27 April 2021



Councillor George Brticevic

Mayor of Campbelltown City Council

CAMPBELLTOWN RSL PLANNING PROPOSAL - 158 TO 168 QUEEN STREET, CAMPBELLTOWN

This letter and supporting studies seek to address all the items listed in the Gateway dated 29 January 2019 as detailed in the table below.

Gateway Item	Comments and additional information provided		
1. Prior to public exhibition, Council is to amend the planning proposal as follows:			
a. under the Introduction section of the proposal, identify the number of additional dwellings, jobs and commercial floor space generate by the proposal.	The existing Club will maintain its employment base of 60 employees. The Motel is anticipated to generate 40 full time employees and an additional 20 contract staff for ongoing services such as plumbing, maintenance, laundry, etc. The site will also see the introduction of commercial and retail floor space of approximately 2635m ² NLA. This floor space will also generate significant employment opportunities on the site. The number of additional dwellings is approximately 438.		
b. under Part 2 – Explanation of Provisions, include the follow	ing:		
i. amend the proposed building height for the site based on the findings of any additional studies.	The proposed building height is 85m. See below discussion relating to both maximum building height and floor space ratio.		
ii. apply a maximum floor space ratio (FSR) control to the site based on the findings of any additional studies.	There are currently no FSR controls as mapped within Campbelltown City Centre within the Campbelltown LEP and it is requested the amendments to the LEP introduce a site specific clause relating to FSR for this land. Nonetheless, a break down of the proposed indicative FSR is provided in Attachment A.		



In this case, the overall site FSR is proposed to be 6.2:10. Broken down into 3.2:1 for the RSL site and 7:1 for the mixed use site, as depicted in Attachment A.

Again, the preferred response to application of an FSR control is through a site specific clause as this is the only site within the Campbelltown CBD which would be the subject of an FSR control. A site specific clause in the LEP is the most appropriate place to provide such controls for the subject land.

Establishing the correct density and maximum building height that relates to this land has been an iterative process beginning with detailed consideration of the environmental constraints that relate to the land, consideration of traffic and access matters, urban design testing and the comparison of other strategic centres.

In terms of consideration of the relevant environmental constraints the case for additional density on this site has been clearly articulated with reference to urban design testing, concept building massing modelling, overshadow impact analysis, wind impact assessment and acoustic assessment. Detailed analysis of all the relevant environmental constraints has revealed that the proposed densities included in this planning proposal are entirely appropriate.

Next comes the consideration of public transport accessibility and traffic impact analysis. As demonstrated by the traffic and access study submitted with this planning proposal, the proposed density is again found to be of little to no consequence in terms of traffic impact. This again demonstrates the proposed density is entirely appropriate for this site.

The final consideration compares the proposed densities with other similar centres across Sydney and within the Western Parkland City. Desktop analysis



of the role of Campbelltown as a strategic
centre reveals the proposed density as
presented in this planning proposal is
aligned with other similar centres within
the Western Parkland City and Western
Sydney.

The Western City District Plan identifies Penrith as a "Metropolitan Cluster" where are Blacktown CBD is identified as a lower order strategic centre. The maximum permitted floor space ratio controls under the Blacktown LEP 2015 which shows that in gateway locations within Blacktown, to land that is not dissimilar to the subject site, densities are permitted well over and above the proposed density for this planning proposal.

The proposed floor space ratio and maximum building height for this site is directly relatable to the densities within the Blacktown CBD, where key sites in gateway locations have a permitted FSR of up to 7.5:1 and on gateway sites that are within walking distance of the Blacktown train station, these FSRs elevate up to 8.5:1 which is very much aligned with the proposed FSR put forward in this planning proposal. It is reiterated that Blacktown CBD is a lower order centre in the view of the Western City District Plan as this is a strategic centre where as Campbelltown is a Metropolitan Cluster.

iii. apply a minimum FSR for the employment components (i.e. hotel and registered club) of the proposed development to the site; and

iv. indicate the satisfactory arrangements for the site may apply to ensure contributions for State infrastructure is provided as the site is located within the Glenfield to Macarthur Urban Renewal Precinct, The minimum FSR for employment floor space should be written as a site specific clause under Part 7 of the Campbelltown LEP. The proposed commercial floor space will equate to approximately 5,000m². Noting this is across the entire land parcel subject to this Planning Proposal.

