as the Scenic Hills, which has long been identified by Campbelltown Council for protection of its scenic and cultural landscapes and to provide a scenic buffer between urban development within the Campbelltown and Camden LGAs.

The site adjoins Raby Road to the north and Badgally Road to the south, although access is currently only available from Raby Road.

The land to the north and east of the site forms part of the wider Scenic Hills and is typically open undulating land with scattered vegetation. Further to the east of the site is the suburbs of Kearns and Eschol Park which are low density suburban neighbourhoods built in the 1980s.

Directly to the north west of the site are large rural residential lots, which are accessed via a private road which runs alongside parts of the north east boundary of the site, connecting to Gledwood Hills Drive.

The land to the west of the site in Camden LGA is currently undergoing development from rural land to urban development comprising predominantly low density residential and supporting uses, including the following:

- the land to the north west of the site beyond the existing rural residential lots is currently being developed by Mirvac as part of its Crest Estate
- The strip of land directly to the south west of the site (190 Raby Road, Gledswood Hills) was rezoned in December 2019 for a mix of environmental living lots adjacent to the site with low density residential lots beyond. The proposed master plan for this land includes a road connection to the Gregory Hills Drive – Bagdally Road intersection, opposite Donovan Boulevard to the south west of the site which provides a potential future access to the site from the south.
- Further to the west are the South West Growth Area Turner Road Precinct and the redevelopment of the Lakeside Golf Course within the suburbs of Gledswood Hills and Gregory Hills.

The site is also well located in close proximity to services and facilities including:

- Gregory Hills Town Centre and Gledswood Hills Public School which was recently completed as part of the Turner Road Precinct
- The planned Gledswood Village within the Turner Road Precinct
- The existing neighbourhood centre and primary school in the suburb of Kearns.

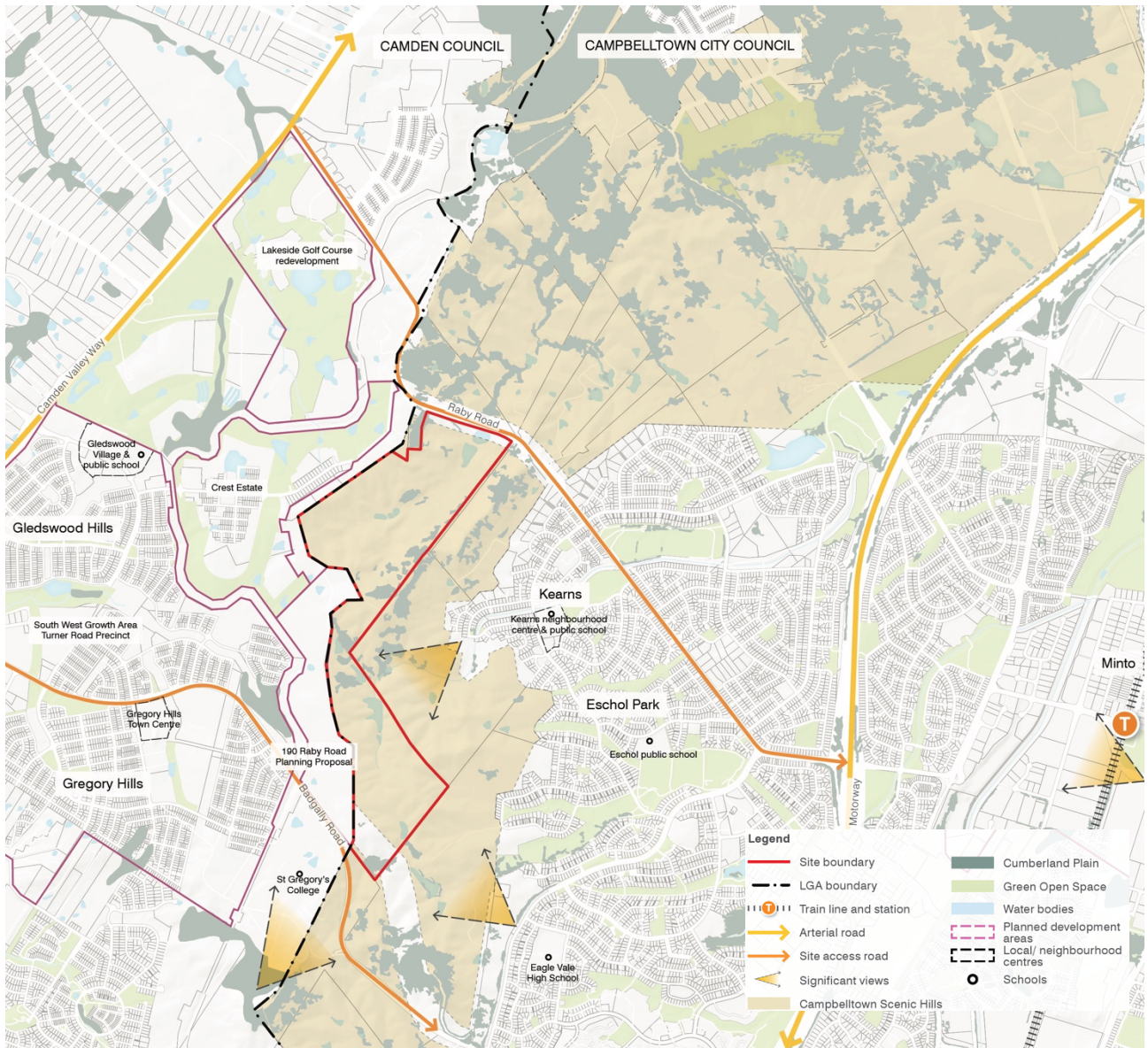


Figure 5: Surrounding context (Source: Architectus)

3 Current planning controls

1.1 Campbelltown Local Environmental Plan 2015

The primary environmental planning instrument which applies to the site is the *Campbelltown Local Environmental Plan 2015* (Campbelltown LEP).

The subject site is zoned E3 Environmental Management under the *Campbelltown Local Environmental Plan 2015* (Campbelltown LEP), and a minimum lot size of 100ha applies. This zoning and minimum lot size control commenced in March 2016 following several years of development and consultation. Council's aim appears to be the preservation of the scenic values of the hills and to provide a buffer between the Turner Road Precinct of the South West Growth Centre in the Camden LGA.

The zoning and provisions outlined in the Campbelltown LEP are outlined in Table 2 below, and the zoning is shown in Figure 6.

Table 2: Campbelltown LEP controls

Clause	Summary of provisions
Zoning	<p>E3 Environmental Management which allows for a range of uses including dwelling house, dual occupancy (attached), and extensive agriculture.</p> <p>The objective of the zone are outlined below:</p> <ul style="list-style-type: none">• To protect, manage and restore areas with special ecological, scientific, cultural or aesthetic values.• To provide for a limited range of development that does not have an adverse effect on those values.• To enable development for purposes other than rural-residential only if that development is compatible and complementary, in terms of design, size and scale, with the character of land in the zone.• To allow cellar door premises, restaurants and cafes only where they are directly associated with the agricultural use of the land.• To protect, and maintain the environmental, ecological and visual amenity of, the Scenic Hills, the Wedderburn Plateau and environmentally sensitive lands in the vicinity of the Georges River from inappropriate development.• To preserve the rural heritage landscape character of the Scenic Hills.• To protect and enhance areas of scenic value and the visual amenity of prominent ridgelines.• To protect bushland, wildlife corridors and natural habitat, including waterways and riparian lands.• To ensure the preservation and maintenance of environmentally significant and environmentally sensitive land.
Clause 4.3 Height of Buildings	9m
Clause 4.1 Minimum lot size	<p>100ha.</p> <p>Given the subject site is 129.5 hectares and is currently one lot no further subdivision potential exists.</p>

Clause	Summary of provisions
Clause 7.8 Development on Steep Land (Scenic Hills)	<p>This clause applies to the entire site and requires consent for all development on land having a gradient of more than 16%, unless excavation or filling will not vary the level of the land by more than 500mm.</p> <p>In granting consent consideration is required to be given to the:</p> <ul style="list-style-type: none"> the proposed excavation or filling, the means whereby the stability of the land will be maintained, the existing vegetation and any proposed plantings in and around the land to be excavated or filled.
Clause 7.6 Escarpment Preservation Area	<p>This clause applies to parts of the site along the western and southern boundaries. It requires the following matters to be satisfied in granting development consent.</p> <ul style="list-style-type: none"> measures will be taken, including in relation to the location and design of the proposed development, to minimise the visual impact of the development on the natural and visual environment of the land the external surfaces of any building consist of prescribed materials the development will incorporate measures to preserve the scenic qualities of, and views to and from, the land measures will be taken to reduce any potential land use conflict the development will maintain the existing natural landscape and landform and will not affect the stability of the land.

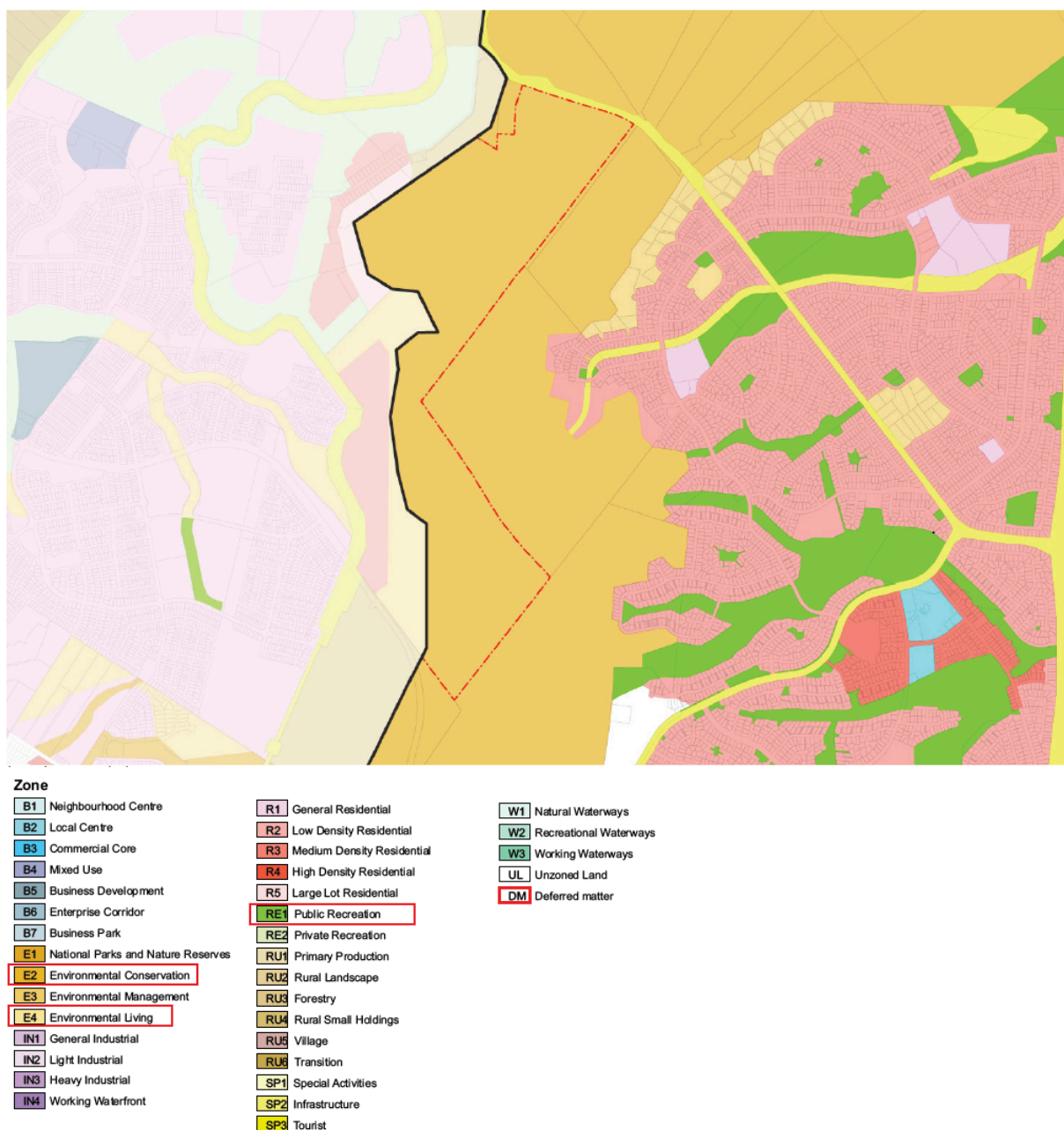


Figure 6: Existing zoning (Source: Architectus)

3.1 Draft Campbelltown Local Environmental Plan 2015

A Planning Proposal to amend the Campbelltown LEP was placed on public exhibition in April and May 2020, which has been prepared following a review of the LEP to ensure consistency with the Western City District Plan.

The draft LEP includes a number of changes which are relevant to the site including:

- Mapping of the Scenic Hills and establishment of assessment criteria
- Expansion of terrestrial biodiversity mapping.

The proposal seeks to protect the character and scenic values of the Scenic Hills, and includes proposed assessment criteria as outlined in Table 3 below.

Table 3: Proposed Scenic Hills assessment criteria

Criteria	Consideration
The development will not impact on the scenic value and character of the land,	The proposal will retain the scenic values of the land by protecting vegetation whilst allowing for environmental living development which is sensitively located to ensure consistency with the character of the Scenic Hills.
The development will not impact on the view lines or ridge lines of the mapped scenic preservation area, and	View lines and ridge lines will be protected through retention of vegetation and sensitive location of development. A visual analysis has also been prepared which is discussed in Section 9.3.1.
The environmental value of the land is not impacted by the development.	The environmental value of the land will not be impacted, with significant vegetation to be retained, improved and protected and riparian corridors retained and enhanced providing improved water quality and ecological function.

The draft LEP also proposes amendments to the Terrestrial Biodiversity Mapping that accompanies existing Clause 7.20 of the LEP, as shown for the site in Figure 7.

The mapping identifies areas of ecological significance based on the outcomes of existing local biodiversity surveys as well as regional vegetation mapping prepared by the Office of Environment and Heritage. The purpose of expanding the mapping is to afford an additional layer of protection for the LGA's significant biodiversity values which are highly contributory to the scenic landscape of Campbelltown.

Clause 7.20 currently outlines heads of consideration that need to be taken into account when assessing development applications on land to which the clause applies including the following:

Being satisfied that the development is sited, designed, constructed and managed to avoid adverse impacts on native biodiversity or, if an adverse impact cannot be avoided that:

- *the development minimises disturbance and adverse impacts to remnant vegetation communities, threatened species populations and their habitats, and*
- *measures have been considered to maintain native vegetation and habitat parcels of a size, condition and configuration that will facilitate biodiversity protection and native flora and fauna movement through biodiversity corridors, and*
- *the development includes measures to offset the loss of biodiversity values.*

An Ecological Assessment has been carried out to inform the proposal which has included extensive surveys to ground truth vegetation identified on the proposed Terrestrial Biodiversity map. The Indicative Master Plan has been sited and designed to retain all very high and high significance vegetation and most moderate significance vegetation, with only small areas needing to be cleared to accommodate a dwellings and associated asset protection zones. This is discussed further in Section 9.3.3.

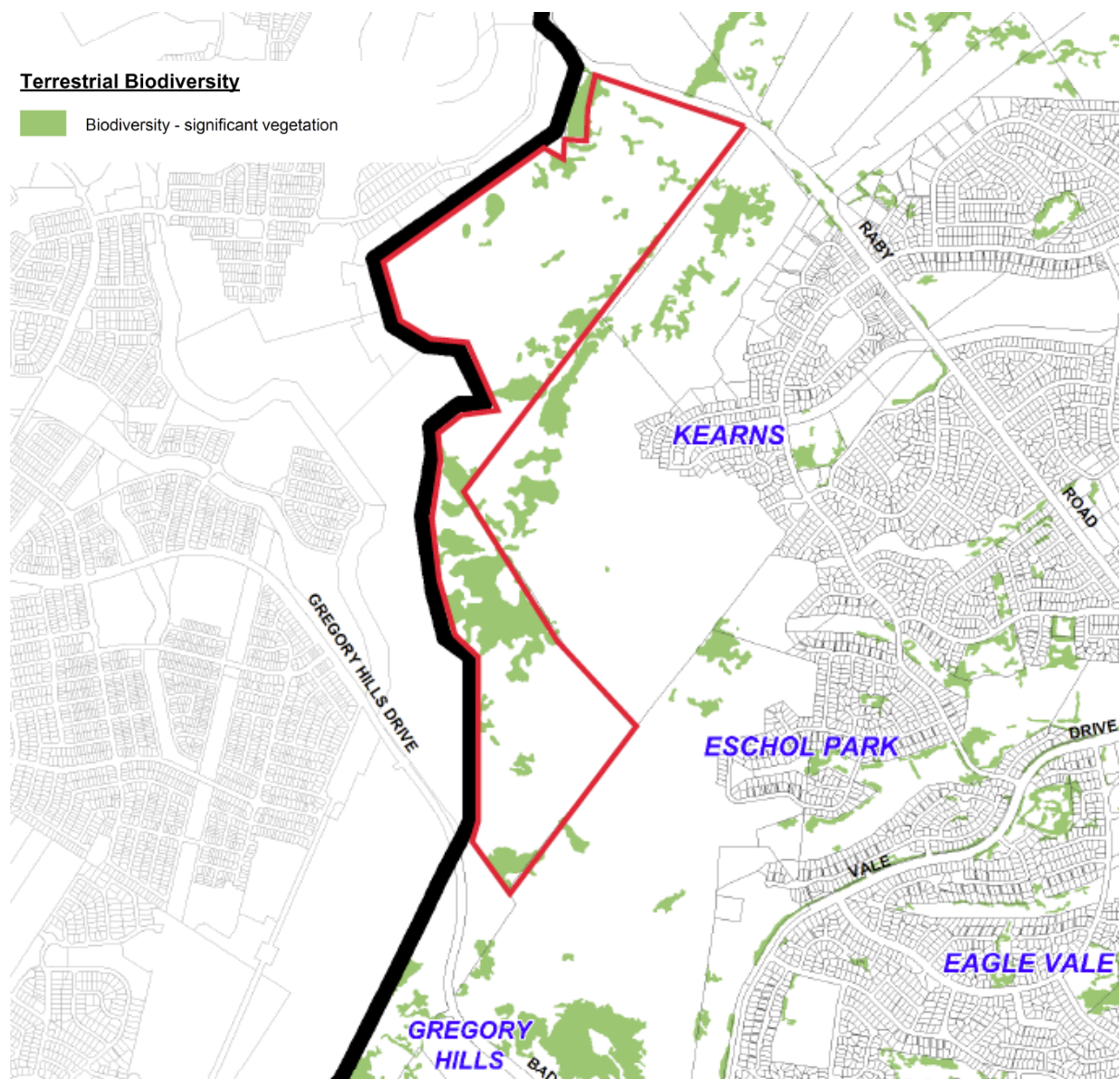


Figure 7: Proposed terrestrial biodiversity mapping (Source: Campbelltown Council)

4 Strategic planning context

4.1 Greater Sydney Region Plan

The final Greater Sydney Region Plan, A Metropolis of Three Cities was released by the Greater Sydney Commission in March 2018.

