

17 December 2020

Planning Panels Secretariat  
Sydney Western City Planning Panel  
Department of Planning, Industry and Environment  
Locked Bag 5022  
PARRAMATTA NSW 2124

Attention: Ms Neala Gautam

Dear Madam,

**Planning Proposal Submission (Objection) - 2 Farrow Road, Campbelltown**  
**DPIE Reference: RR\_2020\_CAMPB\_001\_00**

Thank you for your letter dated 25 November 2020 inviting comment on the abovementioned Planning Proposal (PP) under review by the Sydney Western City Planning Panel (SWCPP).

This submission re-affirms Campbelltown City Council's position that the PP should not proceed to Gateway, in accordance with the Council resolution at its meeting on 10 November 2020. A copy of the planning report considered at this meeting provides all relevant information and can be accessed from Council's website at the following link:

<https://www.campbelltown.nsw.gov.au/CouncilandCouncillors/MeetingsandMinutes/2020BusinessPlans#Council-Meeting-10-November-2>

It is understood that the PP being reviewed by the SWCPP is the same as the PP considered by Council, requesting the following amendments to Campbelltown Local environmental Plan 2015 (CLEP 2015) for land at 2 Farrow Road, Campbelltown:

- a) Removal of the subject site from the "Deferred Matters" area on the Land Application Map.
- b) Amend the zoning of the site from 4(b) – Industrial B (which applies under CLEP 2002 because the site is within a deferred area) to B4 Mixed Use.
- c) Amend the Height of Buildings Map to apply a series of height limits across the site, ranging from 63 metres to 101 metres (18 to 28 storeys).
- d) Add a Clause 41 to "Schedule 1: Additional Permitted Uses" of CLEP 2015, to exempt residential flat buildings on the site adjacent to Bow Bowing Creek from having to comply with Clause 7.9 of the CLEP, which requires that buildings in the B4 zone have an active street frontage and contain only non-residential land uses on the ground floor.

The PP documentation indicates that future development resulting from the proposed rezoning could facilitate an estimated 1200 new dwellings and potentially 1150 – 1500 jobs, however it is noted that these figures rely upon a number of assumptions for the future development of surrounding land as depicted in the accompanying urban design study / masterplan. In this respect, it is emphasised that

the PP does not request any planning amendments beyond the boundary of 2 Farrow Road Campbelltown.

The reasons provided in the Council report remain valid for rejecting the proposal, and are summarised as follows:

- **Misalignment with the CLEP 2015 Review Process / Western City District Plan (WCDP)**

At its meeting of 9 June 2020 Council endorsed a comprehensive planning proposal to align CLEP 2015 with the WCDP. This planning proposal has been forwarded to the Minister for making, and includes the rezoning of the subject land and surrounding precinct to IN2 Industrial zone under CLEP 2015. A copy of the report on the matter is provided at the following link:

<https://www.campbelltown.nsw.gov.au/CouncilandCouncillors/MeetingsandMinutes/2020BusinessPapers#Council-Meeting-9-June-10>

It is noted that there were three (3) submissions from landowners in the deferred matter / industrial zoned precinct at Blaxland Road Campbelltown, including the subject site at No.2 Farrow Road. All three submissions requested different zonings for the area, indicating that there is no consensus of opinion amongst landowners for the future zoning of this area.

As detailed in the above report, Council's decision to rezone these industrial lands to an IN2 Industrial zone under CLEP 2015 included consideration of a number of strategic planning studies being undertaken at that time, as required by the WCDP and the endorsed Campbelltown Local Strategic Planning Statement (LSPS). This planning work includes the Reimagining Campbelltown City Centre Masterplan, Campbelltown Local Housing Strategy, and the Campbelltown Strategic Review of Employment Lands Strategy.