Noted. There is also a letter of offer provided with this submission. The letter of offer demonstrates the landowner's intention of entering into a Voluntary Planning Agreement, which will be subject to negotiations and agreement with





	Council for the delivery of public benefit – see Attachment B.
c. under Part 4 – Mapping, update the proposed maps in accordance with condition 1(b) and include a legend for the current and proposed maps,	The maps identified within the planning proposal have been updated to include a legend.
d. address the consistency of the proposal with Council's local strategy Re-imagining Campbelltown CBD;	See Attachment C below.
e. prepare the draft DCP and concurrently exhibit this plan with the planning proposal, including a standard building setback from the Queen Street interface for solar and visual purposes be developed	See Attachment D. The DCP has been endorsed by Council.
f. prepare a public domain plan to inform appropriate DCP controls for outdoor plaza, streetscape enhancements and pedestrian linkages	See Attachment E – public domain plan.
g. prepare a traffic impact study to ensure the proposed density increase does not have any adverse impact on the surrounding road network	See Attachment F – traffic study.

h. prepare a visual impact assessment report and detailed shadow analysis to address the following:

i. the impacts on the surrounding area, in both the current low-scale environment and the transition to a high density centre and

The Planning Proposal commits to the delivery of 5,000m² of commercial floor space which injects a significant number of future job opportunities ranging from the construction workers who will construct the actual development through to the hotel staff and (for example) landscaping staff that will maintain and manage the property in perpetuity.

A visual impact assessment is provided in

Attachment G.

The Planning Proposal provide a significant level of new and improved connectivity (including visual connectivity) for this site and surrounding land. The proposal seeks to deliver:

• A new link from Queen Street through to Anzac Lane (to the south of the proposed RSL building) along with road widening/future dedication. This will also enhance view lines from Queen Street to Anzac Lane which at present do not exist.

• 2 x new north to south through site links that will link Cordeaux Street, Mawson Park through to Anzac Lane and



Glenalvon House, again these will also
deliver new view lines and visual
connections to these strategic spaces
 1 additional new east to west link through
the activated ground plane of the proposed
development.

The new connections offered under the Planning Proposal are shown in the Draft DCP which accompanies this submission. The entire new development will provide accessible paths of travel through the public domain and into the publicly accessible parts of the development. The future development scheme will offer the residents of Campbelltown a new lifestyle choice that is currently limited in offering. Where people can live a truly urban lifestyle where the need to drive and commute large distances is diminished which largely aligns with the NSW Government's 30 minute city approach to strategic centres.

The visual impact resulting for a development must clearly be seen in two dimensions. Firstly at the ground level and within the public domain as the site will be experienced by future residents, employees and visitors to the site. The proposal seeks to enhance this visual environment with new site connections, high quality public domain and flexible civic spaces as shown in the reference design. The planning proposal also seeks to deliver a visually interesting development with varied building height and high quality architecture which deliver a superior outcome on the site as shown in the photo montage overleaf which has super imposed the proposal onto the Reimagining Campbelltown Vision Document.

ii. the impacts on the adjacent heritage items	See Attachment H – heritage impact assessment also noting there are provisions relating to heritage included in the site specific DCP.
i. prepare a heritage impact study to determine the impacts of the proposed development of the proposed development on the three heritage items and to inform development controls that should apply to the site.	See Attachment H – heritage impact assessment also noting there are provisions relating to heritage included in the site specific DCP.

