



19 November 2020

RJC: 15-221

The Secretary  
Department of Planning, Industry and Environment  
Locked Bag 5022  
Parramatta NSW 2124

**Attention: Mr Adrian Hohenzollern, Director South West, Place and Infrastructure**

Dear Mr Hohenzollern,

**Re No 2 Farrow Road, Campbelltown  
Planning Proposal not determined by Campbelltown Council after 90 days  
Request for Rezoning Review**

We write on behalf of Hyside Projects Subone Pty Ltd ("our client"), for whom we submitted a Planning Proposal to Campbelltown City Council ("Council") in respect of No. 2 Farrow Road, Campbelltown ("the Property") on behalf of the owner, Campbelltown Central 2 Pty Ltd. on 29 April 2020. On 10 November 2020, Council resolved not to support the Planning Proposal.

Our client seeks a Rezoning Review. In this regard, please see attached:

- a completed application form;
- a copy of our client's request for Council to prepare and submit a Planning Proposal for Gateway determination and all supporting material and information that was submitted to Council with the Planning Proposal;
- an abbreviated urban design presentation on the Planning Proposal which was given to Councillors at a Councillor briefing session on 21 July 2020;
- an Addendum to the Planning Proposal's Urban Design Report which was submitted to Council on 19 August 2020 (along with our covering letter), showing the same development concept but with reduced heights of buildings and a reduced development yield of 1,200 apartments (as opposed to 1,528 apartments in the originally submitted scheme); and
- a corresponding amended (i.e. reduced) Height of Buildings Map as submitted to Council on 25 August 2020.

All documents referred to above are in the following Dropbox link for your convenience:-

[https://www.dropbox.com/sh/glz5e8hw14xj98r/AAC7Bf1vpql44KGy5wY7vo\\_2a?dl=0](https://www.dropbox.com/sh/glz5e8hw14xj98r/AAC7Bf1vpql44KGy5wY7vo_2a?dl=0)

Key actions relevant to the Planning Proposal are as follows: -

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EMAIL: [bbc.administration@bbcplanners.com.au](mailto:bbc.administration@bbcplanners.com.au) ~ WEB SITE: [www.bbcplanners.com.au](http://www.bbcplanners.com.au)

ABN 24 061 868 942

1. The request to prepare a Planning Proposal was lodged with Council on 29 April 2020. It sought an amendment of Campbelltown Local Environmental Plan 2015 ("CLEP"), in the following manner:
  - remove the "Deferred Matter" status and rezone the land from 4(b) Industry B under Campbelltown LEP 2002 to B4 Mixed-use under the CLEP;
  - introduce maximum building height controls consistent with the identification of the site for high rise residential development in the Campbelltown Precinct Plan; and
  - add a new Clause 41 into Schedule 1 "Additional Permitted Uses" of the CLEP to provide for an exemption from Clause 7.9 so as to permit residential flat buildings on that part of the site fronting Bow Bowing Creek without them having to have an active street frontage and only non-residential land uses at ground level.
2. On 21 July 2020, there was a briefing of Councillors.
3. On 19 August 2020, the Addendum to the Urban Design Report which accompanies the Planning Proposal as referred to above was submitted to Council.
4. On 25 August 2020, an amended Height of Buildings Map was submitted to Council.
5. On 6 October 2020, the Planning Proposal was considered by Council's Local Planning Panel.
6. On 10 November 2020, Council resolved not to support the Planning Proposal.

The above key actions provides a summary only. A more detailed history of the Planning Proposal is provided in my letter to you of 30 September 2020 which I attach hereto for your convenience (see **Attachment 1**).

The justification for the Planning Proposal is set out in Part 3 of the Planning Proposal report. For your convenience, a summary of the strategic and site specific merits of the Planning Proposal is contained in **Attachment 2** hereto. This has been prepared for the Department's convenience.

Urban renewal on the site in accordance with the requested B4 Mixed Use zoning and development standards contained in the Planning Proposal provides the opportunity for a high rise, high density, primarily residential, transit-oriented development directly opposite Campbelltown railway station. The **public benefits** associated with the Planning Proposal include:

- increased housing stock on a site that has been identified for high density residential in relevant planning strategies;
- contributing to further urban renewal within the Campbelltown City Centre;
- increased housing choice in a centrally-located mixed-use environment with close proximity to public transport, schools, open space, retail and support services in an area where journey-to-work by public transport is enhanced;
- providing for growth in a co-ordinated fashion;
- making more efficient use of an under-utilised site;

- enhanced utilisation of existing infrastructure and services and increased contributions to future infrastructure; and
- consistency with, and giving effect to, relevant strategic land use planning strategies and Ministerial Directions.

The Planning Proposal is a direct response to the Glenfield to Macarthur Urban Renewal Corridor Strategy (July 2015), the Campbelltown Precinct Plan (November 2017) and to the Greater Macarthur 2040: An Interim Plan for the Greater Macarthur Growth Area (November 2018), each of which identifies the site for high rise residential development. The Planning Proposal is also consistent with the objectives and actions in the Greater Sydney Regional Plan and the Western City District Plan and your attention is drawn in particular to Ministerial Section 9.1 Direction 7.7 with which the Planning Proposal is consistent.

There are 3 particular matters that we would like to bring to your attention and we request that they also be brought to the attention of the decision-maker for the Gateway Determination: -

### **1. Consideration of the Planning Proposal by Campbelltown Local Planning Panel**

The Planning Proposal was considered by the Campbelltown Local Planning Panel (CLPP) on 8 September 2020. The assessment/ briefing report prepared by Council's planning officers was not made public either prior to or following the CLPP meeting.

The CLPP recommended that the Planning Proposal not proceed to Gateway Determination citing strategic planning reasons which appear to contradict the relevant strategic planning framework. In that regard, I wrote to the Chair of the CLPP, Ian Reynolds, by letter dated 6 October 2020, a copy of which is attached for your reference (see **Attachment 3**). I have not had a response to the letter.

### **2. Offers to brief the Council on the Planning Proposal**

As noted in my letter to you of 27 August 2020, my client offered to brief the Council on the Planning Proposal in April 2019. That request was denied. When we subsequently engaged with Council Planning officers on the Planning Proposal later in 2019, after the urban design work which underpins the Planning Proposal had progressed further, Council officers requested that the Planning Proposal not be lodged before the draft Re-Imagining Campbelltown City Centre Master Plan had been released for exhibition. We were not aware at the time the officers made that request that the draft Campbelltown Re-Imagined Master Plan (which was not released for exhibition until mid 2020) would so extensively contradict the Campbelltown Precinct Plan by instead of identifying the land which is subject to the Planning Proposal (and also other adjacent and nearby land on the northern side of the railway line) for high rise residential, identifying it as "tech and city servicing innovation precinct" with the potential for residential accommodation only in the longer term.

### **3. Discussions required around the issue of building height**

As the Campbelltown Precinct Plan provided no guidance on what is meant by “high rise residential”, (other than what is obvious) the urban design analysis submitted with the Planning Proposal showed heights that were considered appropriate and justifiable from an urban design perspective, having regard to the context and strategic position of the subject land, and the direction for strategic centre land use intensification envisaged not just for Campbelltown City Centre, but also for other comparable major centres in the Greater Sydney Region.