The site is located in the Western Parkland City. The Plan highlights key areas to accommodate future housing growth in the Western District of Sydney including the South West Growth Centre and the Greater Macarthur Growth Area (comprising the Glenfield Macarthur urban renewal area and land release areas south of Campbelltown).

As would be expected for a plan of this scale it does not include anything specific to the site, however the site appears to be identified as being outside the 'urban area' and within the 'metropolitan rural area' (see Figure 8 overleaf).

The Plan includes the following strategic actions which sit under Objective 29: *Environmental, social and economic values in rural areas are protected and enhanced*:

- Strategy 29.1: Maintain or enhance the values of the Metropolitan Rural Area using place-based planning to deliver targeted environmental, social and economic outcomes.
- Strategy 29.2: Limit urban development to within the Urban Area, except for the investigation areas at Horsley Park, Orchard Hills, and east of The Northern Road, Luddenham.

The Plan makes reference the Scenic Hills under Objective 28 *Scenic and cultural landscapes are protected*, and sets out the following strategies in this regard:

- Strategy 28.1: Identify and protect scenic and cultural landscapes.
- Strategy 28.2 Enhance and protect views of scenic and cultural landscapes from the public realm.

The objectives and strategies of the Greater Sydney Region Plan are elaborated in the Western District Plan which is discussed in Section 1.2.

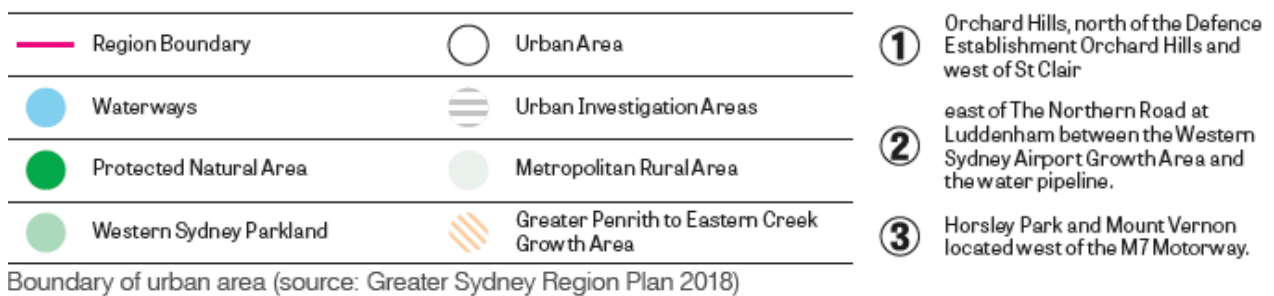
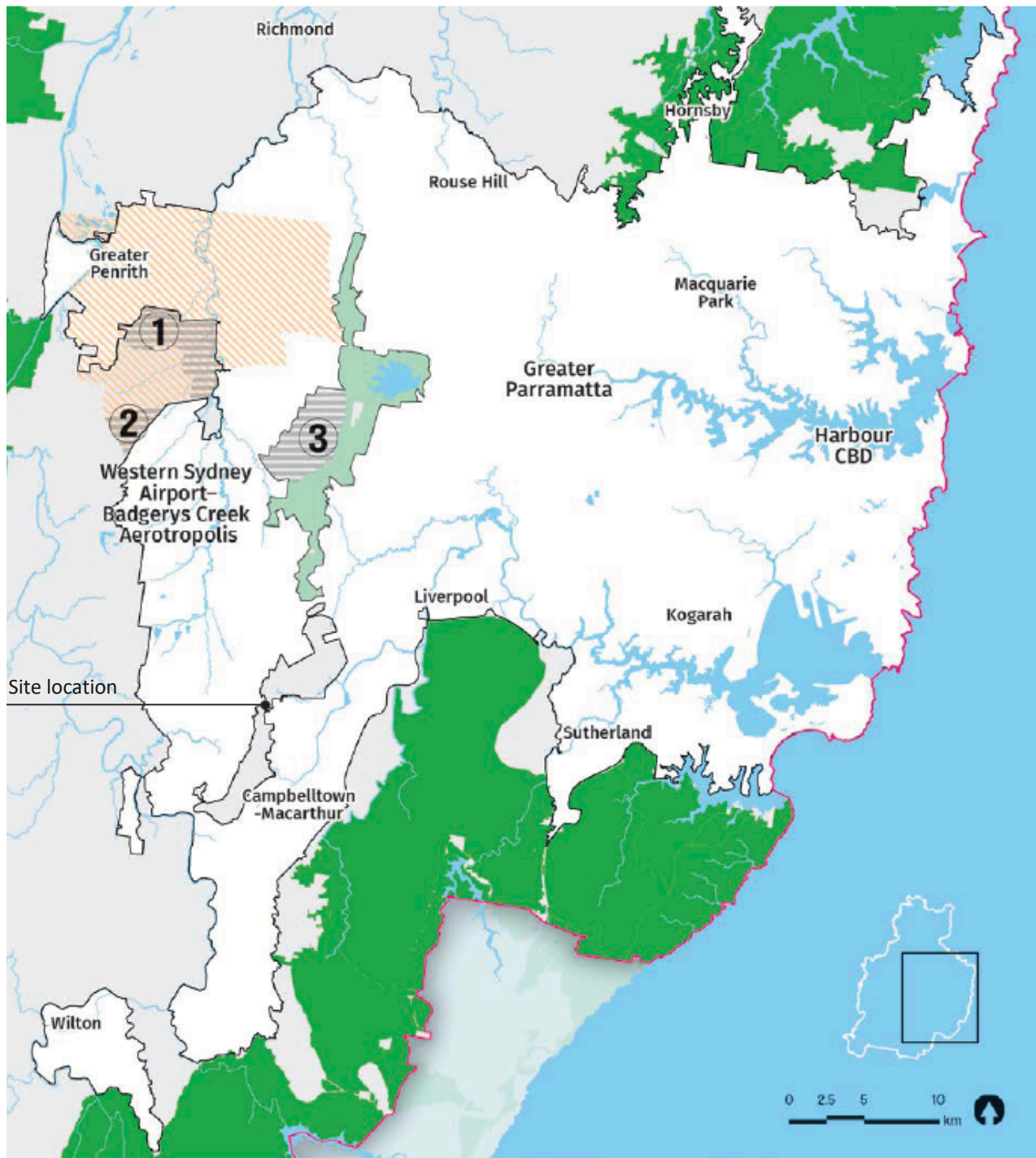


Figure 8: Greater Sydney Region Plan – Urban Area Boundary (Source: GSC)

1.2 Western District Plan

The Western District Plan has been developed to support the Greater Sydney Region Plan. It contains planning priorities and actions for implementing the Greater Sydney Region Plan at a district level and is a bridge between regional and local planning.

The Plan reinforces the Greater Sydney Region Plan Actions of maintaining and enhancing the Metropolitan Rural Area and limiting urban development to the Urban Area.

The key actions relating to the site are set out within Planning Priority 16 *Protecting and enhancing scenic and cultural landscapes* and Planning Priority 17: *Better managing rural areas*.

The Plan highlights that scenic landscapes within the Western District, including the Scenic Hills between Campbelltown and Camden, create a distinct setting for neighbouring urban communities.

The Plan also sets out the following in relation to rural residential development under Planning Priority 17: Better managing rural areas:

Limited growth of rural-residential development could be considered where there are no adverse impacts on the amenity of the local area and the development provides incentives to maintain and enhance the environmental, social and economic values of the Metropolitan Rural Area. This could include the creation of protected biodiversity corridors, buffers to support investment in rural industries and protection of scenic landscapes.

The proposal for the site has been designed to be directly in alignment with the Plan and it seeks to facilitate the long term protection of a component of the Scenic Hills. Table 4 includes consideration of the proposal against key Western District Plan actions.

Table 4: Western District Plan

Action	Consideration
Planning Priority W14: Protecting and enhancing bushland and biodiversity	
Action 72: Protect and enhance biodiversity by: a. supporting landscape-scale biodiversity conservation and the restoration of bushland corridors b. managing urban bushland and remnant vegetation as green infrastructure c. managing urban development and urban bushland to reduce edge-effect impacts.	The proposal seeks to retain significant vegetation both within individual lots for high value vegetation within a 24ha conservation reserve. Future development would be supported by vegetation management plans which would identify opportunities to manage and enhance existing vegetation.
Planning Priority W16: Protecting and enhancing scenic and cultural landscapes	
Action 76: Identify and protect ridgelines, scenic and cultural landscapes, specifically the Scenic Hills, Mulgoa Valley and the escarpments of the Blue Mountains.	The proposal will support the protection of the Scenic Hills by applying a development model which is compatible with the character of the Scenic Hills and will ensure its long term protection.

Action 77: Enhance and protect views of scenic and cultural landscapes from the public realm.	The proposal will protect views of the Scenic Hills from the public realm through limiting development to large lots supporting modest dwellings nestled into the landscape allow the grassy paddocks and native vegetation to dominate views of the site. A visual impact analysis has been prepared which demonstrates that visual impacts will be minimal (see Section 9.3.1)
Planning Priority W17: Better managing rural areas	
Action 76: Maintain or enhance the values of the Metropolitan Rural Area using place-based planning to deliver targeted environmental, social and economic outcomes.	The proposal maintains the values of the Metropolitan Rural Area by protecting biodiversity and the rural character of the Scenic Hills. The proposed large residential lots provide an alternative housing form whilst maintaining potential for small scale agricultural pursuits.
Action 77: Limit urban development to within the Urban Area, except for the investigation areas at Horsley Park, Orchard Hills, and east of The Northern Road, Luddenham.	The proposal does not comprise urban development, being for large environmental / rural residential lots ranging from 5,000 to 2.75ha (1.3ha average lot size).
Planning Priority W18: Delivering high quality open space	
<p>Action 71: Maximise the use of existing open space and protect, enhance and expand public open space by:</p> <ul style="list-style-type: none"> — providing opportunities to expand a network of diverse, accessible, high quality open spaces that respond to the needs and values of communities as populations grow. — investigating opportunities to provide new open space so that all residential areas are within 400 metres of open space and all high density residential areas (over 60 dwellings per hectare) are within 200 metres of open space. — requiring large urban renewal initiatives to demonstrate how the quantity of, or access to, high quality and diverse local open space is maintained or improved. — planning new neighbourhoods with a sufficient quantity and quality of new open space. — delivering shared and co-located sports and recreational facilities including shared school grounds and repurposed golf courses. — delivering or complementing the Greater Sydney Green Grid — providing walking and cycling links for transport as well as leisure and recreational trips. 	<p>The proposal identifies significant opportunities for new open space and walking and cycling links that would connect to the Greater Sydney Green Grid.</p> <p>Dwellings are generally located within 400m of open space.</p>

1.3 Campbelltown Local Strategic Planning Statement

The Campbelltown Local Strategic Planning Statement (LSPS) was finalised on 31 March 2020, following support from the Greater Sydney Commission. It sets a context and direction for land use decisions within Campbelltown LGA for the next 20 years. The LSPS sets out Planning Priorities under key theme areas of liveability, sustainability, productivity, and infrastructure and Collaboration.

The LSPS includes the following description of the Scenic Hills:

The Scenic Hills are characterised by rolling hillsides of pastoral land falling from the visually prominent and highly complex landform and apparent ridge line which marks the eastern edge of the Cumberland Plain. The Scenic Hills provide a quiet, rural landscape backdrop to much of the daily life of Campbelltown and are a prominent element in many views of the city and from the city. This landscape is highly valued by the community and Council and its protection is important, as is maintaining the agricultural and pastoral pursuits that are still undertaken in this area.

The LSPS re-enforces Council's position on the ongoing protection of the Scenic Hills. The LSPS also highlights that the protection of the Scenic Hills is a key priority for the community.

The LSPS includes a number of actions which are relevant to the proposal, including those specifically relating to the protection of the Scenic Hills. These are addressed in detail below, along with other actions relevant to the site.

Table 5: Consideration of Campbelltown LSPS

Planning Priority / Action	Consideration
Planning Priority 2: Creating High Quality, Diverse Housing	
2.5 Contain urban development to existing urban areas and within identified growth and urban investigation areas, in order to protect the functions and values of scenic lands, environmentally sensitive lands and the Metropolitan Rural Area (ongoing)	The proposal is consistent with this action as it does not propose urban development within the site, but seeks to progress an environmental / rural residential proposal consistent with the character and ecological values of the site.
2.7 Develop urban design principles and standards to guide new subdivisions, development and redevelopment (ongoing)	Site specific development controls have been prepared to guide future subdivision and development within the site.
2.12: Promote housing diversity through local planning controls and initiatives (ongoing)	The proposal will enhance local housing diversity by providing an alternative environmental / rural residential housing form.
Planning Priority 3: Embracing our heritage and cultural identity	
3.6 Identify and promote the conservation of environmental heritage and sensitive environmental areas including the Georges River Corridor Landscape, Scenic Hills and Wedderburn (Ongoing)	The proposal seeks to conserve sensitive environmental areas within the Scenic Hills through retention and protection of significant vegetation and riparian corridors. Areas of potential Aboriginal heritage have also been identified and considered in developing the proposal.
3.7 Manage development outcomes having appropriate regard to environmental and heritage considerations (Ongoing)	Detailed consideration has been given to environmental considerations through preparation of an ecological assessment, riparian assessment, and Aboriginal heritage assessment.

Planning Priority / Action	Consideration
Planning Priority 5: Embracing our unique landscape setting	
5.1 Work in partnership with stakeholders to investigate the possibility of connecting the Western Sydney Parklands to include the Scenic Hills, the Australian Botanic Garden and open space areas along the Nepean River (medium term)	The proposal identifies new public open space and walking and cycling connections with potential to connect to the wider Scenic Hills and beyond.
5.6 Work in collaboration with relevant stakeholders to review and implement the recommendations of the Visual Analysis of Campbelltown's Scenic Hills and East Edge Scenic Protection Lands Study (Ongoing)	The proposal takes into consideration the Visual Analysis of Campbelltown's Scenic Hills and East Edge Scenic Protection Lands Study, including through preparation of a site specific visual assessment which takes into consideration key identified viewpoints.
5.7 Develop an asset management plan for scenic and cultural landscapes (short term)	The proposal supports Council in developing an asset management plan by identifies new public open space and walking and cycling connections which could be publicly owned.
5.10 Ensure development is undertaken in accordance with relevant legislation to preserve and/or enhance scenic and cultural landscapes (ongoing)	The proposal has been undertaken in accordance with relevant legislation as discussed in Section 9.2.
5.11 Promote community management of scenic and cultural landscapes in the LGA (ongoing)	The proposal promotes community management of the Scenic Hills by identifying new public open space and walking and cycling connections within the site.
5.13 Investigate opportunities to rehabilitate existing waterways within the LGA to maximise the benefits to the community (ongoing).	The proposal identifies and seeks to protect key existing waterways within the site.
Planning Priority 6: Respecting and protecting our natural assets	
6.20 Retain agricultural opportunities in the Scenic Hills, Kentlyn and Wedderburn, and support opportunities to enhance and grow these opportunities (ongoing)	The site is not currently used for any significant agricultural uses. However, the range of proposed large lots and proposed zones maintains opportunities for small scale agricultural activities.
6.23 Investigate opportunities for agri-tourism in the Scenic Hills (short term)	The range of proposed large lots and proposed zones maintains opportunities for agritourism.
6.24 Ensure natural bushland and open spaces and places are accessible, attractive and safe places for recreation and wellbeing (ongoing)	The proposal enhances potential for public access to natural bushland through identification of open space and a conservation reserve connected by walking and cycling paths.
6.25 Work towards residents being a maximum of 400 metres from quality open space (ongoing)	Lots within the site are generally located within 400m of open space.

1.4 Campbelltown Local Planning Strategy 2014

Section 5.9 of Council's Local Planning Strategy deals extensively with the Scenic Hills area, and includes the following actions:

- Retention of the scenic buffer between Liverpool and Campbelltown LGAs should be optimised.
- Propose and implement a development model for the Scenic Hills
- Foster community access to the Scenic Hills so as to facilitate broader appreciation of their visual/scenic significance.

Council's Local Planning Strategy makes provision for these kinds of developments. See the extract below:

5.2.3 Transitional Environmental Lands (Local Planning Strategy)

Limited large lot urban fringe and environmental living areas flank the established urban areas of the LGA to the east, west and south.

Large lot urban fringe/environmental living provides limited transitional lifestyle housing opportunities. Such forms of housing are briefly described below:

Environmental Living Areas that are designated for Environmental Living generally include land with some type of environmental sensitivity but that still retain a capacity to accommodate a dwelling, subject to the dwelling being appropriately located and designed. Therefore, these areas provide unique opportunities for careful integration of housing with sensitive environmental settings and the management of such settings.

The proposal for large environmental / rural residential lots is entirely consistent with the Strategy as it will protect the visual qualities of the Scenic Hills, whilst applying a development model which will secure its protection in perpetuity.

The proposal also makes significance improvements to community access a component of the Scenic Hills which is currently entirely privatised. This will be achieved through the inclusion of riparian open space, lookout parks and a Hilltop Conservation Reserve connected by over 2.5km of walking and cycling trail extending north south through the site which has the potential to connect to the wider pedestrian and cycle network and the wider Scenic Hills area.

1.5 Campbelltown Residential Development Strategy 2014 (RDS)

The Campbelltown Residential Development Strategy does not contain a lot of discussion on the Scenic Hills area it does however refer to the area in the context of transitional environmental land and introduces the concept of environmental living. See the following extract:

7.4.1 Environmental Living (RDS)

Areas that are designated for Environmental Living generally include land with some type of environmental sensitivity but that still retain a capacity to accommodate a dwelling, subject to the dwelling being appropriately located, designed and accessed and serviced. Therefore, these areas provide unique opportunities for careful integration of housing with sensitive environmental settings and the management of such settings.

These forms of housing flank the established urban areas of the LGA to the east, west and south. They comprise the Wedderburn Plateau and Gilead in the south, the Scenic Hills in the west, and East Edge Scenic Protection Lands and Georges River Landscape in the east and cover a range of lot sizes from 0.4 ha to 4 ha (+). Gilead (described previously) aside, there are limited opportunities that

remain for this form of large lot residential development. It could, however, occur at a small scale within the unique settings of the East Edge Protection Lands, in accordance with comprehensive bushland protection parameters, inclusive of strict height, bulk, scale, materials and colour controls. Additionally, there may be some potential for large lot residential development on certain land that currently separates Glen Alpine from the Menangle Park Release Area.

Any large lot residential development of the subject nature would not contribute significantly to meeting future dwelling targets. It would, however, contribute to residentially focused lifestyle choice.

While not referenced directly the same reasoning applies equally to the subject site and the range of lot sizes is consistent with those proposed in this Planning Proposal.