In this regard, the subject PP is considered to be inconsistent with these Council endorsed planning strategies and studies. Copies of these local strategies and the relevant background reports can be found at the following links:

**Campbelltown Local Strategic Planning Statement:**

<https://www.campbelltown.nsw.gov.au/BuildAndDevelop/Planningforthefuture/LocalStrategicPlanningStatement>

**Reimagining Campbelltown City Centre**

<https://www.campbelltown.nsw.gov.au/Business/ReimaginingCampbelltown>

**Campbelltown Local Housing Strategy:**

<https://www.campbelltown.nsw.gov.au/CouncilandCouncillors/MeetingsandMinutes/2020BusinessPapers#Extraordinary-Meeting-29-September-4>

**Campbelltown Strategic Review of Employment Lands:**

<https://www.campbelltown.nsw.gov.au/CouncilandCouncillors/MeetingsandMinutes/2020BusinessPapers#Council-Meeting-8-December-1>

- **Reliance upon an unendorsed concept masterplan and urban design study**

The subject proposal relies upon an aspirational urban design study / masterplan for the surrounding industrial area that has not been endorsed by Council or any other affected landowners. This urban design study / masterplan submitted by the proponent is inconsistent with the body of planning work undertaken by Council as part of the CLEP 2015 review process and the Campbelltown Local Strategic Planning Statement (LSPS).



As noted above, Council has previously received separate submissions from surrounding landowners requesting a different zoning outcome than that requested in the subject PP, indicating that there is no consensus amongst landowners for the rezoning of the broader industrial precinct encompassing No.2 Farrow Road Campbelltown.

- **Inconsistent with expert advice of the Campbelltown Local Planning Panel**

Advice has been obtained from the Campbelltown Local Planning Panel in accordance Section 2.19 of the Environmental Planning and Assessment Act 1979 (EP&A Act). The advice of the Panel is not to support the subject PP for the following reasons:

- a) The planning proposal lacks site specific merit as the proposal is surrounded by significant employment lands, creating the potential for undesirable land use conflict.
- b) There is insufficient supporting evidence of employment generation for the site and an analysis of potential adverse impacts on adjoining employment lands.
- c) There is sufficient capacity within the Campbelltown Local Government Area for additional dwellings to meet housing targets in land already zoned for high density residential or mixed use development.
- d) The proposal could compromise the revitalisation of the Campbelltown City Centre and residential development opportunities identified in the Re-imagining Campbelltown City Centre Masterplan 2020.
- e) The site is not well located to existing open space within a 200 metre radius, and services and facilities required for high density residential development.
- f) The proposal is isolated in nature and is not part of a wider endorsed strategy of renewal as envisaged by the proponent that is required for the efficient and orderly development of urban land in a regional centre.

Accordingly, the Panel does not support a request for a Gateway determination for this proposal.

- **Unwarranted expansion of housing capacity and associated loss of strategically important employment land in the city centre**

The Campbelltown Strategic Review of Employment Lands Strategy and Campbelltown Local Housing Strategy support the retention of the existing industrial zoned land on the western side of Campbelltown Railway Station encompassing the subject site. This area has been identified for employment opportunities for residents in the short term. This employment objective is consistent with the updated vision for the city centre under the Reimagining Campbelltown City Centre Master Plan identifying the potential of the subject land to form part of a broader Tech and City Servicing Precinct.

This future tech and city servicing land use outcome is consistent with the Campbelltown Local Housing Strategy, which confirms sufficient capacity for high density shop-top housing within the existing B3 and B4 zones of the Campbelltown city centre on the eastern side of the railway line, underpinning the planned revitalisation of the Queen Street commercial precinct.

Accordingly, the evidence based planning work completed under the above studies supports the retention of the subject site for employment outcomes to ensure the sustainable development of the city centre to 2036 and beyond. The planned revitalisation of the Queen Street precinct is dependent upon the viable uptake of new shop top housing within this precinct. This vision for the city centre is clearly articulated in the Reimagining Campbelltown City Centre Master Plan, identifying the potential for the subject land and surrounds to form a high tech city servicing and innovation precinct.