As previously conveyed to you, following initial informal feedback from Council officers and Councillors on the Planning Proposal, as part of which concerns were raised with the heights which were proposed, an Addendum to the Planning Proposal was prepared in which a revised urban design concept was presented with lesser heights. The purpose of this Addendum was to try and obtain from Council an indication of whether the reduced height was in Council’s opinion an improvement on the original scheme.

As you will appreciate, what the Proponent was attempting to do here was provide Council with the tools to make an informed decision about the relatively abstract concept of height in a strategic planning framework which identifies the site for “high rise residential”. That issue requires further discussion with yourselves at the Department. The Proponent is seeking support for a Planning Proposal which responds to the Campbelltown Precinct Plan which identifies the site for “high rise residential”. As the Department has labelled the subject land in that way further discussion is needed with the Department about the outcomes and the parameters that are intended.

Insofar as the Addendum to the Planning Proposal is concerned, as referred to above, this was provided to the Council in response to verbal feedback from both Councillors and Council officers which might best be expressed as reservations about the height limits proposed in the Planning Proposal as lodged. The urban design concept in the Addendum illustrates reductions in the heights of building by between 2 and 11 storeys.

In circumstance where the relevant strategic planning documents (including the document referred to in the Minister’s Section 9.1 Direction 7.7), identifies the site for high rise residential development it is to be expected that there will be differences of opinion as to what the height limit for that type of development should be. The Applicant has provided the Addendum as a response to inferred concerns about the height limits in the Planning Proposal as submitted. Discussions with the Department are invited about the proposed height limits, and the Addendum can inform those discussions.

Please let us know if any further information is required in this regard.

Yours faithfully  
**BBC Consulting Planners**



**Bob Chambers**  
**Director**

## **Attachment 1 – Letter of Planning Proposal History (30 September 2020)**



30 September 2020

RJC:15-221

The Secretary  
Department of Planning, Industry and Environment  
Locked Bag 5022  
Parramatta NSW 2124

**Attention: Mr Adrian Hohenzollern, Director South West, Place and Infrastructure**

Dear Mr Hohenzollern,

**Re: 2 Farrow Road, Campbelltown  
Planning Proposal not determined by Campbelltown Council after 90 days  
Request for Rezoning Review submitted to Department  
Department has declined to accept the Rezoning Review**

I refer to your recent discussions with the Applicant, in relation to the above matter.

You may recall I wrote to you by letter dated 27 August 2020 seeking a Rezoning Review.

The Applicant has asked me to provide to you a brief history of the Planning Proposal: -

- by letter dated 15 April 2019, I requested an opportunity to brief Councillors on my client's intention to prepare a Planning Proposal and the likely content of that Planning Proposal;
- David Smith from Campbelltown Council responded on 18 April 2019 saying that it was not Council's policy to meet with applicants prior to lodgement of their planning proposals;
- in November 2019, and along with Jonathan Knapp and Wil Meaden from SJB Urban, I met with Council's Strategic planning team to show to them the Planning Proposal which was in course of preparation and the feedback which received was incorporated into the Planning Proposal;

- because of the COVID-19 pandemic lodgement of the Planning Proposal was made by email on 29 April 2020 – this was discussed with Council and in accordance with Council's policy at the time;
- receipt of the email containing the Planning Proposal was confirmed by Council at 5.11 pm on 29 April 2020;
- on 14 May 2020, Council advised that the Planning Proposal had been assigned the number 1250/2020/E-PP and that an invoice would be sent shortly;
- by letter of 27 May 2020, Council acknowledged receipt of the Planning Proposal noting that it had been lodged on 4 May 2020;
- by email of 6 July 2020, Council's accounts team sent an invoice for \$102,500.00;
- on 21 July, there was a briefing of Councillors on the Planning Proposal – it was an electronically convened meeting to which I, and the Applicants urban designer Jonathan Knapp of SJB Urban, were invited to make a presentation;
- the land owner wrote to Council on 23 July 2020 to request Council's consideration for a reduction in Council's fee for the Planning Proposal - Council responded to the above letter on 28 August 2020: the response states that Council will accept a staged payment of the fee but not a reduction in the total amount of the fee;
- on 19 August 2020, an Addendum to the Urban Design Report, prepared in support of the Planning Proposal, was submitted to Council addressing what were perceived by the Applicant's planning and design team to be concerns about building height;
- on 25 August 2020, an amended Height of Buildings Map was submitted to Council in support of the Planning Proposal;
- on 27 August 2020, I submitted the Rezoning Review to the Department;
- on 28 August 2020, receipt of the Rezoning Review was acknowledged by the Department;
- on 1 September 2020, I submitted the fee for the Rezoning Review to the Department;
- in response, the Applicant again wrote to Council by letter dated Friday, 4 September 2020 attaching a 25% payment of \$25,000.00 and a request for an altered staging arrangement for the Council fee; and
- by email dated 8 September 2020, Council sent the Applicant a tax invoice for \$51,250.00 being the 50% staged payment (of the first stage) that Council had agreed to, and the balance of that amount (\$26,250.00) was sent to the Council the following week;



- by email of 9 September 2020, the Department wrote to acknowledge receipt of the Rezoning Review;
- by email of 10 September 2020, the Department's Neala Gautam enquired about the payment of fees for the Planning Proposal and advised me that a report had been prepared by Council planning officers for a forthcoming meeting of the Campbelltown Planning Panel;
- by email of 11 September 2020, I responded to Neala's email to me of 10 September 2020;
- on 14 September 2020, Neala emailed me to say that the Planning Proposal was not yet considered to be formally lodged with Council;
- on 15 September 2020, I responded to Neala setting out why I thought the Department should reconsider the opinion in the email referred to above;
- on 18 September 2020, Naomi Moss emailed us to say that the Department considered that the Rezoning Review request had been incorrectly made; and
- on 23 September 2020, the Planning Proposal was considered by the Campbelltown Local Planning Panel (LPP) which received a report on the Planning Proposal by Council staff. The report was confidential. The LPP's discussions relating to the Planning Proposal were in closed session. The LPP's meeting minutes show that the LPP's recommends that Council not proceed with a request for a Gateway Determination citing strategies including Re-imagining Campbelltown City Centre Master Plan 2020 as having greater weight than the Minister's 9.1 Direction 7.7 with which the Planning Proposal is consistent.

Copies of correspondence and emails, in chronological order, will follow in a separate email.

I have also been asked by the Applicant to write to Ms. Naomi Moss requesting reconsideration of the Department's position in relation to the Rezoning Review. A copy of my draft letter is attached. It has not yet been sent. I have been asked to not to send it until you have an opportunity to consider this letter.

Yours sincerely,

**BBC Consulting Planners**



**Robert Chambers**

**Director**

**Email** [bob.chambers@bbcplanners.com.au](mailto:bob.chambers@bbcplanners.com.au)



30 September 2020

RJC:15-221

The Secretary  
Department of Planning Industry and Environment  
Locked Bag 5022  
Parramatta NSW 2124

**Attention: Ms Naomi Moss, Manager  
Place and Infrastructure, Greater Sydney Place and Infrastructure**  
[naomi.moss@planning.nsw.gov.au](mailto:naomi.moss@planning.nsw.gov.au)

Dear Ms Moss,

**Re: Planning Proposal for 2 Farrow Road, Campbelltown  
Request for Rezoning Review: RR\_2020\_CAMPB\_001\_00**

I write with reference to the above matter and in response to your email of Friday 18 September 2020 (12.25 pm).

