



City of Canterbury

City of Cultural Diversity

**PLANNING PROPOSAL TO AMEND
CANTERBURY LOCAL ENVIRONMENTAL
PLAN 2012
(Various amendments)**

**City Planning Division
September 2015**

Table of Contents

1	Background	3
Part 1	Objectives or intended outcomes	4
Part 2	Explanation of the provisions	5
Part 3	Justification	24
Part 4	Mapping	30
Part 5	Community Consultation	31
Part 6	Project Timeline	31
Appendix 1	State Environmental Planning Policies	32
Appendix 2	Section 117 Directions	34
Appendix 3	Maps	36
Attachment 1	Information Checklist	37
Attachment 2	Council Report and Studies	38
Attachment 3	Evaluation Criteria for the Delegation of Plan Making Functions	39
Attachment 4	Advice from Department of Planning and Infrastructure – model clause on sex service premises	40
Attachment 5	Further consideration of relevant S117 Ministerial Directions	41
Attachment 6	Letter from Heritage Council	48

1.0 BACKGROUND

The Planning Proposal incorporates various amendments to the Canterbury Local Environmental Plan 2012. The Planning Proposal intends to:

- Amend the heritage schedule
- Include a number of sites identified for future public car parking
- Include Floor Space Ratio for dwelling houses and semi-detached dwellings
- Reduce the height limit in the R4 zones from 11.5m to 11.0m and
- Insert the standard local provision in relation to sex service premises.

The Planning Proposal has been prepared in accordance with Section 55 of the Environmental Planning and Assessment Act, 1979 and the NSW Government Department of Planning and Infrastructure *'A guide to preparing planning proposals'*.

The matters included in the Planning Proposal have been supported through various council resolutions. Copies of the Council report are included in Attachment 2.

PART 1 OBJECTIVES OR INTENDED OUTCOMES

The objectives of the Planning Proposal are to amend the CLEP 2012 to:

- a. Amend the listing of the Campsie Railway Station Group from an item of State heritage significance to an item of Local heritage significance.
- b. Identify land for future public car parking at Campsie and Punchbowl.
- c. Maintain Council's long standing policy position for three storey Residential Flat Buildings (RFB) in R4 zones by reducing the height in R4 zones from 11.5m to 11.0m.
- d. Maintain Council's previous policy position for Floor Space Ratio (FSR) controls for dwelling houses and semi-detached dwellings by applying the FSR as follows:
 - 0.65:1 for sites less than 200m² and less than 12.5m wide
 - 0.55:1 for sites greater than 200m² and less than 12.5m wide
 - 0.55:1 for sites greater than 200m² and less than 600m² and greater than 12.5m wide
 - 0.5:1 for sites greater than 600m² and greater than 12.5m wide.
- e. Insert the standard local provision in relation to sex service premises.

PART 2: EXPLANATION OF PROVISIONS

a. Heritage listing of Campsie Railway Station

The Campsie Railway Station Group is included in the LEP 2012 Heritage Schedule (Schedule 5) as a State Significant Item. This was the heritage classification at the time of the making of LEP. The Heritage Council of NSW has since advised that the Campsie Railway Station Group has been removed from the State Heritage Register and it is no longer an item of State heritage significance.

A copy of the letter from the Heritage Council is attached (attachment 6).

The Campsie Railway Station Group is still considered to have heritage significance and is retained on the Sydney Trains Heritage (Section 170) Register. As such, it is appropriate the item should be retained as a local heritage item. It is proposed therefore to amend the listing from State to Local significance.

b. Identify land for future public car parking at Campsie and Punchbowl.

Council has undertaken a considerable amount of planning work for its town centres in recent years. The initial output of this work was the gazettal of a new Local Environmental Plan (LEP) and Development Control Plan (DCP) for Canterbury Town Centre, and a new DCP for the other 10 main town centres in Canterbury in 2010. These plans were specifically based on Transit Oriented Development (TOD) principles, and resulted in density increases in these centres. The Canterbury Town Centre LEP also significantly expanded the town centre area and incorporated adjoining high density areas.

This work was carried through into the new Canterbury Local Environmental Plan (CLEP) 2012. This plan also rezoned land or increased densities around many town centres to further facilitate new development.

A consequence of this work was the need to look at the supply of public parking in the centres. While the overall planning was based on TOD principles, a balanced approach was taken recognising that it was important to ensure there was adequate public car parking to meet the needs of town centres, given the significant uplifts in density and development potential.

The Town Centres Parking Strategy was prepared by GTA Consultants in 2012. It made an extensive range of recommendations in relation to town centre parking, including the following:

- Amending parking controls to provide a better mix of parking stay options.
- Identifying new areas for public parking.
- Reducing the current town centre parking standards as it was found the then current rates were excessive.

Specifically the Parking Strategy identified land for future parking in the centres of Belmore, Campsie, Lakemba and Punchbowl to meet the future demand projected from new development. The sites nominated for future parking at Campsie and Punchbowl are:

- 17 Arthur Street, Punchbowl – Lot 62, Sec 6, DP 5701
- 18 Campsie Street, Campsie – Cnr Lot 80, DP 5930
- 20 Campsie Street, Campsie – Lot 79, DP 5930

Council resolved to adopt the Parking Strategy on 24 May 2012. Council also resolved that the recommendations of the strategy involving future parking areas be incorporated into a future draft Development Contributions (Section 94) Plan. These sites for future parking were subsequently identified in our Development Contributions Plan 2013. A copy of the Contributions plan is attached (attachment 2).

The Planning Proposal will implement the recommendation of the adopted Town Centre Parking Strategy to include the land identified for future parking on the Land Reservation Acquisition Map.

The three lots required for acquisition adjoin existing Council car parks in Campsie and Punchbowl town Centres. The lots are currently occupied by single dwelling houses and are privately owned. The Land Acquisition Act 1991 will apply when the land is designated for car-parking purposes and we will be required to acquire the land for market price.

A disc copy of the Parking Strategy is enclosed for your information.

The planning proposal will result in both social and economic benefits for the community, by providing accessibility to the community to their local centre that would in return support the viability and growth of our local town centres.

The planning proposal seeks the following amendments:

i. Land Reservation Acquisition Map

The Canterbury LEP 2012 Land Reservation Acquisition Map (LRA) is proposed to be amended as per the table below.

Table 1: Land reservation acquisition map amendments

LRA Map Tile No	Amendment	Explanation
LRA_001	Include land at 17 Arthur Street, Punchbowl on the Land Reservation Acquisition Map.	To identify land for acquisition purposes.
LRA_006	Include land at 18-20 Campsie Street, Campsie on the Land Reservation Acquisition Map.	Identify land for acquisition purposes.

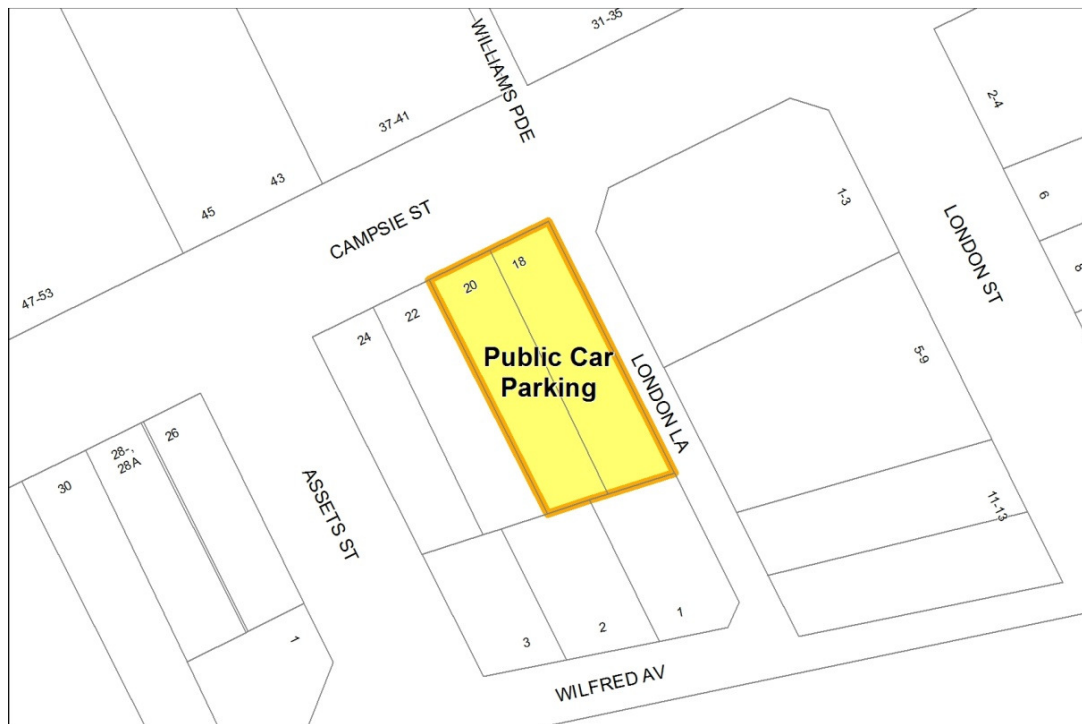
Map 1: Locality Map 18-20 Campsie Street, Campsie



Map 2: Existing LRA Map 18-20 Campsie Street, Campsie



Map 3: Proposed LRA map 18-20 Campsie Street, Campsie



Map 4 : Existing zoning map 18-20 Campsie Street, Campsie





Photo 1: view of 18 Campsie Street, looking north from Campsie Street



Photo 2: view of 20 Campsie Street, looking north from Campsie Street



Photo 3: View of car park looking west from London Street

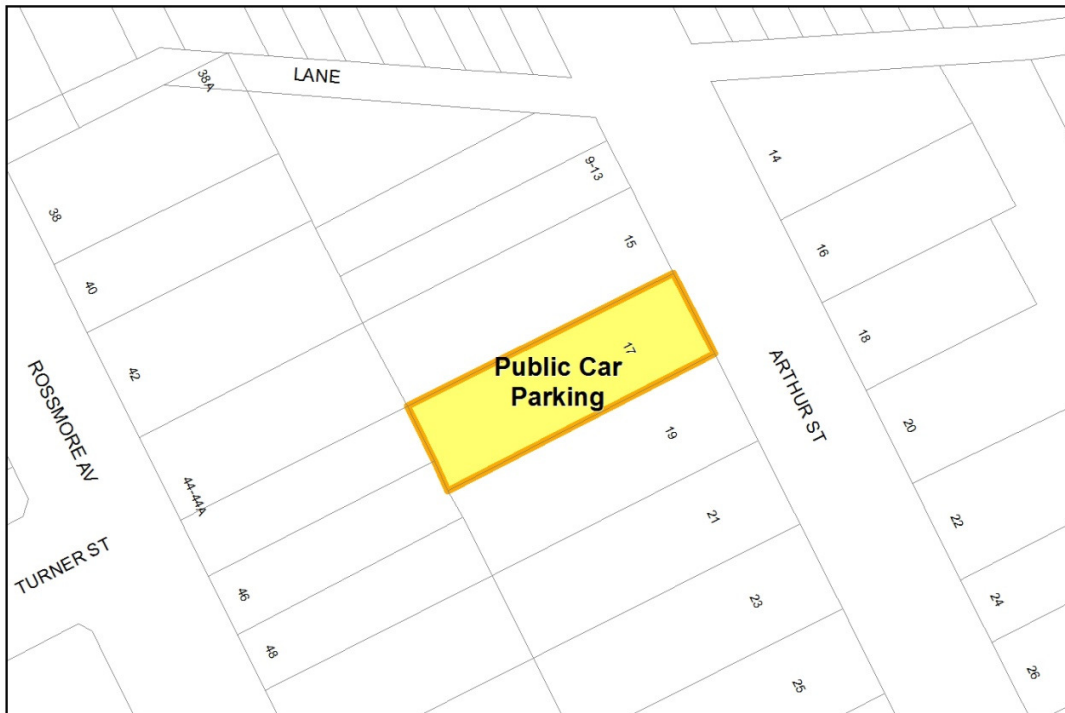
Map 4: Locality Map 17 Arthur Street, Punchbowl