1.6 Visual Analysis of Campbelltown Scenic Hills and East Edge Scenic Protection Lands

Most relevant to this area is the Visual Analysis of Campbelltown Scenic Hills and East Edge Scenic Protection Lands, (October 2011). This lengthy analysis forms the basis of Council's current position with regard to protection of the Scenic Hills area and devotes almost 30 pages to the area surrounding the subject site

This document continually reinforces the principle of having compact urban centres and a sharply defined rural urban interface. It appears to be the primary influence on Council's existing position to retain the predominantly rural character of the area. The Planning Proposal looks to implement a long term sustainable strategy to preserve the character of the area with statutory protection for ridgelines, existing vegetation and a north south green corridor to be dedicated to Council.

Whilst the proposal seeks apply a smaller minimum lot size than was recommended by the visual analysis, the current golf course is not considered by the landowner to be a long term sustainable use. An environmental / rural residential subdivision of the type proposed in the Indicative Masterplan will provide an economic outcome and guarantee a sustainable long term management strategy while preserving Council's strategic objectives and meeting the intent of the visual impact analysis.

A site specific Visual Impact Analysis has also been prepared as part of the Urban Design Study (Appendix A) as discussed in Section 9.3.1, which considers the impact of the proposal from key viewpoints, including those identified in Council's visual analysis (see Figure 9).

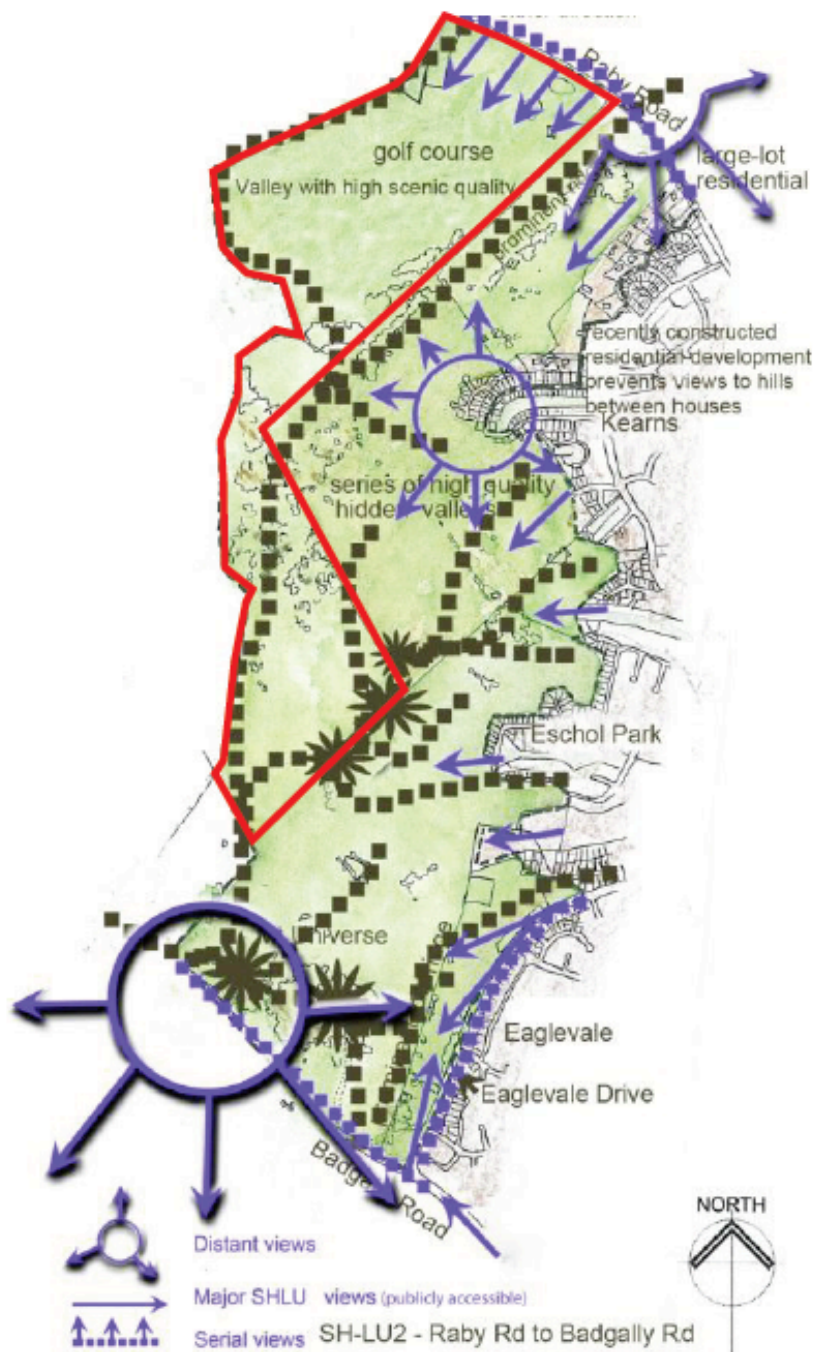


Figure 9: Visual Analysis of Campbelltown Scenic Hills – views to and from Landscape Unit 2

5 The proposal

5.1 Urban Design Master Plan

An Indicative Master Plan (shown at Figure 10) has been prepared by Architectus to illustrate the development of the site in accordance with design principles derived from the District Plan and Council's LSPS consistent with protecting the values of the Scenic Hills. The Master Plan has responded to the Site's landform and accommodates site constraints including ecological, riparian and bushfire constraints and services easements.

The key features of the Master Plan include:

- 63 environmental / rural residential lots ranging from 0.5ha to 2.75ha (1.3ha average lot size), suitable for development with a single dwelling
- A 6ha lot fronting Raby Road to accommodate a potential hotel and function centre uses around the existing club house, subject of future master planning
- A total of 9ha of public open space including riparian open space in the southern section of the site and two lookout parks in the northern section of the site taking advantage of key vantage points within the landscape
- A 24ha Hilltop Conservation Reserve protecting the most significant area of Cumberland Plain Woodland
- North south walking and cycling trails of 2.5km linking open space and the conservation reserve with potential to connect to existing walking and cycling paths, wider Sydney Green Grid projects and future connections through the Scenic Hills.

The Master Plan is based on a vision of a rural landscape and ecologically focussed community that maintains the character and quality of the Campbelltown Scenic Hills and have been guided by the following design principles:

- Maintain current balance of open grassy paddock and natural bushland
- Use existing land forms, ridges and gullies to define future property boundaries and access
- Situate built form in lower areas (gullies) but as close to the vegetation as the APZ will allow
- Average lot sizes to be 1ha to 1.5ha
- Provide scenic public access through the site and to new open space, along with vantage points to key views on higher ground
- Avoid development on gradients of steeper than 1:4 (25%) to minimise earthworks

The Indicative Master Plan is characterised by a rural landscape character, retained native vegetation and scattered buildings that are nestled in the landscape.

Modest dwellings nestled into the landscape allow the grassy paddocks and native vegetation to dominate views of the site, transitioning seamlessly into adjacent parts of the Campbelltown Scenic Hills. Generous lot sizes encourage active agricultural uses and ensure ecological protection of the land to protect its scenic qualities for the future. Larger lots have typically been located in areas with greater visual sensitivity, steep topography and/or requiring retention of large areas of vegetation.

The most sensitive and high quality vegetation has been incorporated in a Hilltop Conservation Reserve, which along with riparian open space and lookout parks would be connected by a north-south walking and cycling path through the site, which offers an alternative scenic link between the Western Sydney Parklands and the Mount Annan Botanic Gardens, compared to the relatively flat Upper Canal Green Grid Project. The lookouts take advantage of district and regional views as far as the Sydney CBD.

The master plan retains the core values of the Scenic Hills by providing a layout and built form outcome compatible with the rural and landscape character of the area. It seeks to establish a long term management arrangement for the site and will provide certainty for the community regarding the future use of the land and the ongoing protection of this part of the Scenic Hills.

The Indicative Master Plan has responded the environmental constraints on the site as summarised below and discussed in detail at Section 9.3.

The most significant areas of high quality Cumberland Plain Woodland have been located within the proposed Hilltop Conservation Area which would ensure their protection in perpetuity. The subdivision layout has located dwellings to avoid areas of native vegetation, with the exception of some areas of Cumberland Plain Woodland derived native grassland at the south of the site. The road layout has also sought to avoid areas of significant vegetation however some clearing would be required to accommodate future roads. Approximately 6.8ha of native vegetation would need to be cleared (22% of the total native vegetation), with the majority of this (6.1ha) being Cumberland Plain Woodland derived native grasslands or derived native shrublands. Future development could easily mitigate these losses through improvement of existing retained vegetation, clearance of non native species and possible revegetation.

The master plan has also sought to protect key riparian corridors through the application of vegetated riparian zones on either side of the corridor. Bushfire APZs have also been incorporated into the master plan would be outside areas of vegetation identified for protection.

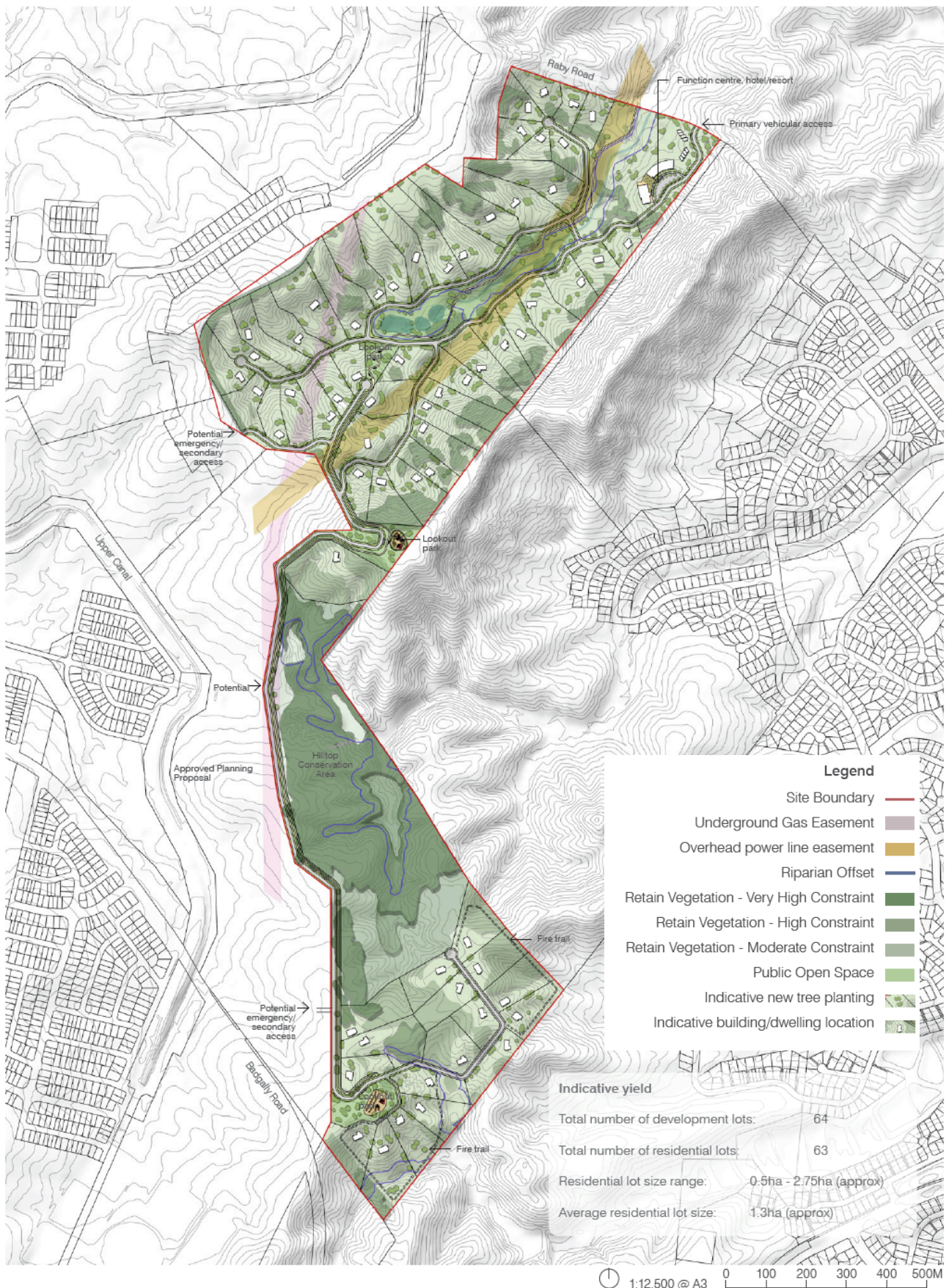


Figure 10: Indicative master plan (Source: Architectus)

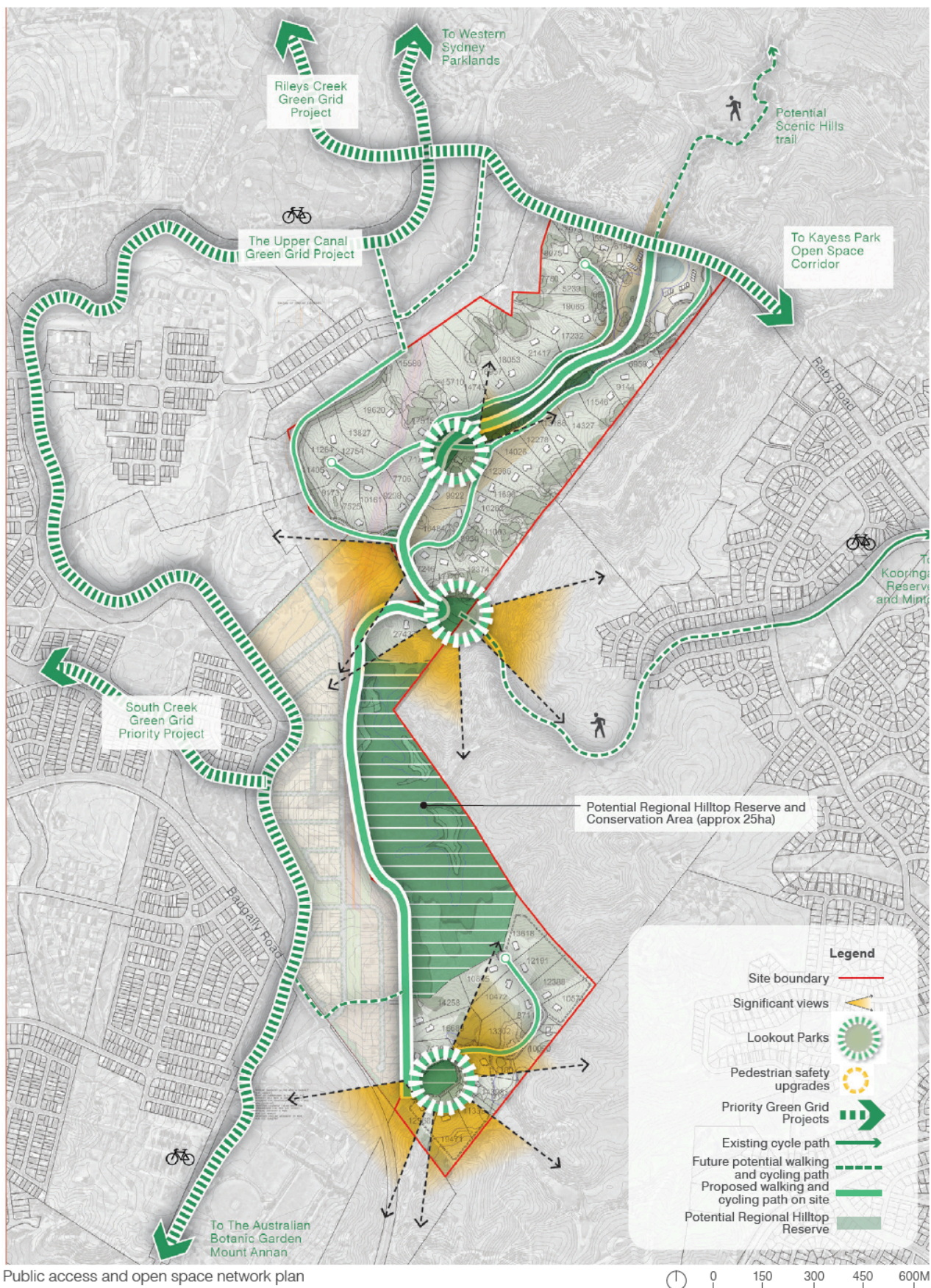


Figure 11: Open space strategy (Source: Architectus)

Lookout Park 1

The cleared high ground between the north and southern precincts provides and space for a new public park with play equipment and BBQ/picnic facilities. The park will offer expansive scenic views over the surrounding local landscape.

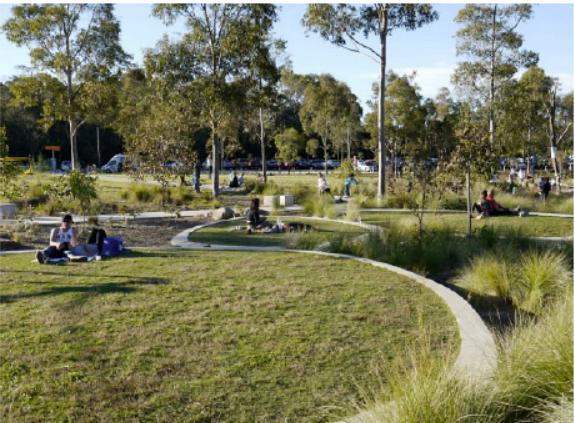
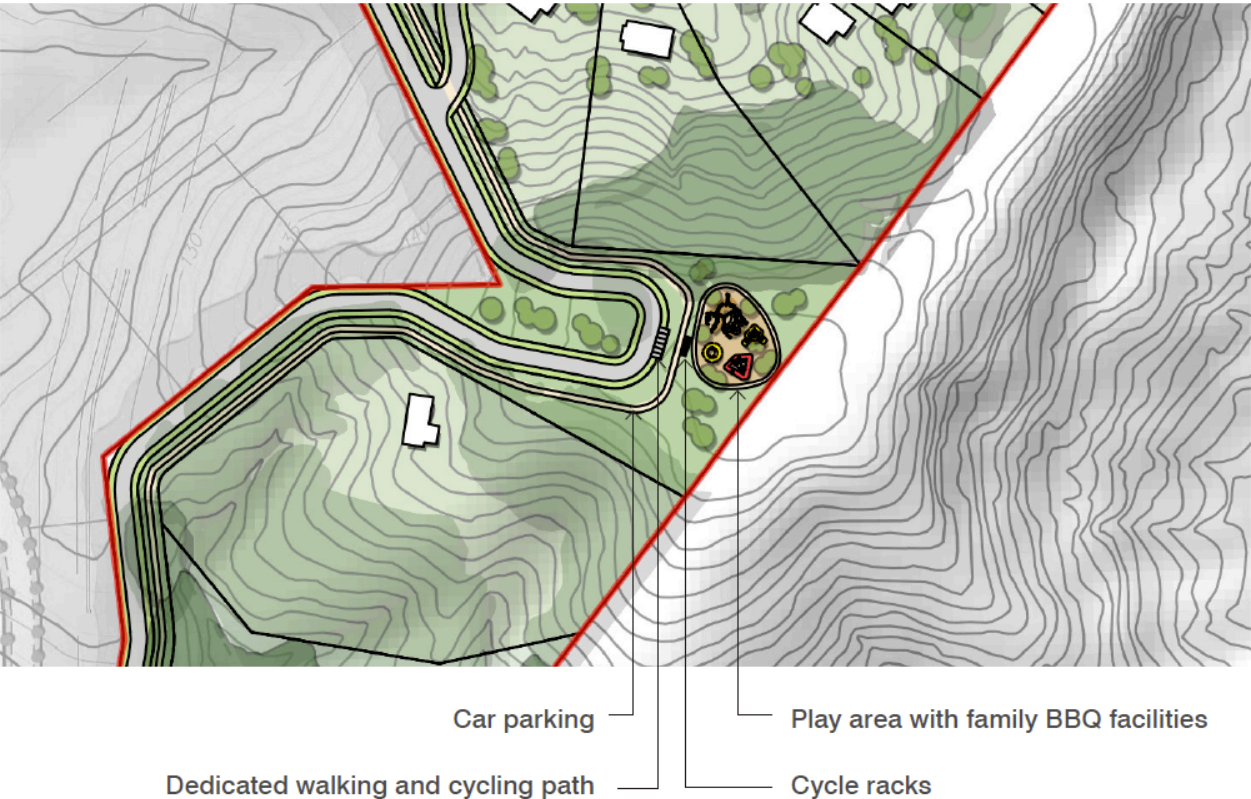


Figure 12: Open space concept plan – Lookout Park 1 (Source: Architectus)

Lookout Park 2

At the southern end of the site an elevated hilltop area will provide a great location for a local park with public play, picnic and BBQ facilities. This space enjoys long range views over the Macarthur region and beyond as far as the Sydney CBD skyline.