The subject PP rezoning is therefore not considered justified given that it would disrupt the strategic delivery of housing within the B3 and B4 zones of the city centre, would displace important employment opportunities for residents, and would be inconsistent with the planned revitalisation of the Queen Street commercial precinct.

- **Ministerial Direction 7.7 – Campbelltown Precinct Plan**

The explanation by the proponent to support the PP is largely based upon the Ministerial Direction relating to the Campbelltown Precinct Plan, prepared as part of the Draft Glenfield to Macarthur Urban Renewal Corridor Strategy 2015 (Corridor Strategy).

The subject site is within the Campbelltown Precinct Plan (CPP), providing the vision for the future development of the city centre having regard to the long term housing and employment needs for the area until 2036. As part of the desired future character and built form, the subject site is identified under the CPP for high rise residential (seven storeys and over) as described below:

*This area could accommodate apartment housing to deliver a high level of amenity for the existing and future residents. This could comprise seven plus storey apartment buildings, with potential for communal open spaces and shared facilities. Detailed planning would be required to identify appropriate height and built form outcomes. The new dwellings should be carefully designed to integrate with the existing streetscape. Building design should maximise climate control and amenity for occupants and capitalise on district views.*

The potential for seven plus storey apartment buildings on the subject land therefore needs to be recognised as a long term vision and, as outlined above, requires further detailed planning work to determine appropriate height and built form outcomes. In this respect, it is noted that the CPP also identifies the potential for a large floor plate, campus style office park west of the station, which could reasonably include the subject land.

Since the CPP was prepared in 2017, the greater Sydney Region Plan (GSRP) and WCDP have provided a new planning framework for housing and employment delivery in the local government areas of the Sydney Region. Council has undertaken extensive work under this new planning framework, including preparation and endorsement of the LSPS, review of CLEP 2015, preparation of the Campbelltown Local Housing Strategy and the Strategic Review of Employment Lands Strategy.

It is therefore important to note that the detailed planning work for the city centre undertaken by Council, as contemplated by the CPP, supports the retention of the subject land for employment generating land uses and the promotion of city centre residential apartments within the existing zoned areas of the city centre. This planning outcome is consistent with the Reimagining Campbelltown City Centre Masterplan, and aligns with the updated direction provided in the GSRP and WCDP to retain and manage existing employment zones near the Campbelltown City Centre. Accordingly, the PP is not considered warranted on the basis of the long term land use vision under the CPP indicating potential for high rise residential (seven plus storeys).

- **Additional studies**

Notwithstanding the key issues and concerns outlined above, should the SWCPP decide to support the PP then a comprehensive investigation of issues, including (but not limited to) the following studies, would need to be undertaken:

- Traffic and Parking Assessment
- Road Corridor Reservation Study in relation to the Badgally-Broughton bridge
- Bow Bowing Public Open Space Corridor Study
- Public Domain Strategy
- Open Space Needs Analysis
- Detailed Contamination Assessment

- Site Specific DCP including a master plan
- Urban design analysis to formulate appropriate development standards in relation to floor space ratios, qualifying site area and block depths
- A funding strategy for the provision of infrastructure including urban domain enhancements, road upgrades, and drainage works to reduce flooding impacts
- Provision of appropriate mechanisms to deliver affordable housing across the site.

## **Conclusion**

The subject PP is not supported for the reasons outlined in the Council report of 10 November 2020. Significant concerns are raised that the PP would sterilise employment opportunities in the Campbelltown city centre, diminishing work opportunities close to home for residents of the Campbelltown Local Government Area and the Western Parkland City. This outcome would be inconsistent with the raft of local planning strategies prepared by Council that support greater self-containment of employment for the City of Campbelltown in accordance with the 30 minute vision of the GSRP and WCDP.

For the reasons outlined above, the SWCPP is requested to reject the subject PP.

Should you require any further information regarding this matter, please contact Luke Joseph, Senior Planner of Council's City Development Division on (02) 4645 4608.

Yours sincerely,



David Smith  
**Executive Manager Urban Centres**