The circumstances surrounding this Planning Proposal and Rezoning Review request are detailed in my email to Neale Gautam (cc yourself) of 15 September 2020 (4.18 pm), a copy of which is attached hereto for convenience.

As you may be aware the Planning Proposal was considered by the Campbelltown Local Planning Panel ("LPP") last Wednesday 23 September 2020. The LPP had before it a report prepared by Council officers. That report was confidential. I do not have a copy of it, therefore I do not know how it characterised the Planning Proposal or what recommendation, if any, it made. I note, however, that the role of the LPP is to provide advice to Council on the PP. The minutes of the LPP meeting reveal that the LPP's recommendation to Council is that Council not proceed with a request for Gateway Determination.

In these circumstances, and given how long the Planning Proposal has now been before Council (it was acknowledged as having been lodged on 4 May 2020) without Council so far giving any indication whatsoever, that it will support it, and with the LPP now having recommended that Council not support it proceeding to Gateway, there is all the more reason why the Department should accept and initiate the Rezoning Review.

The Planning Proposal is in accordance with the Minister's 9.1 Direction 7.7 yet the Council and the LPP both appear to place greater weight on the Re-imagining Campbelltown City Centre Master Plan 2020 being, at its highest, a policy with no statutory weight. The choice for the Department seems clear: does it support the Minister's Direction or, like Council and apparently the LPP, does it support the Minister's Direction being ignored?

I therefore again request that you reconsider your previous advice and commence the Rezoning Review.

I note that the Department's Planning Portal is showing the Planning Proposal as "withdrawn". The Planning Proposal has not been withdrawn. Could you please let me know who instructed the administration officer for the Portal to show the Planning Proposal as "withdrawn"? Could you please arrange for it to be reinstated as "Received" and not as "Withdrawn". If this does not occur by close of business on Friday, the Applicant intends to refer the matter to its lawyers, and reserve its rights in that regard.

Please note that I have written separately to the Chair of the LPP drawing his attention to an error in the LPP's Reasons for Decision: the error is in the failure to recognise that the subject land and other land which is shown for high rise, high density residential development in the Minister's Campbelltown Precinct Plan is not identified in the same way as other industrial and urban services lands on the map on page 85 of the Western City District Plan. The error appears to be fundamental to the LPP's decision-making.

Yours sincerely,

**BBC Consulting Planners**



**Robert Chambers**  
**Director**

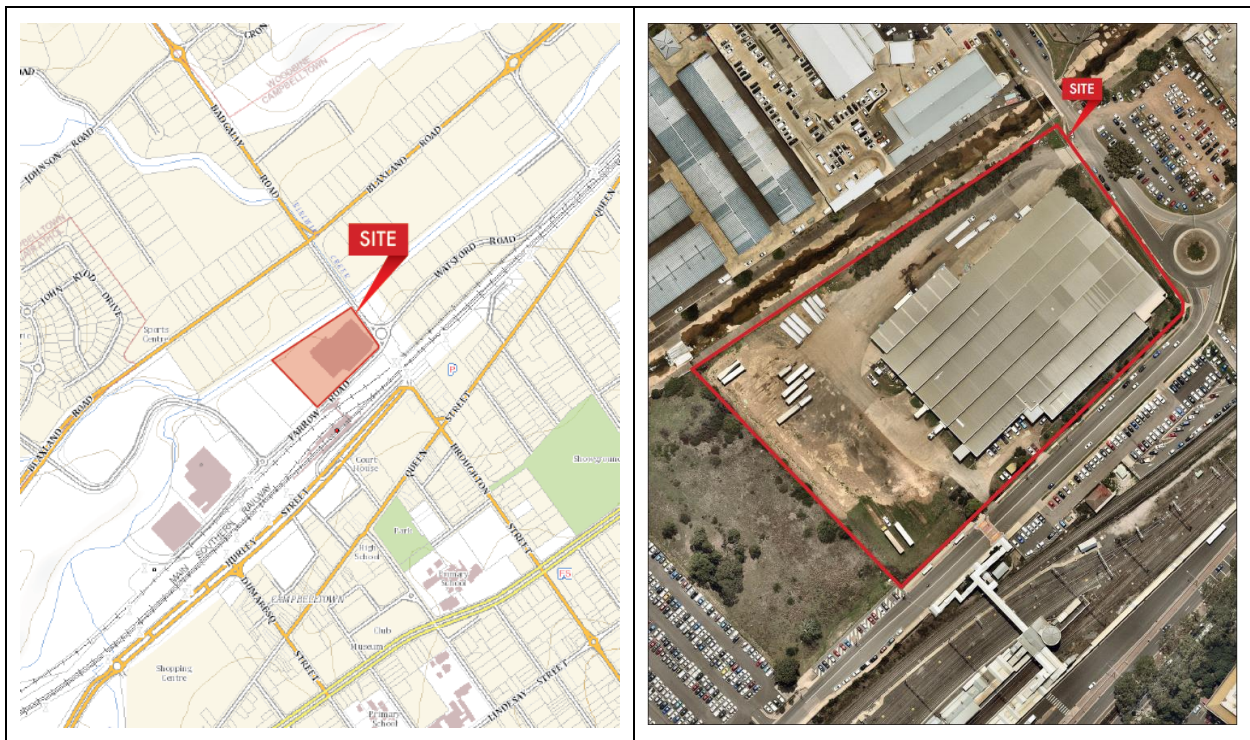
**Email** [bob.chambers@bbcplanners.com.au](mailto:bob.chambers@bbcplanners.com.au)

## **Attachment 2 – Strategic and site specific merit**

## STRATEGIC AND SITE SPECIFIC MERIT

### 1. Summary of site

The site is located immediately to the north of Campbelltown train station and bus interchange. The site comprises Lot 1 in DP 406940 and is owned by Campbelltown Central 2 Pty Ltd having an area of 2.8 hectares and is generally rectangular in shape with a frontage to Farrow Road of approximately 200 metres and to Badgally Road of approximately 110 metres. The frontage to Bow Bowing Creek (which comprises a wide concrete lined channel) is approximately 223 metres.



### 2. The Planning Proposal – explanation of provisions

The Planning Proposal seeks to amend the CLEP in the following manner:

- remove the “Deferred Matter” status and rezone the land from 4(b) Industry B under Campbelltown LEP 2002 to B4 Mixed-use under the Campbelltown Local Environmental Plan 2015 (“CLEP”);
- add a Clause 41 into Schedule 1 “Additional Permitted Uses” of the CLEP to provide for exemption from Clause 7.9 so as to permit residential flat buildings fronting Bow Bowing Creek without having to have any active street frontage and only non-residential land uses at ground level; and

- introduce maximum building height controls consistent with the identification of the site for high rise residential in the Campbelltown Precinct Plan.
- an indicative location for new community facilities.