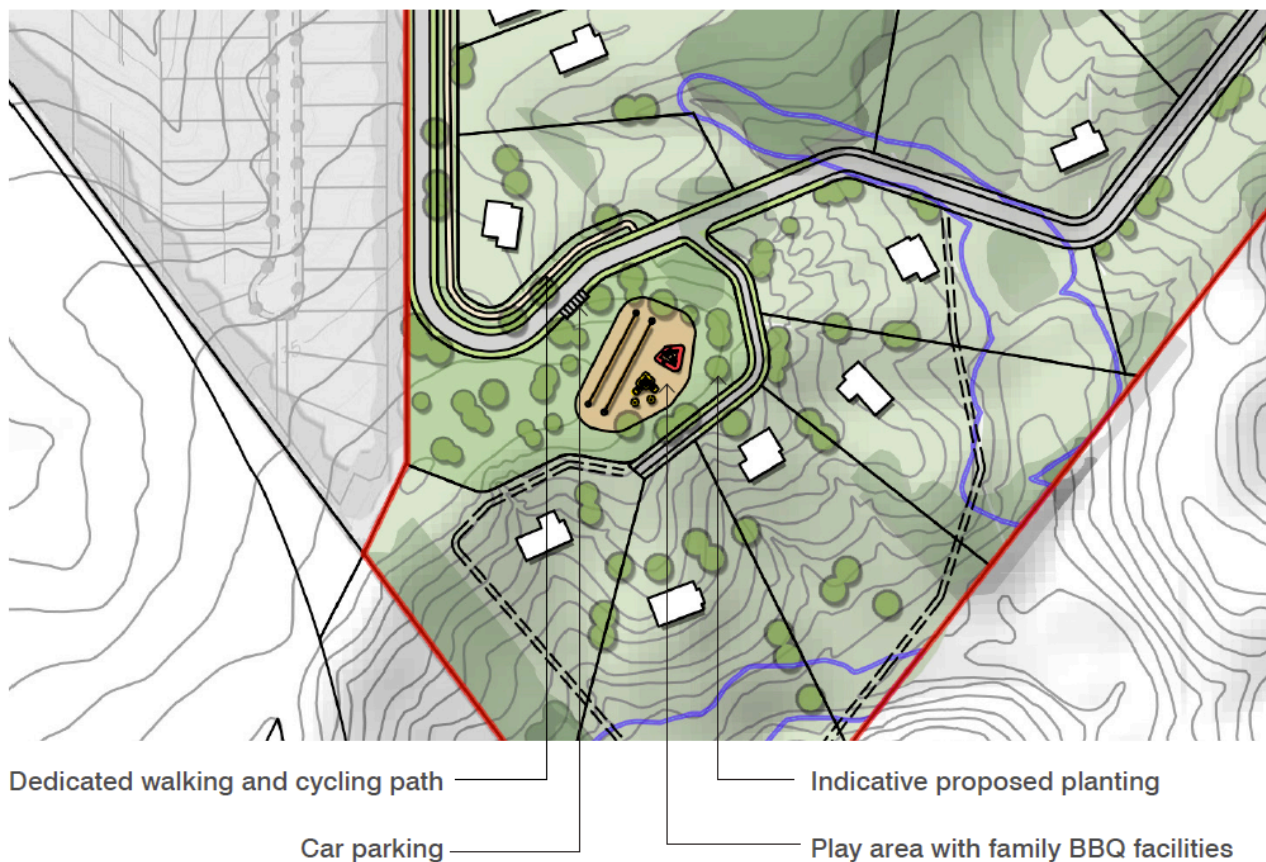


Figure 13: Open space concept plan – Lookout Park 2 (Source: Architectus)

Public linear park and riparian corridor

At the centre of the northern precinct the low point of the site offers the opportunity to provide a linear public open space as part of a vegetated riparian corridor. Existing and proposed native planting will complement a new walking/cycle path along this attractive green space.



Figure 14: Open space concept plan – linear park and riparian corridor (Source: Architectus)

5.2 Proposed LEP Amendments

To facilitate the Planning Proposal amendments are proposed to the Campbelltown LEP which would result in more than 50% percent of the site is being zoned for public recreation or environmental conservation purpose with the remainder zoned environmental living, a zone with direct objectives of preserving the Scenic Hills.

The proposed changes to the Campbelltown LEP are outlined below. Further detail is provided in Section 7 and proposed LEP maps are provided in Section 8.

- Zoning of the site as follows as shown in Figure 15:
 - E2 Environmental Protection across key areas of contiguous significant vegetation and ridgelines (total zoned area 49ha)
 - RE1 for the riparian open space and lookout parks (total zoned area 15ha)
 - E4 Environmental Living across the remainder of the site
- Minimum lot size of 5,000sqm across the site
- Inclusion of the following uses as permissible with consent over the 6ha club house lot: Function centre, Hotel or motel accommodation, and Neighbourhood shop.

Whilst a 5,000sqm minimum lot size is proposed, the average lot size would be much larger and this would be managed through the inclusion of the Indicative Master Plan and subdivision controls within the *Campbelltown Development Control Plan 2014* (Campbelltown DCP), as discussed in Section 5.3 below.

The proposal will provide increased protection of large areas of the site by rezoning them to E2 Environmental Conservation, including vegetation within future individual lots and the Hilltop Conservation Reserve. This means that individual lots would have an E2 / E3 split zoning. The E2 zone restricts development to a small range of compatible uses including: Eco-tourist facilities, Environmental facilities, Environmental protection works, Flood mitigation works, Information and education facilities, Oyster aquaculture and Roads. Accordingly, dwellings would need to be located outside the E2 zoned land. The management of the E2 zoned land has been addressed in the DCP including requirements for vegetation management plans at subdivision stage.

Consideration has been given to the appropriate zone for the areas outside the proposed E2 and RE1 zones. In doing so consideration was given to rezoning these areas to E4 Environmental Living zone or retaining the existing E3 Environmental Protection zone. An analysis of the two zones is provided in Table 6. The permissible uses are relatively similar across the two zones and both include objectives relating to the protection of the Scenic Hills. Accordingly, it is considered that either zone would be appropriate. However, the E4 zone has been proposed given it is intended to apply to low impact residential development and that the range of lot sizes which currently apply under the E4 zone are consistent with the proposed minimum lot size of 5,000sqm.

Consideration was also given to whether an alternative zone should be applied to the 6ha clubhouse lot. However the only zones in the Campbelltown LEP which allow a function centre are commercial zones, which would not be appropriate in this location because of the other uses that would be introduced. Accordingly, additional permitted uses are proposed to apply to this land.

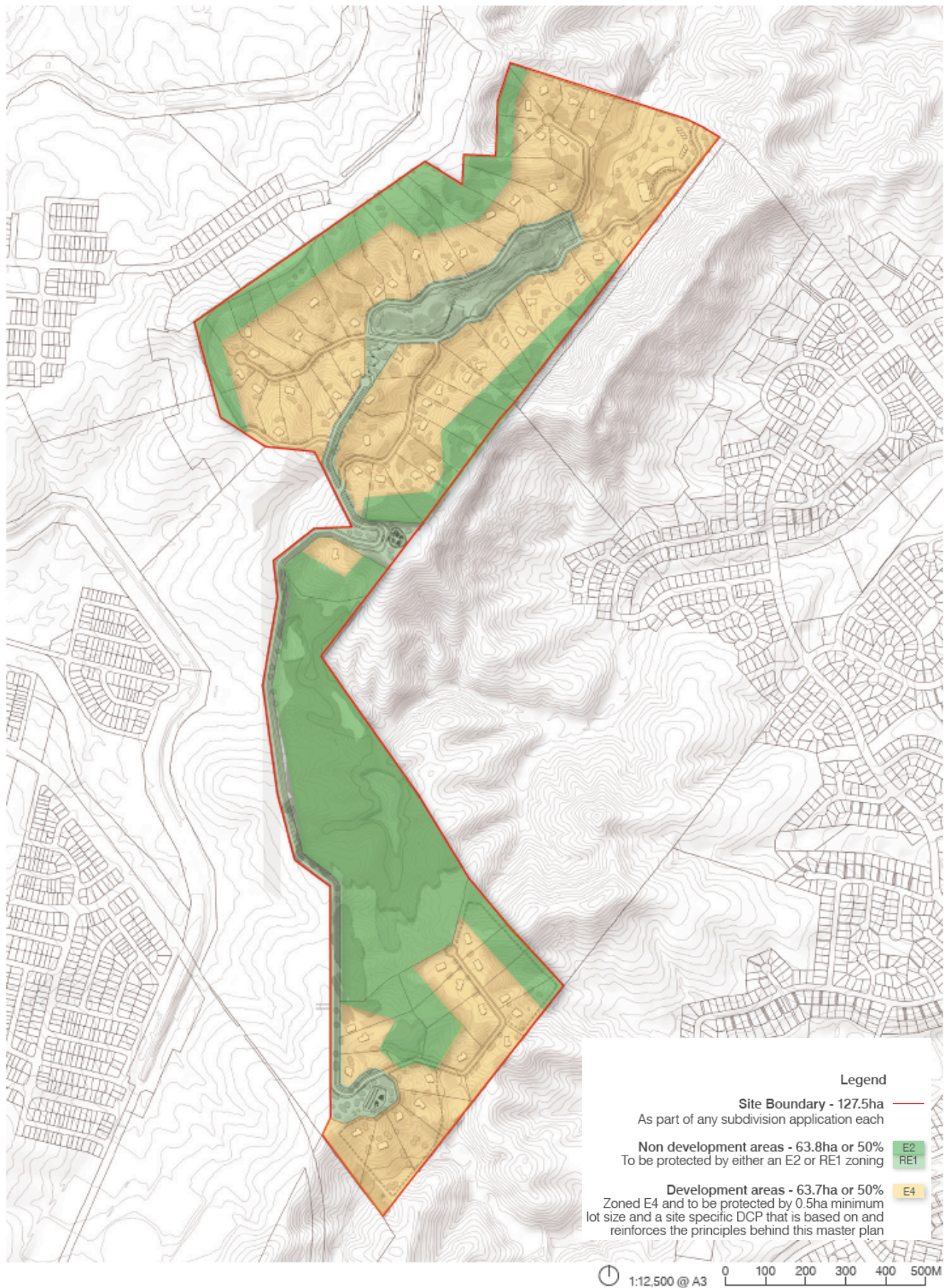


Figure 15: Proposed zones (Source: Architectus)

Table 6: Analysis of the E3 and E4 zones

	E3 Environmental Protection	E4 Environmental Managemenet
Planning Circular Description	This zone is for land where there are special ecological, scientific, cultural or aesthetic attributes or environmental hazards/processes that require careful consideration/management and for uses compatible with these values.	<p>This zone is for land with special environmental or scenic values, and accommodates low impact residential development.</p> <p>As with the E3 zone, any development is to be well located and designed so that it does not have an adverse effect on the environmental qualities of the land.</p>
Objectives	<ul style="list-style-type: none"> To protect, manage and restore areas with special ecological, scientific, cultural or aesthetic values. To provide for a limited range of development that does not have an adverse effect on those values. To enable development for purposes other than rural-residential only if that development is compatible and complementary, in terms of design, size and scale, with the character of land in the zone. To allow cellar door premises, restaurants and cafes only where they are directly associated with the agricultural use of the land. To protect, and maintain the environmental, ecological and visual amenity of, the Scenic Hills, the Wedderburn Plateau and environmentally sensitive lands in the vicinity of the Georges River from inappropriate development. To preserve the rural heritage landscape character of the Scenic Hills. To protect and enhance areas of scenic value and the visual amenity of prominent ridgelines. To protect bushland, wildlife corridors and natural habitat, including waterways and riparian lands. To ensure the preservation and maintenance of environmentally significant and environmentally sensitive land. 	<ul style="list-style-type: none"> To provide for low-impact residential development in areas with special ecological, scientific or aesthetic values. To ensure that residential development does not have an adverse effect on those values. To conserve the rural and bushland character of land that forms the scenic eastern edge of Campbelltown's urban area. To protect and enhance areas of scenic value and the visual amenity of prominent ridgelines. To maintain significant stands of native vegetation and wildlife and riparian corridors. To ensure the preservation and maintenance of environmentally significant and environmentally sensitive land.
Minimum lot size	Appears to range from 2h to 100ha	Appears to range from 4,000sqm (0.4ha) to 2h
Permissible without consent	Home occupations	Home occupations
Permissible with consent	Animal boarding or training establishments Bed and breakfast accommodation Building identification signs Business identification signs Cellar door premises	Building identification signs Business identification signs Centre-based child care facilities Community facilities Dual occupancies (attached)

E3 Environmental Protection		E4 Environmental Managemenet
	Dual occupancies (attached) Dwelling houses Educational establishments Emergency services facilities Environmental facilities Environmental protection works Extensive agriculture Farm buildings Farm stay accommodation Flood mitigation works Home-based child care Home businesses Home industries Horticulture Oyster aquaculture Places of public worship Pond-based aquaculture Recreation areas Restaurants or cafes Roads Roadside stalls Rural workers' dwellings Tank-based aquaculture Viticulture Water supply systems.	Dwelling houses Eco-tourist facilities Emergency services facilities Environmental facilities Environmental protection works Extensive agriculture Farm buildings Flood mitigation works Horticulture Home-based child care centres Home businesses Home industries Oyster aquaculture Pond-based aquaculture Recreation areas Recreation facilities (outdoor) Respite day care centres Roads Tank-based aquaculture Viticulture Water supply systems.
Prohibited	All other uses not identified as permissible with or without consent.	All other uses not identified as permissible with or without consent.

5.3 Draft Development Control Plan

Draft site specific development controls (Appendix B) have also been prepared for inclusion as a new part in Volume 2 Site Specific Development Control Plans of the *Campbelltown (Sustainable City) DCP 2015* (Campbelltown DCP). This would complement the existing Campbelltown DCP, particularly the controls which apply to rural residential development under Part 4.

The development controls require development to be generally consistent with the Indicative Master Plan and include controls relating to:

- Subdivision
- Earthworks
- Built form and design
- Landscaping
- Access and circulation
- Public open space and Hilltop Conservation Area
- Vegetation management on private land
- Riparian corridors
- Aboriginal heritage
- Bushfire management.

5.4 Public benefits

The proposal includes significant public benefits including:

- A total of 15ha of land zoned public open space including riparian open space in the southern section of the site and two lookout parks in the northern section of the site taking advantage of key vantage points within the landscape
- A 24ha Hilltop Conservation Reserve protecting the most significant area of Cumberland Plain Woodland and a further 25ha of significant vegetation protected by the E2 zone on private land
- North south walking and cycling trails of 2.5km linking open space and the conservation reserve with potential to connect to existing walking and cycling paths, wider Sydney Green Grid projects and future connections through the Scenic Hills.
- Provision for a new hotel and conference centre providing local services and significant employment opportunities

The proposal has the potential to support significant public access to parts of the Scenic Hills that are currently in private ownership, aligning with key actions of the Campbelltown LSPS .

The applicant is seeking to engage Council with regard to potential future ownership and access to proposed public open space, the Hilltop Conservation Reserve and walking and cycle paths within the site.

There is potential for this to inform a voluntary planning agreement with Council outlining arrangements for transfer of these items, and offsets arrangements against local infrastructure contribution requirements.

6 Objectives and intended outcomes

- To establish a long term management arrangement for the site to provide certainty for the community regarding the future use of the land and the ongoing protection of this part of the Scenic Hills.
- To ensure that future development within the site maintains the rural and landscape character and scenic qualities of the Scenic Hills Landscape Unit
- To ensure that future development within the site responds to the topography and the location of significant vegetation
- To provide a mix of lot sizes, ranging from 0.5ha to 2.75ha, accommodating a diverse environmental / rural residential community
- To provide potential for a range of uses on the land surrounding the golf club building including Function centre, Hotel or motel accommodation, and Neighbourhood shop
- To provide for a north-south walking and cycle link through the Site connecting to existing cycle paths, potential future trails through the Scenic Hills and wider planned Sydney Green Grid projects
- To provide riparian open space and a series of 'lookout parks' at key high points in the landscape connected by the walking and cycle path
- To establish a Hilltop Conservation Area to protect and restore major areas of contiguous significant vegetation.