Map 5: Existing LRA Map 17 Arthur Street, Punchbowl



Map 6: Proposed LRA map 17 Arthur Street, Punchbowl



Map 7: Existing zoning map 17 Arthur Street, Punchbowl

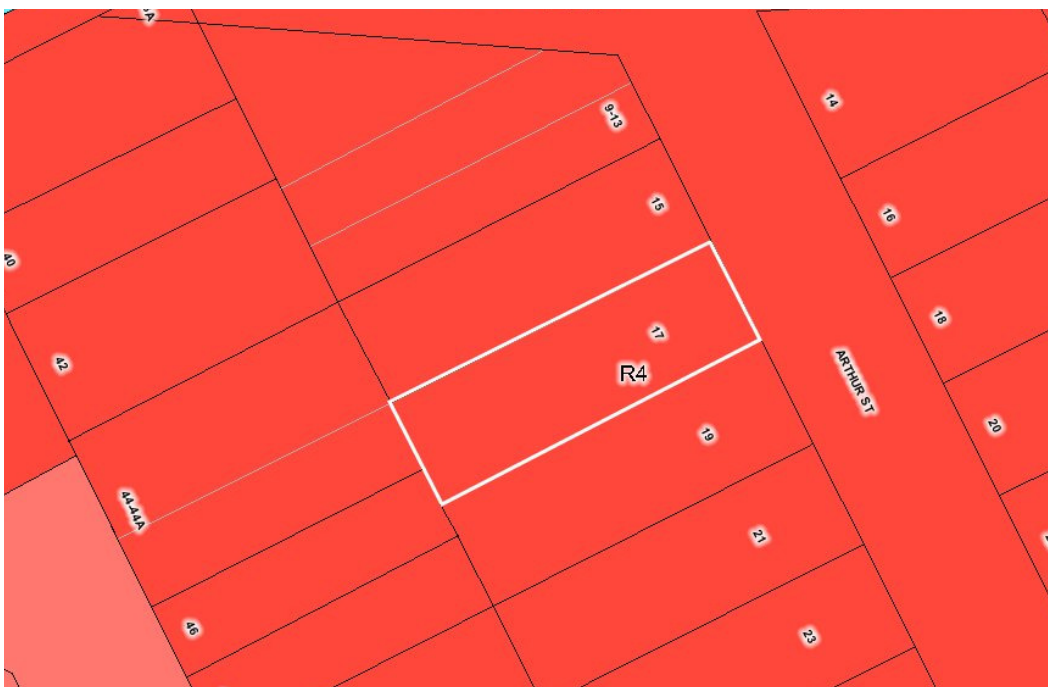




Photo4: view of 17 Arthur Street, looking north from Arthur Street



Photo 5: Council car park on Arthur Street, Punchbowl

c. Reduce the building height in the R4 zone from 11.5 metres to 11 metres.

One of the most common height controls in CLEP 2012 for R4 zones is 11.5 metres. This height control is intended to allow for buildings up to three storeys in height, normally residential flat buildings. The 11.5 metre building height is a direct translation from our previous DCP, and a long standing height control. This is demonstrated from our former planning controls (DCP 13) which contain provisions that require development of this height to be limited to three storeys. A copy of DCP 13 is attached (Attachment 2).

The rationale for the 11.5 metre height limit for three storey development is that it allows for three residential floors, which generally are 3 metres in height assuming a 2.7 metre floor to ceiling height, and 0.3 metre slab thickness. The remaining height can be used to allow for varied roof forms, roof plant rooms and lift overruns if required, and elevation of the building above ground level. Overall the height control is relatively generous to provide good design flexibility.

However Council has received in recent times development applications for four storey buildings in areas with the 11.5 metre height control. Compliance with the height control is manipulated through excavating part or all of a site to artificially lower the building, and using flat roof forms.

This is an unintended consequence of the move to a numeric height control in the LEP under the standard instrument template, rather than the previous more specific DCP controls that regulated both height and number of stories.

Council's concern is the poorer urban design and amenity issues that arise from four storey buildings exploiting the relatively generous height provisions that were meant for three storey development.

A comparison between a three storey Residential Flat Building (RFB) and a four storey RFB is provided in table 2, to provide an overview of the implications of allowing a four storey RFBs in the R4 zones with an 11.5 metre height limit.

Table 2: Three storey RFB vs four storey RFB

Issues	Four storey RFB	Three storey RFB
Design flexibility	Is very limited in design flexibility and building modulation as a consequence of using controls that were never intended for a building of this nature.	High degree of design flexibility.
Character – roof forms	Flat roofs incorporated due to the need for the fourth level to be habitable. This is out of character with the established pitched roof forms of 3 storey RFBs.	Pitched roof. The majority of the established RFBs in the R4 zones have pitched roofs. Simple pitched roof forms are the preferred roof form to maintain neighbourhood character. This is reinforced in the CDCP 2012.
Character – sub-terrain apartments	Ground level apartments are below ground level due to the need to excavate to comply with the 11.5m height limit. This will provide poor living standards for the occupants in these apartments.	Ground level apartments are at or above ground level and provide for improved amenity for residents.
Amenity	There is potential for a four storey building to have a greater impact in terms of overshadowing and overlooking due to the greater wall height of 11.5m as oppose to the 9m wall height for 3 storey buildings.	Established 3 storey RFB have a wall height of 9m as prescribed in the former DCP 13. This height will have a reduced impact in terms of sunlight access to neighbouring properties.

To overcome the issue of four storey development being sought for under controls not appropriate for such development, it is proposed to reduce the maximum building height from 11.5 metres to 11.0 metres. It is important to note that the corresponding FSR of 0.9:1 is not changing, and therefore there will be no overall loss of development potential. The 11 metre height limit will still allow for an acceptable degree of design flexibility for three storey development.

The Canterbury LEP 2012 Height of Building (HOB) is proposed to be amended as per the table below.

Table 3: HOB map amendment

HOB No	Map	Tile	Amendment	Explanation
HOB_001			Amend all height shown as L2 11.5m to L	Reinforce Council's long standing planning policy of allowing three storey RFB developments in the R4 zones
HOB_002			11m.	
HOB_003				
HOB_004			Maps are shown in Appendix 3.	
HOB_005				
HOB_006				
HOB_007				
HOB_008				
HOB_009				
HOB_010				

d. Apply FSR controls for dwelling houses and semi-detached dwellings as follows:

Calculation of floor space for dwelling houses and semi-detached dwellings

Currently we use a maximum floor area (FA) in our DCP rather than a floor space ratio (FSR) control in the LEP for dwelling houses and semi-detached dwellings.

The use of floor areas was consistent with the approach taken by the NSW Housing Code which specifies a maximum floor area for a range of site areas. Differences in the definitions used for gross floor area calculation between the standard instrument template and the Codes SEPP have caused unintended confusion and inconsistency in the application of these controls.

Council therefore wishes to revert back to a FSR control in the LEP for single dwelling houses and semi-detached dwellings so that it is consistent with the application of FSR for all forms of other residential development (RFB, Dual Occupancy, Multi dwelling housing etc) in our LEP, where a FSR have been applied.

Under our previous planning controls, FSRs were provided for single dwellings in DCP 49 - Single Dwelling Code and semi-detached dwellings in DCP 47 – Small Lot Housing. The DCPs applies a preferred FSR to lots in residential zones by way of a sliding scale which allows larger FSR on smaller sites.

Differences between the definition of floor definition under Codes SEPP and gross floor area (GFA) under CLEP 2012

The definition of floor area from the Codes SEPP and the GFA definition in the CLEP 2012 are provided below, along with a table which compares the building and design elements that are included or excluded from the calculation of floor area in each.

Definition of floor area under the Codes SEPP

Floor area, for a dwelling house referred to in Part 3, 3A or 4, means the sum of the areas of each storey of the dwelling house and any carport, garage, balcony, deck, patio, pergola, terrace or verandah, measured at a height of 1.4m above each floor level, that is within the outer face of:

- (a) the external walls of the dwelling house, and
- (b) the walls of the carport, garage, balcony, deck, patio, pergola, terrace or verandah,

but does not include any of the following:

- (c) any part of an awning, blind or canopy that is outside the outer wall of a building,
- (d) the eaves,
- (e) a lift shaft,
- (f) a stairway,
- (g) a void above a lower storey.

Definition of Gross Floor Area under CLEP 2012

Gross floor area means the sum of the floor area of each floor of a building measured from the internal face of external walls, or from the internal face of walls separating the building from any other building, measured at a height of 1.4 metres above the floor, and includes:

- (a) the area of a mezzanine, and
- (b) habitable rooms in a basement or an attic, and
- (c) any shop, auditorium, cinema, and the like, in a basement or attic,

but excludes:

- (d) any area for common vertical circulation, such as lifts and stairs, and
- (e) any basement:
 - (i) storage, and
 - (ii) vehicular access, loading areas, garbage and services, and
- (f) plant rooms, lift towers and other areas used exclusively for mechanical services or ducting, and
- (g) car parking to meet any requirements of the consent authority (including access to that car parking), and
- (h) any space used for the loading or unloading of goods (including access to it), and
- (i) terraces and balconies with outer walls less than 1.4 metres high, and
- (j) voids above a floor at the level of a storey or storey above.

The key differences between the two definitions relate to the design elements that are ‘excluded’ from the calculations from the GFA under the CLEP 2012, such as parking, terraces, balconies, void, staircasing.

The table below identifies the building and design elements that contribute to the bulk and scale of buildings, which are included in the NSW Codes SEPP definition but excluded in the CLEP 2012 Definition.

Table 4: Building elements calculated in floor area definition under Codes SEPP and CLEP 2012

Elements calculated as GFA	Housing Codes SEPP and CDCP 2012	CLEP 2012
Garage	Included	Excluded
Deck	Included	Excluded
Patio	Included	Excluded
Pergola	Included	Excluded
Terrace	Included	Excluded
Verandah	Included	Excluded
Storage	Included	Excluded
Basement	Included	Excluded
Wall thickness	Included	Excluded

FSR and Floor Area comparison

A typical dwelling house would normally include a double garage, front and rear patio/deck which would be excluded if we apply a FSR. These areas would account to around 50m² (double garage 36m², front and rear patio 14m²).

The table below provides a comparison of how the floor areas are calculated using the Codes SEPP and CLEP 2012 definition of gross floor area. The sample development application for a typical two storey dwelling house on a 418m² lot was used.

Table 5: Comparison of how floor area calculation under Codes SEPP and CLEP 2012

Area	Sqm	Floor area under Codes SEPP and CDCP 2012	Floor Area under CLEP 2012
Ground floor	109	Include	Include
First floor	120	Include	Include
Garage	33	Include	Exclude
Porch	2	Include	Exclude
Alfresco	16	Include	Exclude
Total	280m ²	280m ²	229m ²
Control		300m² (sites less than 450m²)	0.55:1 or 230m²
Equivalent FSR using Codes definition of GFA (include garage, porch, alfresco (51m ²), total floor area of			281m ² or 0.67:1
Equivalent FSR using CLEP definition of GFA (exclude garage, porch, alfresco (51m ²), total floor area of		229m ² or 0.55:1	

The table above provides an equivalent FSR using the definitions of GFA under the Codes SEPP and CLEP 2012. The areas (garage, porch, alfresco) that are included in the calculations for floor area under the Codes SEPP are excluded in the floor area calculations under the CLEP 2012 resulting in similar floor areas.

While the FSR under the CLEP 2012 (0.55:1, 230m²) may appear to be restrictive when compared to the FSR under the Codes SEPP, this is because the building elements (garage, porch and alfresco) have been excluded in the calculations. These building elements which are typical in dwelling houses will be excluded when working out the FSR for dwelling house under the GFA definition in the CLEP 2012.