### 3. Need for Planning Proposal

The Planning Proposal is a direct response to the Campbelltown Precinct Plan and the Glenfield to Macarthur Urban Renewal Corridor Strategy. It will result in increased housing, employment and publicly accessible open space. The Planning Proposal is the best and most appropriate means of achieving urban renewal on the site and the only means of achieving the required amendments to the current zoning and height controls.

### 4. Strategic merit

The strategic merit of the site is strong. The site is in an area well recognised by State government agencies and Campbelltown Council as being suitable for urban renewal because of the availability of high quality public transport and proximity to a range of public and community facilities and services.

#### 4.1 Consistency with Greater Sydney Regional Plan A *Metropolis of Three Cities*

*Greater Sydney Regional Plan A Metropolis of Three Cities* prepared by the Greater Sydney Commission presents a vision and innovative actions for managing Greater Sydney's growth and enhancing its status as one of the most liveable global cities. It is built on a vision of three cities where most residents will live within 30 minutes of their jobs, health, education and community facilities. The plan aims to transform Greater Sydney into a metropolis of three cities: the Western Parkland City; the Central River City; and the Eastern Harbour City. Campbelltown is in the Western Parkland City.

Over the next 20 years Sydney's Western Parkland City needs to accommodate a population of more than 1.5m people. Campbelltown City Centre will potentially serve a regional population of more than 800,000 people by 2040.

The *Greater Sydney Region Plan* provides the strategic framework for the predicted population increases in the greater Sydney Region over the next 40 years, which is estimated to grow by approximately 8 million people during this time. Almost half of Sydney's population is expected to live west of Parramatta. Rebalancing economic and social opportunities will leverage this growth and deliver benefits more equally and equitably across Greater Sydney. Campbelltown - Macarthur has been identified as a "Metropolitan Cluster" and as an urban renewal area.

The *Greater Sydney Region Plan* identifies a number of directions and objectives across four broad themes: infrastructure and collaboration; liveability; productivity; and sustainability.

#### ***Infrastructure and Collaboration:***



As Greater Sydney grows and becomes more complex there is a need to design better ways of supporting growth and delivering appropriate infrastructure in the right places. The site is located directly opposite existing transport infrastructure comprising Campbelltown train station and bus interchange. Campbelltown Hospital, numerous schools, and higher education facilities are all within 1-3 km of the site. The site is, therefore, well positioned to ensure optimisation of existing transport and other infrastructure in an area that is forecast for significant population growth.

***Liveability:***

The quality of life that residents enjoy in their neighbourhoods, work places and cities is central to liveability. Maintaining and improving liveability requires housing, infrastructure and services in the right locations. The Planning Proposal shows how the site can be transformed, as a catalyst for a broader precinct transformation which will deliver a high quality of both built form and public domain, with open spaces, a civic plaza, excellent through site connectivity, direct linkages to the station, and a range of living and job opportunities.

***Productivity:***

Enhancing Greater Sydney's productivity will be critical in enhancing the region's economic activity and encouraging investment across the metropolitan area. The development concept which the Planning Proposal seeks to facilitate is for a genuine mixed-use, transit-oriented scheme providing new job and living opportunities directly opposite Campbelltown railway station. This would support job creation and housing diversification within close proximity to the Campbelltown CBD. The immediate proximity of the site to Campbelltown train station has the advantage of providing ease of access to newly created jobs.

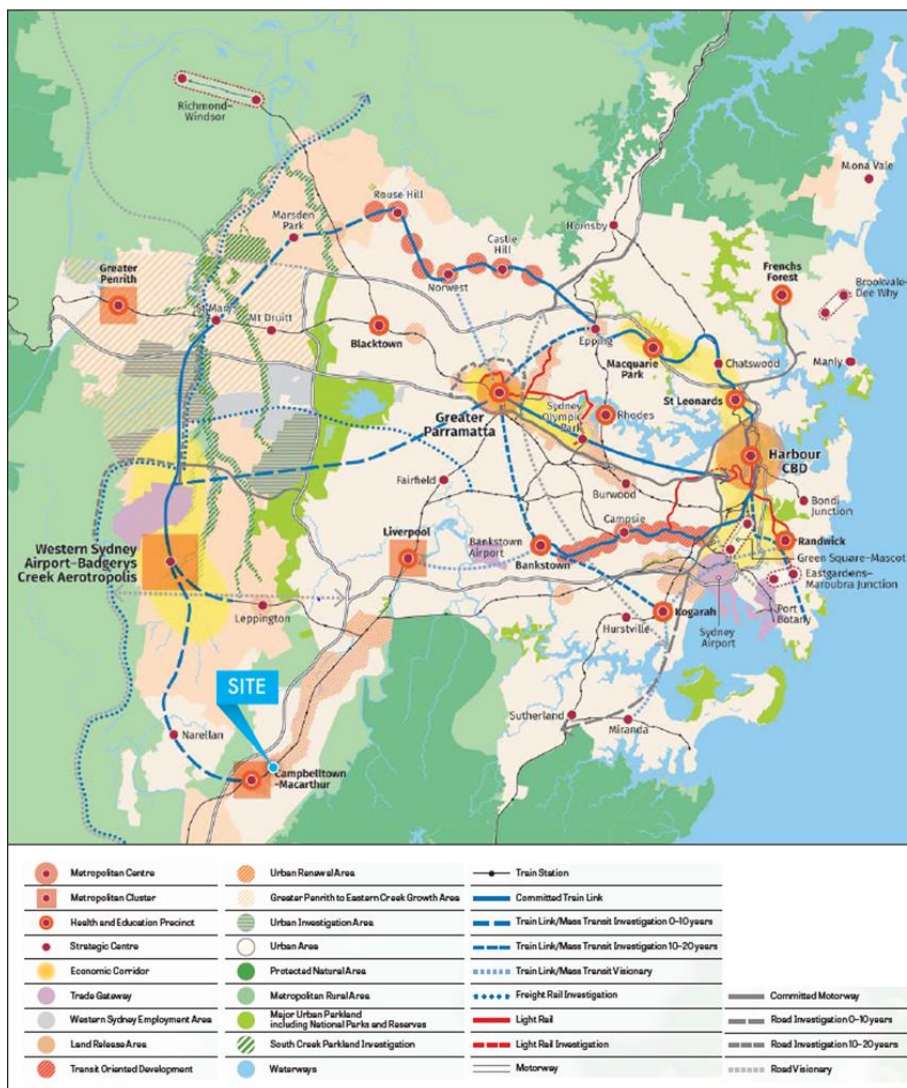
***Sustainability:***

Greater Sydney is one of the world's most attractive and liveable regions. Planning for sustainability involves taking a long term approach to protecting existing natural assets; encouraging the creation of connected green open spaces and corridors; and increasing urban tree canopy cover to reduce the impacts of urban heat island effects experienced in western Sydney. Sustainability is an integral element of the Planning Proposal with opportunities to significantly improve the extent of landscaping and public open space that can potentially be delivered if the site was to be rezoned as requested. Active travel solutions can be incorporated into the detailed design of the scheme to champion pedestrian legibility and discourage private car ownership. Sustainability of individual buildings will be considered at the DA stage.

