

Draft Western District Plan

Submission_id: 31296

Date of Lodgment: 14 Dec 2017

Origin of Submission: Online

Organisation name: HDC Planning

Organisation type: Industry

First name: David

Last name: Haskew

Suburb: 2780

Submission content: Submission lodged by upload.

Number of attachments: 1

Submission form - Draft Western City District Plan

Please enter your submission under the Planning priorities for the Draft Western City District Plan

First Name: David

Last Name: Haskew

Email: [REDACTED]

Postcode: 2780

Organisation: HDC Planning

General Comments

We are engaged by Toscu Investments P/L which is the owner of a large property on Raby Road, Kearns, in the Campbelltown Local Government. The site is formally described as Lot 3900 DP 1170905. It is 129 ha in area and is zoned E3 – Environmental Management under Campbelltown Local Environmental Plan 2015 (CLEP 2015). The site is currently used as an 18 hole championship par 70 links style golf course with associated restaurant and function rooms plus surplus land utilised for grazing cattle.

The land is identified by Council as part of its scenic land. The land appears to also be part of an area identified in the *Draft Western City District Plan* by the Greater Sydney Commission as Scenic Hills. Planning Priority W16 of the Draft Plan provides for 'Protecting and enhancing scenic and cultural landscapes'. Associated actions (72) and (73) in the Draft Plan assigns responsibility to Councils, other planning authorities and state agencies to enhance and protect views of scenic and cultural landscapes from the public realm.

We support Actions 72 and 73 in general terms. However with specific reference to 'identification' of "scenic and cultural landscapes, specifically the Scenic Hills" (Action 72), we argue in support of an evidence led investigation process. Further, we argue that scenic and cultural landscapes ought to be defined by their visibility and scenic quality and not by historic cadastral boundaries.

We reference within this submission substantial and significant studies which have previously been undertaken by qualified planning consultants which demonstrate that not all parts of the site contribute equally to valuable scenic and cultural landscapes.

Sustainability

Planning Priority W16: Protecting and enhancing scenic and cultural landscapes

Of relevance to this submission Planning Priority W16 makes specific mention of “the Scenic Hills between Campbelltown and Camden as an “other scenic landscape within the Western City District Plan”. Ridgelines are described as being “highly valued elements of scenic landscapes, and development should not diminish their scenic quality”. Maintaining or creating visas to and from the Scenic Hills from the priority growth areas is identified as a desirable possible outcome.

We support each of these Planning Priorities.

Associated Action 72 requires “Identify and protect scenic and cultural landscapes, specifically the Scenic Hills and the escarpments of the Blue Mountains”.

Preservation of scenic and cultural landscapes is presently achieved via zoning under CLEP 2015. Specifically, the Scenic Hills are zoned E3 – Environmental Management. The extent of the E3 zone is not informed by elevation, topographic analysis or visual catchment, but rather by historic cadastral boundaries.

In our view, this is both a crude and poor methodology by which to identify scenic landscapes. We also submit that the selected zoning of E3 delivers insufficient certainty that development which is permissible within the zone, will not diminish the scenic quality of the Scenic Hills.

Permissible with consent within the E3 zone are a range of land uses which can attract potentially large buildings, including Dual occupancies (attached); Educational establishments; Places of public worship; and Restaurants or cafes. The zone objectives assist in ensuring development does not derogate from scenic quality however rather than a situation of development prohibition on or near ridgelines, the current method of protecting scenic landscapes is open to merit based argument and visual catchment analysis as part of the Development Application process under Part 4 of the Act.

We submit that a superior approach, where resources and funding allow, is to pursue a finer grain analysis in identifying scenic landscapes and then removing entirely, the potential for their disruption from development by applying an E2 – Environmental Conservation zoning to land which contributes to high scenic value.

Low or nil scenic quality land which by historical happenstance, is within the same cadastral boundary as other high scenic quality land can then be made available for appropriate development under a less restrictive zoning than the present E3 zone.

In essence, the approach we recommend in servitude of Actions 72 and 73 is to tighten existing development restrictions on land which is actually scenically significant and relax development restrictions on other land which is not scenically significant.

The site has been the subject of extensive visual catchment and scenic quality analysis, with that work undertaken by reputable and qualified consultants within the last 3 years.

Using that work as a case study, it is our view that the most practical method of ensuring accurate and effective identification and preservation of scenic landscapes within the Scenic Hills is to develop Guidelines to assist both Council and land owners in following a robust and evidence led process whereby scenically significant land is identified through good planning processes, rather than on historic cadastral boundaries.

Signed,

A handwritten signature in blue ink, appearing to read "David Haskew".

David Haskew
Senior Partner

14 December, 2017