Table 6: FSR and Floor Area conversion

Lot size range	Lot size m ²	Canterbury Dwelling House DCP 47/49	NSW Housing Code	CDCP 2012	Proposed FSR
<450m ²	200	0.65:1 (130m ²)	95% lot size (165m ²)	Merit	0.65:1
	250	0.55:1 (138m ²)	85% lot size (187m ²)	Merit	0.55:1
	300	0.55:1 (165m ²)	0.82:1 (245m ²)	Merit	0.55:1
450-600m ²	451	0.55:1 (247m ²)	0.63:1 (280m ²)	0.63:1 (280m ²)	0.55:1
	500	0.55:1 (275m ²)	0.56:1 (280m ²)	0.56:1 (280m ²)	
	599	0.55:1 (329m ²)	0.47:1 (280m ²)	0.47:1 (280m ²)	
>600m ²	601	0.5:1 (300m ²)	0.55:1 (330m ²)	0.55:1 (330m ²)	0.5:1
	650	0.5:1 (325m ²)	0.5:1 (330m ²)	0.5:1 (330m ²)	
	700	0.5:1 (350m ²)	0.47:1 (330m ²)	0.47:1 (330m ²)	

NB: the NSW Housing Code does not use FSR but a maximum floor area for certain sizes. As the floor area definition of the Code includes the area of garage, terrace, patio, decks etc and the gross floor area definition used in the standard instrument does not, the FSR in column 4 and 5 (for sites over 450m²) have been calculated by deducting the size of a double garage (36m²), and patio and deck (14m²) from the floor space allowances of the NSW Housing Code to achieve a general equivalent FSR. For sites less than 450m² a deduction of 25m² is used (single garage and front porch and rear terrace).

- Table 6 shows that when using the FSR definition to calculate floor area the resultant floor area is similar or slightly less than the floor area when using the Code's SEPP definition.
- Table 6 also shows that the conversion of a floor area (FA) would be comparable when using the proposed FSR control. This is the case for larger sites (greater than 550m²) where the FSR is seen to provide more floor area than the Codes SEPP. In most instances the proposed floor

space when using the FSR is not considered to provide significantly less floor area than what can be achieved under the current floor area controls in CDCP 2012.

- The conversion to a FSR would only impact on the smaller lot sizes less than 300m² where the Codes SEPP allows a larger floor area than the proposed FSR controls. We currently use a merit based approach to determine the floor space for these small lots. Council proposes to retain the FSR used in our former planning controls for smaller lots as they better reflect the existing character of small lots in our area. The use of the Codes SEPP's larger floor area can still be available to applicants if they decide to lodge an application under the Complying Codes SEPP.
- The Planning Proposal would revert back to FSR controls from our former planning controls intended for dwelling houses and semi-detached dwellings. This is considered to be the most suitable approach to reinstate Council's policy position and control mechanism for dwelling houses and semi detached dwellings in our residential zones which has operated successfully for the 10 + year duration under our former planning controls (DCP 49). A copy of the report is attached for your information (attachment 2).

The following reasons are provided to support the inclusion of a FSR for dwelling houses and semi-detached dwellings:

- The planning proposal is consistent with the Department of Planning's Practice Note PN 08-001 Height and Floor Space Ratio. The practice note encourages the use of FSR as a development standard to implement strategic planning objectives and provide certainty to the community and land owners about the acceptable bulk and scale of development. The conversion to a FSR also removes confusion as to how floor space is to be calculated.
- The provision of a FSR for dwelling houses and semi-detached dwellings is similar to other Council LEP's; Rockdale, Burwood, Ashfield and Hurstville use a FSR for dwelling houses and semi-detached dwellings. We are proposing to do the same. For example, Canada Bay's LEP 2013 uses a FSR provision (Clause 4.4) that applies a FSR to dwelling houses and semi-detached dwellings by way of a sliding scale.
- The application of a FSR for dwelling houses and Semi-Detached dwellings will not alter the supply or location of residential zoned land or densities. The existing density of one dwelling per site will remain unchanged as a result of the proposal to introduce FSR for these dwelling types.
- The recommended FSR will still enable a suitably sized dwelling to be provided. As demonstrated earlier in the report (table 5, page 14) the proposed FSR will be comparable to the floor areas in CDCP 2012.

Proposed calculation of floor space for dwelling houses and semi-detached dwellings.

The following FSR are proposed to be applied to all dwelling houses and semi-detached dwellings:

- 0.65:1 for sites less than 200m² and less than 12.5m wide
- 0.55:1 for sites greater than 200m² and less than 12.5m wide
- 0.55:1 for sites greater than 200m² and less than 600m² and greater than 12.5m wide
- 0.5:1 for sites greater than 600m² and greater than 12.5m wide.

The proposed FSR's come directly from our former DCP controls (DCP 49 and DCP 48). A copy of these planning documents is attached (attachment 2).

Clause 4.4 (2A)) of the CLEP 2012

The LEP currently contains a provision (4.4 (2A)) that exempts the FSR from applying to dwelling houses only. This exemption does not extend to semi-detached dwellings and was erroneously removed from the Clause when the LEP was initially gazetted. The consequence of this is that a semi-detached dwelling will be subject to varying FSR controls that apply to the land (0.5:1 in R2 zones and up to 1.8:1 in R4 zones). For semi-detached dwellings in our R2 zones where a 0.5:1 FSR applies, Council is relying on Clause 4.6 to vary the FSR as in most instances the proposal would exceed the 0.5:1 FSR. The planning proposal is seeking to rectify this anomaly by introducing a FSR for the dwelling houses and semi-detached dwellings.

e. Insert the standard local provision in relation to sex service premises.

The concept of initiating a planning proposal to prohibit sex services premises throughout the City of Canterbury had been previously raised with the Department of Planning and Infrastructure and advice received (attachment 4) at the time suggested that such a planning proposal would be unlikely to be viewed favourably.

The Department of Planning and Infrastructure has had a long standing policy that sex services premises are to be provided for within each local government area and that a blanket prohibition would not be entertained. This view has not changed.

There is, however, a Model local clause which has been developed for sex services premises. It restricts the location of sex services premises based on proximity to low density residential areas, schools, community uses and places of worship. The wording of the local clause appears below.

General Information

LEPs should provide for sex services premises somewhere in the LGA and the zone/s selected need to reflect how the Council will adequately provide for this use.

6.6 Restriction on consent for particular sex services premises [local]

- (1) *Development consent must not be granted for development for the purposes of sex services premises if the premises will be located on land that adjoins, or that is separated only by a road from, land:*
 - (a) *in Zone R1 General Residential, Zone R2 Low Density Residential or Zone R3 Medium Density Residential, or*
 - (b) *used as a place of public worship or for community or school uses, or*
 - (c) *in Zone RE1 Public Recreation.*
- (2) *In deciding whether to grant consent to any such development, the consent authority must take into account the impact that the proposed development would have on children who use the land.*

The permissibility of sex services premises in our LEP will not be affected.

It is therefore considered appropriate to introduce the Model local clause for sex service premises into our LEP.

PART 3 JUSTIFICATION

SECTION A: Need for the Planning Proposal

1. Is the planning proposal the result of any strategic study or report?

Heritage listing of Campsie Railway Station

Yes. The proposed amendments to the heritage listing status of Campsie Railway Station have been informed by a review of all NSW Rail Heritage items carried out by the Heritage Council of NSW.

Identify land for future public car parking at Campsie and Punchbowl.

Yes. The sites identified for future car parking have been informed by a Car Parking Strategy for our town centres prepared by GTA Consultants. The parking strategy was adopted by Council on 24 May 2012.

Other remaining changes

All other amendments in the planning proposal are not a result of any strategic study or report. It is a result of Council resolutions dated 14 November 2013 and 28 November 2013 which supports the preparation of a planning proposal to reduce the height in R4 zones from 11.5m to 11m to apply FSR controls for dwelling houses and semi-detached dwellings and to include a local provision in relation to sex service premises.

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

The planning proposal is considered the best way of achieving the objectives. The objectives and intended outcomes of the planning proposal relate to clarifying policy positions with the Canterbury LEP 2012.

3. Is there a net Community benefit?

The planning proposal will make a number of amendments to the CLEP 2012 that will improve the operation of the CLEP 2012, which will be of benefit to the wider community.

SECTION B: Relationship to strategic planning framework

4. Is the planning proposal consistent with the objectives and actions contained within the applicable regional strategies?

The Strategic planning context for consideration of this Planning Proposal includes:

- A Plan for Growing Sydney

The Government's vision for Sydney is: a strong global city, a great place to live.

To achieve this vision, the Government has set down 4 key goals that Sydney will be:

- a competitive economy with world class services and transport;
- a city of housing choice with homes that meet our needs and lifestyles;
- a great place to live with communities that are strong, healthy and well connected; and
- a sustainable and resilient city that protects the natural environment and has a balanced approach to the use of land and resources.

The planning proposal is not inconsistent with the goals and subsequent directions and actions of this Plan. More specifically, the planning proposal:

Table 7: Consistency with A Plan for Growing Sydney

Provision	Comment
Goal 2: Sydney's housing choices	In relation to item c and d. Consistent. This planning proposal seeks to improve consistency to our local development controls for residential development (RFB, dwelling houses, semi-detached dwellings). The planning proposal does not include any provisions that seek to: • Reduce housing choice; • Increase demand on existing services; or • Increase land consumption. In relation to item a, b and e. The planning proposal will not adversely impact on the directions and actions identified in the plan to provide more housing with greater choice of dwelling types in well serviced locations.

Goal 3: Sydney's great places to live Direction 3.1 Revitalise existing suburbs	In relation to item c – identifying land for car parking purposes. The planning proposal is consistent with this direction as the expanded public car park is a key local infrastructure needed to support the growth of the Campsie and Punchbowl town centres. In relation to the remainder of the items in the planning proposal, the planning proposal will not adversely impact on the directions and actions identified in the plan to achieve a great place to live with communities that are strong, healthy and connected.
Goal 4: Sydney's sustainable and resilient environment	Not applicable.
South subregion priorities	This section of the plan does contain any specific priorities that are relevant to the planning proposal.

5. Is the Planning Proposal consistent with the local Council's community strategic plan, or other local strategic plan?

5.1 Residential Development Strategy

The Residential Development Strategy (October 2013) was prepared to guide future residential development in terms of zonings, development controls and planning framework. The Strategy examines all relevant aspects of housing in Canterbury, including general characteristics, demand and supply factors, planning framework, current trends and future development potential.

One key aspect of the strategy is an assessment of the capacity of the City to meet State Government set housing targets. The strategy has found, in respect of the current target, that this is generally being met and Canterbury has the capacity to meet this target into the future. These findings are relevant to the planning proposal insofar as it relates to meeting housing targets. The amendments being sought will not have a significant impact on housing numbers.

5.2 City of Canterbury Community Strategic Plan 2014-2023

Council's Community Strategic Plan 2014-2023 (Community Plan) sets the vision for the Canterbury LGA into the next decade and aims to promote sustainable living. The Community Plan sets out long term goals under five key themes being:

- Attractive city;
- Stronger community;
- Healthy environment;
- Strategic leadership; and
- Improving Council

The planning proposal generally is consistent with Council's Community Strategic Plan. More specifically in relation to item c (reduce height in R4 zones from 11.5m to 11m) it helps achieve the objective of Attractive City through the reinforcement of a long standing planning policy position of having three storey RFB within the 11.5m height areas in our R4 zones and Balanced Urban Development through the appropriate location of new housing. In relation to item b (identifying land for public car parking) the planning proposal is also consistent with Council's local strategies which include the aim of supporting the renewal of existing town centres.

6. Is the planning proposal consistent with applicable State Environmental Planning Policies?

Yes. See **Appendix 1**.

7. Is the planning proposal consistent with applicable Ministerial Directions (s117 directions)?

Yes. See **Appendix 2**.

SECTION C: Environmental, social and economic impact

8. 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?

No. There is no likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the Planning Proposal.

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

There is no likelihood of adverse environmental impact as a result of this planning proposal.

10. How has the planning proposal adequately addressed any social and economic effects?

The purpose of the planning proposal will reinforce council planning policies. This will improve the operation of the CLEP 2012 and provide positive social and economic outcomes for the whole community.

SECTION D: State and Commonwealth interests

11. Is there adequate public infrastructure for the planning proposal?

Yes. The planning proposal does not generate any need to upgrade or improve public infrastructure.

12. What are the views of the State and Commonwealth public authorities consulted in accordance with the gateway determination?

Consultation with appropriate State and Commonwealth public authorities has not yet been undertaken. Council will engage any such public authority in accordance with the Gateway Determination.