The *Greater Sydney Region Plan - A metropolis of three cities* is the first plan concurrently developed with the metropolitan transport plan, Future Transport 2056, and the *State Infrastructure Strategy*. The site is located in the Western Parkland City – one of three cities within the region envisaged by 2056. The Planning Proposal is completely consistent with the *Greater Sydney Regional Plan* in that:

- it facilitates targeted development focused on housing diversity around a centre and transit node/rail station;

- the site is located within an area identified for urban renewal;
- the site benefits from existing and proposed links for walking and cycling promoting a healthy lifestyle and liveability;
- it aligns with investment in regional and district infrastructure;
- there is good accessibility to regional transport including being within walking distance of rail and bus services.





## 4.2 Consistency with Western City District Plan (March 2018)

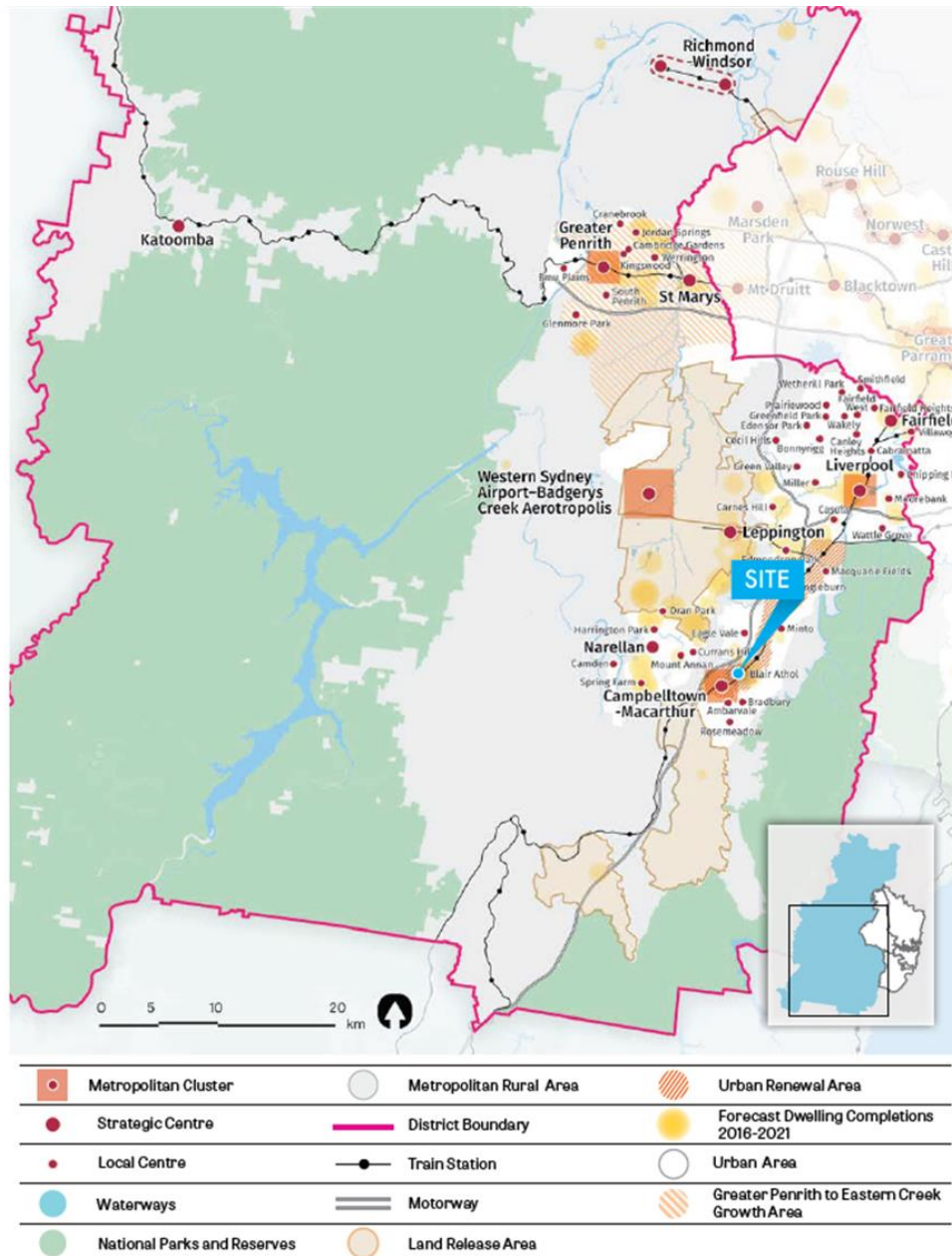
The Western City District Plan identifies objectives for the future development of the Western Parkland City as identified in the Greater Sydney Region Plan, including an over-arching goal to provide a 30 minute city where housing, transport, jobs, health care and open space are conveniently accessible.

Creating capacity for new housing in the right locations is necessary to help deliver the goal of a 30 minute city. Opportunities for capacity growth are to be realised by a combination of urban renewal, local infill developments and land release areas.

The site is located in an “Urban Renewal Area” and as such, the Planning Proposal will provide additional housing supply in immediate proximity to Campbelltown train station supporting the achievement of a 30 minute city. The Planning Proposal is consistent with the objectives and planning priorities of the Western Sydney District Plan as outlined below:

- *Planning Priority W1:* The Planning Proposal optimises existing transport infrastructure in an area aligned with forecast population growth;
- *Planning Priority W3:* The Planning Proposal supports the integration of services and infrastructure to meet the communities changing needs;
- *Planning Priority W5:* The Planning Proposal provides for a diverse range of housing supply with immediate proximity to jobs, services and public transport;
- *Planning Priority W9:* The Planning Proposal will grow and strengthen the Campbelltown - Macarthur metropolitan cluster by providing a high density, mixed-use development on a gateway site in the Campbelltown CBD immediately opposite the Campbelltown railway station;
- *Planning Priority W11:* The Planning Proposal supports investment and business activity in the Campbelltown CBD and the creation of local jobs; and
- *Planning Priority W15:* The Planning Proposal supports the establishment of green grid connections and increases urban tree canopy cover.

Notably, the site is not identified in the District Plan as an “indicative location of existing jobs, and services in centre”. The site is suitable for renewal because of its proximity to jobs, transport, infrastructure and services, and its ability to accommodate new development in a balanced way with no adverse environmental or sustainability outcomes.