7 Explanation of provisions

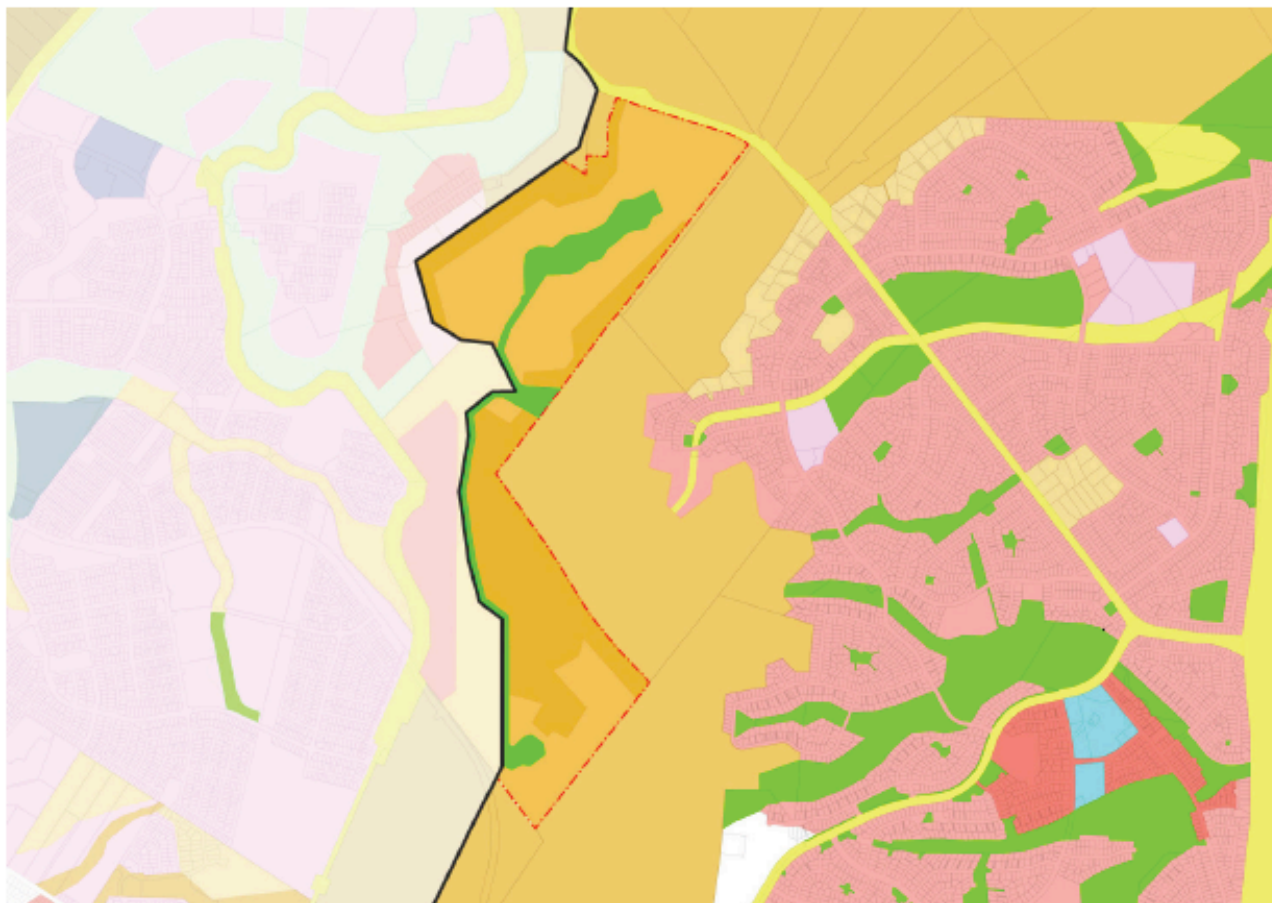
The proposed amendments to the Campbelltown LEP are outlined in Table 7 below. This will require amendments to the zoning, minimum lot size and additional permitted uses map as shown in Section 8.

Table 7: Proposed LEP Amendments

Control	Existing	Proposed
Zoning	E3 Environmental Management	<ul style="list-style-type: none"> • E2 Environmental Protection across key areas of contiguous significant vegetation and ridgelines • RE1 for the riparian open space and lookout parks • E4 Environmental Living across the remainder of the site.
Minimum lot size	100ha	<ul style="list-style-type: none"> • 5,000sqm for areas to be developed
Additional permitted uses	NA	<p>Inclusion of the following uses in Schedule 1 as permissible with consent over the 6ha club house lot:</p> <ul style="list-style-type: none"> • Function centre • Hotel or motel accommodation • Neighbourhood shop

8 Mapping

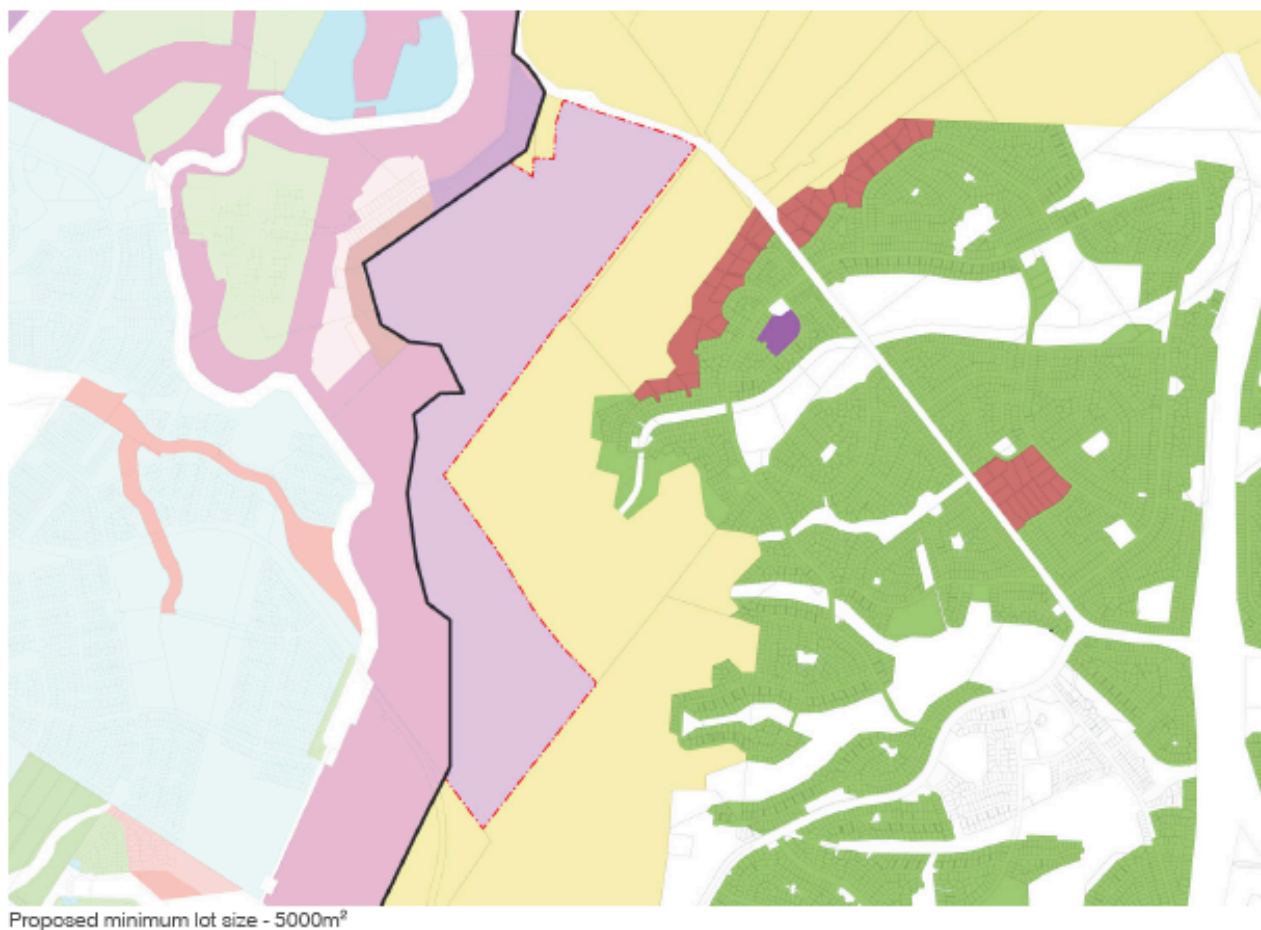
Amendments are proposed to the Campbelltown LEP zoning map and minimum lot size map as shown in Figure 16 and Figure 17 respectively.



Proposed land use zones - E2, E4 and RE1

Zone		
B1 Neighbourhood Centre	R1 General Residential	W1 Natural Waterways
B2 Local Centre	R2 Low Density Residential	W2 Recreational Waterways
B3 Commercial Core	R3 Medium Density Residential	W3 Working Waterways
B4 Mixed Use	R4 High Density Residential	UL Unzoned Land
B5 Business Development	R5 Large Lot Residential	DM Deferred matter
B6 Enterprise Corridor	RE1 Public Recreation	
B7 Business Park	RE2 Private Recreation	
E1 National Parks and Nature Reserves	RU1 Primary Production	
E2 Environmental Conservation	RU2 Rural Landscape	
E3 Environmental Management	RU3 Forestry	
E4 Environmental Living	RU4 Rural Small Holdings	
IN1 General Industrial	RU5 Village	
IN2 Light Industrial	RU6 Transition	
IN3 Heavy Industrial	SP1 Special Activities	
IN4 Working Waterfront	SP2 Infrastructure	
	SP3 Tourist	

Figure 16: Proposed Campbelltown LEP zoning map (Source: Architectus)



Minimum Lot size (sq m)			
A	0 - 199	P	675 - 699
B	200 - 249	Q	700 - 749
C	250 - 299	R	750 - 799
D	300 - 349	S	800 - 899
E	350 - 399	T	900 - 999
F	400 - 449	U	1000 - 1999
G	450 - 474	V	2000 - 2999
H	475 - 499	W	3000 - 4999
I	500 - 524	X	5000 - 9999
J	525 - 549	Y	10000 - 19999 (1 - 1.9ha)
K	550 - 574	Z	20000 - 49999 (2 - 4.9ha)
L	575 - 599	AA	50000 - 99999 (5 - 9.9ha)
M	600 - 624	AB	100000 - 499999 (10 - 49.9ha)
N	625 - 649	AC	500000 - 999999 (50 - 99.9ha)
O	650 - 674	AD	1000000 - 1999999 (100 - 199ha)
		AE	2000000 - 3999999 (200 - 399ha)
		AF	4000000 - 5999999 (400 - 599ha)
		AG	6000000 - 7999999 (600 - 799ha)
		AH	8000000 - 9999999 (800 - 999ha)
		AI	10000000+ (1000ha+)

Figure 17: Proposed Campbelltown LEP minimum lot size map (Source: Architectus)

9 Justification

9.1 Need for the planning proposal (Section A)

Q1. Is the Planning Proposal a result of any strategic study or report?

The protection of the Scenic Hills, and in particular its role as a scenic buffer between Liverpool and Campbelltown LGAs, has been a long held objective of Council and is formalised in various State and local government strategies, as outlined in Section 4, including the Greater Sydney Region Plan, Western District Plan, Campbelltown LSPS and the Campbelltown Local Planning Strategy 2014.

Of particular relevance, the Campbelltown Local Planning Strategy 2014 deals extensively with the Scenic Hills area, and includes an action to 'propose and implement a development model for the Scenic Hills'. The proposal seeks to progress the objective of protecting the visual, environmental and landscape qualities of the Scenic Hills, whilst applying a development model which will ensure its protection in perpetuity.

Q2. Is the Planning Proposal the best means of achieving the objective or intended outcomes or is there a better way?

The Planning Proposal is the best means of achieving the intended outcomes as the proposal is not currently permissible within the zone and development controls which apply to the site under the Campbelltown LEP (see Section 3 of this report). Accordingly, an amendment to the Campbelltown LEP is required to facilitate the proposal.

9.2 Relationship to the strategic planning framework (Section B)

Q3. Is the planning proposal consistent with the objectives and actions of the applicable regional or sub-regional strategy (including the Sydney Metropolitan Strategy and exhibited draft strategies)?

The Planning Proposal is consistent with the objectives and actions of the Greater Sydney Region Plan and Western District Plan as outlined in Section 4.

Q4. Is the Planning Proposal consistent with a council's local strategy or other strategic plan?

The Planning Proposal is consistent with the Campbelltown LSPS and the Campbelltown Local Planning Strategy 2014 as outlined in Section 4.

Q5. Is the Planning Proposal consistent with applicable State Environmental Planning Policies

An analysis of the consistency of the proposed amendments with relevant State Environmental Planning Policies (SEPPs) is outlined below.

9.2.1 State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55)

State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55) introduces planning controls for the remediation of contaminated land. The policy states that the planning authority must consider whether the land is contaminated, and if so that the land is suitable in its contaminated state for the permitted uses in the zone, or that the land requires remediation before the land is developed for that purpose.

A Preliminary Site Investigation was undertaken by Senversa (Appendix H) to assess the likelihood of contamination and consider whether additional assessment or remediation would be required.

Senversa considers that the site is likely to be suitable for the proposed use and that should any contamination be identified during redevelopment of the site, including the presence of asbestos in buried services, then it should be assessed in-line with relevant guidelines at that time.

9.2.2 State Environmental Planning Policy (Koala Habitat Protection) 2019

The aim of the *State Environmental Planning Policy (Koala Habitat Protection) 2019* (Koala Habitat SEPP) is to encourage the conservation and management of areas of natural vegetation that provide habitat for Koalas.

Koalas have not previously been identified on the site, however the site includes vegetation identified by the SEPP as being potential Koala habitat.

Campbelltown City Council have a Koala Plan of Management however this plan is yet to be approved under the current Koala Habitat SEPP. Depending on the timeline of the project either the previous Campbelltown Koala Plan of Management may be approved and will apply or a Koala Assessment Report will need to be prepared consistent with the Koala Habitat Protection Guide.

This matter will need to be further addressed at DA stage, however the high level of vegetation retention associated with the proposal is expected to minimise any impacts on Koala habitat.

9.2.3 State Environmental Planning Policy (BASIX) 2004

State Environmental Planning Policy (BASIX) 2004 (SEPP BASIX) requires all future residential developments to achieve mandated levels of energy and water efficiency, as well as thermal comfort. BASIX Certificates are included as part of future DAs to demonstrate compliance with SEPP BASIX requirements.

9.2.4 Greater Metropolitan Regional Environmental Plan No. 2 – Georges River Catchment

The *Greater Metropolitan Regional Environmental Plan No. 2 – Georges River Catchment* (Georges River REP) is a deemed SEPP which seeks to manage development within Georges River Catchment to ensure its environmental qualities are maintained. It sets out aims, objectives and planning principles which relate to the management of the Georges River Catchment.

Waterways on site are upper tributaries in the Georges River catchment. A Riparian Assessment has been prepared by Ecological Australia to ground truth riparian corridors within the site and identify riparian corridors that require retention and protection through the establishment of riparian buffers. The recommendations of the assessment have been incorporated in the Indicative Master Plan ensuring that the aims, objective and planning principles of the Georges River REP can be met. The Riparian Assessment is discussed further in Section 9.3.4.

Further detail on the management of stormwater and water sensitive urban design would be provide at development application stage.

Q6. Is the Planning Proposal consistent with the applicable Ministerial Directions?

The proposal is consistent with all relevant Ministerial Directions under Section 9.1 of the *Environmental Planning and Assessment Act 1979* (previously Section 117).

An assessment of the proposal against the applicable Section 9.1 directions is supplied in Table 8.

Table 8: Analysis against Ministerial Directions

Ministerial Direction	Assessment
1.1 Business and industrial zones	
1.5 Rural lands	<p>This direction applies to Planning Proposals that</p> <ul style="list-style-type: none"> will affect land within an existing or proposed rural or environment protection zone (including the alteration of any existing rural or environment protection zone boundary), or changes the existing minimum lot size on land within a rural or environment protection zone. <p>The direction sets out that Planning Proposals must:</p> <ul style="list-style-type: none"> be consistent with any applicable strategic plan, including regional and district plans endorsed by the Secretary of the Department of Planning and Environment, and any applicable local strategic planning statement consider the significance of agriculture and primary production to the State and rural communities identify and protect environmental values, including but not limited to, maintaining biodiversity, the protection of native vegetation, cultural heritage, and the importance of water resources consider the natural and physical constraints of the land, including but not limited to, topography, size, location, water availability and ground and soil conditions promote opportunities for investment in productive, diversified, innovative and sustainable rural economic activities support farmers in exercising their right to farm prioritise efforts and consider measures to minimise the fragmentation of rural land and reduce the risk of land use conflict, particularly between residential land uses and other rural land uses Consider State significant agricultural land identified in <i>State Environmental Planning Policy (Primary Production and Rural Development) 2019</i> for the purposes of ensuring ongoing viability of land Consider the social, economic and environmental interests of the community. <p>The direction also sets out that a Planning Proposal that changes the existing minimum lot size on land within a rural or environment protection zone must demonstrate that it:</p> <ul style="list-style-type: none"> is consistent with the priority of minimising rural land fragmentation and land use conflict, particularly between residential and other rural land uses will not adversely affect the operation and viability of existing and future rural land uses and related enterprises, including supporting infrastructure and facilities that are essential to rural industries or supply chains where it is for rural residential purposes: <ul style="list-style-type: none"> is appropriately located taking account of the availability of human services, utility infrastructure, transport and proximity to existing centres is necessary taking account of existing and future demand and supply of rural residential land. <p>The proposal addresses these requirements as summarised below:</p> <ul style="list-style-type: none"> The proposal is consistent with the relevant regional and district plans and the Campbelltown LSPS as set out in Section 4 The site does not have any significance in terms of agricultural and primary production, given the current use as a golf course and vacant land subject of minor and intermittent grazing. Further it does not create any land use conflict, as it is not located adjacent to any significant agricultural land uses, and is largely located

Ministerial Direction	Assessment
	<p>between existing and planned residential areas. Further, the site is not identified as State significant agricultural land</p> <ul style="list-style-type: none"> • Environmental values on the site are proposed to be protected, including biodiversity, native vegetation, cultural heritage and water resources as outlined in the relevant parts of Section 9.3 • The natural and physical constraints of the land have been considered and incorporated into the Indicative Master Plan • The proposal is for environmental / rural residential purposes. It is appropriately located within close proximity of centres and accessible to a range of services and infrastructure as outlined in Section 9.3.11. The site is also able to be serviced by utility infrastructure as outlined in Section 9.3.9. The proposal contributes to the housing diversity in the local area by providing supply of large residential lots with a range of sizes, whilst protecting the character and values of the scenic hills. <p>On the basis of the above it is considered that the proposal is consistent with this direction.</p>
2. Environment and heritage	
2.1 Environment Protection zones	<p>The direction requires that a Planning Proposal must:</p> <ul style="list-style-type: none"> • include provisions that facilitate the protection environmentally sensitive areas • not reduce the environmental protection standards for land within an environment protection zone (including by modifying the standards that apply to the land). This requirement does not apply to a change to a development standard for minimum lot size for a dwelling in accordance with Direction 1.5 Rural Lands. <p>A proposal may be inconsistent with this direction if the Secretary of DPIE (or delegate) is satisfied that it is justified by a study prepared in support of the planning proposal that gives consideration to the objectives of the direction, being to protect and conserve environmentally sensitive areas.</p> <p>Inconsistency with the direction is considered appropriate given that the proposal would retain the site within an environmental protection zones (E4/E2 rather than E3), noting that the E2 zone provides a high level of protection that the existing zone. Further, it is supported by an ecological study which demonstrates that the proposal would protect and enhance environmentally sensitive areas on the site (as discussed in Section 9.3.3).</p>
2.3 Heritage conservation	<p>This direction sets out that a planning proposal must contain provisions that facilitate the conservation of Aboriginal objects or places that are protected under the <i>National Parks and Wildlife Act 1974</i>.</p> <p>The site does not include any recorded Aboriginal heritage items. An Aboriginal Heritage Due Diligence Assessment has been prepared (Appendix G) which identified areas of high and moderate archaeological potential.</p> <p>The assessment concluded that where areas of moderate and high archaeological potential would be impacted by future development, further assessment would be required at Development Application stage in the form of an Aboriginal Cultural Heritage Assessment (ACHA), which would include Aboriginal community consultation.</p>
3. Housing, infrastructure and urban development	
3.4 Integrating land use and transport	<p>The direction requires the consideration of the principles of Integrating Land Use and Transport as outlined in key policies and guidelines.</p>

Ministerial Direction	Assessment
	The site has good accessibility to a range of services and facilities, with an appropriate level of access to transport for a rural residential style development.
4. Hazards and risks	
4.1 Acid Sulfate soils	The site is not identified in Campbelltown LEP as being subject of acid sulfate soils.
4.2 Mine subsidence and unstable land	The site is not within a Mine Subsidence District.
4.3 Flood Prone Land	The site is not identified in the Campbelltown LEP as being flood prone.
4.4 Planning for Bushfire Protection	<p>This direction applies to a planning proposal in proximity to bushfire prone land. It requires consultation with the NSW Rural Fire Service (RFS) following a Gateway decision and prior to public exhibition.</p> <p>The direction sets out requirements to ensure that bushfire hazard is appropriate managed.</p> <p>A Bushfire Assessment has been prepared to support the Planning Proposal which is discussed in Section 9.3.5. Further consultation with RFS would be undertaken following a Gateway decision and prior to public exhibition.</p>
6 Local Plan Making	
6.2 Reserving land for a public purposes	<p>A planning proposal must not create, alter or reduce existing zonings or reservations of land for public purposes without the approval of the relevant public authority and the Secretary of DPIE (or delegate).</p> <p>The proposal includes land proposed to be zoned RE1 Public Recreation. This would be subject to further discussion with Council prior to finalisation of the Planning Proposal.</p>
7. Metropolitan Planning	
7.1 Implementing the Metropolitan Plan	<p>This direction requires planning proposals to be consistent with A Plan for Growing Sydney. A Plan for Growing Sydney was superseded by the Greater Sydney Region Plan in March 2018.</p> <p>The proposal is consistent with the Greater Sydney Region Plan as outlined in Section 4.1.</p>

9.3 Environmental, social and economic impacts (Section C)

Q7. Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the proposal?