Part 4: Mapping

The following maps (**Appendix 3**) have been prepared to support the planning proposal:

In relation to item b – identify land for future car parking at Campsie and Punchbowl, the following maps are shown:

- Existing Land reservation Map.
- Proposed Land Reservation Map.

In relation to item c – reduce the height limit in the R4 zone from 11.5m to 11m

- Existing height of Building Map.
- Proposed Height of Building Map.

Part 5: Community Consultation

The Planning proposal will be placed on public exhibition in accordance with the Gateway Determination.

Notice of the public exhibition on the planning proposal will be prepared and will involve the following:

- Advertisement to the local newspaper (ie Torch, Valley Times)
- Notification letters to relevant State Agencies and other authorities nominated by the Department.
- Advertise the proposal on Council's website.
- Copies of the Planning Proposal to be available at Council's administration building.
- In relation to item b identify land for future car parks; notification letters are proposed to be sent to directly affected land owners and adjoining landowners.

Note: For items c and d that relate to reducing the height of R4 zoned land from 11.5m to 11.0m and applying a FSR for dwelling houses and semi-detached dwellings, letters are not proposed to be sent to affected or adjoining landowners because "the number of landowners made it impracticable to notify them", as per the DP&I's 'A guide to preparing local environmental plans' (2013).

These consultation mechanisms are considered sufficient.

PART 6: PROJECT TIMELINE

This is outlined in the table below:

Planning proposal stage	Timeframe
Gateway determination issued by Department of Planning and Infrastructure	October 2015
Preparation for public exhibition	November 2015
Government agency consultation	November 2015
Public exhibition	
Public submissions report to Council	February 2016
Anticipated date the Council will make the plan (if delegated)	March 2016

APPENDIX 1: State Environmental Planning Policies

State Environmental Planning Proposal	Comments
SEPP 1 – Development Standards	Not Applicable
SEPP 14 – Coastal Wetlands	Not Applicable
SEPP 15 – Rural Land sharing Communities	Not Applicable
SEPP 19 – Bushland in Urban Areas	Not Applicable
SEPP 21 – Caravan Parks	Not Applicable
SEPP 26 – Littoral Rainforests	Not Applicable
SEPP 29 – Western Sydney Recreation Area	Not Applicable
SEPP 30 – Intensive Agriculture	Not Applicable
SEPP 32 – Urban Consolidation (Redevelopment of Urban Land)	The planning proposal does not contain provisions that would affect the application of this SEPP.
SEPP 33 – Hazardous and Offensive Development	Not Applicable
SEPP 36 – Manufactured Home Estates	Not Applicable
SEPP 39 – Spit Island Bird Habitat	Not Applicable
SEPP 44 – Koala Habitat Protection	Not Applicable
SEPP 47 – Moore Park Showground	Not Applicable
SEPP 50 – Canal Estate Development	Not Applicable
SEPP 52 – Farm Dams and other works in Land and Water Management Plan Areas	Not Applicable
SEPP 55 – Remediation of Land	The planning proposal does not contain provisions that would affect the application of this SEPP.
SEPP 59 – Central Western Sydney Regional Open Space and Residential	Not Applicable
SEPP 62 – Sustainable Aquaculture	Not Applicable
SEPP 64 – Advertising and Signage	Not Applicable

SEPP 65 – Design Quality of Residential Flat building	The planning proposal does not contain provisions that would affect the application of this SEPP.
SEPP 70 – Affordable Housing	Not Applicable
SEPP 71 – Coastal Protection	Not Applicable
SEPP (Affordable Rental Housing) 2009	Not Applicable
SEPP (Building Sustainability Index BASIX) 2004	The planning proposal does not contain provisions that would affect the application of this SEPP.
SEPP (Exempt and Complying) 2008	Not Applicable
SEPP (Housing for Seniors or People with a Disability) 2004	Not Applicable
SEPP (Infrastructure) 2007	Not Applicable
SEPP (Kosciusko National Park – Alpine Resorts) 2007	Not Applicable
SEPP (Major Developments) 2005	Not Applicable
SEPP (Mining, Petroleum Production and Extractive Industries) 2007	Not Applicable
SEPP (Miscellaneous Consent Provisions) 2007	Not Applicable.
SEPP (Penrith Lakes Scheme) 1989	Not Applicable
SEPP (Rural Lands) 2008	Not Applicable
SEPP (SEPP 53 Transitional Provisions) 2011	Not Applicable
SEPP (State and Regional Development) 2011	Not Applicable
SEPP (Sydney Drinking Water Catchment) 2011	Not Applicable
SEPP (Sydney Growth Centres) 2006	Not Applicable
SEPP (Three Ports) 2013	
SEPP (Urban Renewal) 2010	Not Applicable
SEPP (Western Sydney Employment Area) 2009	Not Applicable
SEPP (Sydney Western Parklands) 2009	Not Applicable

APPENDIX 2: Section 117 Directions

Direction	Title	Consistency with planning proposal
1.1	Business and Commercial	This direction applies when a relevant planning authority prepares a planning proposal that will affect land within an existing or proposed business or industrial zone (including the alteration of any existing business or industrial zone boundary). The planning proposal does not propose any controls that would affect land within an existing business or industrial zone. The proposal is consistent with this direction.
2.3	Heritage Conservation	This direction is relevant to the proposal to amend the listing of the Campsie Railway Station Group as an item of state heritage significance to an item of local heritage significance. The proposal is consistent with this direction as it will facilitate the conservation of the property.
3.1	Residential	This item applies to the following items and is discussed further below (see attachment 5 - further consideration of relevant S.117 Ministerial Directions): • Future car parking for land in Campsie and Punchbowl (item b). • Height reduction from 11.5m to 11.0m (item c). In relation to item (e) apply FSR to dwelling houses and semi-detached dwellings. The proposal will introduce a FSR for dwelling houses and semi-detached dwellings. The proposed FSR will not affect the density of dwelling houses and semi-detached dwellings, as the maximum density for dwelling houses in our residential zones will be one dwelling per site. As demonstrated in the planning proposal (see Part 2 item e (page 14-17)), the conversion of floor area control to a FSR is comparable in floor area and will have no significant impact on housing diversity. The provision of an FSR standard will still encourage a broad choice of residential dwelling houses and semi-detached dwellings in the residential zones. The proposal is consistent with this direction.

3.4	Integrating Land Use and Transport	This item applies to the following items and is discussed further below (see attachment 6 - further consideration of relevant S.117 Ministerial Directions): • Future car parking for land in Campsie and Punchbowl (item b). • Height reduction from 11.5m to 11.0m (item c). In relation to item (e) apply FSR to dwelling houses and semi-detached dwellings. The proposal is consistent with the objectives of this Direction on the basis, that the planning proposal, will not alter the boundary of existing residential zoned (R2, R3, R4) land in the LGA. The proposal will continue to enable redevelopment of dwelling houses and semi-detached dwellings in all residential zoned land that is accessible to housing, jobs and services.
6.1	Approval and Referral requirements	The Heritage Council of NSW has endorsed the removal of the Campsie Railway Station Group from the State Heritage Register. Accordingly, the planning proposal is considered to be consistent with this direction.
6.2	Reserving Land for Public Purpose	The aim of this direction is to facilitate the provision of reserving land for public purposes. The planning proposal seeks to identify land at Campsie and Punchbowl for future car parking purposes with Council as the nominated acquisition authority. The proposal is considered to be consistent with this Direction.
7.1	Implementation of The Plan for Growing Sydney	Consistent. The consistency of the planning proposal with the NSW Government's A Plan for Growing Sydney has been considered as part of the planning proposal (see section 4).

APPENDIX 3: Maps

- **Current and Proposed Height of Building Maps**
- **Current and proposed Land Reservation Acquisition Map**

Current Height of Building Maps



Canterbury Local Environmental Plan 2012

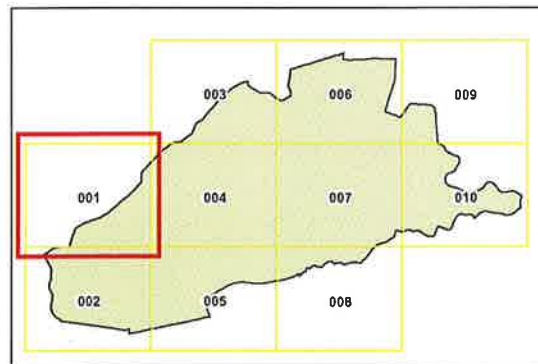
Height Of Buildings Map - Sheet HOB_001

Maximum Building Height (m)

B	4
I	8.5
J	9.5
K	10
L1	11
L2	11.5
M	12
N	14
P	18
R	21
T	27
U	30

Cadastre

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Projection: GDA 1994
Zone 56

0 200 Metres

Scale: 1:10,000 @ A3

Map Identification number: 1550_COM_HOB_001_010_20130807





Canterbury Local Environmental Plan 2012

Height Of Buildings Map - Sheet HOB_002

Maximum Building Height (m)

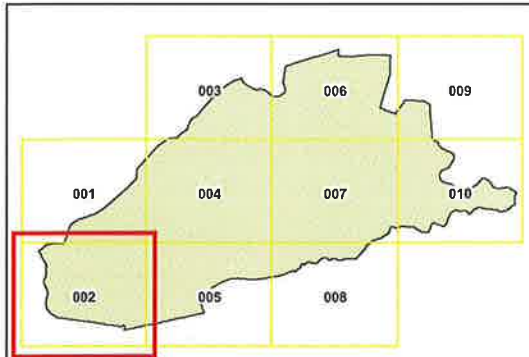
B	4
L	8.5
J	9.5
K	10
L1	11
L2	11.5
M	12
N1	13.5
N2	14
P	18
R	21
T	27
U	30

Cadastre

Cadastre 01/02/14 © Land & Property Information (LPI)

BANKSTOWN LGA

HURSTVILLE LGA



0 200 Metres

Scale: 1:10,000 @ A3

Projection: GDA 1994
Zone 56

Map Identification number: 1550_COM_HOB_002_010_20141216



Canterbury Local Environmental Plan 2012

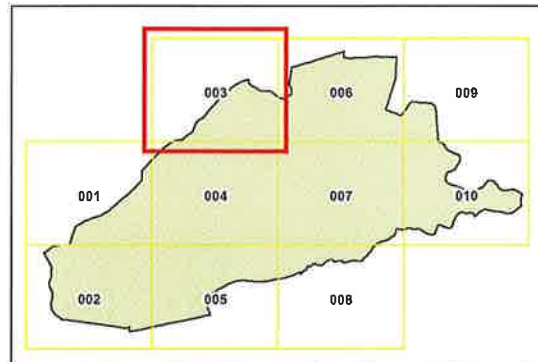
Height Of Buildings Map - Sheet HOB_003

Maximum Building Height (m)

B	4
J	8.5
J	9.5
K	10
L1	11
L2	11.5
M	12
N	14
P	18
R	21
T	27
U	30

Cadastre

Cadastre 01/02/12 © Land & Property Information (LPI)



Projection: GDA 1994
Zone 56

0 200 Metres

Scale: 1:10,000 @ A3

Map identification number: 1550_COM_HOB_003_010_20121105





Canterbury Local Environmental Plan 2012

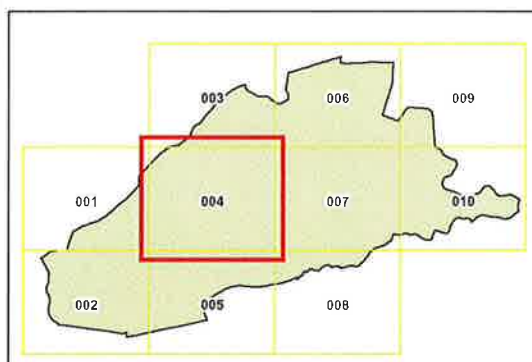
Height Of Buildings Map - Sheet HOB_004

Maximum Building Height (m)

B	4
I	8,5
J	9,5
K	10
L1	11
L2	11,5
M	12
N	14
O	15
P	18
R	21
T1	25
T2	27
T	27
U	30

Cadastre

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Projection: GDA 1994
Zone 56