#### 4.3 Glenfield to Macarthur Urban Renewal Corridor Strategy (July 2015)

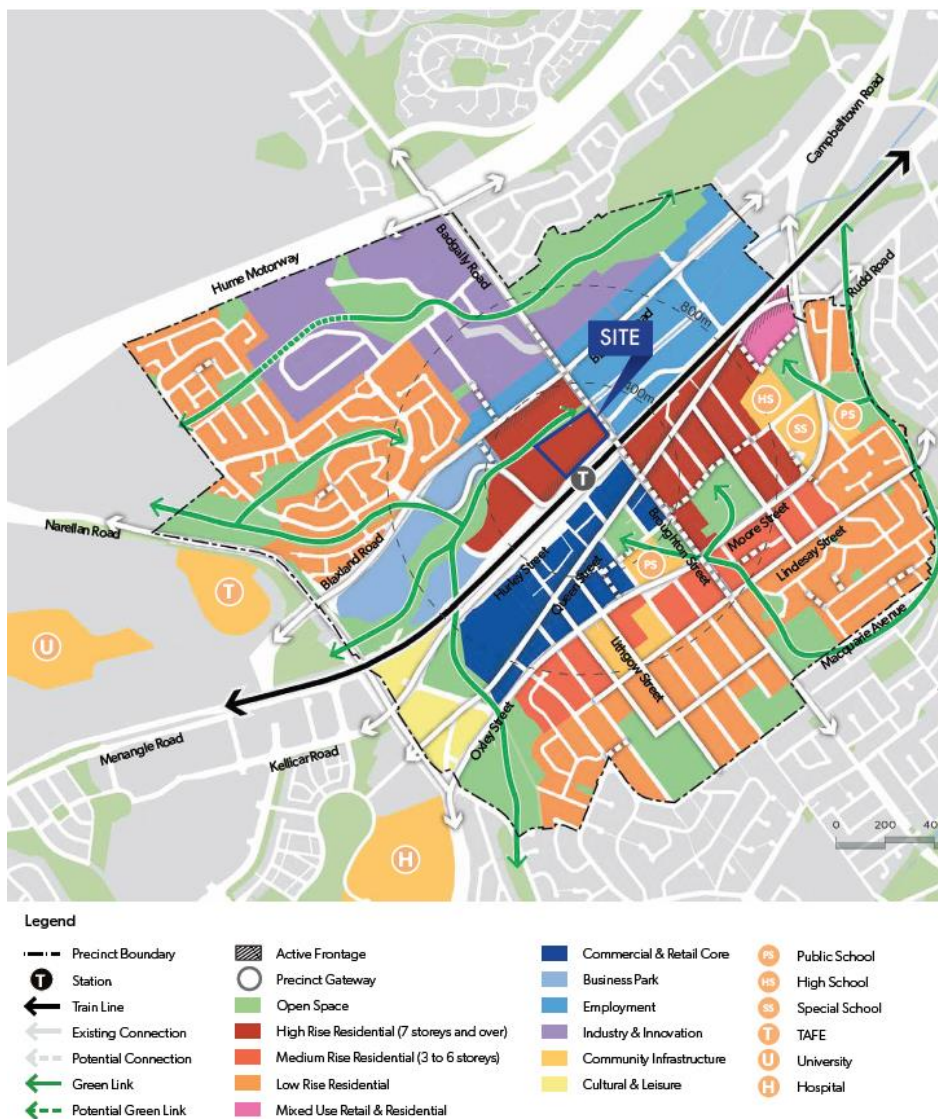
The NSW State Government identified Glenfield to Macarthur as an “Urban Renewal Corridor” with the aim of revitalising existing urban centres through good design. The Strategy provides a basis to support future growth in South-West Sydney by identifying opportunities for additional homes and jobs close to existing public transport and employment areas. The Strategy identifies 7 precincts: the site is in the Campbelltown

Precinct. Campbelltown has been identified as a Regional City Centre and a priority precinct that will provide higher order civic, cultural, employment, residential and retail opportunities.

The Strategy outlines that the vision of the plan will be realised through the lodgement of Planning Proposals to amend existing controls in the CLEP. The site is identified as being located in a high rise residential area under the Strategy.

#### 4.4 Campbelltown Precinct Plan (November 2017)

The site is located at the centre of the Campbelltown Precinct:



The Precinct Plan states, on page 4: -

*“The Analysis has incorporated a review of the character, demographics and economy of Campbelltown.*

*A comprehensive audit of the precinct’s environmental and built form characteristics identified areas to be protected and unconstrained land suitable for development.*

*The vision and growth projections for the precinct have been informed by economic feasibility and market demand analysis and reflect the long term housing and employment needs for the area.”*

The Precinct Plan contains a detailed analysis of the character of the Precinct, demographics and constraints: transport and movement, the walking catchment (showing that almost all of the Precinct is within a 20 minute walk of the station but as the site is directly opposite the station, it is within a 1 to 3 minute walk), the open space network, topography, drainage, vegetation, ecology, bushfire risk, and available social infrastructure. The site is identified in the Precinct Plan as unconstrained land.

The Precinct Plan identifies the site and adjacent land holdings as being suitable for “High Rise Residential” development. It states that the area will accommodate a mix of apartment housing, communal open spaces, improved active travel connections and shared facilities. It states that detailed planning is required to identify appropriate height and built form outcomes in order to deliver a high level of amenity for future residents. The Planning Proposal contained this detailed planning for the area identified for “High Rise Residential” development as presented in the SJB Urban Design Study accompanying the Planning Proposal.

The Precinct Plan states that over time, there is likely to be increasing demand for a greater diversity of housing, including medium and high rise residential housing, close to the station, which will facilitate more retail investment and employment opportunities. Further from the station, low rise housing will remain the predominant housing type. This Planning Proposal is consistent with the vision for the Campbelltown Precinct as it enables the delivery of high density, residential development, mostly in mixed-use buildings, with a central focus on connectivity, open space and public realm enhancements.

#### **4.5 Draft Greater Macarthur 2040 – An interim plan for the Greater Macarthur Growth Area (November 2018)**

*Greater Macarthur 2040 – An Interim Plan for the Greater Macarthur Growth Area* sets out the strategic planning framework for the Growth Area and incorporates the Glenfield to Macarthur Urban Renewal Precincts. The interim plan is based on the following five themes:-

##### ***Place:***

Each of the Greater Macarthur Growth Areas’ 12 precincts has a distinct character and development capability. The Campbelltown Precinct provides high rise buildings close to the station to maximise pedestrian activity and increase trade for local businesses. The site is identified as an area suitable for high rise residential development on the Greater Macarthur Structure Plan Urban Renewal Areas Map (see diagram overleaf). Public domain improvements are seen as an important aspect of helping to create “place”. As Greater



Macarthur develops, high quality public places that provide opportunities for social-interaction, recreation and leisure will be required. These places will enhance activity in and around centres to include streets, plazas, parks and recreation spaces, providing opportunities to hold community events, markets and festivals. Precinct planning will create public places and activate main streets; deliver high quality public domain spaces; and create high quality open space. The Planning Proposal is consistent with this theme.