Consideration is given to potential impacts on critical habitat or threatened species, populations or ecological communities, or their habitats in Section 9.3.3.

Q8. Are there any other likely environmental effects as a result of the planning proposal and how are they proposed to be managed.

9.3.1 Visual impact

The proposal has been developed with a view to retaining the rural and landscape character of the Scenic Hill by restricting development to large environmental / rural residential lots with modest dwellings nestled into the landscape allowing the grassy paddocks and native vegetation to dominate views of the site. This will significantly minimise visual impacts from the surrounding area as well as from proposed public domain areas within the site.

A Visual Impact Assessment has been prepared which forms part of the Urban Design Report (Appendix A) which considered the visual impact of the proposal from five viewpoints which were selected based on the views identified in the 'Visual Analysis of Campbelltown's Scenic Hills and East Edge Scenic Protection Lands' report (October 2011), as well as their relative importance and likelihood to be of value to the wider landscape.

The views of the site from Sommes Place and Canadian Place within residential areas to the east, and Raby Road looking along the eastern site boundary were identified as having negligible impacts due to the site topography and existing vegetation. From these viewpoints the development would sit below the ridgeline, and would be screened by existing vegetation.

The view from Raby Road fronting the north of the site was identified as having a moderate impact noting that while the proposal does obstruct some elements of the existing view along the valley, the proposal is predominately screened by vegetation and with the low building height and wide building separation, decreases the impact of the view. It was considered that these impacts could be mitigated through future landscape planting along the boundary edge that interfaces with Raby Road, as well as the re-vegetation of the existing riparian corridor, to provide an additional level of screening to the built form and retain the landscape character.

The view from Gregory Hills Drive to the south of the site was identified as having low to moderate impact, noting that the proximity of the view to the proposal means it is apparent, however due to the existing vegetation, the topography sloping down to the southern corner, and the proposed built form keep away from the ridgeline, the distance views looking north over the Scenic Hills will not be obstructed. It was considered that these impacts could be mitigated through future landscape planting along the boundary edge that interfaces with Gregory Hills Drive to provide an additional level of screening to the built form and retain the landscape character.

It is considered that the visual impacts of the proposal would be acceptable and could be further mitigated through landscape planting. Overall, the proposal will maintain the scenic values of the site.



Existing view



Photo-montage with proposal (Note: demonstrating indicative building envelopes only)

Figure 18: Visual impact from Raby Road looking south (Source: Architectus)



Existing view



Photo-montage with proposal (Note: demonstrating indicative building envelopes only)

Figure 19: Visual impact from Gregory Hills Drive looking north (Source: Architectus)

9.3.2 Implications for the wider Scenic hills

Council's long term strategic direction is for the ongoing protection of the Scenic Hills. However, as identified in the Campbelltown Local Planning Strategy 2014, there is the need to plan for limited development in the Scenic Hills to provide for the ongoing protection of this area.

The Western District Plan also highlights that limited growth of rural-residential development could be considered where there are no adverse impacts on the amenity of the local area and the development provides incentives to maintain and enhance the environmental, social and economic values of the Metropolitan Rural Area, including the protection of scenic landscapes.

To allow for the ongoing protection of the scenic hills, a sustainable development model is required. The most appropriate model is low density rural residential development outcome that protects the scenic and rural values of the area, while allowing limited development that will not compromise these values.

The Urban Design Study (Appendix A) includes an analysis to show the effect of applying the principles to the wider Scenic Hills area.

If this model of development was applied to the total area of the Scenic Hills, there would be potential for less than 600 dwellings over 1,500 hectares. Under a 'worst case scenario' there would be one dwelling to every 2.5ha. The analysis demonstrates that such a development pattern would have minimal impact on the scenic and rural values of this area.

The development also provides the potential to enhance public access to the Scenic Hills providing the potential for a green connection between the Western Sydney Parklands to the north and the Mount Annan Gardens to the south as shown in Figure 20.

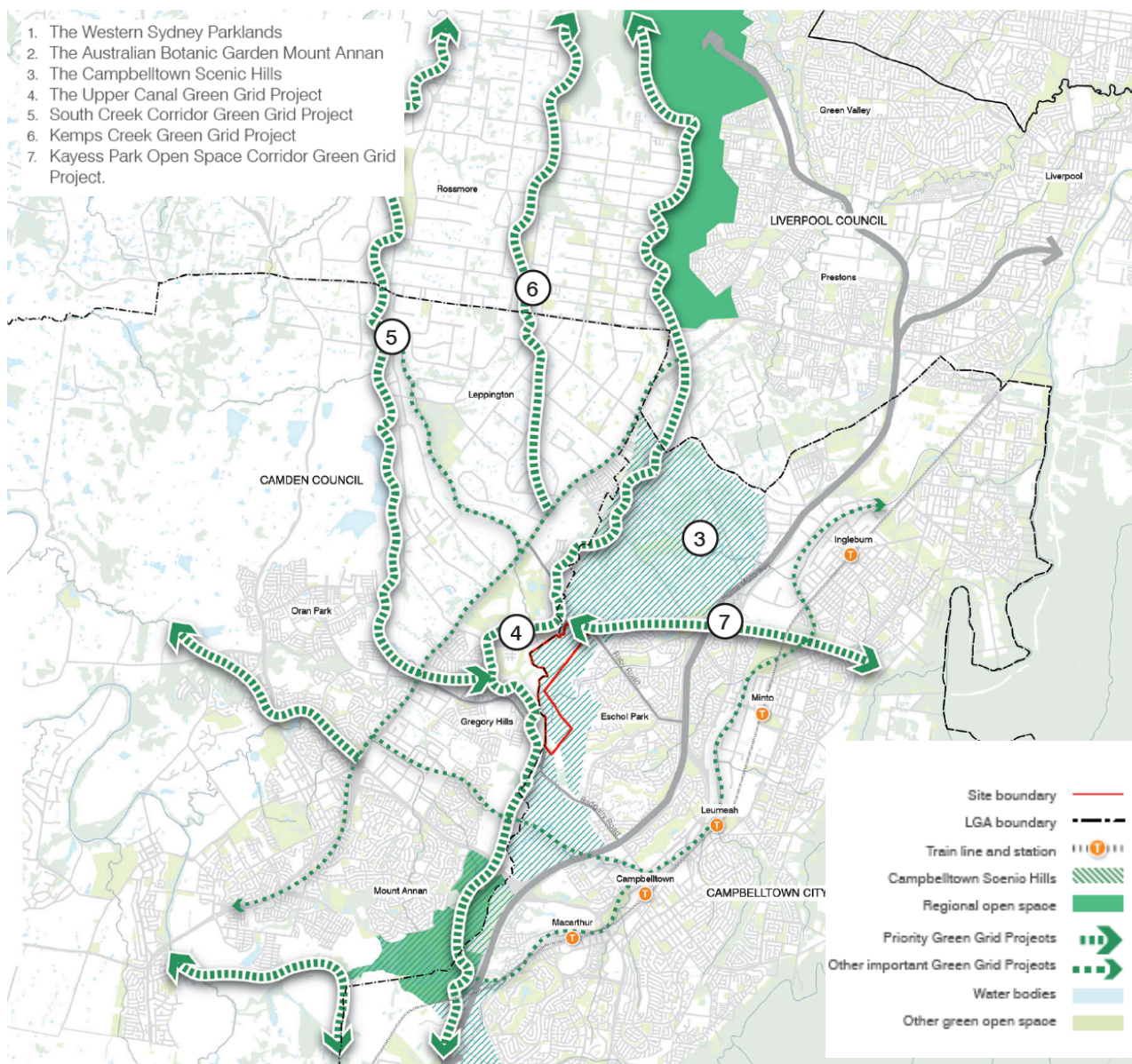


Figure 20: Strategic open space opportunities (Source: Architectus)

9.3.3 Ecological impacts

A Flora and Fauna Assessment has been prepared by Ecological Australia (Appendix C) to support the Planning Proposal.

The Assessment included targeted surveys across the site which identified a range of ecological values, including:

- Cumberland Plain Shale Woodlands and Shale Gravel Transition Forest which is critically endangered under the *Biodiversity Conservation Act 2016* (BC Act) and *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) which was identified as corresponding to Plant Community Type 850 (PCT 850) being Cumberland Plain Woodland.
- River-flat Eucalypt Forest which is endangered under the BC Act and nominated for listing under the EPBC Act, which was identified as corresponding to Plant Community Type 835 (PCT 835).

Large areas of the site were identified as cleared or exotic vegetation, along with a small area of *Phragmites australis* and *Typha orientalis* coastal freshwater wetlands of the Sydney Basin Bioregion - Artificial wetland which is not listed under the BC Act or EPBC Act.

For the Cumberland Plain Woodland, vegetation of good, moderate and poor condition was identified as well as areas of derived native shrublands and derived native grasslands. Whilst the shrublands and grasslands lack canopy trees, and in the case of grasslands lack midstorey vegetation, they are classified as Cumberland Plain Woodland and protected under the BC Act. The Cumberland Plain Woodland is largely located in the southern section of the site and along the ridgelines to the north.

River-flat Eucalypt Forest was identified as being poor quality, and is predominantly located along the riparian areas through the centre of the northern section of the site.

The vegetation types within the site are listed in Table 9 and shown at Figure 21.

The Flora and Fauna Assessment also categorised the level of constraint of each vegetation type. This is shown in Table 9 and Figure 22.

Table 9: Vegetation communities and offsetting arrangement

PCT	PCT Name	Condition	Total area (ha)	Directly impacted area (ha)	BC Act listing	EPBC Act listing	Constraint	Indicative Credits required
835	River-flat Eucalypt Forest	Poor	0.80	0.05	Yes	N/A	Moderate	1
850	Cumberland Plain Woodland	Good	0.17	0.46	Yes	Yes	Very high	16
850	Cumberland Plain Woodland	Moderate	2.06	0.03	Yes	Yes	High	1
850	Cumberland Plain Woodland	Poor	3.54	0.20	Yes	N/A	Moderate	5
850	Cumberland Plain Woodland	Derived native shrubland	14.16	1.34	Yes	N/A	Moderate	25
850	Cumberland Plain Woodland	Derived native grassland	10.28	4.76	Yes	N/A	Moderate	0
1071	Fresh Water wetlands	Moderate	0.05	0.0003	N/A	N/A	Moderate	1
		TOTAL	31.06ha	6.84ha (22%)				49

Validated Vegetation Communities (ELA 2020)

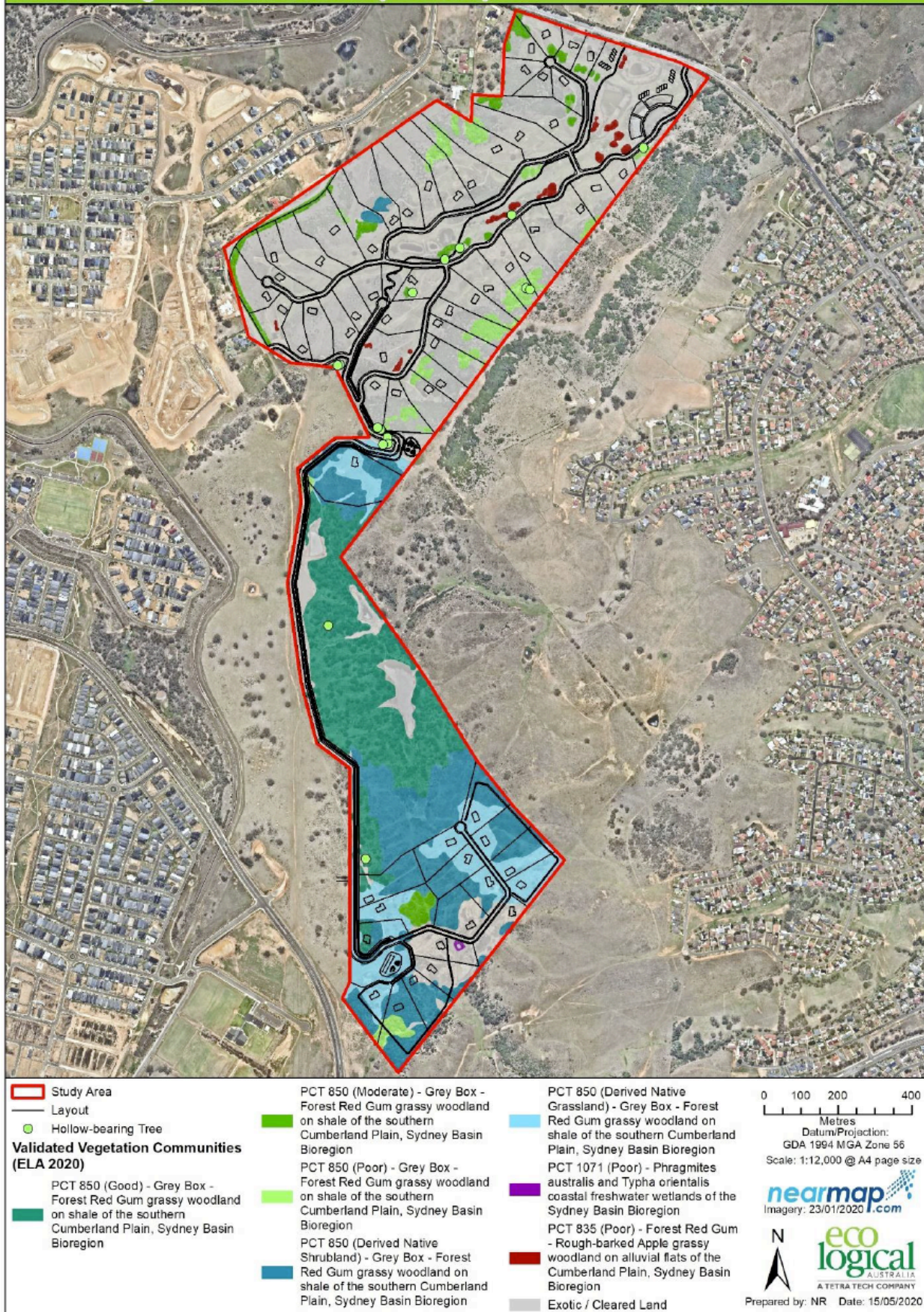


Figure 21: Validated vegetation communities (Source: Ecological Australia)

Ecological Constraints

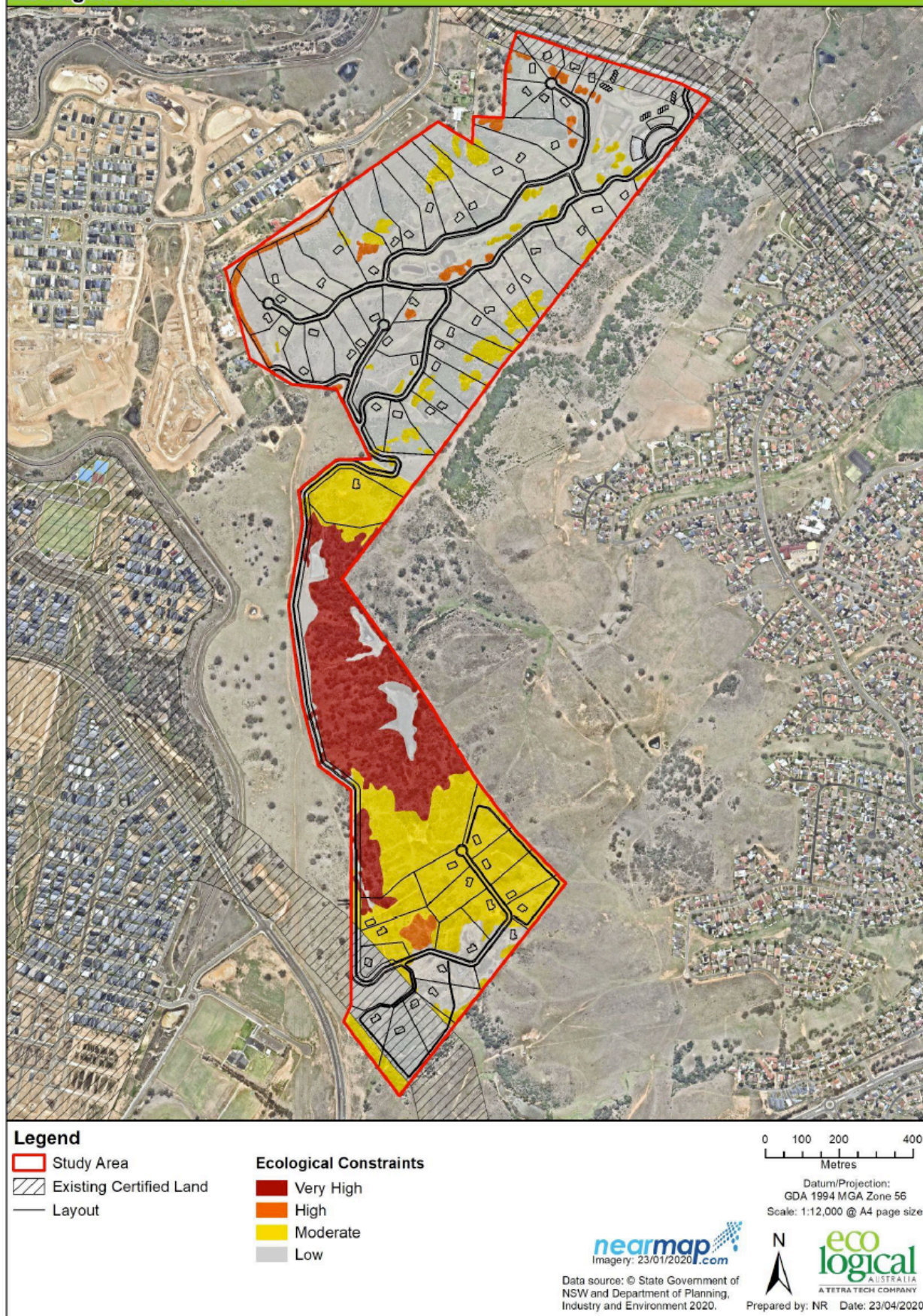


Figure 22: Vegetation constraints (Source: Ecological Australia)

The Indicative Master Plan has been developed with a view to retaining native vegetation where possible. The most significant areas of high quality Cumberland Plain Woodland have been predominantly located within the proposed Hilltop Conservation Area which would ensure their protection in perpetuity. The subdivision layout has located dwellings to avoid areas of native vegetation, with the exception of some areas of Cumberland Plain Woodland derived native grassland at the south of the site. The road layout has also sought to avoid areas of significant vegetation however some clearing would be required to accommodate future roads. The areas proposed to be cleared are outlined in Table 9, demonstrating that of the total 6.8ha of native vegetation would be cleared (22% of the total native vegetation), with the majority of this (6.1ha) being Cumberland Plain Woodland derived native grasslands or derived native shrublands.