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Scale: 1:10,000 @ A3

Map identification number: 1550_COM_HOB_004_010_20140218





Canterbury Local Environmental Plan 2012

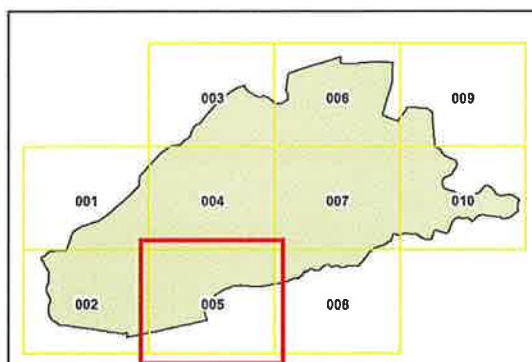
Height Of Buildings Map -
Sheet HOB_005

Maximum Building Height (m)

B	4
I	8.5
J	9.5
K	10
L1	11
L2	11.5
M	12
N1	13.5
N2	14
P	18
R	21
T	27
U	30

Cadastre

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Projection: GDA 1994
Zone 56

0 200 Metres

Scale: 1:10,000 @ A3

Map identification number: 1550_COM_HOB_005_010_20141216





Canterbury Local Environmental Plan 2012

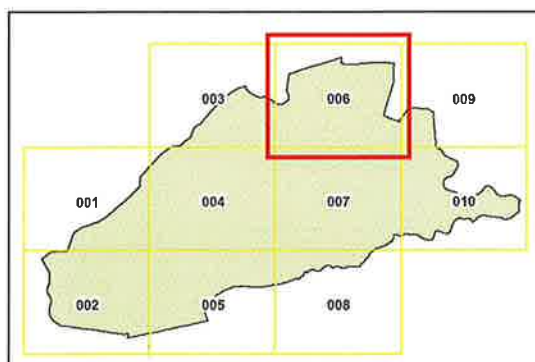
Height Of Buildings Map -
Sheet HOB_006

Maximum Building Height (m)

B	4
J	8.5
K	9.5
L1	10
L2	11
M	11.5
N1	12
N2	13.5
P	14
R	18
T	21
U	27
	30

Cadastre

Cadastre 01/02/14 © Land & Property Information (LPI)

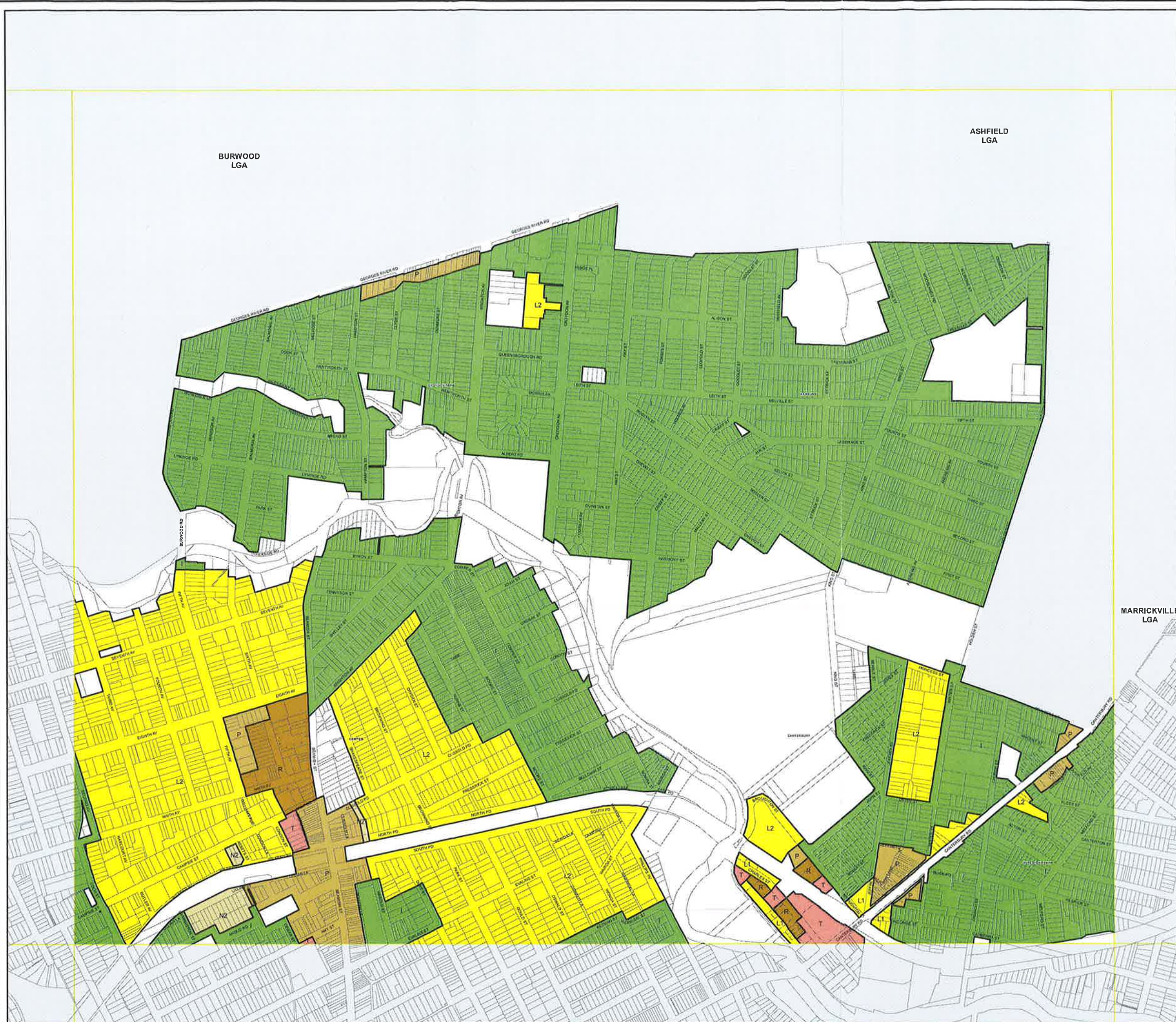


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Zone 56

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Scale: 1:10,000 @ A3

Map identification number: 1550_COM_HOB_006_010_20141216





Canterbury Local Environmental Plan 2012

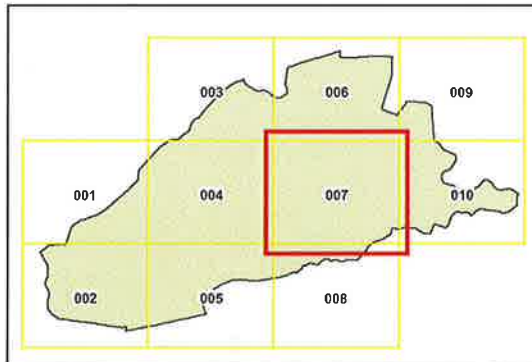
Height Of Buildings Map - Sheet HOB_007

Maximum Building Height (m)

B	4
8.5	
J	9.5
K	10
L1	11
L2	11.5
M	12
N1	13.5
N2	14
P	18
R	21
T	27
U	30

Cadastre

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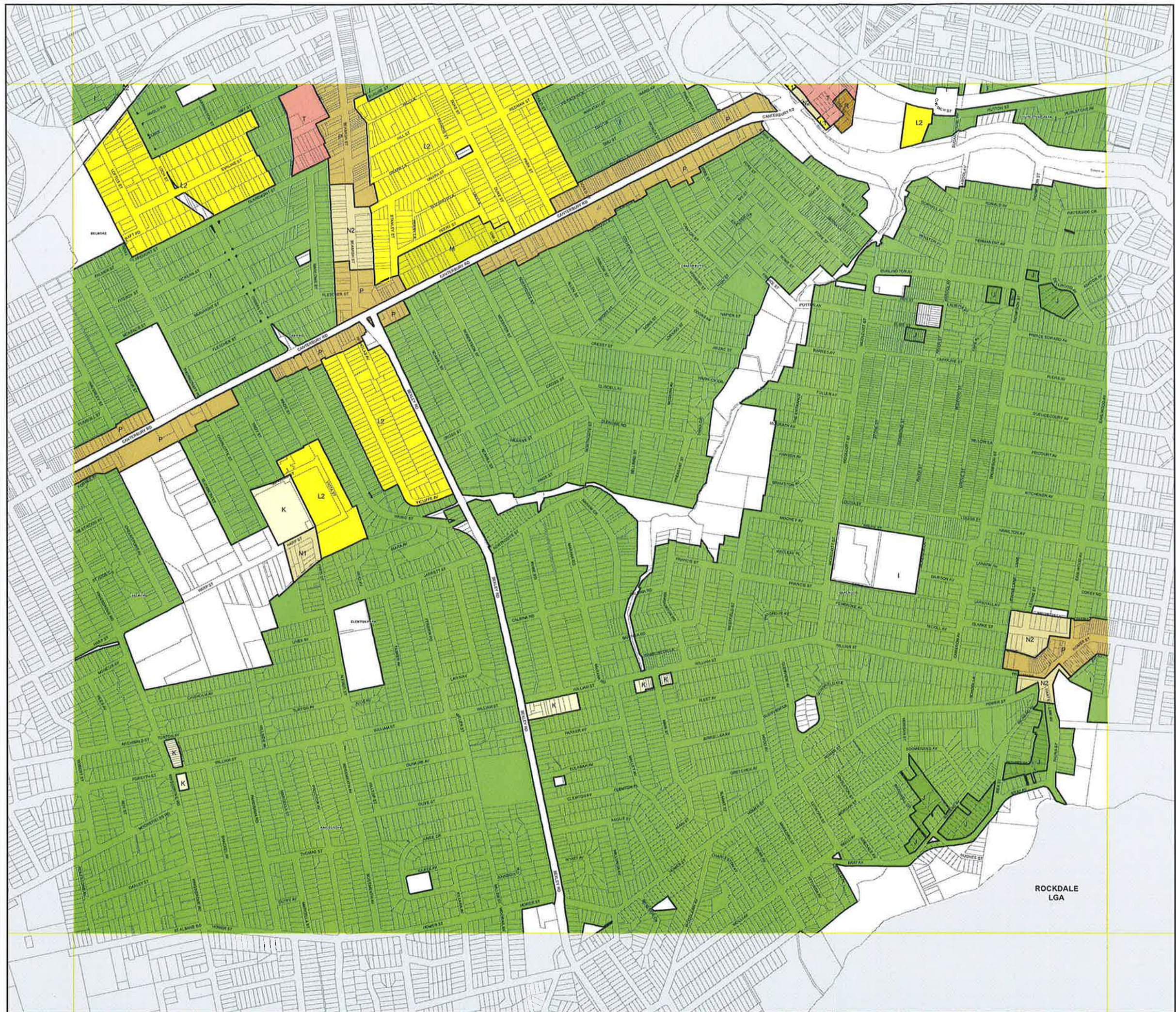


Projection: GDA 1994
Zone 56

0 200 Metres

Scale: 1:10,000 @ A3

Map identification number: 1550_COM_HOB_007_010_20141216



ROCKDALE
LGA



Canterbury Local Environmental Plan 2012

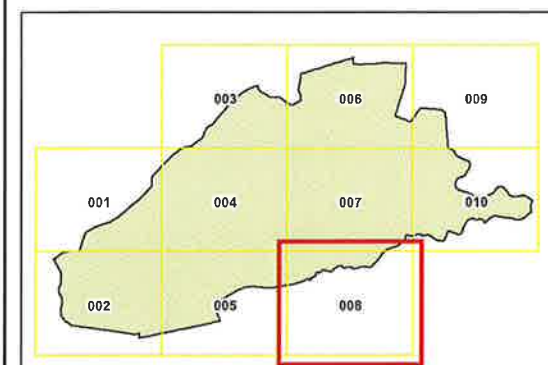
Height Of Buildings Map - Sheet HOB_008

Maximum Building Height (m)

B	4
I	8.5
J	9.5
K	10
L1	11
L2	11.5
M	12
N	14
P	18
R	21
T	27
U	30

Cadastre

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Projection: GDA 1994
Zone 56