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2. The revised planning proposal is to be updated in accordance with condition 1 and forwarded to the Department for review and approval prior to exhibition.	This is now been provided to NSW Department of Planning.
3. Public exhibition is required under section 3.34(2)(c) and schedule 1 clause 4 of the Act as follows:	
(a) the planning proposal must be made publicly available for a minimum of 28 days	Noted.
(b) the planning proposal authority must comply with the notice requirements for public exhibition of planning proposals and the specifications for material that must be made publicly available along with planning proposals as identified in section 5.5.2 of A guide to preparing local environmental plans (Department Planning and Environment 2016).	Noted.
 4. Consultation is required with the following public authorities/organisations under section 3.34(2)(d) of the Act and/or comply with the requirements of relevant section 9.1 Directions: Roads and Maritime Services Transport for NSW Office of Environment and Heritage Relevant servicing authorities including: Sydney Water, Telstra, Jemena Gas and Endeavour Energy 	Council has previously written to all public authorities listed in the gateway determination. Responses received from public authorities are outlined within the planning proposal. Consultation with public authorities will also occur during the public exhibition period.
Each public authority/organisation is to be provided with a copy of the planning proposal and any relevant supporting material and given at least 21 days to comment on the proposal.	
5. A public hearing is not required to be held into the matter by any person or body under section 3.34(2)(e) of the Act. This does not discharge Council from any obligation it may otherwise have to conduct a public hearing (for example, in response to a submission or reclassifying land).	Noted
6. The time frame for completing the LEP is to be 18 months following the date of the Gateway determination.	Noted

ATTACHMENT A

PROPOSED FLOOR SPACE RATIO BREAKDOWN – SEE SEPARATE FILE

ATTACHMENT B

VPA LETTER – SEE SEPARATE FILE



ATTACHMENT C

REIMAGINING CAMPBELLTOWN CBD

This vision was adopted by Campbelltown City Council in July 2018. The vison goes a long way towards providing a clear direction for the future of Campbelltown as the regional centre for Sydney's south west, providing the framework for small and largescale interventions that are both practical and measurable. Western Sydney is experiencing unprecedented population growth.

The Greater Sydney Commission is projecting that the Western Parkland City will need to accommodate a population of more than 1.5 million people by 2036. At present the local government area has a grand total of 79% of separate houses. As such, this vision will create a range of density's including low, medium and high housing types which can support the development of Campbelltown as a city centre, while also accommodating the community's changing preferences for housing as they enter different stages of life.

At a population of 800,000, the region would need to accommodate an additional 186,000 dwellings. It is evident the proposal will provide over 400 new dwellings within Campbelltown CBD. Moreover, the proposal has been designed in accordance with this vison. The proposal seeks to deliver a range of new housing in a highly accessible location which will also include adaptable and housing design to comply with the Silver Level of Liveability Housing Standards which meets the needs of a growing and diverse community. The future proposal will also include some smaller apartments which are either 1 bedrooms of studio apartments which can provide a lower cost housing choice for elderly downsizers or new starters who are seeking to enter into the property market for the first time.

The Planning Proposal commits to the delivery of 5,000m² of commercial floor space which injects a significant number of future job opportunities ranging from the construction workers who will construct the actual development through to the hotel staff and (for example) landscaping staff that will maintain and manage the property in perpetuity.

The Planning Proposal provide a significant level of new and improved connectivity for this site and surrounding land. The proposal seeks to deliver:

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 1 additional new east to west link through the activated ground plane of the proposed development.

The new connections offered under the Planning Proposal are shown in the Draft DCP which accompanies this submission.

The entire new development will provide accessible paths of travel through the public domain and into the publicly accessible parts of the development. The future development scheme will offer the residents of Campbelltown a new lifestyle choice that is currently limited in offering. Where people can live a truly urban lifestyle where the need to drive and commute large distances is diminished which largely aligns with the NSW Government's 30 minute city approach to strategic centres.

As demonstrated via extracts from the urban design report as well as the reimagining Campbelltown CBD document noting, the proposal fits into the Indicative Artist Impression.

Figure 1: Subject Site (black outline) with Northgate development and existing residential flat development (Source: extract from Architectural Plans).



ATTACHMENT D

DEVELOPMENT CONTROL PLAN – SEE SEPARATE FILE.

ATTACHMENT E

PUBLIC DOMAIN PLAN – SEE SEPARATE FILE.





ATTACHMENT F

TRAFFIC AND PARKING STUDY -- SEE SEPARATE FILE.

ATTACHMENT H

HERITAGE IMPACT STATEMENT – SEE SEPARATE FILE.