To ensure protection of the vegetation identified for retention the following strategies have been applied:

- Application of E2 Environmental Conservation zone for areas of contiguous native vegetation including within individual lots and the Hilltop Conservation Reserve
- Inclusion of a map in the draft DCP showing all areas of vegetation to be retained and application of associated controls
- Inclusion of controls in the draft DCP requiring preparation of vegetation management plans with subdivision applications for individual lots, public open space, and the Hilltop Conservation Reserve.

The Flora and Fauna Assessment noted that the proposed rezoning and Indicative Master Plan layout has undergone several design iterations which considered the ecological values present in the study area and the potential approvals pathways for each iteration. It concluded that the development footprint presented in the proposal has used the avoid, minimise and mitigate principles to retain areas of higher ecological constraint and value and concentrated development in cleared areas.

The Assessment noted that the proposal may also result in clearing of potential threatened species habitat and that further threatened species surveys would be required at DA stage, along with preparation of a Biodiversity Development Assessment Report, Construction Environment Management Plan, and a Koala Plan of Management.

The Assessment noted that the expected impact on Cumberland Plain Woodland is unlikely to constitute a controlled action under the EPBC Act as less than 0.5ha of EPBC Act listed vegetation would be removed. However, further consideration of potential impacts on EPBC listed threatened species would be required at DA stage. Whether the proposal constitutes a controlled action would need to be determined by way of a referral to the Federal Government at DA stage.

9.3.4 Riparian impacts

A Riparian Constraints Assessment has been prepared by Ecological Australia, to confirm the current condition of waterways within the site and requirements for riparian corridors. The assessment has considered the regulatory framework of the *Water Management Act 2000* and the *Guidelines for Controlled Activities on waterfront land—Riparian corridors (2018)* published by the Natural Resources Access Regulator (NRAR).

The assessment identified 21 first-order and three second-order creeks within the site (see Figure 23), along with a number of man-made dams. The riparian vegetation was identified as highly modified within the golf course, and as predominantly native species with exotic species scattered throughout for the southern extent of the site.

The assessment concluded that the 13 first order creeks, including 12 within the highly modified golf course area, did not meet the definition of a river under *Water Management Act 2000*, as they had no defined bed and banks. Further, there were three additional creeks which had no defined bed or banks upstream of the

mapped dam. The assessment recommended that NRAR should be engaged to support the removal of these creeks, which would remove the need to address these areas as waterfront land under the *Water Management Act 2000*.

For waterways that meet the definition of a river, the NRAR Guidelines outline the need for a Vegetated Riparian Zone (VRZ) adjacent to the channel to provide a transition zone between the terrestrial environment and watercourse. The VRZ is required to be established is as follows:

- 10m on each side the creek for first-order waterways
- 20m on each side the creek for second-order waterways.

The NRAR Guidelines allow for non-riparian uses within the outer 50% of the VRZ as long as compensation (1:1 offset ratio) is achieved within the site. The inner 50% of the VRZ must be fully maintained and vegetated with native riparian species.

The Riparian Assessment included an analysis of the Indicative Planning Proposal which concluded that the proposal appropriately addresses the protection of riparian corridors and the establishment of appropriate Vegetated Riparian Zones, including through the application of the offsetting approach outlined above.

Further consultation with NRAR would be carried following a Gateway decision on the proposed approach to managing riparian corridors and to seek support for removal of creeks where appropriate.

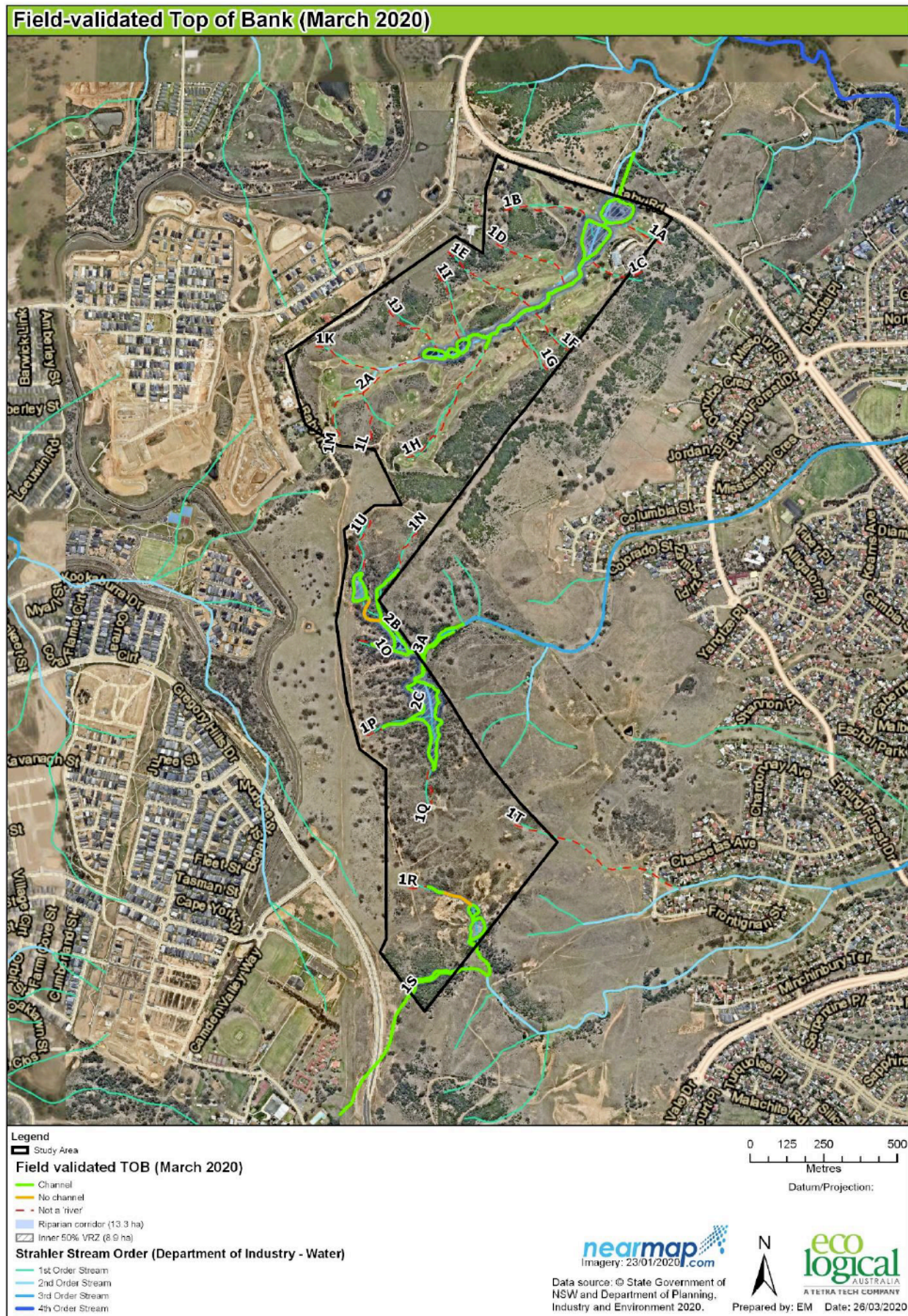


Figure 23: Riparian corridor analysis (Source: Ecological Australia)

9.3.5 Bushfire hazard

The placement of dwellings downslope from remnant vegetation has resulted in easier management conditions than would have otherwise been the case. The site has also very low population density comparable to the surrounding area.

A Bushfire Opportunities and Constraints Assessment has been prepared by Ecological Australia (Appendix E), which has considered the proposal against Planning for Bushfire Protection 2019.

The assessment identified suitable asset protection zones (APZs) from existing vegetation to be retained and areas of the site to be revegetated such as the riparian corridors. The recommended APZs vary from 12m to 25m for residential uses and from 50m adjacent to the hotel / function centre which is identified as a Special Fire Protection Purposes. The recommended APZs based on the Indicative Master Plan are shown at Figure 24 and Figure 25.

The assessment also considered access arrangement to the site in the event of a bushfire and noted that the access / egress arrangements and the design of internal roads and property access will need to be further addressed at the DA stage. In particular it noted that a secondary access / egress would be necessary. There are a number of opportunities to provide secondary access / egress to and from the site either as permanent or emergency arrangement via Badgally Road and/or Gledswood Hills Road, as shown on the Indicative Master Plan (Figure 10). This will be further considered at the DA stage.

The assessment also highlighted potential non compliances with Planning for Bushfire Protection 2019 including the absence of a perimeter road and a number of dead end roads which exceed 200m in length. The assessment notes that performance solutions may exist and would need to be negotiated with the NSW Rural Fire Service (RFS) through a Bush Fire Design Brief. The road layout is indicative only and room for variation exists at a more detailed planning stage.

Consultation will be carried out with RFS following a Gateway decision, with the objective of identifying an appropriate bushfire access solution which provides safe access to the site without the need to provide an excessive road network requiring extensive earthworks and being potentially incompatible with the rural and landscape character of the Scenic Hills.

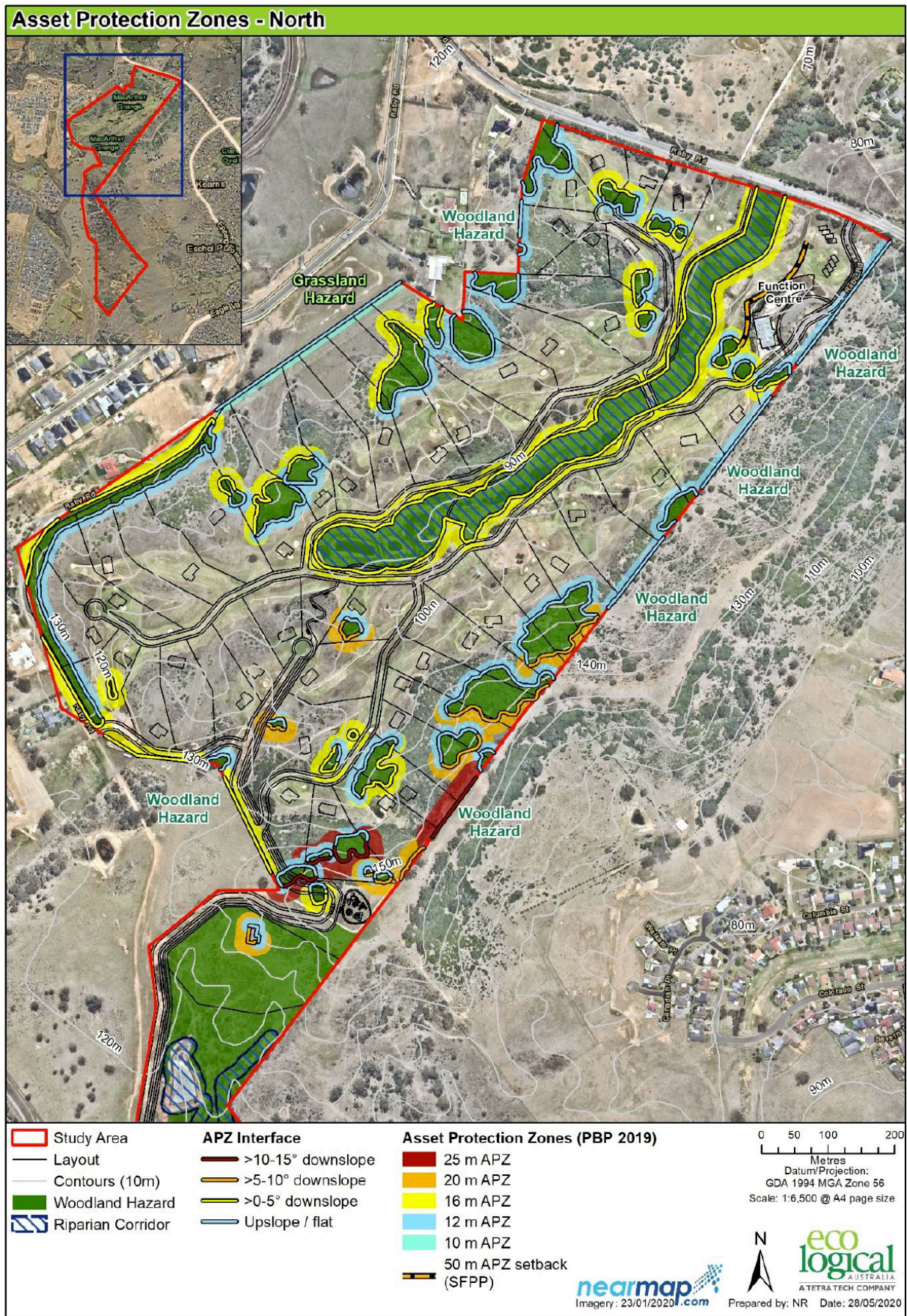


Figure 24: Bushfire asset protection zones – north (Source: Ecological Australia)

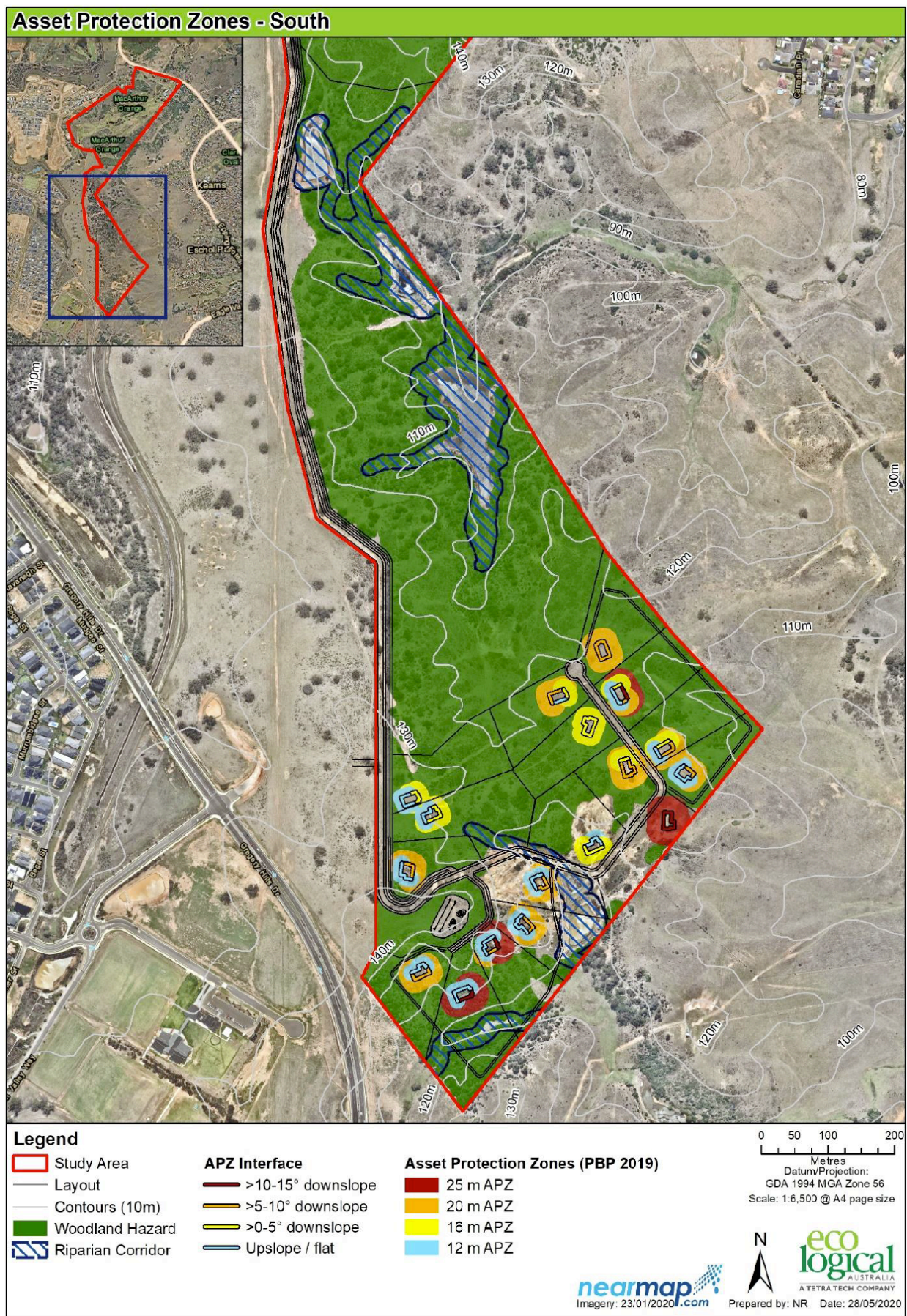


Figure 25: Bushfire asset protection zones – south (Source: Ecological Australia)

9.3.6 Traffic and transport

A Traffic Impact Assessment has been prepared by The Transport Planning Partnership (Appendix F).

The assessment notes that the existing access to the site is via Raby Road at the existing access to the golf course, and that there is potential for a future site access to Gregory Hills Drive / Badgally Road intersection, opposite Donovan Boulevard, subject to approval from the adjacent landowner. There is also potential for emergency vehicle access via a service road off Gledswood Hill Drive.

The Traffic Impact Assessment has assumed the following development on the site for the purposes of carrying out an assessment of the traffic impacts:

- 63 environmental living lots
- 25ha of regional open space
- Redevelopment of the club house area, comprising 100 room resort, function centre (300 capacity) and 10 room day spa.