0 200 Metres

Scale: 1:10,000 @ A3

Map identification number: 1550_COM_HOB_008_010_20121105





Canterbury Local Environmental Plan 2012

Height Of Buildings Map - Sheet HOB_009

Maximum Building Height (m)

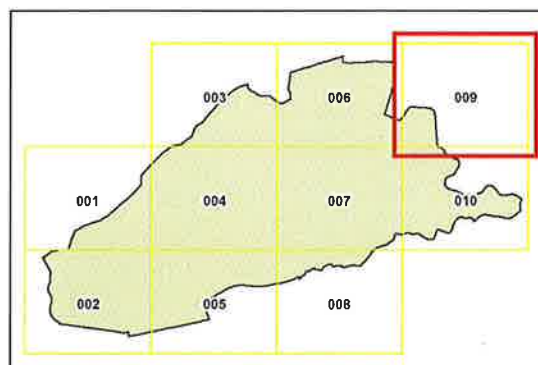
4
8.5
9.5
10
11
11.5
12
14
18
21
27
30

Cadastral

Cadastral 01/02/12 © Land & Property Information (LPI)

ASHFIELD LGA

MARRICKVILLE
LGA



Projection: GDA 1994
Zone 56

0 200 Metres

Scale: 1:10,000 @ A3

Map Identification number: 1550_COM_HOB_009_010_20121105



Canterbury Local Environmental Plan 2012

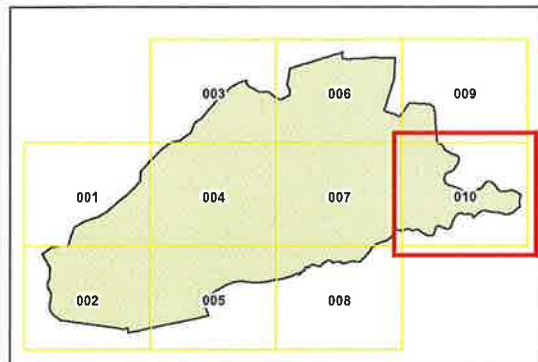
Height Of Buildings Map - Sheet HOB_010

Maximum Building Height (m)

B	4
J	8.5
J	9.5
K	10
L1	11
L2	11.5
M	12
N	14
P	18
R	21
T	27
U	30

Cadastre

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Projection: GDA 1994
Zone 56

0 200 Metres

Scale: 1:10,000 @ A3

Map identification number: 1550_COM_HOB_010_010_20121105



Proposed Height of Building Maps



Canterbury Local Environmental Plan 2012

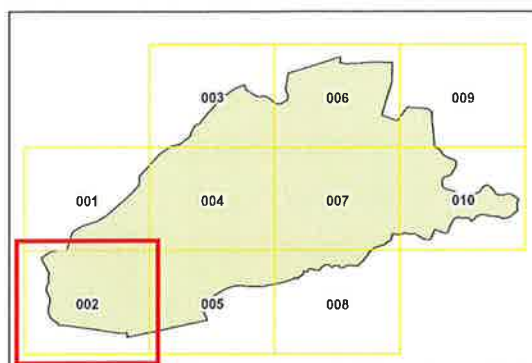
Height Of Buildings Map - Sheet HOB_002

Maximum Building Height (m)

B	4
8.5	
9.5	
K	10
L	11
M	12
N1	13.5
N2	14
P	18
R	21
T	27
U	30

Cadastre

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Projection: GDA 1994
Zone 56

0 200 Metres

Scale: 1:10,000 @ A3

Map identification number: 1550_COM_HOB_002_010_20150618





Canterbury Local Environmental Plan 2012

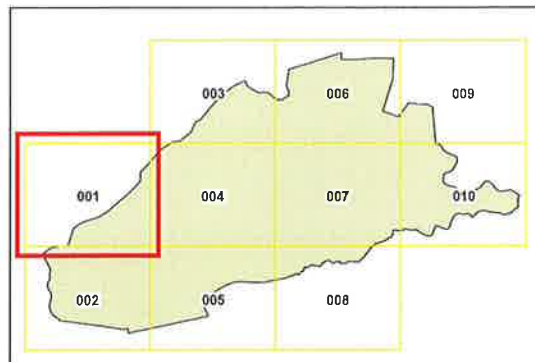
Height Of Buildings Map -
Sheet HOB_001

Maximum Building Height (m)

B	4
	8.5
	9.5
K	10
L	11
M	12
N1	13.5
N2	14
P	18
R	21
T	27
U	30

Cadastral

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Projection: GDA 1994
Zone 56

0 200 Metres

Scale: 1:10,000 @ A3

Map identification number: 1550_COM_HOB_001_010_20150618





Canterbury Local Environmental Plan 2012

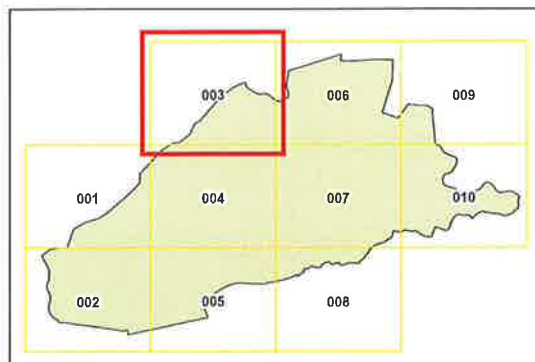
Height Of Buildings Map - Sheet HOB_003

Maximum Building Height (m)

4
8.5
9.5
10
11
12
13.5
14
18
21
27
30

Cadastral

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Projection: GDA 1994
Zone 58

0 200 Metres

Scale: 1:10,000 @ A3

Map identification number: 1550_COM_HOB_003_010_20150618





Canterbury Local Environmental Plan 2012

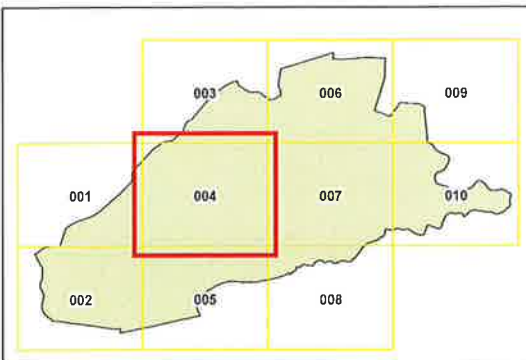
Height Of Buildings Map -
Sheet HOB_004

Maximum Building Height (m)

B	4
8.5	
9.5	
K	10
L	11
M	12
N1	13.5
N2	14
P	18
R	21
T	27
U	30

Cadastre

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Projection: GDA 1994
Zone 56

0 200 Metres

Scale: 1:10,000 @ A3

Map identification number: 1550_COM_HOB_004_010_20150618





Canterbury Local Environmental Plan 2012

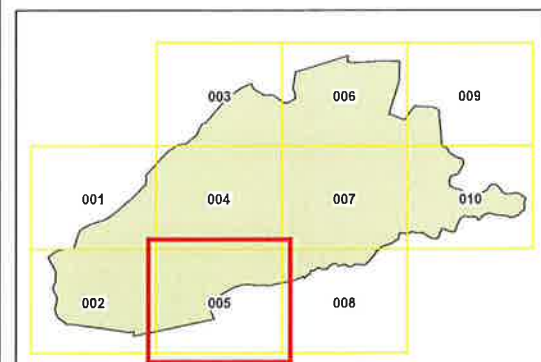
Height Of Buildings Map - Sheet HOB_005

Maximum Building Height (m)

B	4
8.5	
9.5	
K	10
L	11
M	12
N1	13.5
N2	14
P	18
R	21
T	27
U	30

Cadastral

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Projection: GDA 1994
Zone 56

0 200 Metres

Scale: 1:10,000 @ A3

Map identification number: 1550_COM_HOB_005_010_20150818





Canterbury Local Environmental Plan 2012

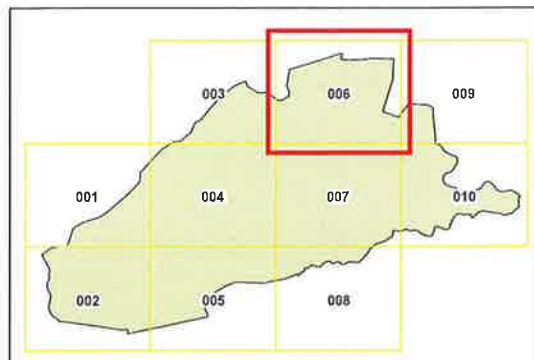
Height Of Buildings Map - Sheet HOB_006

Maximum Building Height (m)

B	4
8.5	
9.5	
K	10
L	11
M	12
N1	13.5
N2	14
P	18
R	21
T	27
U	30

Cadastre

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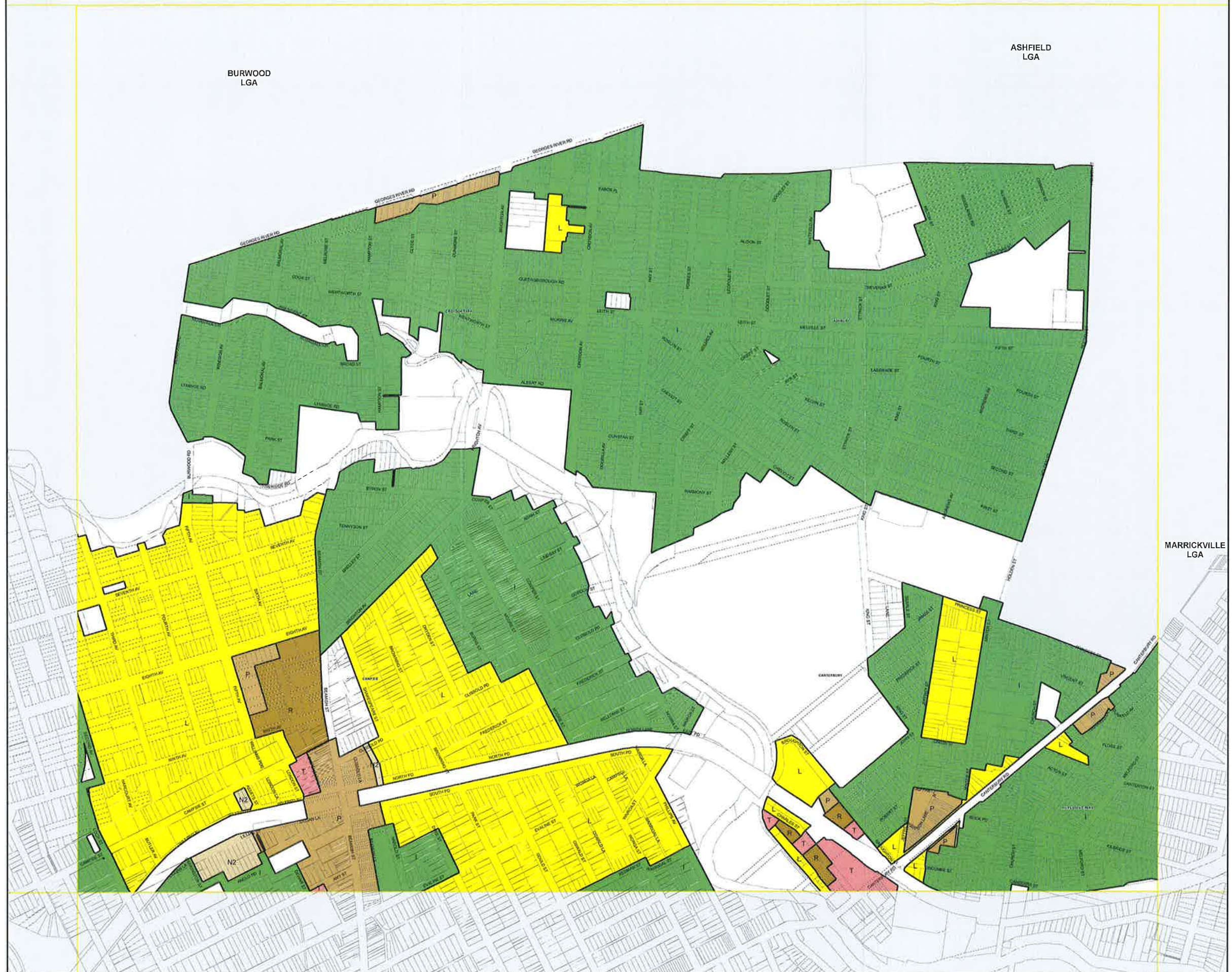