#### ***Land Use:***

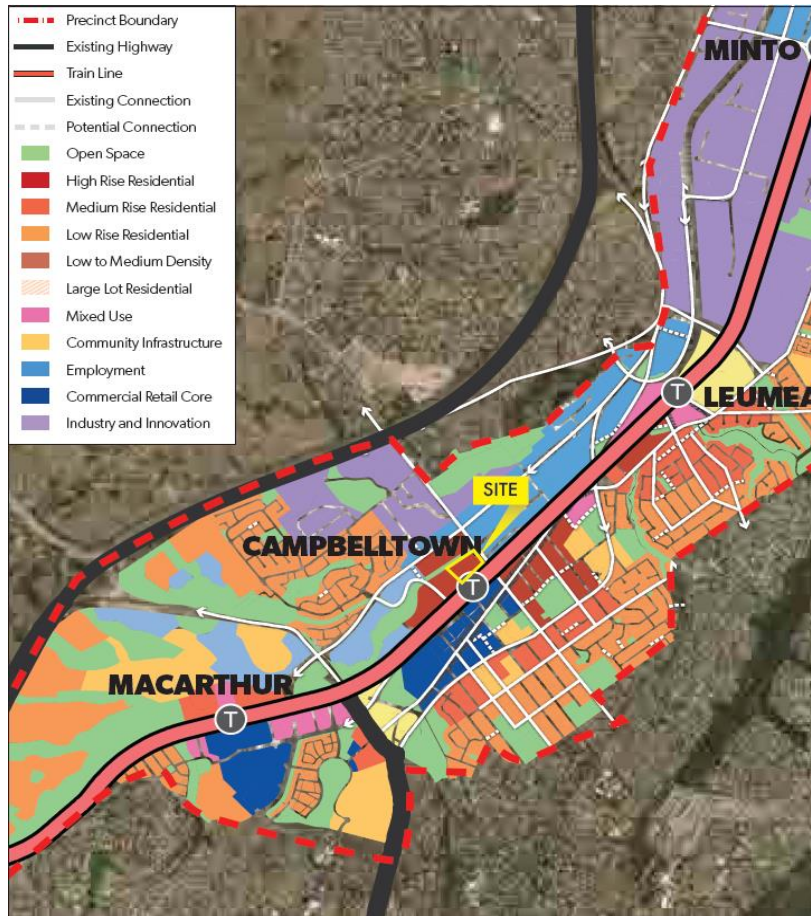
Housing supply is a critical component to the successful future growth of the Campbelltown Precinct with the potential to deliver 3,600 new homes in an activated commercial/ retail core. The Planning Proposal is consistent with this theme. The renewal of town centres is a fundamental aspect of the Glenfield to Macarthur Urban Renewal Corridor. Campbelltown – Macarthur is to be re-enforced as the primary centre for retail, commercial uses and services. To ensure this outcome, precinct planning must: consider the overall distribution of retail space; establish a strong neighbourhood; provide public realm and open space; improve walking, cycling and public transport; and expand retail/commercial floor space. The Planning Proposal is consistent with this theme.

#### ***Movement:***

The evolution of Greater Macarthur and will rely on a diverse and connected network of transportation options across the Growth Area. To meet these ambitions, transport options are required to support population, jobs and economic growth. This includes locating higher density development in areas that have access to reliable, high frequency public transport. The site is located opposite Campbelltown train station and bus interchange, helping to facilitate these objectives. The Planning Proposal is therefore consistent with this theme.

#### ***Implementation:***

This Planning Proposal is supported by an Urban Design Study, an infrastructure report, a preliminary site assessment and a traffic report. These studies are intended to enable the Planning Proposal to progress to Gateway, and for further discussions to occur in relation to the implementation of the rezoning which is proposed. Clearly, as is set out above, all relevant strategic planning initiatives point to high density, high rise residential development on the site. This is what is proposed, therefore the pathway should be available for implementation. The Planning Proposal is therefore consistent with this theme.



#### **4.6 Consistency with a relevant local strategy that has been endorsed by the Department**

An assessment of the Planning Proposal against the relevant provisions of Campbelltown Community Strategic Plan, Campbelltown LSPS, Campbelltown Residential Development Strategy, Re-imagining Campbelltown City Centre Phases 1 and 2, and Campbelltown Macarthur Collaboration Area and Place Strategy is contained in the Planning Proposal Report.

#### **4.7 Summary**

The Planning Proposal has strategic merit because it gives effect to the Greater Sydney Region Plan, the Western City District Plan, the Glenfield to Macarthur Urban Renewal Corridor Strategy (July 2015), Campbelltown Precinct Plan (November 2017) and the Draft Greater Macarthur 2040 – An interim plan for the Greater Macarthur Growth Area (November 2018). Furthermore, the Planning Proposal also gives effect to Campbelltown Local Strategic Planning Statement (LSPS) and the Campbelltown Residential Development Strategy (RDS).

### **5. Site-specific merits**

#### **5.1 Natural environment**

The site is in a disturbed state in a highly urbanized environment. The site is free of constraints that would preclude development in accordance with the Planning Proposal. Any site contamination can be remediated to a level appropriate to the proposed use. The site is geotechnically suitable for the development. The site is located within the Bow Bowing Bunbury Curran Creek catchment which is the subject of a strategic flood plain risk management study and plan prepared for Campbelltown City Council by Molino Stewart, Environment and Natural Hazards Consultants in 2018. It identifies flooding 'hotspots', none of which include the site. That is not to say that flooding issues do not require detailed investigation, however, flooding issues need to be addressed on a precinct wide basis. This is a matter that will require co-operation and consultation with Council, preferably post-Gateway. Redevelopment of the site provides an opportunity to ensure that new development remains flood free in the 1 in 100 ARI.

The characteristics of the site are suitable for the development envisaged by the Planning Proposal.

#### **5.2 Surrounding context**

The site is opposite Campbelltown railway station and is an appropriate location for a transit-oriented development.

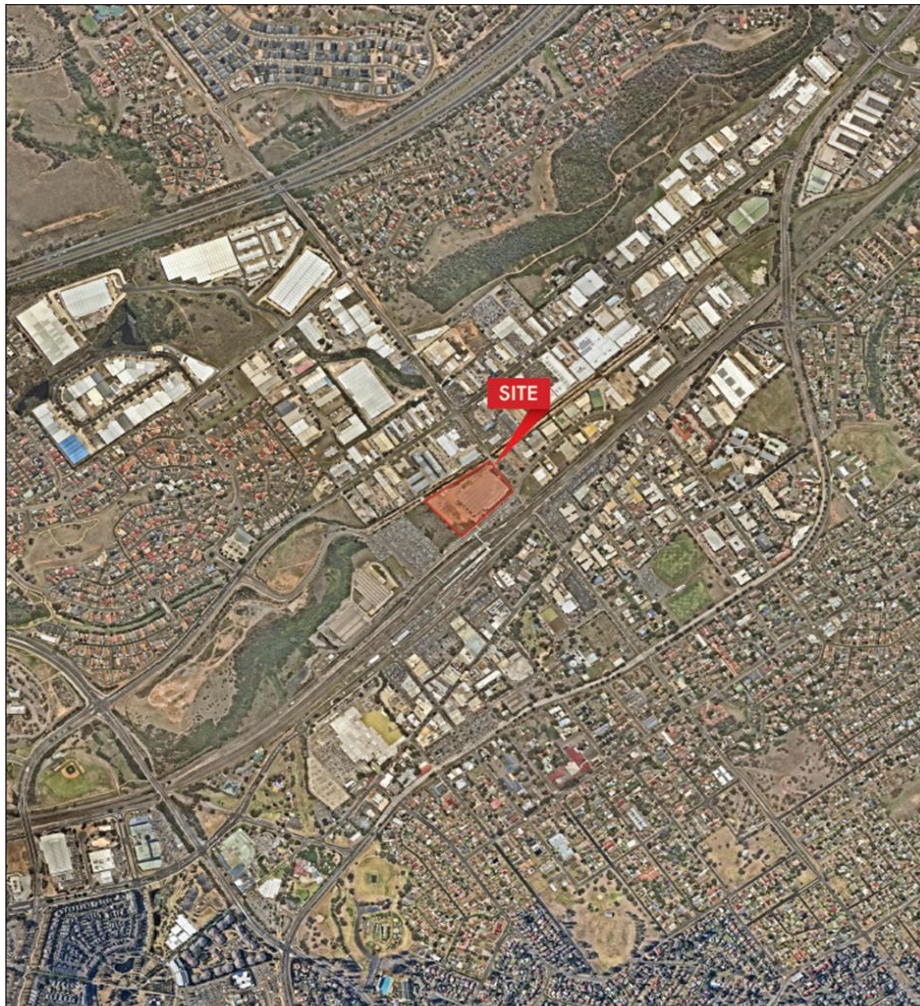
The area surrounding the site can be described as follows:

- To the **north**, beyond the channelised Bow Bowing Creek are industrial, retail and commercial uses along Blaxland Road, and Badgally Road: these include - automotive spare parts retailers; service stations; car showrooms; plant hire facilities; and a concrete batching plant.