The traffic impact assessment concluded the following in relation to the capacity of the surrounding road network:

- The proposed development could be expected to generate additional 65 trips and 175 trips in the AM and PM peak hour, respectively.
- Raby Road/Macarthur Grange site access intersection is currently performing near or at capacity with level of service “D” to “F” during the morning and afternoon peak periods.
- This is mainly due to the difficulty experienced by the right turning movement from the site access.
- It is recommended to upgrade this intersection to provide a two-stage right turn treatment, similar to the arrangement provided as Raby Road/Gledswood Hill Drive intersection.
- Under the proposed right turn treatment option, intersection results would improve significantly, that is from level of service “F” to “B”, reducing the average delay for the right turn movement from site access to less than 25 seconds.
- Overall, there would be no adverse traffic implications resulting from the proposed development, provided that the right turn treatment is provided at Raby Road/Macarthur Grange site access intersection.

Future development on the site would comply with the car parking rates under the Campbelltown DCP, to be demonstrated at the Development Application stage. Following the approval of the Planning Proposal, a separate detailed Development Application will be submitted to Council for approval, which will confirm the exact development yields, vehicle access, and parking provision and layout.

9.3.7 Aboriginal heritage

An Aboriginal Heritage Due Diligence Assessment has been prepared by Ecological Australia (Appendix G). A search of the Aboriginal Heritage Information Management System was conducted which highlighted that no Aboriginal sites have previously been recorded in the study area. Based on a site inspection, desktop research and mapping of the site, the assessment identified several areas of high and moderate archaeological potential, predominantly located in the southern half of the site (Figure 26).

The assessment concluded that where areas of moderate and high archaeological potential would be impacted by future development, further assessment would be required at Development Application stage in the form of an Aboriginal Cultural Heritage Assessment (ACHA), which would include Aboriginal community consultation. The ACHA would be used to support a future Aboriginal Heritage Impact Permit application if Aboriginal sites cannot be avoided.

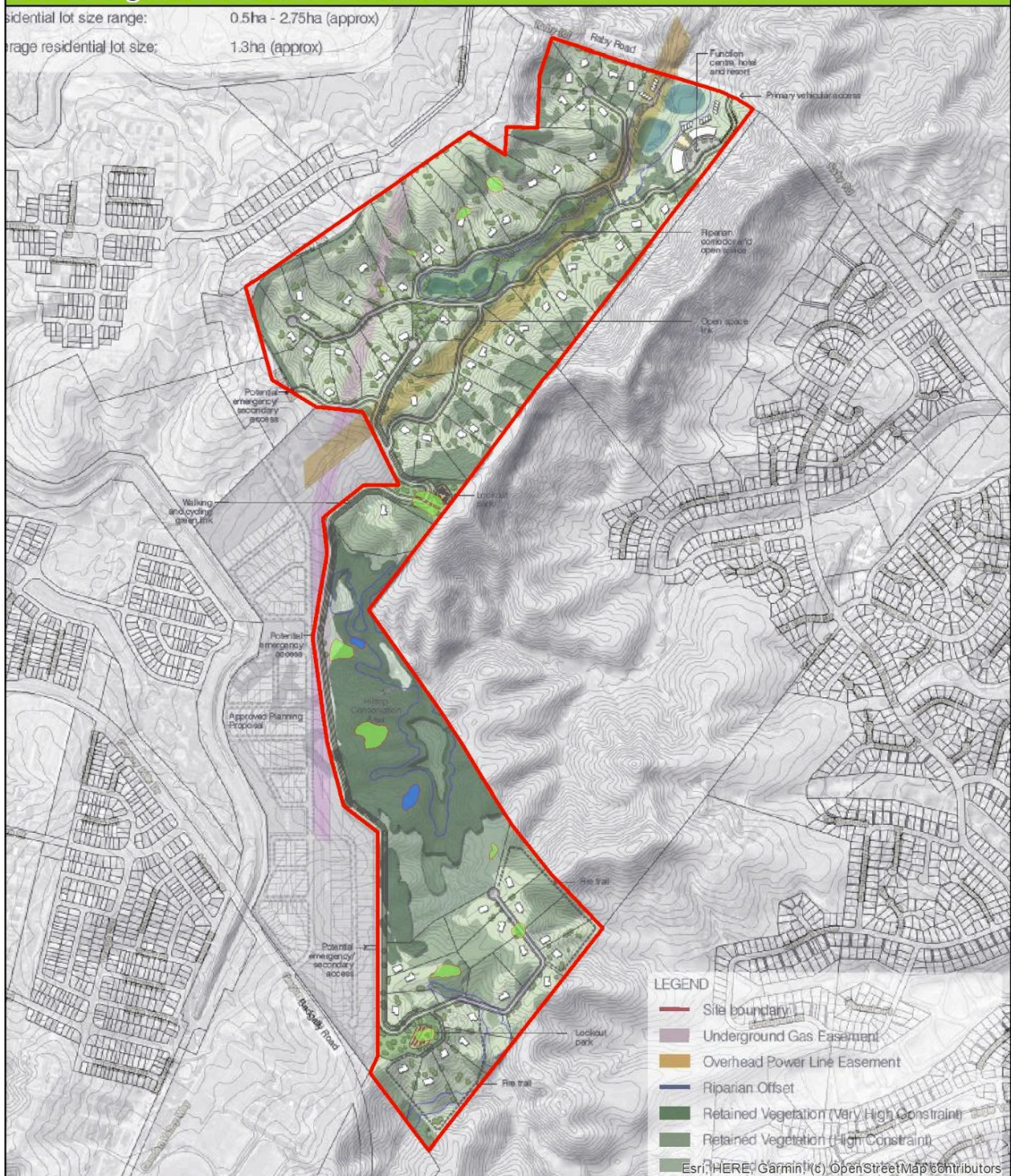
The assessment also recommended that areas possessing archaeological potential should be considered for conservation where possible, and that an Aboriginal heritage management plan should be developed for the long-term management for the conservation areas.

The two areas of high archaeological potential are located within the proposed Hilltop Conservation Area and therefore would be unlikely to be impacted. Where areas of moderate archaeological potential are impacted an ACHA would be prepared at development application stage.

Archaeological Potential - Master Plan

Residential lot size range: 0.5ha - 2.75ha (approx)

Average residential lot size: 1.3ha (approx)



Legend

 Study Area

Archaeological Potential

High

Moderate

LEGEND

- Site boundary
- Underground Gas Easement
- Overhead Power Line Easement
- Riparian Offset
- Retained Vegetation (Very High Constraint)
- Retained Vegetation (High Constraint)
- Esri, HERE, Garmin, (c) OpenStreetMap contributors

0 120 240 480
Metres

Datum/Projection:
GDA 1994 MGA Zone 56



eco
logical
AUSTRALIA
A TETRA TECH COMPANY

Prepared by: DC Date: 06-May-20

Figure 26: Archaeological potential (Source: Ecological Australia)

9.3.8 Contamination

A Preliminary Site Investigation was undertaken by Senversa (Appendix H) to assess the likelihood of contamination and consider whether additional assessment or remediation would be required. The assessment concluded the following based on the review of the available information and the site inspection:

- The site appears to have been vacant prior to its current use as a golf course from the mid to late 1990s. The remainder of the site has remained vacant with the exception of occasional cattle grazing.
- Minor quantities of chemicals and fuels were observed in isolated locations at the site, including the club house and maintenance shed, however the potential risk of serious contamination if considered to be low and acceptable.
- It is possible that groundwater under the site has some level of nutrient impact from irrigation and the application fertiliser.
- It is also possible that areas of land may have been historically filled, and may contain contamination such as asbestos.

Senversa considers that the site is likely to be suitable for the proposed use. However, considering the size of the site and the difficulty in inspecting certain areas and beneath existing buildings, there remains the potential that isolated and minor contamination may be present. Should contamination be identified during redevelopment of the site, including the presence of asbestos in buried services, then it should be assessed in-line with relevant guidelines at that time.

9.3.9 Utility infrastructure

A Servicing and Infrastructure Report has been prepared by Craig and Rhodes (Appendix I) to consider the capacity of surrounding infrastructure to service the site, and the implications of services easements through the site.

The report highlighted significant utilities that traverse the site as shown at

- Three high pressure gas pipelines that transect the western portion of the Site
- Transgrid's 132kV overhead transmission cables within a 60-metre-wide easement that transect the centre of the Site
- Endeavour Energy's 66KV overhead transmission cable that transects the southern boundary of the Site
- Telstra network cables to the north of the Site.

The Report concluded that there is existing or planned bulk capacity in utility services for the intended development and that to service the development the following works will be required:

- Extension of the water networks from Gregory Hills Drive in the south and Gledswood Hills Drive in the north, and possible in-line booster stations to service the higher parts of the site (subject to modelling) after the Currans Hill reservoir has been delivered
- Extension and amplification of the wastewater networks from the west, pending assessment of the capacity of those networks (subject to modelling)
- Electrical power from the future upgraded capacity of the South Leppington Zone Substation
- Application with the National Broadband Network for lead-in telecommunications infrastructure
- Extension of the natural gas main from the Corner of Epping Forest Drive and Elbe Place.

The Report also noted that for the high pressure gas pipelines that traverse the site the requirements of the operator would need to be complied with at DA stage no construction of buildings or structures or planting

of vegetation within the easement, maintenance of a clear line of site must be along the easement, and no construction of physical barriers along the easement. It is considered that these matters can be addressed at DA stage.

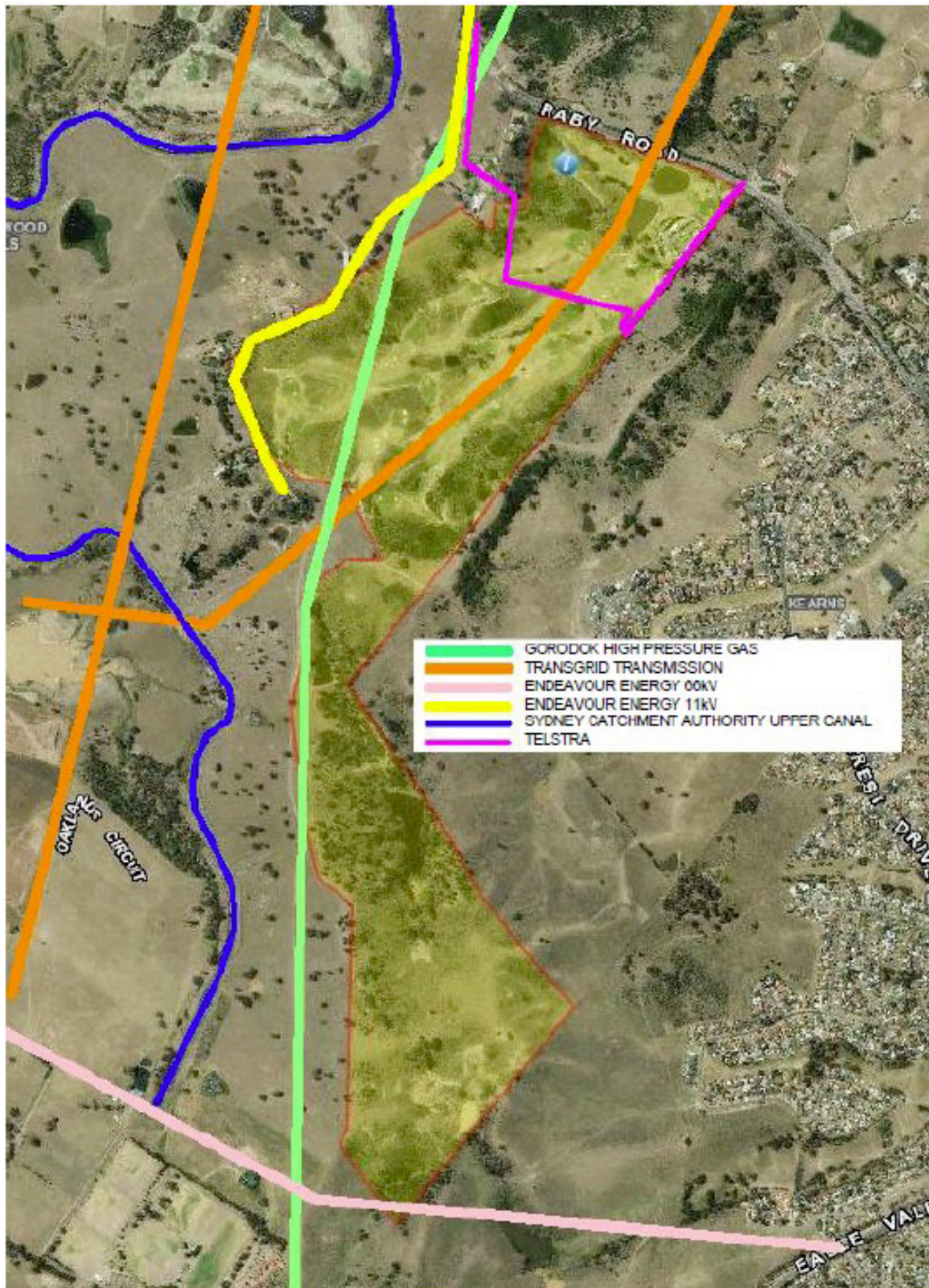


Figure 27: Existing utilities and easements (Source: Craig and Rhodes)

Q9. *Has the Planning Proposal adequately addressed any social or economic effects?*

9.3.10 Economic impact

The proposal is not expected to generate any significant economic impacts. There will be economic benefits associated with construction work within the short term and with a small number of jobs associated with a commercial use of the golf club site.

9.3.11 Social impact / social infrastructure

Q10. *Is there adequate social infrastructure for the Planning Proposal*

The proposal is not expected to generate any significant social impacts. The site is well located in close proximity of local services and facilities including local primary schools in nearby Kearns (2km) and Gledswood Hills (3km), a local centre at Kearns and a town centre at Gregory Hills (5km). A local centre is also planned at Gledswood Hills adjacent to the school. District and regional facilities are accessible in Campbelltown centre (8km), which along with Leumeah Station (7km) provides access to the rail network via the T8 Airport and South line.

10 Consultation

10.1 Campbelltown Council

In preparing the Planning Proposal extensive consultation has been undertaken with Campbelltown Council, with the master plan going through a number of iterations in response to issues raised by Council. The key consultation stages and outcomes are as outlined in

Table 10: Consultation with Campbelltown Council

Date	Consultation / key comments
17 May 2019	<p>Meeting held with Council staff to present a preliminary proposal for an environmental living development. Council's advice included:</p> <ul style="list-style-type: none"> • The proposal has a long history but that there needs to be a sustainable strategic solution for the scenic hills area • Council recognised that there was little of this type of land use available in the locality and that while not contributing to overall dwelling numbers there may be a place for a greater diversity of lot types/sizes • Council advised that they would be interested in further analysis as to what this approach would mean for the wider Scenic Hills area • Council also indicated that further work would be required to explore potential public benefit of pedestrian, cycle "green grid connections" • Council advised that it would be appropriate to work towards a joint briefing of Council once they had achieved a level of comfort with the proposal.
16 July 2019	<p>A Preliminary Strategic Planning Analysis and Urban Design Study were submitted to Council for consideration.</p> <p>This included a draft masterplan comprising a rural living concept including 69 environmental rural living lots ranging from 1ha to 3.7ha and an 8ha lot fronting Raby Road for recreation, entertainment, and community uses including the existing club house.</p> <p>In response to Council's request, the Urban Design Report also gave consideration to how the proposed approach could be applied to the wider Scenic Hills area, through preparation of a high level constraints analysis.</p>
18 October 2019	<p>A meeting was held on-site with Council staff to discuss the proposal. Council indicated a support for the proposal but noted the need for consideration of opportunities for open space within the development and for pedestrian and cycle access through the site.</p>
26 November 2019	<p>An updated Urban Design Study was submitted to Council including an updated draft Master Plan which reduced the potential development yield to 60 residential lots, and identified 8 hectares of public open space within three lookout parks and 17ha as a conservation area connected by pedestrian and cycle paths.</p>
2 March 2020	<p>A letter was sent to Council advising of the intention to prepare a Planning Proposal and outlining the proposed scope of planning studies.</p> <p>A formal response was not received although Council verbally indicated that it was supportive of the scope and Council flooding specialist advised that a flood study would not be required for the Planning Proposal.</p>

10.2 State Government agencies and service providers

Q11. What are the views of the State and Commonwealth public authorities consulted in accordance with the Gateway determination

Consultation would be carried out with relevant State and Commonwealth public authorities following a Gateway decision.

10.3 Adjoining landowners

Consultation has been carried out with the landowner of the site located to the south west of the site (190 Raby Road, Gledswood Hills) which was rezoned in December 2019 for a mix of environmental living lots adjacent to the site with low density residential lots beyond.

The landowner was supportive of the proposal, including the proposed access point from the site through 190 Raby Road to the existing intersection at Badgally Road. The potential to share road access along the Boundary of the site was also noted.

11 Project timeline

An indicative timeline is set out in Table 11 below.

Table 11: Project timeline

Planning proposal stage	Date
Lodgement for Planning Proposal for Gateway decision	June 2020
Campbelltown Council considers Planning Proposal	July 2020
Campbelltown Council refers Planning Proposal to Department of Planning and Environment for a Gateway Decision	August 2020
Issue of Gateway Determination	September 2020
Lodgement of updated Planning Proposal	September 2020
Exhibition of Planning Proposal	October 2020
Campbelltown Council reviews submissions	November 2020
Campbelltown Council endorses Planning Proposal	February 2021
Drafting of instrument and finalisation of mapping	March 2021
Amendment to Campbelltown LEP	March 2021

12 Conclusion

The Planning Proposal seeks to progress an environmental / rural residential concept for the site comprising approximately 63 environmental living lots ranging from 0.5ha to 2.75 (average lot size 1.3ha) and a 6ha lot fronting Raby Road for a hotel / function centre including the existing club house. The proposal is characterised by a rural landscape character, retained natural vegetation and scattered buildings that are nestled in the landscape which is consistent with the core values of the Scenic Hills. This effectively provides for a “green belt” between the urban areas to the east and west.

The proposal also includes two lookout parks and riparian open space (totally 9ha) and a Hilltop Conservation Area (24ha) connected by a green grid of walking / cycle trails. The proposal presents an opportunity to provide public access to a part of the Scenic Hills which is currently entirely privatised. The Hilltop Conservation Area seeks to protect the most significant areas of Cumberland Plain Woodland.

To facilitate the Planning Proposal amendments are proposed to the Campbelltown LEP which would result in more than 50% percent of the site is being zoned for public recreation or environmental conservation purpose with the remainder zoned environmental living, a zone with direct objectives of preserving the Scenic Hills.

The Planning Proposal is entirely consistent with Council’s vision for the Scenic Hill’s including the assessment criteria proposed in Council’s draft amendment to the Campbelltown LEP. The Planning Proposal will deliver an enhanced biodiversity outcome through the long term protection of significant vegetation and key riparian corridors, and apply a development model to the Scenic Hills securing the long term protection of the landscape and rural qualities of the site.