Projection: GDA 1994
Zone 56

0 200 Metres

Scale: 1:10,000 @ A3

Map identification number: 1550_COM_HOB_006_010_20150618





Canterbury Local Environmental Plan 2012

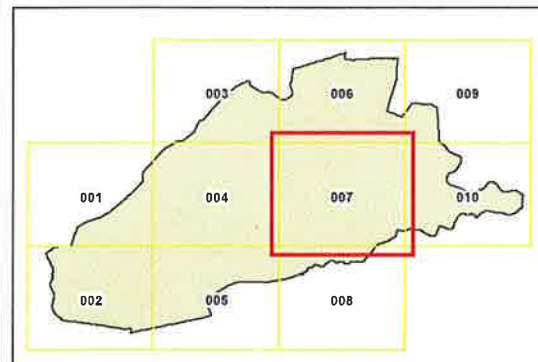
Height Of Buildings Map - Sheet HOB_007

Maximum Building Height (m)

B	4
8.5	
J	9.5
K	10
L	11
M	12
N1	13.5
N2	14
P	18
R	21
T	27
U	30

Cadastre

Cadastre 01/02/15 © Land & Property Information (LPI)

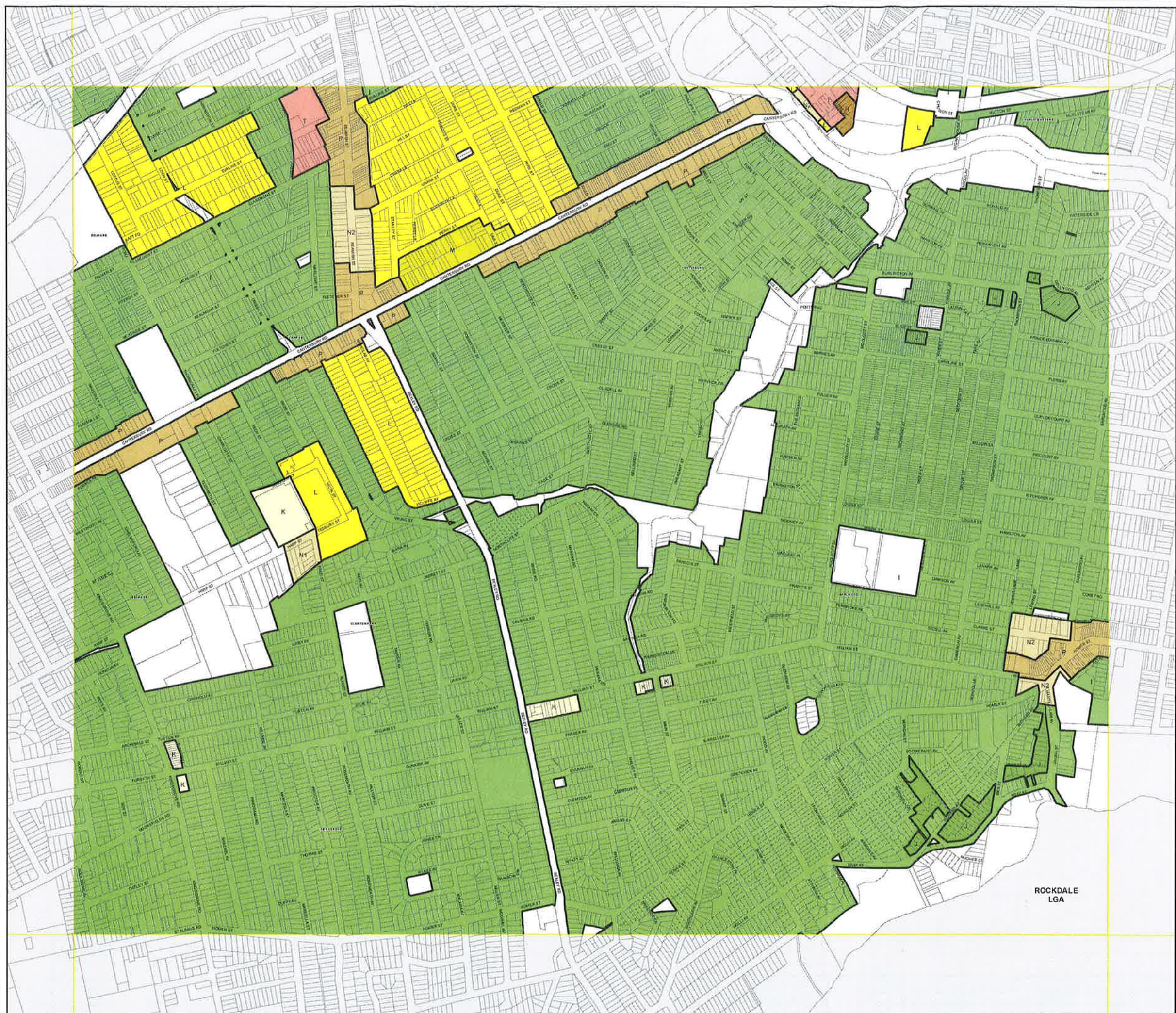


0 200 Metres

Scale: 1:10,000 @ A3

Projection: GDA 1994
Zone 56

Map identification number: 1550_COM_HOB_007_010_20150618





Canterbury Local Environmental Plan 2012

Height Of Buildings Map - Sheet HOB_008

Maximum Building Height (m)

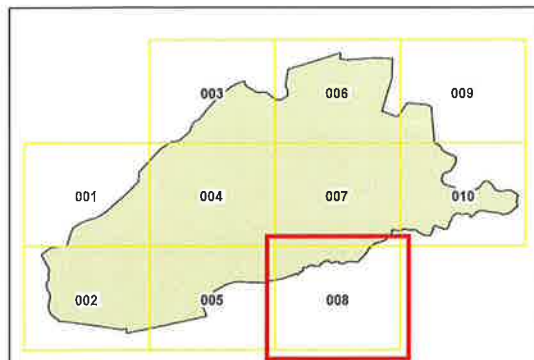
B	4
	8.5
	9.5
K	10
L	11
M	12
N1	13.5
N2	14
P	18
R	21
T	27
U	30

Cadastral

Cadastral 01/02/15 © Land & Property Information (LPI)

HURSTVILLE LGA

ROCKDALE LGA



Projection: GDA 1994
Zone 56

0 200 Metres

Scale: 1:10,000 @ A3

Map identification number: 1550_COM_HOB_008_010_20150618



Canterbury Local Environmental Plan 2012

Height Of Buildings Map -
Sheet HOB_009

Maximum Building Height (m)

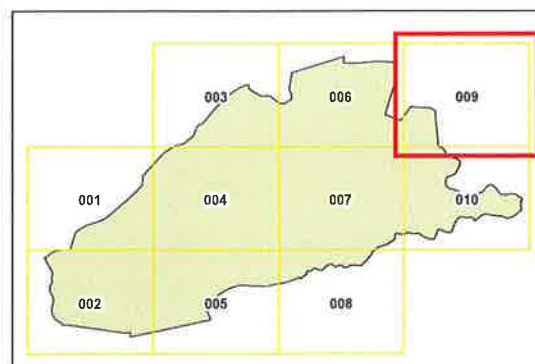
4
8.5
9.5
K 10
L 11
M 12
N1 13.5
N2 14
P 18
R 21
T 27
U 30

Cadastre

Cadastre 01/02/15 © Land & Property Information (LPI)

ASHFIELD
LGA

MARRICKVILLE
LGA



Projection: GDA 1994
Zone 56

0 200 Metres

Scale: 1:10,000 @ A3

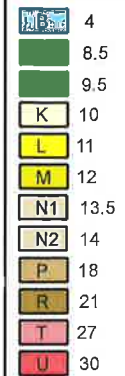
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Canterbury Local Environmental Plan 2012

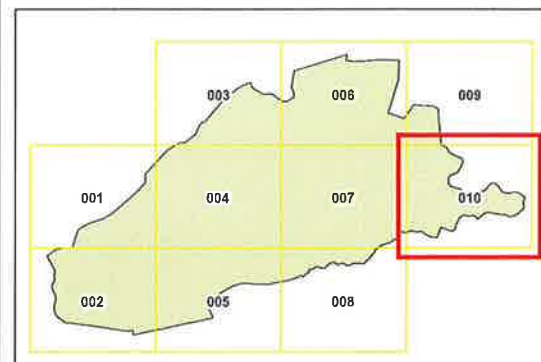
Height Of Buildings Map - Sheet HOB_010

Maximum Building Height (m)



Cadastre

Cadastre 01/02/15 © Land & Property Information (LPI)