- To the **east** beyond Badgally Road, is an informal commuter car park. Further east along Watsford Road is a mix of large floorplate commercial, retail and industrial uses including: engineering and manufacturing services; automotive repairs and sales; and transport/freight services. Council and the RMS are investigating a new bridge connection over the railway line on the alignment of Badgally Road and Broughton Street.
- To the **south**, beyond Farrow Road and the railway line is a commuter carpark, to the south west of which is Campbelltown Station, pedestrian access to which is via stairs and a lift.
- To the **west**, is a large vacant parcel of land, beyond which is the main commuter car park on the northern side of the railway line at Campbelltown.

Nearby lands are like the subject site, identified for high rise residential development in the relevant strategic plans (see Section 4.4 above). The site does not contain any heritage listed item and is not located in a heritage conservation area.





### 5.3 Services and infrastructure available and to be provided

The site has excellent connectivity to the surrounding area and to facilities and services provided and to be provided in the area and include:

- access to Campbelltown Station and bus interchange (across the road from the site);
- access to Campbelltown city centre and associated commercial and community services;
- all utility services are available or can be readily extended to meeting the needs of the development;
- future residents will have immediate access to a wide range of facilities and services, including job opportunities and an established public transport system;
- community infrastructure is located in the immediately surrounding area and can be incorporated into the development.

The site has the following key characteristics:

- it is suitable for redevelopment in terms of hazards and risks in that the site is capable of being remediated to the standard appropriate for the use, drainage can be accommodated on the site, all utility services are available to the site or can be readily augmented to meet the needs of the development;
- it is extremely well-located in close proximity to public transport and to the regional road network;
- it is close to retail facilities and services;
- the site is close the recreational facilities; and
- there are community facilities, including schools, in the local area.

### 5.4 Summary

The Urban Design Report by SJB Urban which forms part of the Planning Proposal identifies how the proposal fits into the existing and likely future character of the locality. From an urban design perspective, it is considered that the proposal:

- has emerged from a detailed consideration of the site and its local and regional context;
- is well connected to, and can make a positive contribution toward, the public realm through street activation and safety improvements;
- allows a design that is well resolved and thoughtful;
- makes a positive contribution to improved access to existing and planned facilities and services including retail centres, education, public transport and open space;
- represents a healthy outcome being located in a highly walkable environment, contributing to social cohesion in the area and improving community safety and security;

- responds to local housing needs with a mix of unit types and a high level of common open space;
- enables the site to redevelop in a way that does not impede the future potential of surrounding sites;
- enables a resultant built form that is compatible with the existing and future character of the surrounding urban context;

The Planning Proposal provides a suitable design response to the local context, and with further design development and refinement would be compatible with the emerging character of the local area. Furthermore, the evaluation suggests that this site could be redeveloped without compromising the ability of the other adjoining sites to amalgamate and achieve comparable development densities.

The Planning Proposal is accompanied by two traffic reports. Based on the SIDRA analysis, the reports find that the proposal is projected not to have any unreasonable impacts on the level of safety and efficiency afforded by the existing surrounding road, pedestrian and public transport network.

Previous investigations have indicated that the site is suitable for, or can be made suitable, for the proposed development having regard to the contamination status of the site.

The social and economic effects will be positive:

- the amount of housing stock and choice will be increased on a site which is close to services and facilities, recreational and employment opportunities and public transport;
- the underutilised site will be developed for an orderly and economic purpose; and
- the economy of the Campbelltown will be strengthened and enhanced.

The redevelopment of the site in accordance with the Planning Proposal represents the orderly and economic use of land.

## **Attachment 3 – Letter to the Chair of the CLPP (6 October 2020)**



6 October 2020

RJC:15-221

Mr Ian Reynolds  
Panel Chair  
Campbelltown Local Planning Panel  
C/o Campbelltown City Council  
P O Box 57  
Campbelltown NSW 2560

**Attention: Mr Ian Reynolds**

email: [council@campbelltown.nsw.gov.au](mailto:council@campbelltown.nsw.gov.au)

Dear Sir,

**Re: Planning Proposal Request – Campbelltown  
2 Farrow Road, Campbelltown  
Item 5.1 in Minutes Summary of Campbelltown LPP meeting  
held on 23 September 2020**

I write with reference to the above Planning Proposal which was considered by the LPP last week. I have now had an opportunity to read the minutes of the meeting and wish to draw your attention to what appears to be an important misunderstanding by the LPP. (Because the report from Council planning officers to the LPP on this item was confidential, I am unable to say whether this misunderstanding stems from the information provided to the LPP by Council officers).

The Planning Proposal, is consistent with the Minister's 9.1 Direction 7.7, which refers to the Glenfield to Macarthur Urban Renewal Corridor Strategy and to the Precinct Plans (including the Precinct Plan for Campbelltown) prepared pursuant thereto. The Department's website states that the Precinct Plan was published in November 2017. (Although this was 5 months before the Western City District Plan was published, it was after that Plan has been substantially prepared and exhibited as a draft). The Campbelltown Precinct Plan is attached hereto.

Please also see attached, page 85 from the Western City District Plan. On it you will see that the same land which is identified for "high rise residential" on the Campbelltown Precinct Plan is not shown as an "indicative location of existing jobs and services in centre". This is a

recognition by the Western City District Plan that the Campbelltown Precinct Plan identifies this land for “high rise residential” purposes.

I also refer you to page 41 of the Western City District Plan. It relevantly states: -

*“Additional capacity for housing supply is well progressed across much of the District, including the State-led projects through the Growth Areas and Planned Precincts:*

- *Greater Macarthur Growth Area comprising:*
  - *Glenfield to Macarthur Corridor - including **Precincts** at Macquarie Fields, Ingleburn, Minto, Leumeah, **Campbelltown** and Macarthur” (my emphasis)*

The statement in the Minutes that the Western City District Plan envisages an alternate strategic outcome for the site (to that which is in the Planning Proposal) is a misunderstanding.

The Planning Proposal is consistent with the Minister’s 9.1 Direction 7.7. The purpose of that Direction is to ensure that Planning Proposals are consistent with it.

My client is pursuing the matter further with the Department of Planning, Industry and Environment, but has requested me to convey the above information to you.

Yours sincerely,

**BBC Consulting Planners**



**Robert Chambers**

**Director**

**Email** [bob.chambers@bbcplanners.com.au](mailto:bob.chambers@bbcplanners.com.au)