Projection: GDA 1994
Zone 56

0 200 Metres

Scale: 1:10,000 @ A3

Map identification number: 1550_COM_HOB_010_010_20150818

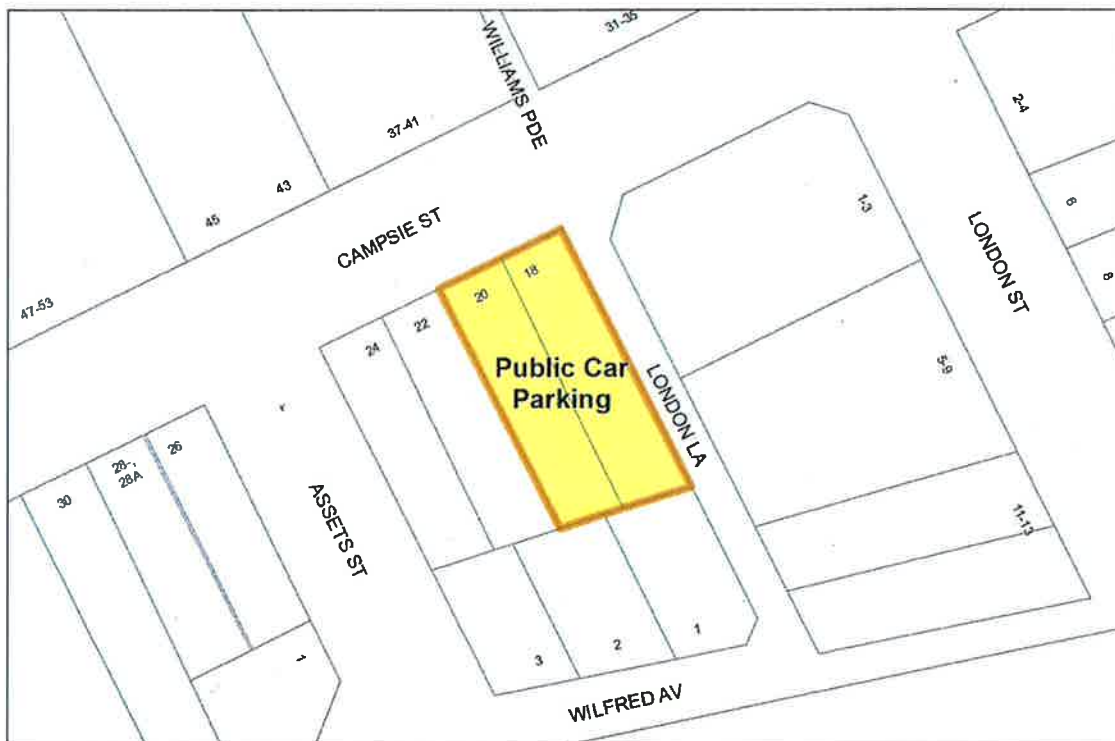


Current and proposed Land Reservation Acquisition Map

Existing LRA Map 18-20 Campsie Street, Campsie



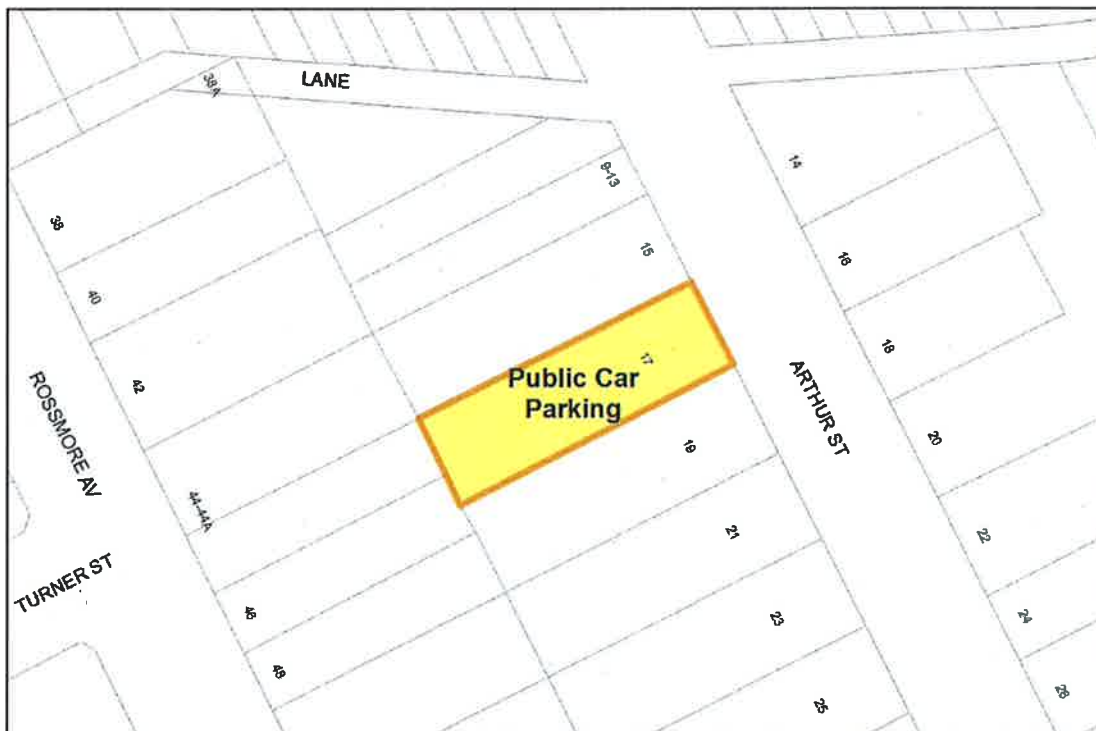
Proposed LRA map 18-20 Campsie Street, Campsie



Existing LRA Map 17 Arthur Street, Punchbowl



Proposed LRA map 17 Arthur Street, Punchbowl



Attachment 5

Further consideration of relevant S.117 Ministerial Directions

Item B Land for future car parking at Campsie and Punchbowl

S117 Direction 3.1: Residential Zones

Direction 3.1 – Residential Zones

This direction applies when a relevant planning authority prepares a planning proposal that will affect land within an existing or proposed residential zone (including alteration of any existing residential boundary) and any other zone in which significant residential development is permitted or proposed to be permitted.

This direction will apply as the proposal to identify land for car parking is zoned R4 High Density Residential.

The objectives of this direction are stated, inter alia:

- (a) To encourage a variety and choice of housing types to provide for existing and future housing needs,*
- (b) To make efficient use of existing infrastructure and services and ensure that new housing has appropriate access to infrastructure and services, and*
- (c) To minimise the impact of residential development on the environment and resource lands*

Comment/response

The designation of land for car parking purposes would remove opportunity for the ground level of the land to be used for residential purposes. It is noted that it is possible that the air space above the car park could be used for residential purposes. The underlying R4 zone will not change and therefore the residential potential of the land will be retained.

In addition, the loss of residential floor space (2,350m²) is considered of minor significance in the context of the amount of new high density residential R4 zoned land created through Canterbury LEP 2012 in the Campsie Town Centre and Punchbowl Town Centre. A total of 31,280m² of residential zoned land in Punchbowl Town Centre has been rezoned from R3 Medium Density to R4 High Density Residential through CLEP 2012 and a total of 35,400m² of residential zoned land in Campsie Town Centre receiving density increases through increased height and FSR. A map showing the expanded residential zoned lands and its corresponding density increases around Campsie and Punchbowl are attached. (See **attachment 2**).

The provision of off street car parking in a central and convenient location is an important provision for the functioning of the Campsie and Punchbowl Town Centres. Support for the provision of off street car parking in this location is provided by the Car Parking Strategy which identifies these sites to be suitable for future public car parking to support the growth of the Campsie and Punchbowl town centres.

Direction 3.4 – Integrating Land Use and Transport

The direction applies when a relevant planning authority prepares a planning proposal that will create, alter or remove a zone or a provision relating to urban land, including land zoned for residential, business, industrial, village or tourist purposes.

The objectives of this direction are stated, inter alia:

- a. Improving access to housing, jobs and services by walking, cycling and public transport, and*
- b. Increasing the choice of available transport and reducing dependence on cars, and*
- c. Reducing travel demand including the number of trips generated by development and the distances travelled, especially by car, and*
- d. Supporting the efficient and viable operation of public transport services, and*
- e. Providing for the efficient movement of freight.*

The Direction outlines that the relevant planning authority must locate zones for urban purposes and includes provisions that give effect to and are consistent with the aims, objectives and principles of:

- a) Improving Transport Choice – Guidelines for planning and development (DUAP 2001), and*
- b) The Right Place for Business and Services – Planning Policy (DUAP 2001).*

Comment/response

The provision of additional public off street car parking does encourage access to Campsie Town Centre and Punchbowl Town Centre by private vehicle which is contrary to the objectives of this Direction. The inconsistency with the Direction can be justified if the Planning Proposal is:

- b) justified by a study prepared in support of the planning proposal which gives consideration of the objective of this direction, or*
- c) in accordance with the relevant Regional Strategy or Sub-Regional Strategy prepared by the Department of Planning which gives considerations to the objectives of this direction, or*
- d) of minor significance.*

The Town Centre Parking Strategy is a comprehensive document that provides Council's with strategies to manage car parking both now and in the future to meet future demands relating to the proposed rezoning's and increase in development density around our town centres. The implementation of the strategy will involve both management measures to better regulate the supply of parking, and where appropriate new public car parking to be provided by Council.

The Strategy recommends the reduction in current car parking provision rates to reflect the greater public transport accessibility that our centres generally have. The Parking Strategy therefore gives consideration to the objectives of this Direction through recommending reduced parking rates where sites have greater public transport accessibility. This is consistent with the Guidelines for Improving Transport Choice.

The draft South Subregional Strategy supports the renewal of existing centres through new development and the provision of supporting infrastructure. The provision of off street car parking is an essential infrastructure element in supporting the operation of the Campsie and Punchbowl Town Centre's. The Planning Proposal is therefore considered to be consistent with the draft South Subregional Strategy and any inconsistency with this S117 Direction can be justified.

Item C: Reduce the height limit in the R4 zone from 11.5m to 11m.

Direction 3.1 – Residential Zones

The direction applies when a relevant planning authority prepares a planning proposal that will affect land within an existing or proposed residential zone (including the alteration of any existing residential boundary) and any other zone in which significant residential development is permitted or proposed to be permitted.

Comment/response:

As the current proposal relates to existing area of R4 High Density Residential land, proposing to reduce the height limit in this zone from 11.5m to 11m, this Direction applies.

The objectives of this direction are stated, inter alia:

- (a) To encourage a variety and choice of housing types to provide for existing and future housing needs,*
- (b) To make efficient use of existing infrastructure and services and ensure that new housing has appropriate access to infrastructure and services, and*
- (c) To minimise the impact of residential development on the environment and resource Lands*

Objective (a) - The R4 High Density Residential zone permits a variety of residential accommodation. The planning proposal will not change the zoning of the land and will therefore have no significant impact on housing diversity. The reduction in height will reinstate council's long standing policy of three storey RFBs in R4 zones. The proposal will ensure RFB in R4 zones have a comparable height (storeys) to existing RFB's in the R4 zones.

Objective (b) - It is understood that there is sufficient infrastructure capacity to accommodate the existing R4 zoned land. The Department of Planning has previously been satisfied that a R4 High Density Residential zone could be adequately serviced and on this basis, the reduction in height of 0.5m in this zone would likewise be accommodated and serviced. The planning proposal will not alter the maximum densities (0.9:1) specified for the R4 zone and therefore have no impact on the demand for residential support services in the locality.

Objective (c) - In our opinion, there are not likely to be any adverse environmental impacts on the locality as a result of the proposal. Any localised environmental impacts will be dealt with at development application stage in accordance with the relevant provisions of the Environment Planning and Assessment Act 1979. In summary, the planning proposal is consistent with the objectives of this direction.

Actions of the Relevant Planning Authority

The direction establishes a number of actions that should be taken by the relevant planning authority in the event this direction applies. These are stated, inter alia:

A planning proposal must include provisions that encourage the provision of housing that will:

- a. Broaden the choice of building types and locations available in the housing market, and*
- b. Make more efficient use of existing infrastructure and services, and*
- c. Reduce the consumption of land for housing and associated urban development on the urban fringe, and*
- d. Be of good design.*

Requirement (a) - As outlined, the planning proposal is not seeking to change the zoning of the land, and will continue to provide a variety of housing options as permissible uses in the R4 zone.

Requirement (b) – The R4 zoned land is within an established urban locality and is supported by existing infrastructure such as water, sewer, electricity and so forth. As indicated, the planning proposal will not alter the zoning or maximum density of R4 zoned land and will continue to make efficient use of existing infrastructure and services.

Requirement (c) - The proposal will not result in the consumption of additional land in the urban fringe given the subject area is located within an established urban area.

Requirement (d) - Council has established design parameters for residential development within its DCP which are designed to deliver good design outcomes for the Canterbury LGA. The proposal is intended to reinforce the three storey height limit for RFB in our R4 zones so that is compatible with the surrounding residential character. It is our opinion that good design will continue to be achieved for RFBs in our R4 zones.

Further requirements are stated, inter alia:

A planning proposal must, in relation to land to which this direction applies:

- a) Contain a requirement that residential development is not permitted until land is adequately serviced (or arrangements satisfactory to the council, or other appropriate authority, have been made to service it), and*
- b) Not contain provisions which will reduce the permissible residential density of land.*

Requirement (a) – The R4 zoned land is located within an existing urban area that that is serviced. The planning proposal is not proposing changing the zoning of the land in the R4 zone and is understood that infrastructure in the locality is sufficient to accommodate development in the R4 zone.

Requirement (b) – By nature of the height reduction from 11.5m to 11.0m, there will be no reduction in residential densities, the FSR will remain unchanged at 0.9:1. As outline, the primary difference in built form outcome is that residential flat buildings will be three storeys instead of four storeys in the R4 High Density Residential zone.

The direction outlines that a planning proposal can be inconsistent with the terms of this direction if the proposal is in accordance with the relevant regional strategy or subregional strategy prepared by the Department of planning which gives consideration to the objectives of this direction, or if the inconsistency is of minor significance.

The Planning Proposal has demonstrated that the reduction in height in the R4 zones is consistent with the objectives of the Directions and Actions of The Plan for Growing Sydney. Furthermore, it is considered that as the Canterbury LGA can satisfy its housing targets (see section 5.1).

Direction 3.4 – Integrating Land Use and Transport

The direction applies when a relevant planning authority prepares a planning proposal that will create, alter or remove a zone or a provision relating to urban land, including land zoned for residential, business, industrial, village or tourist purposes.

Comment/response:

As the current proposal relates to existing area of R4 High Density Residential land, proposing to alter the height limit in this zone from 11.5m to 11m, this Direction applies.

The objectives of this direction are stated, inter alia:

- a. Improving access to housing, jobs and services by walking, cycling and public transport, and*
- b. Increasing the choice of available transport and reducing dependence on cars, and*
- c. Reducing travel demand including the number of trips generated by development and the distances travelled, especially by car, and*
- d. Supporting the efficient and viable operation of public transport services, and*
- e. Providing for the efficient movement of freight.*

The proposal is consistent with the objectives of this Direction on the basis that the planning proposal will not alter the boundary of existing R4 zoned land in the LGA. The proposal will continue to enable redevelopment of R4 zoned land that are accessible to housing, jobs and services.

Attachment 6

Letter from Heritage Council